Botley West Solar Farm

STATEMENT OF COMMON GROUND –

West Oxfordshire District Council

EN010147/APP/11.7/13

22 July 2025

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Statement of Common Ground - West Oxfordshire District Council
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Approval for issue	
Jon Alsop	22 July 2025

Prepared by:

RPS
101 Park Drive,
Milton Park, Abingdon,
Oxfordshire, OX14 4RY
United Kingdom

Prepared for:

Photovolt Development Partners GmbH,
on behalf of SolarFive Ltd.

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SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and West Oxfordshire District Council.

West Oxfordshire District Council

[Signature]

[Name]

[Title]

[Organisation]

[Date]

SolarFive Ltd

[Signature]

[Name]

[Title]

[Organisation]

[Date]

1 Introduction

1.1 DCO Reference

1.1.1 EN010147/APP/11.7/13

1.2 Date of Examination

1.2.1 May 2025 – November 2025

1.3 Proposed Development

1.3.1 The Applicant is seeking development consent for Botley West Solar Farm (the 'Project'), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic ('PV') solar farm and associated infrastructure with a total capacity exceeding 50 megawatts ('MW'), in parts of west Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.

1.3.2 The Project is classed as a 'nationally significant infrastructure project' ('NSIP') for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a Development Consent Order (DCO). The application for development consent is being submitted to the planning inspectorate ('PINS'), with the decision on whether to grant a DCO to be made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), as required under the PA 2008.

1.3.3 This Statement of Common Ground (SoCG) has been prepared to support the DCO application made to the Secretary of State under section 37 of the PA 2008 for the proposed Project. The Application has been submitted by SolarFive Ltd (the Applicant).

1.3.4 A Location Plan can be found in the Examination Library at **[AS-024]** and a full description of the Project can be found at ES Chapter 6 - Project Description **[APP-043]**.

1.4 Statement Overview

1.4.1 This Statement of Common Ground ('SoCG') is a working draft document. It comprises a record of consultation held with the relevant SoCG organisation to date as appropriate, and is designed to evolve, representing the ongoing nature of these discussions throughout the Examination period.

1.4.2 This SoCG has been prepared between (1) the Applicant and (2) West Oxfordshire District Council (jointly referred to as the Parties).

1.4.3 An overarching Statement of Commonality **[EN01047/APP/11.6]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.

1.4.4 The Examining Authority has requested that the SoCGs include the following matters as set out in the Rule 6 Letter **[PD-006]**:

- Methodology for environmental assessments;

- Data collection methods;
- Baseline data;
- Data/statistical analysis, approach to modelling and presentation of results;
- Expert judgements, assumptions and worst case scenario;
- Assessment of alternatives;
- Design development;
- Identification and sensitivity of relevant features and receptors;
- Construction and operational effects;
- Embedded and additional mitigation;
- Cumulative effects and mitigation; and
- Relevant wording in the draft Development Consent Order (dDCO)

1.4.5 It can be taken that any matters not specifically referred to in sections 3 and 4 of this SoCG are not of material interest or relevance to West Oxfordshire District Council's representations and therefore have not been considered in this document.

1.4.6 For the avoidance of doubt, this SoCG comprises contributions from the following environmental topic disciplines:

- Ecology
- Historic Environment
- Agricultural Land Use & Public Rights of Way
- Landscape and Visual Resources
- Noise and Vibration
- Planning Policy

1.4.7 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with West Oxfordshire District Council to date:

a. Relevant submission documents and plans
b. Record of relevant correspondence to date
c. Matters that are agreed
d. Matters yet to be agreed
e. Matters that are not agreed

1.4.8 As referenced above, c, d, and e (sections 4), summarises issues that are 'agreed', 'yet to be agreed' or are 'not agreed'. 'Not agreed' indicates a final position where the parties have agreed to disagree. 'Agreed' indicates that an issue has been resolved.

2 Relevant Submissions Documents and Plans

2.1.1 A list of DCO documents and plans of relevance to engagement with West Oxfordshire District Council is identified in the tables below for ease of reference.

Table 2.1: Draft DCO submission documents and plans record pursuant to West Oxfordshire District Council discussions – Ecology and Nature Conservation

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/2.2	Streets, Access and Rights of Way Plans	APP-005	November 2024
EN010147/APP/2.6	Statutory and Non-Statutory Sites - Features of Nature Conservation Plan	APP-009	November 2024
EN010147/APP/2.8	Habitats of Protected Species Plan	APP-010	November 2024
EN010147/APP/2.9	Statutory and Non-Statutory Features of Historic Environment Plan	APP-012	November 2024
EN010147/APP/2.10	Hedgerow Removal Plans	APP-013	November 2024
EN010147/APP/3.1	Draft Development Consent Order	REP2-004	Rev3/ July 2025
EN010147/APP/6.2	ES Volume 0, Non-Technical Summary	APP-037	P0/ November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 9 Ecology and Nature Conservation	REP2-012	Rev2/ July 2025
EN010147/APP/6.4	ES Volume 2, Figure 9.1 Statutory Designated Sites	APP-086	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.2 Non-Statutory Designated Sites	APP-087	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.3 a b & c Phase 1 Habitat Map	APP-088	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.1 Desk Study	APP-150	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.2 Phase 1 Habitat Survey Report	APP-151	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.3 Hedgerow Survey Report	APP-152	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.4 Bat Survey Report	APP-153	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.5 Great Crested Newt (GCN) Survey Report	APP-154	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.6 Invertebrate Survey Report	APP-155	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.7 Reptile Survey Report	APP-156	P0/ November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 9.8 Badger Survey Report [CONFIDENTIAL]	APP-157	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.9 Breeding Bird Survey Report	APP-158	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.10 Wintering Bird Survey Report	APP-159	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.11 Dormouse Survey Report	APP-160	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.12 Arable Weeds Survey Report	APP-161	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.13 Biodiversity Net Gain Assessment	APP-162	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.14 Habitats Regulations Assessment Report	APP-163	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.15 Veterans Tree Survey Report	APP-164	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.16 Section 42 Consultation Responses	APP-165	P0/ November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	REP2-016	Rev2/ July 2025
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 1	APP-232	P0/ November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 2	APP-233	P0/ November 2024
EN010147/APP/7.6.2	Outline Operational Management Plan	REP2-017	Rev2/ July 2025
EN010147/APP/7.6.3	Outline Landscape and Ecology Management Plan	REP2-019	Rev2/ July 2025
EN010147/APP/7.6.4	Outline Decommissioning Plan	APP-236	P0/ November 2024

Table 2.2: Draft DCO submission documents and plans record pursuant to West Oxfordshire District Council discussions – Historic Environment

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 7: Historic Environment	CR1-003	Rev 1/March 2025
EN010147/APP/6.5	ES Volume 3, Appendix 7.1: Historic environment desk-based assessment	APP-131	November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology	APP-132	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.3: Geophysical survey report, Parts 1-8	APP-133 – APP-140	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment	APP-141	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.5: Settings Assessment	REP2-014	Rev 1/July 2025
EN010147/APP/6.5	ES Figures 2.1a – 2.4c – Illustrative Masterplan	AS-020	Rev 1/March 2025
EN010147/APP/6.5	ES Figures 8.248 - 8.371 - Photomontages (Winter and Summer)	APP-072 – APP-080	November 2024
EN010147/APP/7.6.5	Outline Written Scheme of Investigation	REP2-021	Rev 2/July 2025
EN010147/APP/12.7	Additional Photomontages for Historic Environment Assessment	REP2-030 – REP2-033	July 2025

Table 2.3: Draft DCO submission documents and plans record pursuant to West Oxfordshire District Council discussions – Agricultural Land Use and ProW

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev01/November 2024
EN010147/APP/6.3	ES Chapter 17 - Agricultural Land Use and Public Rights of Way	APP-054	Rev01/November 2024
EN010147/APP/6.4	ES - Figures 17.1 to 17.6	APP-108 to APP-113	Rev01/November 2024
EN010147/APP/6.5	ES - Appendix 17.1 ALC and Soil Survey Report	APP-223	Rev01/November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	APP-232	Rev01/November 2024
EN010147/APP/7.6.2	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	APP-233	Rev01/November 2024

Table 2.4: Draft DCO submission documents and plans record pursuant to West Oxfordshire District Council discussions – Landscape and Visual Resources

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev01/November 2024
EN010147/APP/6.3	6.3 - ES Chapter 8 – Landscape and Visual Impact Assessment	APP-045	Rev01/November 2024
EN010147/APP/6.4	Figure 8.128 to 8.243: Representative Viewpoint Photographs (Summer)	APP-065	Rev01/November 2024
EN010147/APP/6.4	Figure 8.12 to 8.127: Representative Viewpoint Photographs (Winter)	APP-066	Rev01/November 2024
EN010147/APP/6.4	Figure 8.1-8.3 Site Location	APP-067	Rev01/November 2024
EN010147/APP/6.4	Figure 8.244: National Character Areas	APP-068	Rev01/November 2024
EN010147/APP/6.4	Figure 8.245: Regional Landscape Character	APP-069	Rev01/November 2024
EN010147/APP/6.4	Figure 8.246: Local Landscape Character Areas	APP-070	Rev01/November 2024
EN010147/APP/6.4	Figure 8.247: District Landscape Character Areas (including ZTV)	APP-071	Rev01/November 2024
EN010147/APP/6.4	Figure 8.248 to 8.371: Photomontages (Winter and Summer)	APP-072 to APP-080	Rev01/November 2024
EN010147/APP/6.4	Figure 8.4-8.6: Landscape Resources Plan	APP-081	Rev01/November 2024
EN010147/APP/6.4	Figure 8.7: ZTV and Representative Viewpoints (Whole Project Overview)	APP-082	Rev01/November 2024
EN010147/APP/6.4	Figure 8.8: ZTV Section Overlaps (Whole Project Overview)	APP-083	Rev01/November 2024
EN010147/APP/6.4	Figure 8.8a: ZTV Bare Earth	APP-084	Rev01/November 2024
EN010147/APP/6.4	Figure 8.9-8.11: Representative Viewpoint and Photomontage Locations	APP-085	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.1: Landscape Character	APP-143	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.2: Landscape Value	APP-144	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.3: Strategic Arboricultural Impact Assessment & Method Statement	APP-145 to APP148	Rev01/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	Appendix 8.4: Photomontage Methodology	APP-149	Rev01/November 2024
EN010147/APP/6.3	Figure 2.1a to 2.4d: Illustrative Masterplan	APP-062	Rev01/November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	REP2-016	Rev2/ July 2025
EN010147/APP/7.6.3	Outline Landscape and Ecological Management Plan	REP2-019	Rev2/ July 2025

Table 2.5: Draft DCO submission documents and plans record pursuant to West Oxfordshire District Council discussions – Noise and Vibration

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.3	6.3 - ES Chapter 13 - Noise and Vibration	PDB-010	Rev01/May 2025
EN010147/APP/6.4	6.4 ES - Figure 13.1 - Construction Phase Noise Study Area	APP-103	Rev01/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.2 - Construction Phase Vibration Study Area	APP-104	Rev01/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.3 - Operational Phase Noise Study Area	APP-105	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.1 Baseline Sound Survey	APP-211	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.2 Construction Phase Noise and Vibration	APP-212	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.3 Operational Phase Noise	APP-213	Rev01/November 2024
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 1	APP-232	Rev01/November 2024
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 2	APP-234	Rev01/October 2024
EN010147/APP/7.6.2	7.6.2 - Outline Operational Management Plan	REP2-017	Rev01/July 2025

Table 2.6: Draft DCO submission documents and plans record pursuant to West Oxfordshire District Council discussions – Planning Policy

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/7.1	7.1 Planning Supporting Statement inc. Green Belt Case	REP1-012	Rev1/ June 2025

3 Record of Relevant Correspondence

3.1.1 The Project has been the subject of pre-application engagement with West Oxfordshire District Council, and both parties continue to engage throughout and beyond the submission of the DCO application for the Project.

3.1.2 Error! Reference source not found. identifies the discussions and correspondence that have taken place between the Applicant's project team and West Oxfordshire District Council to date.

4 Areas of Discussion between the Parties

Table 4.1: Areas of Discussion between the Parties – Ecology and Nature Conservation

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
4.1.1	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) **[REP2-012]**	Survey methodology	Other than where noted below, survey scope and methodology agreed.	Agreed.	Agreed.
4.1.2	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) **[REP2-012]**	Assessment approach, scope and methodology	Other than where noted below, assessment approach, scope and methodology agreed.	Agreed.	Agreed.
4.1.3	6.5 ES - Appendix 9.13 Biodiversity Net Gain Assessment **[APP-162]**	Biodiversity Net Gain	The Council welcomes the commitment to deliver Biodiversity Net Gain (BNG) above the minimum statutory requirement of 10% due to come into force in November 2025. The statutory biodiversity metric has been used to calculate the BNG outcome from the proposed development. However, this has only been calculated for area habitats and hedgerows, without taking account of the presence of watercourses within the site. As the red line boundary of the site encompasses a watercourse, to ensure compliance with the statutory biodiversity metric user guide, the watercourse module should be applied. Clarity is also needed as to whether a delay to habitat creation and enhancement works should be applied in the metric due to the construction period of two years.	Following discussions with Natural England, the watercourse section of the metric will be included in the BNG Assessment, following River Morph surveys. Although the total construction period is anticipated to be two years, as a staged approach to work areas will be undertaken (excluding temporary compounds), it is considered that the majority of the site will be constructed in less than one year from construction, as such the Project does not require temporal multipliers to be entered. This will be developed once further details of construction methodologies and timings become available.	Discussions ongoing.
4.1.4	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) **[REP2-012]**	Farmland birds	Although the majority of farmland birds and other birds recorded breeding/foraging and over wintering on site will be effectively mitigated for as part of the enhancement proposals for the solar farm, including hedgerows, woodlands, scrub and tussocky grassland, the Council are concerned about the proposed mitigation for skylark and lapwing. There are both priority species and written into the NPPF Chapter 15. The breeding bird assemblage identified within the project area is of county importance (Table 9.6.4 page 60 of the ES) and the Council therefore recommend that this should be given detailed consideration at examination to ensure that impacts on protected and priority species are avoided and adequately compensated. The proposed development will result in significant loss of breeding territories for the local skylark population resulting in a landscape scale impact. The proposed skylark plots within the project area are to provide winter foraging habitat for skylarks rather than being used for breeding. Mitigation for loss of breeding habitat is proposed via the creation/enhancement of 36 hectares (ha) of meadow on land that is not being used for solar arrays due to their archaeological importance. However, this quantum of compensatory habitat is unlikely to be sufficient as it appears to be comprised of small, spread-out parcels of land across the project area. Skylarks are unlikely to use proposed skylark plots for breeding when surrounded by solar panels as they require long, unbroken sightlines and minimal perches for raptors (predators). The solar panels themselves will therefore reduce the desirability of the area for nesting skylark due to the perceived risk of predation. Post-construction monitoring of over 100 solar farms in England and Wales found no evidence of nesting skylarks (In Practice Issue 117, September 2022, Chartered Institute of Ecology and Environmental Management, CIEEM). The Council calculates that in order to compensate for the recorded 228 no. breeding territories identified through the applicant's assessment, the development will need to	Table 9.6.4 in ES Chapter 9 Ecology and Biodiversity [REP2-012] sets out that the breeding bird assemblage is of County importance. This is carried through into the assessment of effects (e.g. section 9.9.90) and in the summary table 9.16.1. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species. The Project site will be managed through conservation grazing to create grasslands of varied diversity and structure. Recent research on the impact of solar farms on farmland birds (Copping et al 2025) found that solar managed for mixed habitats (either ungrazed or grazing with an allowance for wildflowers to set seed, woody hedgerow features) had significantly higher numbers of both farmland birds and bird species than an intensive arable baseline. Given that, as set out in the oLEMP [APP-235], the Project will be managed via conservation grazing with pauses in the grazing over the summer to allow plants to flower and set seed, it is anticipated that the Project will provide an overall enhancement for the bird assemblage present.	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
			provide 114ha of suitable habitat (based on two skylark territories per ha). In the absence of further clarification and justification for the applicant's approach, proposed compensatory habitat would appear to be insufficient. Measures to safeguard protected and priority species within the project area are essential but it is not clear whether specific measures or mitigations are included in the scheme to compensate for impacts on lapwing and nightingale habitat.		
4.1.5	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) **[REP2-012]**	Wetland birds and aquatic invertebrates	There has been no assessment of the potential effects during operation of the solar farm on wetland birds and aquatic invertebrates. The zone of influence of the impact assessment should take this into account due to the close proximity of several large waterbodies of value to birds in the local area, including Cassington Gravel Pits, Blenheim Lake and the Lower Windrush Valley Project Area. An understanding of the use of the wider landscape by wetland birds and aquatic invertebrates is needed to assess how the solar panels might influence the behaviour of these species and consequent impacts on their populations through mortality or reduced breeding success. Evidence suggests that the polarised light of solar panels can be confused by these species for open water, for example, resulting in dragonflies laying eggs on them. The size and density of the proposed solar farm project is such that this could result in a significant effect on local populations. The impact of the new linear corridors for wildlife created by the proposed screening is to be welcomed but the adverse impact upon species wishing to roam locally but prevented from so doing by the new fences and screening also needs to be factored in.	Operational impacts on all breeding and wintering birds, and invertebrates identified within the Botley West Solar Farm have been assessed in ES Volume 1, Chapter 9, Section 9.9 [REP2-012]. The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [REP2-012]. Although the lake effect has been hypothesised as a possibility, a review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. Research in the United States found some evidence that such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations and no evidence has been published demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping et al. 2025).	Discussions ongoing.
4.1.6	6.5 ES - Appendix 9.4 Bat Survey Report **[APP-153]**	Bat assemblages survey and assessment	The bat survey concluded that the assemblage of bats present at the site is at least of national importance, due to the presence of two Annex II species – Bechstein's and Barbastelle bats, which are using woodlands adjacent to the site for roosting, including maternity colonies. The mosaic of habitats within the site are also considered to have at least national importance for bats, including for foraging and commuting. However, the Environmental Statement concludes that the impact on the local bat population will be negligible due to the retention of the majority of the landscape features that the bats are using for foraging, commuting and roosting, and the protection of these with buffers. However, In particular, although there is mention of the provision of a suitable buffer to protect all important bat flightlines as a key commitment (ref. 9.20), these are not shown on the Masterplan or in any other documentation, including the CoCP, Outline Operation Management Plan and Outline Landscape and Ecology Management Plan submitted with the application. there is limited information regarding proposed avoidance or mitigation measures for bats. In particular, although there is mention of the provision of a suitable buffer to protect all important bat flightlines as a key commitment (ref. 9.20), these are not shown on the Masterplan or in any other documentation, including the CoCP, Outline Operation Management Plan and Outline Landscape and Ecology Management Plan submitted with the application. The conclusion in the Environmental Statement that 5 metre gaps to be created in hedgerows are unlikely to cause changes to commuting routes and foraging habitats is unjustified as no information has been provided	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England/other IPs with respect to the use of these data for this commitment are on-going	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
			with regard to which hedgerows are important bat flightlines. This conclusion is therefore unsupported.		
4.1.7	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) **[REP2-012]**	Otter and water vole	The Environmental Statement indicates that it is assumed that otters and water voles forage and commute within the project site, and that there may be otter holts (or laying up sites) along the river, but no surveys have been carried out to confirm this. It is recognised that there could be short term disturbance to otters due to noise and vibration during construction, and the impact assessment would be better informed if it were understood whether there were any holts present along the river within the site. This is equally applicable to the potential for water voles to be present on the river (the Environmental Statement takes the approach that this species is adequately covered in the assessment of impacts to watercourses). This is particularly relevant to any crossings over watercourses within the site but could also apply to the installation of solar panels near watercourses (not just the main river).	Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity [REP2-012], otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact. This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean et al 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced. All watercourses will be crossed via HDD with no open-cut methods proposed.	Discussions ongoing.
4.1.8	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) **[REP2-012]**	Great Crested Newts	The ES ecology chapter appears to keep the licensing option for great crested newts open and refers to both a great crested newt mitigation licence and the District Licensing Scheme (administered by NatureSpace). However, Section 8.3.1 in the Outline LEMP states that a Natural England mitigation licence will be obtained for the site, so no	The Project will require a licence to address potential effects to GCN populations on and around the site. At this stage, it is anticipated that the Project will use a Natural England mitigation licence for GCN and discussions with NE in respect of this are on-going. However, the Project	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
			off-site compensation would be possible. It is unclear why the District Licensing option has been discounted. If the District Licensing Scheme is not used, then we would consider this a significant missed opportunity for landscape-scale conservation for this species if all habitat works are carried out on site only (via the standard mitigation licence approach). Use of the District Licensing Scheme can be secured via the appropriate wording from the standard planning conditions and translated into planning requirements within the DCO. The Council recommends that NatureSpace should be consulted for their comments to inform the Examination to understand the details of the likely impacts to this species. The closest ponds are located 20m (P83) and 30m (P64) of the site boundary and the nearest great crested newt population through surveys was P19, 130m from the site. Although the majority of suitable habitat will be retained, apart from small sections of hedgerow spread across the site for vehicular access, there would be temporary disturbance and loss of terrestrial habitat as a result of the proposed development. The council notes the negative eDNA result from the ponds at City Farm where great crested newts were previously recorded (for the Salt Cross Garden Village outline planning application) and that ponds with a 'below average' or lower score in the HSI assessment were not subject to an eDNA survey. Negative eDNA survey results from a single survey are not sufficient to prove absence, several years' worth of negative eDNA results are needed in line with Natural England guidelines (for licence applications) and the species does occur in below average suitability ponds. The HSI assessment is not intended to be a marker for which ponds are likely to contain newts or not.	may make use of the DLL, if that is more appropriate, as per commitment 9.13.	
4.1.9	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) **[REP2-019]**	Outline Landscape and Ecology Management Plan (OLEMP)	The Outline LEMP refers to a detailed LEMP being produced by condition as part of the DCO. The Council recommends that this should be for lifetime of the development and include monitoring for BNG. The guidance in EN-1 5.4.44 indicates that any habitat creation or enhancement delivered for compensation or Biodiversity Net Gain would be maintained for a minimum of 30 years, or for the lifetime of the project, whichever is longer. The oLEMP mentions monitoring for 30 years, but elsewhere references monitoring for the lifetime of the project. Clarification and correction of the documents is therefore suggested to provide certainty that management and monitoring will be undertaken for the lifetime of the development as a minimum. The Council would also encourage the ongoing management of habitats created/enhanced as compensation and for Biodiversity Net Gain to extend beyond the lifetime of the project. The Outline LEMP lists the inclusion of "bee hives" in (see section 9.12 of Table 9.8.1 on page 71 of the ES ecology chapter), however, we are unconvinced that it would be appropriate as it would increase competition with native bumblebees and other pollinating insects. Depending on the number of bee hives, it might be possible to locate these in areas of wildflower-rich habitat to ensure a lower level of competition with native bees. Further clarity is required on this part of the proposals. It is the intention as set out in the oLEMP for multiple LEMPs to be produced for the different zones within the site, and for these to be approved by the District Councils before be responsible for monitoring the implementation of the LEMPs. The applicant needs to demonstrate the mechanism for ensuring that the District Councils are adequately resourced and funded to do this and set out the mechanisms whereby the District Councils could take enforcement action in case of non-compliance commencement. This presents an issue in terms of oversight of the whole project and who will be responsible for monitoring the implementation of the LEMPs. The applicant needs to	The Project site will be managed and maintained for the lifetime of the Project, as set out in paragraphs 1.1.10 and 17.1.1 of the oLEMP. The reference to 30 years is in respect of the minimum commitment for the maintenance of features for Biodiversity Net Gain purposes. However, this will be clarified in the next iteration of the oLEMP. The bee hives will be in accordance with those identified in Appendix A of the OLMEP [APP-235], providing habitat for native invertebrate species. Project edges containing meadow grassland with wildflowers for invertebrates are outlined in the OLEMP [APP-235].	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
			demonstrate the mechanism for ensuring that the District Councils are adequately resourced and funded to do this and set out the mechanisms whereby the District Councils could take enforcement action in case of non-compliance.		
4.1.10	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) **[REP2-019]**	Local Nature Recovery Strategy	The aim of the proposed development is to create a landscape-scale wetland corridor along the River Evenlode, which is welcomed by the Council, and this aligns with the priorities and mapping in the emerging Local Nature Recovery Strategy for Oxfordshire. However, there the enhanced connectivity for other habitats, notably ancient woodlands, is not given the same weight. Hedgerow planting is planned to provide connectivity between Tackley Wood and the Blenheim Estate, and Bladon Heath and Burley Woods. While this is welcomed in principle, the current proposals only integrate the minimum 15 metre buffer to these ancient woodlands, and this would seem to be a missed opportunity to allow for woodland expansion in future. The woodlands would effectively become surrounded by solar panels for 42 years and therefore restrict the ability of any future woodland restoration plans. The Council recommends that the potential for wood pasture and natural woodland regeneration in the area is explored further to provide greater woodland connectivity, aligning with the mapped measures in the emerging LNRS and supporting the important bat populations that have been found to use these woodlands.	Noted re the broad alignment between the Ecology Strategy for the Project and the emerging LNRS. The Project has committed to providing appropriate buffers along key flightlines for bats (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). The nature of the buffers with respect to management and habitat creation will be set out in more detail in the bat technical note to be published. However, it is intended that such buffers support the connectivity for bats and other wildlife between the ancient woodland blocks and ensure that the overall permeability of the landscape remains post development.	Discussions ongoing.

Table 4.2: Areas of Discussion between the Parties – Historic Environment

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
4.2.1	ES Chapter 7: Historic environment **[CR1-003]**	Assessment approach, scope and methodology.	Other than where noted below, assessment approach, scope and methodology agreed.	Other than where noted below, assessment approach, scope and methodology agreed.	Agreed.
4.2.2	ES Appendix 7.3: Geophysical Survey Report [**APP-133 – APP-140**]	Methodology for geophysical surveys.	The application of the geophysical survey methodology within the Project Site is acceptable.	The application of the geophysical survey methodology within the Project Site is acceptable.	Agreed.
4.2.3	ES Chapter 7: Historic environment **[CR1-003]**	Mitigation of potential impacts on buried archaeological remains.	The proposed methodologies for the mitigation of potential impacts on buried archaeological remains are acceptable.	The proposed methodologies for the mitigation of potential impacts on buried archaeological remains are acceptable.	Agreed.
4.2.4	Outline Written Scheme of Investigation (Rev 2) [**REP2-021**]	The proposed programme of further archaeological work.	The proposed programme of further archaeological work is acceptable.	The proposed programme of further archaeological work is acceptable.	Agreed.
4.2.5	ES Chapter 7: Historic environment **[CR1-003]**	The level of harm to the significance of designated heritage assets.	All harm to the significance of designated heritage assets is less than substantial, therefore the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1.	All harm to the significance of designated heritage assets is less than substantial, therefore the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1.	Agreed
4.2.6	ES Appendix 7.5: Settings Assessment (Rev 1) **[REP2-014]**	The likely significance of effect on designated heritage assets as a result of the change within their setting, including: the Blenheim Palace World Heritage Site; Grade I listed buildings at Church Hanborough and Cassington; Scheduled Monuments at Sansom's Platt and Bladon Camp; and Conservation Areas at Church Hanborough and Bladon.	The applicant's assessment of effects in relation to the historic environment confirms that no significant effects in respect of any aspect of the historic environment have been identified within the Environmental Statement. The effects on designated heritage assets, including the Blenheim Palace WHS, as a result of change within their setting have been assessed by the applicant as not significant. The effects on buried archaeological remains resulting from physical impacts have also been assessed by the applicant as being not significant. The cumulative effects assessment examined likely impacts on designated heritage assets as a result of change within their setting and the impacts on the character of the historic landscape. The applicant concludes	The Applicant's assessment of likely impacts and effects in respect of the Blenheim Palace World Heritage Site are presented in the Heritage Impact Assessment (ES Appendix 7.4 [**APP-141]**). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (*Guidance and Toolkit for Impact Assessment in a World Heritage context*), and the preparation of the report was carried out within an iterative process in consultation with Historic England. The Heritage Impact Assessment identified a likely 'minor negative' impact on one attribute (Attribute 7) which	Discussions remain ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
			that there are no significant cumulative effects from the Project alongside other projects/plans. WODC do not agree with these conclusions and consider that the applicant has played down the likely significance of impacts arising from the proposed development. Notwithstanding the conclusions that the applicant makes through their own assessment, it is the view of WODC that there are residual harmful impacts that are likely to arise from the project on heritage assets that are of international and national importance and that these impacts should be regarded as significant. This includes the impact on the settings of the heritage assets including Blenheim Palace World Heritage Site, Grade 1 Listed Buildings at Church Hanborough and Cassington, Scheduled Monuments at Sansom's Platt and Bladon Camp, and Conservation Areas at Church Hanborough and Bladon. The maintenance of the Outstanding Universal Value of Blenheim Palace World Heritage Site and its setting is a key objective and therefore needs to be given particular consideration through the examination of the solar farm proposals.	contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. The overall assessment of likely impacts and effects on the historic environment is presented within ES Chapter 7: Historic environment [**CR1-003**]. The likely impact on the Blenheim Palace WHS is set out at paragraphs 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4 [**APP-141**]). The impact would be time-limited and fully reversible. The sensitivity/value of the WHS is determined as 'very high', resulting in a likely effect of 'minor adverse' significance, which is not significant in EIA terms. The Applicant notes that in their Relevant Representation (**RR-0398**], Historic England does not disagree with the Applicant's assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4, [**APP-141**]), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment [**CR1-003**]. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS. The Applicant also notes that in their Relevant Representation [**RR-0413**], ICOMOS-UK state that '*the proposed Botley West Solar Farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map 'Character of Setting of WHS' on page 50 of Appendix III of the Management Plan*'. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the Outstanding Universal Value (OUV) of the UK World Heritage Sites and their settings is one of their key objectives. The detailed assessment of likely impacts on the heritage significance of designated heritage assets as a result of change within their settings is presented in ES Appendix 7.5: Settings Assessment (Rev 1) [**REP2-014**]. The Applicant considers that the assessments presented within this document are robust and accurate.	

Table 4.3: Areas of Discussion between the Parties – Agricultural Land Use and Public Rights of Way

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
4.2.1	ES Chapter 17: Agricutral land and public Rights of Way [**APP-054**]	The applicant's approach to assessing and mitigating the loss of Best and Most Versatile (BMV) land during the project's operation and maintenance is inadequate, as it does not sufficiently consider the significant coverage of BMV land, lacks a strategy to avoid or minimise its loss, and fails to address feedback from the PEIR consultation.	Loss of BMV land (RR-1102-25): The applicant has scoped out the assessment of temporary and permanent loss of best and most versatile land during operation and maintenance of the Project. The applicant suggests that there would be no works during the operation and maintenance phase of the Project that would result in the temporary or permanent loss of best and most versatile land. In addition, they propose that soils located below the solar panels will be retained and made available for grazing during operation of the Project. On this basis, they argue that the temporary and permanent loss of best and most versatile land during operation and maintenance of the Project is unlikely to result in likely significant effects and has been scoped out the assessment in this Chapter of the ES. The LPA have considerable concerns with the above approach The applicant's mapping submitted in support of the application indicates significant coverage of Best and Most Versatile across the project area. It is not clear that the proposed design, layout or scale of the project has been shaped by the presence of Best and Most Versatile Agricultural Land. As this is a non-renewable resource there should be a strategy to avoid its loss and to consider mitigation only where loss is very small in scale and unavoidable. Similarly, a strategy to focus the development on the poorest quality land should have informed the site scoping stage of the scheme. A key policy objective for West Oxfordshire is to protect and conserve soil resources and this includes Best and Most Versatile Agricultural Land. Our response to the PEIR consultation identified areas of land that could be removed from the project to avoid multiple harms including landscape, heritage and loss of BMV land. The design of the scheme has not responded to these comments.	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 **[APP-223]**) determined that 38.35% of the whole Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 **[APP-042]**) The assessment of the significance of effects of the Project on ALC identifies that only 5.5ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 **[APP-054]**, paragraph 17.9.6). In terms of the distribution of grades, according to the provisional mapping of ALC grades within Oxfordshire, the county comprises approximately 20.9% Grades 1 and 2 land, 58.5% of Grade 3 land (which includes both Subgrades 3a and 3b) and 20.1% Grade 4 land (Table 17.14 of ES Chapter 17 **[APP-054]**). If only one third of the provisionally mapped comprised Subgrade 3a land, this would provide an estimate of an average of 40.4% Grades 1,2 and 3a in Oxfordshire. The detailed ALC survey results for the Project site (Table 17.17 of ES Chapter 17) identify that only 7.4% of the land comprises Grades 1 and 2 land, with approximately 29% Subgrade 3a land. In comparison to the pattern of land quality that might be expected in the wider county, therefore, the distribution of land quality grades within the Project site comprises a typical, if not slightly lower average percentage of the best and most versatile land. The temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 **[APP-054]**, paragraph 17.9.8). The inherent quality of the best and most versatile land would not therefore be lost within these areas as a result of the Project. The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 **[APP-043]**, paragraph 6.1.4). The socio-economic impacts of the proposed changes in the agricultural use of the site based on the current pattern of agricultural land use within the Project site are assessed in Section 15.9 of Chapter 15 of the ES **[APP-052]**. However,	Discussions remain ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
				decisions about changes to the pattern of land management within the Project site in the future both with or without the implementation of the Project remains a matter for the owners and farming enterprises occupying the land to determine at that time.	

Table 4.4: Areas of Discussion between the Parties – Landscape and Visual Resources

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
4.4.1	Chapter 8: Landscape and Visual Impact Assessment **[APP-045]**	LVIA Methodology	Other than where noted below, regarding specifics of the application of the LVIA methodology, the scope and methodology w agreed at a meeting with the OHAs dated 10th June 2025.	Other than where noted below, regarding specifics of the application of the LVIA methodology, the scope and methodology w agreed at a meeting with the OHAs dated 10th June 2025.	Agreed
4.4.2	Chapter 8: Landscape and Visual Impact Assessment **[APP-045]**	Assignment of significance	The OHAs believe that the LVIA [APP-045] has, many cases, underplayed the level of significance for a number of Representative Viewpoints	A review of Representative Viewpoints within the LVIA is being completed to determine whether we believe our assessment is correct and in accordance with the agreed methodology. The Applicant's current position remains as follows: When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. Paragraph 3.32 of GLVIA3 explains that there are no hard or fast rules about what effects should be deemed to be significant. The assessment within Chapter 8: Landscape and Visual Impact Assessment **[APP-045]** are influenced by the proportionality principle expressed in paragraph 1.17 of GLVIA3 "identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that assessment should be tailored to the particular circumstances in each case." Neither the EIA Regulations or GLVIA3, nor subsequent landscape Institute technical guidance notes set out a formulaic/standard set of criteria / definitions for sensitivity, magnitude of impact or significance. The LVIA uses the methodology set out at sections 8.4 and 8.6 of the submitted LVIA **[APP-045]**. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24). LI TGN-2024-01 provides clarification in the assessment of effects "…if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not." (Issue / Question 3(5), Page 8). In assessing significance of effect, the LVIA has followed the methodology as set out in Sections 8.4 and 8.5 of the LVIA **[APP-045]**. The numbers of people using the public rights of way network within the 5 m study area varies, as does the distance, context and visual characteristics of the view. It is not known how people use sections of a Public Right of Way, in which direction and when. Where no firm data are available a relative judgement is sufficient, as proposed in GLVIA3, Therefore, the position has been adopted of individuals using a public rights of way walking towards or through the Project, looking directly at the Project, even if wider views are available. Regarding valency, the position has been taken of that of a person who objects to the presence of the Project. It is the Applicant's position that the methodology used to assess the landscape and visual effects, of the Botley West Solar Farm Project, follows best practice guidance. The judgements made in the Landscape and Visual Impact Assessment (LVIA) are clear, transparent, correct and proportionate to the Project.	Discussions ongoing.
4.4.3	Chapter 8: Landscape and Visual Impact	Suitability of Representative Viewpoint Selection and Photomontages	OHAs have questioned the number of Representative Viewpoint and photomontages used within the LVIA **[APP-045]**.	During discussions at the meeting with the OHAs the possibility of produced winter Year 15 photomontages was discussed. This would help support our position in terms of significance of effect and give the OHAs further clarity. The Applicant' current position remains as follows:	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
	Assessment **[APP-045]**.			The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources **[APP-045]**). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages **[APP-072 to 080]**. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP_149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA **[APP-045]**. At no point were aerial viewpoints suggested, either by the Applicant or the local planning authorities. GLVIA3 only mentions aerial imagery twice, in the context computer generated 3D models (paragraphs 8.28 and 8.29). Moreover, GLVIA3 explains that such models "do not necessarily represent the way that people would experience the change [in view] and so can be misleading in an assessment context" (GLVIA3, paragraph 8.29). This is especially true of people within vehicles including aircraft, travelling at speed on the approach to, or taking off from airports. The transient nature of potential views available from the air and the enclosed nature of the aircraft would reduce the sensitivity of the visual receptor to such a degree that there is no potential for significant effects. Land-based dynamic receptors are considered at paragraphs 8.6.44 to 8.6.65 of the LVIA **[APP-045]**.	
4.4.4	Chapter 8: Landscape and Visual Impact Assessment. **[APP-045]**	Mitigation	OHAs and other RRs have questioned the suitability of mitigation proposals.	Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [REP2-016]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The Project's main elements, the solar panels, would be low in height, at a maximum of 2.3m, and follow the natural contours of the landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located. Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that *"infrastructure to achieve our energy objectives national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation"* (NPS EN-1, paragraph 3.3.63). The NPS explains further that with *"projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero"* (NPS EN-1, paragraph 4.1.7). The residual landscape and visual effects, after the proposed mitigation do not present an unacceptable risk to the matters listed.	Discussions ongoing
4.4.5	**[APP-045]** Chapter 8: Landscape and Visual Impact Assessment.	Representative Viewpoints		The Representative Viewpoints, agreed with the LPAs are as they are named – i.e. they are representative of available views along certain routes and within the local landscape. Where these are based on a route a summary for the whole route is included in the description of effects, e.g. for Representative Viewpoint 1, an assessment of the effects experienced by people using the whole route during the operational phase is given in paragraph 8.9.144 of Chapter 8: Landscape and Visual Impact Assessment **[APP-045]**. It is acknowledged that the assessment of the effects on PRoWs does not include detailed section by section descriptions of the change in views along each PRoW or road. However, the 54 viewpoints provide a good range of evidence of the different effects on the PRoW within the study area, at varying geographical locations, distances and elevations, as well as different contexts, to enable professional judgement to be exercised in the assessment of effects along the wider networks.	Discussions ongoing

Table 4.5: Areas of Discussion between the Parties – Noise and Vibration

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
4.5.1	6.3 - ES Chapter 13 - Noise and Vibration **[PBD-010]**	Assessment approach, scope and methodology	No specific confirmation has been received from WODC.	The scope and methodology utilised for the noise and vibration assessment has been WODC and we have not received confirmation. The assessment has been undertaken in line with best practice. This was	Yet to be agreed.

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
				confirmed and agreed during a virtual meeting on the 16th July 2025.	
4.5.2	6.3 - ES Chapter 13 - Noise and Vibration **[PBD-010]**	Baseline noise survey methodology	No specific confirmation has been received from WODC.	The scope and methodology utilised for the baseline noise survey has been issued to WODC and we have not received confirmation. The assessment has been undertaken in line with best practice. This was confirmed and agreed during a virtual meeting on the 16th July 2025.	Yet to be agreed.
4.5.3~~4.5.2~~	6.3 - ES Chapter 13 - Noise and Vibration **[PBD-010]**	Assessment Findings	No specific confirmation has been received from WODC.	This was confirmed and agreed during a virtual meeting on the 16th July 2025.	Agreed
4.5.4	6.3 - ES Chapter 13 - Noise and Vibration **[PBD-010]**	Discussion regarding the noise and vibration impact assessment. The following points were discussed during the consultation; - Justification of the baseline data. - The integration of a tranquillity assessment into the noise and vibration assessment. - The methodology which was used to assess the noise emissions from the PCS units. - The baseline data set. Following the call, the baseline data set was issued via email to WODC.	Confirmation of receipt of data.	No further comment. This was confirmed and agreed during a virtual meeting on the 16th July 2025.	Agreed

Table 4.6: Areas of Discussion between the Parties – Planning Policy

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
4.6.1	Planning Supporting Statement	**Application of Planning Policy to Decision Making for NSIP's** Section 104 of the Act contains the most pertinent policy outlining the decision-making process for NSIPs and providing guidance on how the Secretary of State (SoS) should approach their decisions. In this respect, Section 104 (3) provides that the SoS must decide applications for development consent in accordance with any National Policy Statement (NPS) except to the extent that the SoS is satisfied that one or more of the following exceptions apply: • that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations; • that deciding the application in accordance with any relevant national policy statement would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under enactment;	Agreed	Agreed	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
		• That deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment; and • That the Secretary of State is satisfied that the adverse impact of the proposed development outweighs its benefits. A such, it is agreed that the following NPSs make up the relevant primary policy, against which the SoS must make their decision and to the extent that Section 104 allows, the following national, regional and local policy may also be relevant.			
4.6.2	Planning Supporting Statement	**Overview** The statutory framework for preparing, examining and determining application for DCOs for NSIPs is provided by the Act. As discussed in section 2, the Act sets out the consenting system for all NSIPs, including those in the energy sector, and provides the legislative context that has guided the below considerations. The relevant NPSs to which the SoS must have regard in accordance with Section 104 (2) and 104 (3) of the Act are considered to be: • National Policy Statement for Energy (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and National Planning Statement for Electricity Networks Infrastructure (NPS EN-5). • Other policies of relevance identified below include: National Planning Policy Framework NPPF and the Local Development Plan documents for the host authorities West Oxfordshire District Council, Cherwell District Council, the Vale of Horse District Council and Oxford City Council. Appendices B to E attached detail national and local planning policy against which the project will be judged. These appendices are described as 'Compliance Tables', and details the applicants position in respect of degree on compliance with these policy statements well as the host authorities position with respect to compliance. Together they represent matters agreed and not agreed.	Agreed	Agreed	Agreed
4.6.3	Planning Supporting Statement	**West Oxfordshire Local Plan 2031 (adopted)** The WOLP was adopted in September 2018 and sets out the overall planning framework for the District from 2011 to 2031. the appendices below identifies policies of the WOLP that are	Agreed	Agreed	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
		considered most relevant to the proposed development.			
4.6.4	Planning Supporting Statement	**West Oxfordshire Local Plan (emerging)** WODC are in the process of preparing a new Local Plan, to cover the period up to 2041. WODC have completed an initial scoping consultation, in August – October 2022 and a focused consultation on draft plan objectives, pattern of development and call for ideas, opportunities and sites, in August – October 2023. A preferred options consultation (Regulation 18) is set to take place in October 2024, following this a draft Local Plan is to be published in March 2025, submission for independent examination in June 2025 and adoption is expected in late 2025 to early 2026. Whilst still at a very early stage, the focused consultation addressed Tackling the Climate and Ecological Emergency with Objective 1 seeking "To minimise the impact we are having on our changing climate by reducing carbon emissions across all sources, with a particular focus on transport, housing, industry and energy." This includes the Pathways to a Zero Carbon Oxfordshire1 (PaZCO) aim to "achieve a 50% reduction in carbon emissions by 2030 and net zero by 2050 in Oxfordshire". Additionally, WODC's own Climate Change Strategy (2021 – 2025) commits WODC to a "working in partnership with Oxfordshire councils and partners to support the transition to ultra-low emission transport and active travel, a zero-carbon economy and clean energy supply". Additionally, Objective 2 of the focused consultation seeks "To facilitate the roll out of clean, renewable energy at a range of different sites in suitable, appropriate locations across the District." Again, PaZCO has highlighted the "need to increase local renewable electricity generation in response to an expected doubling of electricity demand due to the electrification of heating, transportation and high population growth". The Council Plan (2023 – 2027) also "seeks to encourage renewable energy generation at appropriate sites in the District, improving local energy and economic resilience and supporting the community benefits that this resilience will bring".	Agreed	Agreed	Agreed
4.6.5	Planning Supporting Statement	**Woodstock Neighbourhood Plan** The Woodstock Neighbourhood Plan (WNP) was 'made' on the 23rd January 2023 and covers the period 2020-2031, to coincide with the expiry of the adopted WOLP. An area of approximately 10 ha within the Northern Site falls within the WNP designated area.	Agreed	Agreed	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
		The WNP states it “has a singular focus on the protection of green and open spaces within the plan area”. It has secured this protection through the designation of five ‘Local Green Spaces’” (Paragraph 1.4), including areas of allotments, water meadow, woodland and nature reserve. No Local Green Spaces are designated within the Project site boundary. Since there are no Local Green Spaces designated within the Project site boundary, there are no relevant policies of the WNP which are relevant to the Project.			
4.6.6	Planning Supporting Statement	**Eynsham Neighbourhood Plan** The Eynsham Neighbourhood Plan (ENP) was ‘made’ on 6th February 2020 and covers the period 2018-2031, again to coincide with the expiry of the adopted WOLP. An area of approximately 8 ha falls within the ENP designated area which are currently cable route options. Whilst no policies specifically cover the cable route option areas, the Project site boundary is adjacent to the eastern boundary of a designated Local Green Space. Policy ENP12: Local Green Space designates LGS4: Hazeldene Close Open Space, an area of open central grassed area with young trees and orchard planting as a Local Green Space. Other relevant policies of the ENP are detailed in the appendices below.	Agreed	Agreed	Agreed
4.6.7	Planning Supporting Statement	**Cassington Neighbourhood Plan** The Cassington Neighbourhood Development Plan (CNDP) was ‘made’ on 26th June 2023 and covers the period 2021-2041, which will coincide with the expiry of the new Local Plan currently being prepared by WODC. An area of approximately XX falls within the CNDP designated area. Relevant policies of the CNDP are detailed in the table below.	Agreed	Agreed	Agreed
4.6.8	Planning Supporting Statement	**Wootton by Woodstock Neighbourhood Plan** The Neighbourhood Plan Area for the parish of Wootton was designated on 14 July 2023. Approximately XX ha of the site would fall within the Wootton Neighbourhood Plan Area. As of mid-2024, the Parish Council has been actively engaging with the community, and the Wootton neighbourhood Plan Survey was launched on 7th September 2024. At present, there are no policies to consider in relation to the proposed development.	Agreed	Agreed	Agreed
4.6.9	Planning Supporting Statement	Compliance with the following NPS paras or policies: 1.NPS EN-1 paras: Please see Appendix B	Discussions ongoing	Discussions ongoing	Yet to be agreed

Ref	Relevant Application Document	Summary of Description of Matter	West Oxfordshire District Council Current Position	Applicant Current Position	Status
		2.NPS EN-3 paras: Please see Appendix C 3.NPS EN-5 paras: Please see Appendix D 4.NPPF paras: Please see Appendix E 5.List Development Plans and other policies: Please see Appendix F			

Appendix A
Record of Relevant Correspondence

Date	Form of Correspondence	Topics Discussed	Outcomes
Ecology			
14/03/2023	Meeting	Identified biodiversity and approach to Net Gain methodology as a key topic.	Nil.
19/03/2023	Meeting	Identified biodiversity as a key topic. Discussion on ecological and habitat improvements through Biodiversity Net Gain.	Nil.
3/05/2023	Meeting	Overview of ongoing surveys, designated sites and Biodiversity Net Gain.	Nil.
3/12/2024	Meeting	Protected species licensing.	Letters of no impediment to be sought with Natural England for relevant species.
1/08/2024	Meeting	Set out of project update including methodologies and surveys to date, bats, results and key receptors, emerging impacts, Biodiversity Net gain and timetable.	September meeting to discuss bat radio tracking results.

Date	Form of Correspondence	Topics Discussed	Outcomes
19/09/2024	Meeting	Set out project update including ongoing design and progress update, Statement of Common Ground, key survey results, Biodiversity Net Gain, ecology strategy and next steps.	Nil
11/07/25		Meeting	Minutes to be agreed by areas covered included: • Overview of all bat survey work including that from May 2025 and activity data analysed to date. • Overview of Change Request 2 submitted at D2. • Proposed 25m buffer locations on key bat flightlines plus discussion on location and extent of other buffers. • Provision of bat technical note including contents. • Scope of potential air quality assessment in respect of Oxford

Date	Form of Correspondence	Topics Discussed	Outcomes
			Meadows SAC. • Discussion on Local Impact Report Responses. • Discussion on proposed skylark mitigation. • Discussion on nightingale enhancements to OLEMP. Discussion on monitoring programs and approval process.
Historic Environment			
July 2023	WODC input into Scoping Opinion	Various	n/a
February 2024	WODC response to PEIR	Various	n/a
February 2025	WODC response to DCO submission	Various	n/a
Agricultural Land Use and PRoW			
Landscape and Visual Resources			
October / November 2022	Correspondences (by email) with all local authorities regarding the selection of Representative Viewpoints.	A detailed log was kept of the responses and any requested for additional/alternative viewpoints. Any changes were incorporated into the PEIR and subsequent ES chapter.	Progressed.
January 2023	Meeting held with OCC (including Landscape Officer) to	Minutes of meeting issued and actioned where necessary.	Progressed.

Date	Form of Correspondence	Topics Discussed	Outcomes
	discuss matters arising on Project, including Landscape		
June 2023	Submission of Scoping Report, including LVIA section outlining approach to the assessment, including methodology.	Comments received from the Scoping report are detailed within the LVIA [APP-045] Table 8.5, with details of how they have been addressed.	Progressed.
September 2024	Meeting with local authority landscape officers to discuss LVIA specific matters.	Outcome of meeting actioned as part of the PEIR / ES	Progressed.
April 2023	Email	Consultation was sought via email to agree upon the proposed baseline sound survey and noise impact assessment methodologies.	Not agreed at this stage.
May 2024	Email	Consultation was sought via email to agree upon the proposed baseline sound survey and noise impact assessment methodologies.	No Response Received Agreed.
10th June 2025	Online meeting with local authority landscape officers to discuss LVIA specific matters	Topics of specific discussion were focused around the OHAs Joint Local Impact Report submitted at Deadline 1. With	A detailed response to the OHAs Joint LIR (and appended LUC report) would be responded to at Deadline 2. Agreement was

Date	Form of Correspondence	Topics Discussed	Outcomes
		a particular focus on the LVIA methodology and application of significance of effect.	reached on the LVIA methodology.
Noise and Vibration			
April 2023	E-mail	Consultation was sought via email to agree upon the proposed baseline sound survey and noise impact assessment methodologies	No response was received
July 2024	E-mail	The proposed noise and vibration assessment methodology was issued to VoWHDC via email.	No response was received
10th March 2025	Virtual Meeting	During the meeting the following items were discussed with the Planning Officer as the Environmental Heal Officer (EHO) was on leave. - Agreement of the Assessment - Justification of the baseline noise environment. - Assessment of the noise and tranquillity on the PROWs	The Planning Officer was not able to confirm the position as the EHO was absent. The baseline data set issued to WODC.

Date	Form of Correspondence	Topics Discussed	Outcomes
		-	

Planning Policy

Appendix B
NPS EN-1 Compliance Table

National Policy Statement for Energy (NPS EN-1), November 2023

Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.2.1	'In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.'	The delivery of the Botley West is a very important part of ensuring the UK Government meets its legally binding net zero obligations and in meeting its goal of 70GW of solar by 2035.	
2.3.3	'Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system.'	The scale of the problem is great; the scale of the solution needs to respond accordingly. Even with the addition of 840MW of renewable energy from the Botley West project, there is still a very significant shortfall of solar projects coming forward to meet the Government's target of 70GW by 2035 (see for example ES Chapter 5, paras 5.1.19 to 5.1.22 ref **[EN010147/APP/6.3]**.	
2.3.4	'Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level ....'	See response to paragraph 2.2.1 and 2.2.3 above.	
3.2.1	'The government's objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios ....'	See response to paragraph 2.2.1 and 2.2.3 above.	
3.2.3	'It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for	The investment provided by PVDP and Solar Five Ltd, for the Botley West project is significant and necessary to increase the supply of this	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government ....'	type of Critical National Priority infrastructure.	
3.2.4	'It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types ....'	The scale of the problem is great; the scale of the solution needs to respond accordingly. Even with the addition of 840MW of renewable energy from the Botley West project, there is still a very significant shortfall of solar projects coming forward to meet the Government's target of 70GW by 2035 (see for example Chapter 5, paras 5.1.19 to 5.1.22). More renewable energy developments are required, need approval and to be implemented.	
3.2.6	**'The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.'**	Some third parties opposing the Project question its need. This statement makes clear that the need has already been demonstrated.	
3.2.7	**'In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.'**	This is noted and welcomed by the Applicant.	
3.2.8	**'The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.'**	This is noted by the Applicant. However, it is important to also note that all host authorities have declared a climate emergency and Botley West coming forward can help	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		positively address that emergency.	
3.3.12	Decentralised and community energy systems such as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the Government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives. This is because connection of large-scale, centralised electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.	Some third parties claim roof top solar can satisfy Government targets in relation to solar (70GW by 2035). However, this statement makes clear that the Government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives.	
3.3.20	'Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.'	Noted. The Botley West solar farm will perform a critical role in the delivery of net zero by 2050.	
3.3.62	'Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2	Noted. Solar is one such example of low carbon technology and therefore is CNP infrastructure (see 4.2.5 below).	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	states which energy generating technologies are low carbon and are therefore CNP infrastructure.'		
3.3.63	'Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible.'	The weight to attributed to CNP infrastructure in the planning balance is noted and welcome. The Applicant is not aware nor expects any legal impediment that would prevent a positive decision being taken by the Secretary of State in respect of the Botley West Project. The Applicant has mitigated significant adverse effects and is left with residual impacts, none of which are considered significant adverse and many of which are beneficial. In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.	
3.3.65	'There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.'	Botley West is likely to be one of the first solar NSIP's to connect to the national grid and start supplying affordable, clean and secure energy into the system. A grid connection offer has already been made to the Applicant and it expected to connect to the national grid in 2028. This is a material consideration in the planning balance.	
3.3.83	'Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.'	See response to paragraph 3.3.65 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
4.1.3	'Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.'	The presumption in favour of CNP infrastructure in the planning balance is noted and welcomed. There is no policy at local or national level that clearly indicates that permission should be refused. Whilst there is some conflict with Green Belt policy, very special circumstances exist that outweigh harm caused by inappropriateness and any other harm - see planning balance conclusion and Appendix 8 in this report. In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.	
4.1.5	'In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits • its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy'	Noted. See planning balance conclusion in this report. In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.	
4.1.7	'Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the	Noted. Please refer to the planning balance conclusion in this PSS. In the opinion of the Applicant, the planning	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development ....'	balance is overwhelmingly in favour of the Project.	
Other documents			
4.1.12	'Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.'	Noted. These are set out and assessed in this report. The Applicant considers the Project is compliant or substantially in compliance with relevant Development Plans and other policy documents.	
4.1.13	"Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded.'	Noted. This assessment is set out in this report.	
4.1.14	'The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it.'	Noted. This assessment is set out in this report.	
4.1.15	'In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.'	Noted.	
Development consent			

Paragraph	Details	Applicant Comments	Planning Authority Comments
4.1.16	'The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.'	Noted. The Applicant has devised a list of Draft Requirements which meet these tests.	
4.2.2	Ensuring the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy. The UK's strategy to increase supply of low carbon energy is dependent on deployment of renewable and nuclear power generation, alongside hydrogen and CCUS. Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale.	Botley West is likely to be one of the first solar NSIP's to connect to the national grid and start supplying affordable, clean and secure energy into the system. A grid connection offer has already been made to the Applicant. The connection date is assumed to be October 2028.	
4.2.5	'.... Low carbon infrastructure for the purposes of this policy means: • for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion and other plants that convert residual waste into energy, including combustion, provided they meet existing definitions of low carbon; and nuclear generation), as well as natural gas fired generation which is carbon capture ready • for electricity grid infrastructure, all power lines in scope of EN-5 including network	Noted. Solar farms fall within the scope of this definition.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System • for other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of "low carbon", such as hydrogen distribution, and carbon dioxide distribution • for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of "low carbon", such as interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore • Lifetime extensions of nationally significant low carbon infrastructure, and repowering of projects.'		
4.2.6	'The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all	The need case and weight to be attributed to renewable projects is noted and Botley West benefits from this support.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	assessments of energy infrastructure applications.'		
4.2.10	'Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.'	Noted. This document clarifies compliance.	
4.2.11	'Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.'	Noted. This is the approach that is taken in the Environmental Statement. Residual effects are reported in Chapter 21 of the ES, summarised in Table 22.1. These are the effects after adverse impacts have been the subject of avoidance through design and layout and/or the application of relevant and reasonable mitigation measures.	
4.2.12	'Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.'	Noted. This is the approach that is taken in the Environmental Statement.	
4.2.13	'Where residual impacts relate to HRA or MCZ sites then the Applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance.'	Noted. There are no residual impacts that relate to HRA or MCZ sites.	
4.2.15	"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely	Noted. The Applicant welcomes this consideration.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts ....'		
4.2.16	'As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.'	Noted. This is also the welcomed by the Applicant. See Planning balance and conclusion in this report.	
4.2.17	'This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: • where development within a Green Belt requires very special circumstances to justify development; • where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs. • where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and • where substantial harm to or loss of significance to heritage assets	Noted. This is welcomed by the Applicant. See also the Planning balance and conclusion in this report.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	should be exceptional or wholly exceptional'		
4.3.1	'All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.'	The Applicant has submitted an ES with the Draft DCO.	
4.3.3	'The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.'	Noted. The Environmental Statement has identified and assessed the likely significant effects on the environment. A Mitigation Measures and Commitment Schedule has also been produced [**EN010147/APP/6.5**].	
4.3.4	'To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.'	Noted. This is the approach that is taken in the Environmental Statement.	
4.3.5	'For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects	Noted. This is the approach that is taken in the Environmental Statement.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	arising from pre-construction, construction, operation and decommissioning of the project.'		
Applicant assessment			
4.3.10	'The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.'	Noted. This is the approach that is taken in the Environmental Statement.	
4.3.11	'In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case'	Noted. This is the approach taken in the ES – see in particular Chapter 4 – Methodology, and Chapter 6 – Project Description	
4.3.12	'Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.'	Noted. This is the approach that is taken in the Environmental Statement.	
4.3.15	'Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.'	Noted. This is the approach that is taken in the Environmental Statement. See also Chapter 5 – Alternatives and Chapter 6 – Project Description.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
4.3.17	'Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.'	See response to paragraph 4.3.15.	
4.3.24	'The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals'.	Noted. Notwithstanding, the Applicant has set out how they came to select the subject site, the design evolution, and has set out the Very Special Circumstances to explain why development of that part of the site within the Green Belt should be allowed.	
4.3.27	'Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.'	Noted.	
4.3.28	'Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.'	Noted. This statement may be of relevance to third parties who have sought to suggest alternative sites or approaches to development. Notwithstanding, the Applicant has set out in some detail the site and design evolution of the Project – see Chapter 5 – Alternatives, and Layout and Design Principles document **[EN010147/APP/7.7]**	
4.3.29	'It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an	Noted. The main alternative proposed by third parties during consultation has been roof mounted solar or in some cases wind turbines.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.'	The Applicant is a solar developer. Wind turbines are considered to give rise to adverse visual effects over a wide area, and unacceptable effects in terms of the setting of The Blenheim Palace World Heritage site.	
Health			
4.4.2	'The direct impacts on health may include • increased traffic • air or water pollution • dust, odour • hazardous waste and substances • noise • exposure to radiation, and • increases in pests'	Noted. Where relevant these matters are addressed in the Human Health Chapter **[EN010147/APP/6.5].**	
4.7.2	Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the	The Applicant has limited influence over design of the electrical infrastructure associated with the Project. The NGET substation will ultimately be designed and laid out to meet relevant technical, engineering and safety parameters. However, parameters have been established for the envelope within which this has been assessed (Chapter 6 – Project Description). Design approval of the solar arrays, and other electrical infrastructure will be agreed with the relevant planning	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	enhancement of the quality of the area	authority via a Requirement in the DCO.	
4.7.3	Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	NGET intends to build their substation using Gas Insulated technology rather than Air Insulated technology; this results in a substation that is smaller and quieter than would otherwise be the case, and so is better environmentally in terms of visual impact and noise effects. Siting of other noise generating equipment has been undertaken in a way to be remote from sensitive receptors and/or designed with additional mitigation measures to reduce adverse noise effects (Please also refer to Layout and Design Principles documents **[EN010147/APP/7.7]**.	
4.12.9	'In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves.'	Noted. However, the Applicant has set out a series of Mitigation Measures and Commitments [**EN010147/APP/7.6** onwards**]**, and a series of Management Plans, the purpose of which is to avoid or reduce relevant adverse environmental effects arising from the Project.	
5.11.20	'The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and if it is, whether their proposal may be inappropriate development within the meaning of Green	The Applicant has set out the VSC applicable to their Project within this Planning Supporting Statement (refer to Appendix 8) Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Belt policy (see paragraph 5.11.36 below).'		
5.11.34	'The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.'	Noted. For full details please refer to Chapter 17 – Agriculture, Landuse and PRoW. **[EN010147/APP/6.3]** Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project outweigh the impact upon BMV land.	
5.11.37	'Very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. However, when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation. Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources.'	Noted. The Applicant has set out the VSC applicable to their Project within this Planning Supporting Statement. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	

Appendix C
NPS EN-3 Compliance Table

National Policy Statement for Renewable Energy Infrastructure (NPS EN-3)

November 2023 Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
General Assessment and Technology Specific Information			
Factors influencing site selection and design			
National designations			
2.3.6	'When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.'	Noted. The location of the Project does not fall within nationally recognised designations. For compliance see Appendices B to E and Section 4.0 of this PSS. The Applicant considers the Project is in accordance or substantially in accordance with relevant Development Plans and other policy documents.	
2.3.8	'In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the	Noted. For full details please refer to Chapter 14 – Heritage **[EN010147/APP/6.3]** and section 4.3 of the PSS. In summary, the Project avoids important underground archaeology, removing development from such areas, and avoids significant adverse effects upon setting through a combination of distance and/or and screening from heritage assets, including The Blenheim Palace WHS. In respect of the latter the Applicant has produced a Heritage Impact Assessment at Appendix 14 of Chapter 9 of the ES.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	urgency of meeting the net zero target.'		
Other locational considerations			
2.3.9	'As most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments).'	The absence of any limit on need is welcomed as is the avoidance of taking a consecutive approach in the consideration the location of renewables i.e. not giving priority to previously developed land. Please also see Chapter 5 – Alternatives **[EN010147/APP/6.3]** for the explanation and rationale for the Applicants choice of site etc.	
Climate change adaption and resilience			
Solar photovoltaic			
2.4.11	'Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: • increased risk of flooding; and • impact of higher temperatures.'	Please refer to Chapter 10 - Hydrology and Chapter 15 on Climate Change. No significant adverse effects are predicted.	
Consideration of good design for energy infrastructure			
2.5.2	'Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.'	This project design evolution is described in Chapter 6, Alternatives. Please also refer to the illustrative masterplans, the Landscape, Ecology and Amenities Plan **[EN010147/APP/7.6.3]**, and in the Layout and Design Principles document [**EN010147/APP/7.7]**.	
Flexibility in the project details			

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.6.1	'Where details are still to be finalised, applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case.'	Please refer to Chapter 6 – Project Description **[EN010147/APP/6.3]** and the list of Requirements within the Draft Order, which refer to plans/measures requiring subsequent approval.	
2.6.2	"Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.'	This is the approach that has been taken in the Environmental Statement. For details, please refer to Chapter 4 of the ES, Approach to Assessment [**EN010147/APP/6.3]**	
Solar Photovoltaic Generation			
Introduction			
2.10.10	'Solar also has an important role in delivering the government's goals for greater energy independence. The British Energy Security Strategy states that government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is "co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use".'	It is acknowledged by the Applicant that there are many schemes currently in the consenting process. The largest schemes are listed on the PINs website and an analysis of their capacity and status can be found at Annex A. However, even if all of these are consented, built and connected before 2035, this would only add approximately 15.2GW to the 15.8GW of installed capacity reported in the House of Commons briefing paper from May 2024 i.e. a total potential capacity of approximately 31.0GW. This includes the potential contribution of the Project of an anticipated 840MW, and which has the benefit of a confirmed grid connection offer of October 2026 (but for ES purposes is assumed to be October 2028). At this point therefore, there is still a significant shortfall in the 70GW Government target, of approximately 39GW (see DCO Solar Capacity Calculation, Chapter 5, Alternatives, ref **[EN010147/APP/6.3]**	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		The Botley West scheme does not include battery storage; other battery storage facilities are available nearby to help balance the grid. The Botley West Project does retain and support ongoing agricultural use of the land.	
2.10.11	'The Powering Up Britain: Energy Security Plan[81] states that government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.'	See 2.10.10 for urgency to deliver solar farms and other forms of renewables and response to 2.3.9 in respect avoiding a consecutive approach to prioritising specific land use types to locate renewable energy projects. The Applicant will also retain an agricultural use of the land through conservation grazing, make available up to 30 ha of land for local food growing initiatives, and make available land for educational use (refer to Chapter 6 of the ES and the oOMP and oLEMP **[EN010147/APP/7.6.2]** and **[EN010147/APP/7.6.3]**.	
Applicant Assessment			
Factors influencing site selection and designation			
Irradiance and site topography			
2.10.19	'Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the	Irradiance has been an important, but not overriding, factor in optimising the design and layout of the Project. See also the Layout and Design Principles document **[EN010147/APP/7.7]**.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	commercial viability of the site'		
2.10.20	"In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order further to maximise the solar resource.'	See response to paragraph 2.10.19. The applicant has chosen a fixed rather than rotating scheme.	
Network Connection			
2.10.21	'Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5 ....'	The Applicant has been in ongoing discussion with National Grid (NGET) and has the benefit of a grid connection offer from NGET (assumed connection date October 2028). The Applicant has included a new NGET substation within the Order Limits as part of its Draft DCO. See also Chapter 6 for approach to assessment of the NGET substation **[EN010147/APP/6.3]**.	
2.10.23	'Larger developments may seek connection to the transmission network if there is available network capacity and/or supportive infrastructure.'	Noted – see above.	
2.10.24	'In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.'	Noted. The Applicants' site selection process has been influenced by network capacity leading them to the Project Site (refer to Chapter 5, Alternatives). The current illustrative layout shows the NGET substation within the Order limits and the customer substation adjacent.	
2.10.25	'To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.'	The approach to connection is set out in the ES Chapter 6, and the Applicant already benefits from a Grid Connection offer from NGET. Availability of a suitable connection point has influenced the Project site location (see Chapter 5, Alternatives).	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.10.26	“Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.’	The Applicant has undertaken a cumulative impact assessment should the proposed location of the NGET substation be moved to an adjacent site. In this scenario the Applicant assumes its own infrastructure will replace the current NGET site.	
Proximity of a site to dwellings			
2.10.27	‘Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections below’	Noted. Recognising that landscape and visual effects are one of the main environmental effects arising from solar farms, the Applicant has adopted a landscape led approach to the design and layout of the Project. Retention and enhancement of the existing landscape character has been one of the central features of the Project (See Landscape and Visual Resources chapter **[EN010147/APP/6.3]** and Layout and Design Principles Document [**EN010147/APP/7.7]**.	
Agriculture land classification and land type			
2.10.28	‘Solar is a highly flexible technology and as such can be deployed on a wide variety of land types’	It is also noted that solar is a CNP, and currently deployment of solar is significantly short of the Government's target of 70GW by 2035 (see for example ES Chapter 5, paras 5.1.19 to 5.1.22 **[EN010147/APP/6.4]**	
2.10.29	‘While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most	Then Applicant has explained its rational for the selection of the subject site (see Chapter 5 of the ES. Effects upon soils/BMV are considered in detail in Chapter 17– Agriculture, Landuse Soils and PROW **[EN010147/APP/6.3].** No significant adverse effects are predicted. Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Versatile" agricultural land where possible. 'Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification'	outweigh the impact upon BMV land.	
2.10.30	'Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92 and 2.10.107 – 2.10.126.'	All these impacts are considered within relevant chapters within the ES and at section 4.3 of this PSS. No significant adverse effects are predicted.	
2.10.31	'It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.'	Then Applicant has explained its rational for the selection of the subject site (See Chapter 5 – Alternatives **[EN010147/APP/6.3]**.	
2.10.32	'Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use.'	The Applicant does propose continued agricultural use – see Chapter 6 – Project Description **[EN010147/APP/6.3]**.	
2.10.33	'The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current,	Soil sampling has been undertaken and has informed the Soil Management Plan and other management plans **[EN010147/APP/7.6.1]**.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.'		
2.10.34	'Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030.'	The Applicant has produced a Soils Management Plan **[EN010147/APP/7.6.1]**	
Accessibility			
2.10.35	'Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.'	The Applicant has defined and assessed the use of relevant links on the public highway during construction and operation. Full details are contained with Chapter 12– Highways. **[EN010147/APP/6.3]**. No significant effects are predicted.	
2.10.36	'Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting.'	See response to paragraph 2.10.35 above.	
2.10.37	'Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.'	Internal maintenance roads are shown on the illustrative masterplans (see Figure 2.1a to 2.3 inclusive **[EN010147/APP/7.6.4]**. New pedestrian access routes are shown on the Landscape, Ecology and Amenities Plan	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		[EN010147/APP/6.3]. No significant earthworks are envisaged – of note, however, is a new water storage feature proposed north of Cassington, in order to reduce the effects of flooding that the village currently experiences intermittently. New earth bunds are also proposed in the same location to further assist in diverting water away from the village.	
2.10.38	'In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.'	Four new vehicular access points have been designed to serve the four construction compound areas **[EN010147/APP/7.3.1 and 7.3.6]**. The Applicant has used existing field accesses into the Project site where possible; this will also assist in the continued agricultural use of the site.	
2.10.39	'Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	This is the approach taken within the ES.	
Public rights of ways			
2.10.41	"Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.'	The Applicant has considered the effect of the Project upon existing rights of way (Please refer to Chapter 17– Agriculture, Land Use and PRoW and Health Chapter 16 **[EN010147/APP/6.3]**). Some adverse effects are predicted in the short term only.	
2.10.42	'Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.'	This is the approach taken with the proposed development. PRoW diversions are proposed in four locations – see Chapter 16). New pedestrian access routes have also been created to increase access to this part of the countryside. A new permissive path was proposed by the Applicant	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		during the consultation exercises along the route of the Evenlode. No third party expressed a wish for this to be delivered and so is not included in the Applicants submission.	
2.10.43	'Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.'	The layout of the solar installation, the height of the solar arrays (reduced height post the PEIR), combined with existing and new landscaping has, in combination, led to the avoidance or minimisation of adverse visual impacts of the Project upon sensitive receptors.	
2.10.44	Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.'	This is the approach taken with the Project. Existing rights of way have been retained and proposed to be enhanced. The Applicant has also consulted upon and now incorporated the provision of new pedestrian access routes (refer to Landscape, Ecology and Amenities Plan **[EN010147/APP/7.3.3]**).	
2.10.45	''Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.'	The Applicant has produced an outline Public Rights of Way Management Plan within the outline Code of Construction Practice and Operational Management plan **[EN010147/APP/7.6.1]**.	
Security and lighting			
2.10.46	'Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the	The Applicant is proposing lighting and security cameras and fencing. See Chapter 6, Table 6.3 **[EN010147/APP/6.3]**	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	measures proposed on a site-specific basis.'		
Technical Considerations			
Capacity of a site			
2.10.53	'From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.'	The total installed capacity is approximately 936,000 kVA Total apparent power in AC).	
2.10.55	"The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays."	The Applicant has assumed some degradation of the panels over time, and replacement as necessary. Details are contained in Chapter 14 – Climate Change and in Chapter 12 Transport **[EN010147/APP/6.3]**.	
2.10.56	'AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to set the maximum extent of development when determining the planning impacts of an application.'	In table 6.3 of Chapter 6, the Applicant assumes a range for the following: total installation areas for the solar arrays; an indicative range for the number of solar modules; and an indicative dimension of the PV modules.	
2.10.58	"In particular, any permissions granted on the basis of a DC installed generating capacity should be built on that basis, unless an amendment is made to that permission and the difference in impacts is considered.	The Applicant does not wish to consent to be controlled by limitation to its generation capacity. Instead, as with other solar DCO consents (e.g. Mallard Pass, Gate Burton and Cottam), it wishes to secure consent by reference to when decommissioning is to start. As such Requirement 15 of the draft Order states that	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.	
Site layout design, and appearance			
2.10.59	'Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.'	See NPS EN-1 table above and section 4.7.2 and 4.7.3 within that table.	
2.10.60	As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use, and ability to mitigate environmental impacts and flood risk.'	See Chapter 5 – Alternatives, and the Layout and Design Principles Document **[EN010147/APP/7.7]**, where the approach to site selection and layout and design refinement and control is set out.	
2.10.61	'For a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.'	The Applicant has continued to refine the layout of the solar installation having regard to power output, engineering, and planning and environmental considerations. The illustrative layout can be found in Figures 2.1 to 2.3 inclusive **[EN010147/APP/6.4]**	
2.10.62	'In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen. For example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread more evenly throughout the day.	The Applicant has continued to refine the layout of the solar installation having regard to power output, engineering, and planning and environmental considerations. The illustrative layout can be found in Figures 2.1 to 2.3 inclusive **[EN010147/APP/6.4]** and the description of the design evolution is contained in Chapter 5 of the ES **[EN010147/APP/6.3]**	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.10.63	'It is likely that underground and overhead cabling will be required to connect the electrical assets of the site, such as from the substation to the panel arrays or storage facilities.'	No overhead cabling is proposed by the Applicant. However, where cabling crosses important archaeology, cables will be laid on the surface of avoid damage to the heritage asset.	
2.10.64	'In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.'	The Applicant has produced a report which provides details of cable laying methods, Volume 3, Appendix 6.2 **[EN010147/APP/6.7]**. An oOMP is also produced which describes the proposed operation and maintenance regime **[EN010147/APP/7.6.2]**.	
Project lifetime			
2.10.65	'Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.'	The Applicant wishes to secure consent by reference to when decommissioning is to start. As such Requirement 15 of the draft Order states that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.	
2.10.66	'Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.'	The Applicant seeks a temporary consent primarily because much of the site is within the Oxfordshire Green Belt. The Applicant considers it important to allow the Project to generate much needed renewable energy but for the Green Belt to continue to perform its function in the longer term for planning purposes. The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. Notwithstanding, paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	
2.10.67	Solar panel efficiency deteriorates over time and applicants may elect to	The Applicant is assuming that replacement panels will be required over time and has	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	replace panels during the lifetime of the site.'	allowed for this eventuality – Appendix 14.2 **[EN010147/APP/6.5]**.	
Decommissioning			
2.10.68	'Solar panels can be decommissioned relatively easily and cheaply. The nature and extent of decommissioning of a site can vary. Generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue.'	The Applicant describes its decommissioning proposals in Chapter 6 and in the Decommissioning Plan (see ref **[EN010147/APP/7.6.4]**). See also the Applicant's response to 2.10.66 above.	
2.10.69	'Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation.'	The Applicant describes its decommissioning proposals in Chapter 6 and in the Decommissioning Plan **[EN010147/APP/7.6.4]**. Some of the key benefits of the Project is not only the renewable energy it will produce, but the considerable enhancement it will make to the landscape with the very significant new planting proposed, but also the biodiversity gain it will achieve, increased public access and educational benefits.	
Flexibility in the project details			
2.10.70	'In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: • the type, number and dimensions of the panels; • layout and spacing; • the type of inverter or transformer; and	Details of the project parameters are set out in Chapter 6 of the ES and the Layout and Design Principles document **[EN010147/APP/7.7]** which set out control and delivery measures.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	• whether storage will be installed (with the option to install further panels as a substitute).'		
2.10.71	'Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.'	Details of the project parameters are set out in Chapter 3 and 6 of the ES.	
2.10.72	'Guidance on how applicants should manage flexibility is set out at Section 2.6 of this NPS.'	Details of the project parameters are set out in Chapter 3 and 6 of the ES.	
Impacts			
Biodiversity, ecological, geological conservation and water management			
2.10.76	'The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.'	Details of the ecology assessment, impacts and mitigation are contained within Chapter 9 of the ES and in the Mitigation and Commitments schedule **[EN010147/APP/6.5]**.	
2.10.77	'Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.'	Relevant surveys have been undertaken.	
2.10.78	'The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.'	The Applicants has employed experienced and competent ecologists to advise on the scheme, and secure substantial BNG. In particular, Mr Guy Parker of Wychwood Ecology Ltd has worked with RPS's ecologists to bring his expertise to bear on the delivery of the BNG and management of the site based upon his recent experience with the Southill Solar Farm in Oxfordshire and Boxsted Solar Farm in Essex. Dr Peter Shepherd of BSG ecology has also been employed to bring his knowledge and expertise in respect of bat populations that exist in and around the Project Site.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.10.79	'The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should specify mitigation to avoid or minimise these impacts, and any further surveys required.'	Details of the ecology assessment, impacts and mitigation are contained within Chapter 9 of the ES and in the Mitigation and Commitments schedule Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**.	
2.10.80	'Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.'	A Soils Management Plan has been produced and describes how soils will be managed **[EN010147/APP/7.6.1]**.	
2.10.81	'Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at paragraphs 2.10.33 and 2.10.34.'	A Soils Management Plan has been produced and describes how soils will be managed **[EN010147/APP/7.6.1]**.	
2.10.82	'Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.'	The Applicant has considered this and lighting type, location and use will be controlled in the oCMP, the oLEMP and reflected in the Mitigation and Commitments Schedule [**EN010147/APP/6.5]**.	
2.10.83	'Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction and design of any fencing should account	Hedgerow removal has been minimised and where removal is proposed surveys have been undertaken to describe associated impacts and effects. Substantial hedgerow planting is proposed, and the Layout and Design Principles document **[EN010147/APP/7.7]** references the control measures to be adopted by the Project including the buffers	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	for enabling mammal, reptile and other fauna access into the site if required to do so in the ecological report.'	proposed throughout the site. The oLEMP also describes how fencing will allow for access for mammal, reptile and other fauna.	
2.10.84	'Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.'	This is included in ES Volume 3 Appendix 10.1: Flood Risk Assessment **[EN010147/APP/6.5]**.	
2.10.85	'Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches, should be used to control any run-off where recommended.'	Access tracks are proposed and where surfacing is proposed, that will be permeable avoiding or minimising effects on surface water run-off. Any access tracks located within Flood Zone 1, 2 and 3 have been subjected to the sequential test and exception test. Where required, appropriate mitigation measures are outlined within Volume 3, Appendix 10.1: Flood risk assessment [EN010147/APP/6.5].	
2.10.86	'Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.'	The conceptual drainage strategy is presented within Appendix 10.2: Conceptual Drainage Strategy [EN010147/APP/6.5] and has been developed in accordance with 2023 NPS, NPPF, PPG ID7 the SuDS Manual and local council policy. The Conceptual drainage strategy considers existing and proposed runoff rates, the hierarchy of drainage and how SuDS can be incorporated within the proposed design.	
2.10.87	'Culverting existing watercourses/drainage ditches should be avoided.'	Culverting is not proposed by the Applicant	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.10.88	'Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.'	Culverting is not proposed by the Applicant	
2.10.89	'Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged.'	Substantial BNG is planned for the Project site – Volume 3, Appendix 9.13 **[EN010147/APP/7.6.3]** The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. The oLEMP **[EN010147/APP/7.6.3]** will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.	
2.10.90	'For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.'	The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. The oLEMP **[EN010147/APP/7.6.3]** will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.	
2.10.92	'Applicants should consider whether they need to provide geotechnical and hydrological information (such as identifying the presence of peat at each site) including the risk of landslide connected to any development work.'	Ground conditions are described in Chapter 11 of the ES and soil types are also described in Chapter 11 and 17. No peat is present. Hydrological information is contained in Chapter 10 **[EN010147/APP/6.3]**	
Landscape, visual and residential amenity			
2.10.94	'The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be	Chapter 8 describes the ZTV of the Project. **[EN010147/APP/6.3]**	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.'		
2.10.95	'However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised.'	As the design and layout of the Project evolved refinements included removing solar arrays on more exposed high ground and lowering of the panel heights have assisted in reducing the visual effects of the Project. This combined with the management of the exiting landscape structure (e.g. allowing existing hedgerow to grow up to a height to screen development) and the substantial new planting proposed is designed to provide effective screening from year 5 and beyond (see Landscape and Visual Chapter 8).	
2.10.96	'Landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre-application process.'	Notwithstanding that the Project does not fall within any National Landscape, one of the key priorities in the course of the evolution of the design and layout of the Project has been to prioritise, where possible, a landscape led approach to the development. As a result, maximum use has been made of existing landscape features when siting development, substantial new planting is proposed, and development has been stripped back from higher ground all in order to avoid or minimise adverse impacts in visual and character terms.	
2.10.97	'Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any	The landscape and heritage consultant have worked together to avoid or minimise significant adverse effects upon heritage assets and other sensitive receptors. Representative viewpoints have been chosen and photomontages produced to	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	nearby residential areas or viewpoints.'	describe visual effects of the development (refer to Chapter 7 and 8 **[EN010147/APP/6.3]).**	
2.10.98	'Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.'	See response above to paragraphs 2.10.96, 2.10.97 and section 4.3 of this PSS.	
2.10.99	'Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact..'	The Applicant, where possible, has placed fencing behind existing or proposed planting in order avoid to reduce adverse visual effects of fencing and other security measures.	
2.10.100	'`The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.'	The Applicant has adopted a landscape led approach to the layout and design of the Project, maximising the use of existing landscape features (hedgerows, trees and woodland) when siting development, imposing appropriate buffer distances to protect existing features, proposing substantial new planting in key areas, and stripping development back from higher ground, all in order to avoid or minimise adverse impacts in visual and character terms. Individual veteran trees have also been identified and protected throughout the Project Site.	
2.10.101	'The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate.'	The Applicant has retained the vast majority of existing landscape features throughout the Project Site, with only limited hedgerow removal. Hedgerow surveys have been undertaken and effects reported within the Ecology and Landscape Chapters 9 and 8 of the ES **[EN010147/APP/6.3].**	

Paragraph	Details	Applicant Comments	Planning Authority Comments
Glint and glare			
2.10.102	'Solar panels are specifically designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun's rays at certain angles, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.'	The Applicant has undertaken a Glint and Glare assessment. Mitigation measures adopted and no residual adverse effects are predicted – Volume 3, Appendix 4.4 **[EN010147/APP/6.5]**	
Cultural Heritage			
2.10.107	'The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.'	The Applicant has assessed above and below ground heritage assets including potential effects upon The Blenheim Palace World Heritage Site (WHS) - see Volume 3, Appendix 7.4 **[EN010147/APP/6.3 and 6.5]**. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.	
2.10.109	'Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.'	The Applicant has agreed a WSI with the County Archaeologist **[EN010147/APP/7.6.5]**. This includes an agreed approach of protection of underground archaeology. Positive effects are predicted as the Applicant has removed development from all identified areas of potential archaeological significance i.e. a no dig approach. In addition, where cabling crosses important areas of underground	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		archaeology, cables will be laid on the surface to avoid damaging the asset.	
2.10.110	'Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.'	See above response to 2.10.109.	
2.10.112	'Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	The applicant has undertaken a desk top exercise, examining all relevant records relevant to the site, examined photographic records and undertaken extensive geophysical surveys of the site. Trial trenching is also underway, with the results of this being reported shortly after submission of the DCO in agreement with the County Archaeologist and Historic England. **[EN010147/APP/7.6.5]**	
2.10.113	'Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.'	See response to 2.10.122 above. Setting of heritage assets has also been considered by the Applicant and appropriately protected by reason of distance from the receptor and/or screening. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.	
2.10.114	'In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the	The approach to identification, evaluation and protection of heritage assets has been agreed with the County Archaeologist **[EN010147/APP/7.6.5]**. The	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.'	Applicant continues to work with HE in respect of the HIA study which addresses effect upon The Blenheim Palace World Heritage Site see Volume 3, Appendix 7.4 **[EN010147/APP/6.5]**. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.	
2.10.115	'The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area.'	The approach to identification, evaluation and protection of underground heritage assets has been agreed with the County Archaeologist **[EN010147/APP/7.6.5]**.	
2.10.116	'Applicants should take account of the results of historic environment assessments in their design proposal.'	The Applicant has removed development away from areas identified as having potential archaeological importance. Setting of heritage assets has also been considered by the Applicant and appropriately protected by reason of distance from the receptor and/or with the introduction of landscape screening. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.	
2.10.117	"Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.'	See response to paragraph 2.10.116 above. A WSI has also been agreed with the County Archaeologist see Volume 3, Appendix 7.4 **[EN010147/APP/7.6.5]**.	
2.10.118	'As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale,	The Applicant has removed development away from areas identified as having potential archaeological importance. Setting of heritage assets has also been considered by the Applicant and appropriately protected by reason of distance from the	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	design, and prominence, may cause substantial harm to the significance of the asset.'	receptor and/or with the introduction of landscape screening. The Applicant continues to work with HE in respect of the HIA study which addresses the potential effect upon The Blenheim Palace World Heritage Site **[EN010147/APP/7.6.5]**. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.	
2.10.119	'Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.'	Visualisations and cross sections have been produced by the Applicant in the HIA report **[EN010147/APP/7.6.5]**.	
Construction including traffic and transport noise and vibration			
2.10.120	'Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the delivery and assemblage of the necessary components.	The Applicant has given detailed consideration to vehicular access requirements for construction and operation. In particular, the general approach for construction is to deliver all materials into the four main Construction Compound sites as identified on the Temporary Facilities pan **[EN010147/APP/7.6.5]**, from which materials will be distributed as necessary throughout the wider site. Detailed consideration has also been paid to the design and layout of the accesses proposed to serve these compound areas and these details are shown at Figures **[EN010147/APP/7.3.1]**.	
2.10.121	'Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farms will derive mainly from the effects of traffic movements, which is likely to involve smaller vehicles than typical onshore energy	An assessment of the traffic and transportation effects of the development is reported in Chapter 12 of the ES. This chapter sets out the assumptions on which the assessment is based including the delivery routes to be used during the construction phase. No significant adverse effects are predicted.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	infrastructure but may be more voluminous.'		
2.10.123	'Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application and select the route that is the most appropriate.'	See response to paragraph 2.10.121 above.	
2.10.124	'Where the exact location of the source of construction materials, such as crushed stone or concrete is not be known at the time of the application, applicants should assess the worst-case impact of additional vehicles on the likely potential routes.'	See response to paragraph 2.10.121 above	
2.10.125	'Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES.'	See Applicants' response to paragraph 2.10.121 above. The Works Plans and schedules within the draft DCO describe the works required for access purposes **[EN010147/APP/2.3]**	
2.10.126	"Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local	The Applicant has undertaken a cumulative effects assessment with other relevant development – Chapter 20 [**EN010147/APP/6.3**]. No significant effects are predicted.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	highways authorities is likely to be necessary.'		
Secretary of State decision making			
Factors influencing site selection and design			
Agriculture land classification and land type			
2.10.145	'The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.'	The assessment of effects in respect of BMV is set out in Chapter 8 of the ES and section 4.3 of this PSS. A Soil Management Plan is proposed **[EN010147/APP/7.6.1]**. Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project outweigh the impact upon BMV land.	
Technical Considerations			
Project lifetime and decommissioning			
2.10.146	'The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable ...'	The Applicant has provided an outline Decommissioning Plan as part of the ES and DCO **[EN010147/APP/7.6.4]**.	
2.10.147	'Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity.'	The Applicant does not wish to consent to be controlled by limitation to its generation capacity. Instead, as with other solar DCO consents (e.g. Mallard Pass, Gate Burton and Cottam), it wishes to secure consent by reference to when decommissioning is to start. As such Requirement 15 of the draft Order states that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.	
2.10.148	'Such a requirement should also secure the	The Applicant has prepared a Decommissioning Plan which is	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life.'	secured by Requirement **[EN010147/APP/7.6.4]**.	
2.10.149	'An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.'	The Applicant seeks a temporary consent for the development – see response to paragraph 2.10.147 above.	
2.10.150	'The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.'	The Applicant seeks a temporary consent for the development – see response to paragraph 2.10.147 above.	
2.10.151	'The Secretary of State should consider the period of time the applicant is seeking to operate the generating station, as well as the extent to which the site will return to its original state, when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.'	Noted. The Applicant considers these effects within relevant chapters of the ES, and in the conclusion on the planning balance at section 4.0 of this PSS.	
Impacts			
2.10.152	'The impacts identified in Part 5 of EN-1 and below, are not intended to be exhaustive.'	Noted.	
2.10.153	'The Secretary of State should consider any impacts which it determines are relevant and important to its decision.'	Noted. The Applicant believes it has assessed all relevant impacts to allow a decision to be made.	
Biodiversity, ecological, geological conservation and water management			
2.10.154	'Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved	The Applicant has sought to optimise the environmental advantages of the development, and incorporates significant BNG and this, together with other environmental	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.'	improvements, are set out in the oLEMP. Of note is the ability of the Applicant to manage the Evenlode corridor to bring that area into a more favourable conservation status, and the proposal to create a water attenuation feature and associated bunding designed to avoid or reduce flooding that has historically occurred in the village of Cassington.	
2.10.155	'The Secretary of State must consider the worst-case effects in its consideration of the application and consent.' '	The Applicant has assessed the likely worst case effects arising from the development (see Chapter 4 of the ES, Approach to Assessment).	
2.10.156	Where developments are proposed on peat, to ensure the development will result in minimal disruption to the ecology, or release of CO2, and that the carbon balance savings of the scheme are maximised, the Secretary of State should be satisfied that the solar farm layout and construction methods have been designed to minimise soil disturbance during construction and maintenance of roads, tracks, and other infrastructure and in England should take into account the policies set out in the England Peat Action Plan 2021 ....'	No peat is present on the Project Site.	
Landscape, visual and residential amenity			
2.10.157	'The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks,	Adverse landscape and visual effects of the development have been avoided or minimised as a result of continuous refinements to the Project layout and design. Relevant environmental effects and mitigation measures are set out with the Landscape and Visual Effects Chapter of the ES, in the Layout and Design Principles Document **[EN010147/APP/7.7]**, and in the Mitigations and	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	The Broads and Areas of Outstanding Beauty) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.'	Commitment Schedule **[EN010147/APP/6.5]**. Whilst some short term some adverse effects are predicted during construction and in Year 1 in winter, these effects diminish and are avoided after year 5. Overall, the site is capable of absorbing the development without giving rise to unacceptable adverse effects. The effects of the solar farm are temporary and reversible and will ultimately lead to a significant biodiversity and landscape enhancement of the area.	
Glint and glare			
2.10.158	'Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).'	The Applicant has undertaken a Glint and Glare Assessment and no significant adverse effects have been found – Volume 3, Appendix 4.4 **[EN010147/APP/7.6.5]**.	
2.10.159	'Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms.'	See response to paragraph 2.10.158 above.	
Cultural Heritage			
2.10.60	'Solar farms are generally consented on the basis that	The Applicant seeks a temporary consent and reports	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.'	upon relevant effects within all topic chapters in the ES (e.g. Chapter 7, Historic Environment [**EN010147/APP/6.3**]). No adverse effects are predicted, and some beneficial effects are expected.	
Construction including traffic and transport noise and vibration			
2.10.161	'Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.'	The assumptions underpinning the Traffic and Transportation effects are set out within Chapter 12 **[EN010147/APP/6.3]** of the ES and relevant appendices within Volume 3, Appendix 12 **[EN010147/APP/6.5]**	
2.10.162	'The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.'	In respect of traffic and transportation effects there will be no significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases.	

Appendix D
NPS EN-5 Compliance Table

National Policy Statement for Electricity Works Infrastructure (NPS EN-5)

Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
Assessment and Technology-Specific Information			
Introduction			
2.1.4	'Decommissioning of electricity networks is not specifically covered in this NPS. Generally, nationally significant electricity networks are likely to have an ongoing function, but will be subject to maintenance, reinforcement works and for assets to be replaced when they come to the end of their lifespan.'	Noted. The Applicant has prepared a Decommissioning Plan for the Project **[EN010147/APP/7.6.4]**. It assumes that the NGET substation will remain in situ once consented and commissioned.	
2.1.5	'As stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure ....'	Noted. The Applicant is proposing associated electrical infrastructure to enable connection to the NGET substation; this infrastructure will attract CNP status in policy terms.	
Factors influencing site selection and design			
2.2.1	'The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.'	In the case of the Botley West solar farm, the Applicant intends to secure consent for a new NGET substation within its Order Limits. The subsequent consent will be transferred to NGET to build out and commission **[EN010147/APP/3.1]**.	
2.2.2	'Siting is determined by: • the location of new generating stations or other	NGET have chosen to develop and commission a new 400kV substation to serve the Botley West solar farm and other renewable	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	infrastructure requiring connection to the network, and/or • system capacity and resilience requirements determined by the Electricity System Operator.'	generation developments emerging nearby. The location is assumed to be within the Applicants Order Limits within its Southern Site area. The Applicant is aware however, that NGET is also pursuing the possibility of securing consent for its new substation on land immediately to the west of the Applicants Southern Site. or possibly immediately to the west, both being in close proximity of the existing 400kV overhead line. The approach to assessment of the NGET substation is set out in Chapter 6 of the ES. In the event that NGET delivered on land to the west, the Applicant has assessed that scenario cumulatively. Siting of the NGET substation was influential in the selection of the Project Site.	
2.2.3	'These twin constraints, coupled with the government's legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries[7] and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date.'	This is noted and understood by the Applicant.	
2.2.4	'However, a strategic and holistic approach to onshore and offshore network planning, as set out in paragraphs 2.7 – 2.8, will identify the most efficient way of meeting decarbonisation targets and should reduce the	This is noted by the Applicant, but the NGET 400kV substation is CNP infrastructure and is vital to deliver the Botley West Project as well as other energy generating and storage scheme nearby.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	overall amount of network infrastructure required.'		
2.2.5	'Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone.'	The availability and provision of the new NGET substation was one of a number of factors that influenced the Applicants' site selection (see Chapter 5, Alternatives). The provision of the connecting electrical cables largely follow the public highway. There are four locations where alternative cable routes are possible and being evaluated (see Chapter 5 and 6 in the ES for details).	
2.2.6	'Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in sections 2.4-2.9.'	The site selection and cable route choice and influences upon both are described in detail in Chapter 5 and 6 of the ES.	
2.2.7	'The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.'	The site selection and cable route choice and influences upon both are described in detail in Chapter 5 and 6 of the ES.	
2.2.8	'There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.'	The siting of the Applicants electrical infrastructure has sought to avoid or minimise any adverse effects, including from visual or from a noise perspective. Design of above ground infrastructure will be the subject of approval from the relevant local planning authority.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.2.9	'In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)'	Relevant mitigation measures are described in the Mitigation and Commitments Schedule – Volume,3 Appendix 6.1 **[EN010147/APP/6.5]**.	
2.2.10	'As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."'	The Applicant has taken into account the duties associated with Schedule 9 of the Electricity Act 1989.	
2.2.12	'Transmission and distribution licence holders are also required under	The Applicant has produced a statement to address Schedule 9 of the Electricity	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Schedule 9 to the Electricity Act 1989 to produce and publish a statement setting out how they propose to perform this duty generally.'	Act 1989 **[EN010147/APP/1.1]**.	
Climate Change Adaption and Resilience			
2.3.2	'As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables	Climate change effects are assessed with the Climate Change Chapter no.14 within the ES. **[EN010147/APP/6.3]**.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	and their associated substations in the inshore and coastal locations respectively.'		
2.33	'Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Sections 5.8 in EN-1). Consideration should also be given to coastal change (see sections 5.6 in EN1).'	Climate change effects are assessed with the Climate Change Chapter no.14 within the ES. **[EN010147/APP/6.3]**.	
Consideration of good design for energy infrastructure			
2.4.3	'However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.'	Subject to safety and engineering requirements, the design of above ground electrical infrastructure will be the subject of detail approval by the relevant planning authority via Requirements in the DCO.	
2.4.4.	'While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Sections 2.9 below) – the functional	Noted. See Applicant response to 2.4.3 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.'		
Environmental and Biodiversity Net Gain			
2.5.1	'When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.'	The Applicant has achieved significant BNG (refer to oLEMP and BNG Report at **[EN010147/APP/7.6.3]** and Volume 3, Appendix 9.13 **[EN010147/APP/6.5]**, and is able to deliver other benefits including increased public access to the site (refer to Landscape, Ecology and Amenities Plan, **[EN010147/APP/7.3.3]**).	
Land Rights and Land Interests			
2.6.1	'In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or	Land ownership and rights are reported within the Book of reference **[EN010147/APP/4.3]**	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	enhancement schemes, applicants must: i. own the land on, over, or under which the relevant activity is to take place; or ii. hold sufficient rights over or interests in that land (typically in the form of an easement); or iii. have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave).'		
2.6.2	'Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work.'	Voluntary agreements have been sought throughout the Project area. For details on see Book of reference **[EN010147/APP/4.3]** and Land and Rights Negotiations Tracker **[EN010147/APP/3.6]**	
2.6.3	'As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO.'	Voluntary agreements have been sought throughout the Project area. For details on see Book of reference **[EN010147/APP/4.3]** and Land and Rights Negotiations Tracker **[EN010147/APP/3.6].** Compulsory powers sought are set out in the draft DCO **[EN010147/APP/3.1]**	
2.6.5	'The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.'	The compulsory powers sought are set out in the draft DCO **[EN010147/APP/3.1]**	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.6.6	As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance	The compulsory powers sought are set out in the draft DCO **[EN010147/APP/3.1]**	
Applicant Assessment			
Biodiversity and Geological Conservation			
2.9.3	'Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure.'	No overhead lines are proposed by the Applicant. The NGET substation has been deliberately sited close to the existing 400kV line to reduce costs of connection to the national grid network and limit any adverse visual or other effects that might otherwise arise if the overhead connection was required.	
2.9.6	'Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the	The Applicant has considered impacts upon feeding and hunting grounds, migration corridors and breeding grounds where relevant within Chapter 9 of the ES. **[EN010147/APP/6.3]**	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	'national site network' provisions of the Conservation of Habitats and Species Regulations.'		
Landscape and Visual Impact			
2.9.7	'While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.'	See response to paragraph 2.9.3 above. No overhead lines are proposed by the Applicant. The landscape and visual effects of the substations and other development are assessed with Chapter 8 in the ES. **[EN010147/APP/6.3]**	
2.9.8	'These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed.'	See Applicants response to paragraph 2.9.7 above.	
2.9.9	'New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.'	See Applicants response to paragraph 2.9.7 above.	
2.9.10	'Cumulative adverse landscape, seascape and visual impacts may arise where new	See Applicants response to paragraph 2.9.7 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.'		
2.9.11	'Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines.'	See Applicants response to paragraph 2.9.7 above.	
2.9.12	'However, in nationally designated landscapes (for instance, National Parks, The Broads and Areas of Outstanding Natural Beauty) even residual impacts may well make an overhead line proposal unacceptable in planning terms. (See Section 2.9.20 below for guidance on this case.)'	The Project is not located within any nationally designated landscape.	
2.9.13	'Where possible, applicants should ensure that the principles detailed in Sections 2.11.16-2.11.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also offer proposals (for	See Applicants response to paragraph 2.9.7 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	instance those detailed in Section 2.10 below) for additional mitigation.'		
Undergrounding and subsea cables			
2.9.20	'Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty).'	Noted. All cables are laid underground or, in limited areas, on the surface where significant archaeology has been identified. As a result no significant adverse visual or other environmental effects are predicted.	
2.9.21	'In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by re-routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line.'	See Applicants response to paragraph 2.9.20.	
2.9.22	'However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes	See Applicants response to paragraph 2.9.20.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme.'		
2.9.23	'Additionally, cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling.'	See Applicants response to paragraph 2.9.20.	
2.9.24	'In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against: • the adverse implications of the overhead line proposal; • the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and • the cost and feasibility of the reconfiguration, rationalisation,	Noted. See Applicants response to paragraph 2.9.20.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure.'		
2.9.25	In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider: • the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the	Noted. See Applicants response to paragraph 2.9.20.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	setting of designated features and areas), noting the policy in EN-1 section 5.4.53 on regional and local designations; • the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating; • the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating); • the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection		

Paragraph	Details	Applicant Comments	Planning Authority Comments
	can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment; • the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline		

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.'		
2.9.25	In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider: • the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and	Noted. See Applicants response to paragraph 2.9.20.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 section 5.4.53 on regional and local designations; • the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating; • the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would		

Paragraph	Details	Applicant Comments	Planning Authority Comments
	an overhead line of equivalent rating); • the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment; • the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land,		

Paragraph	Details	Applicant Comments	Planning Authority Comments
	including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.'		
Noise and Vibration			
2.9.26	'All high voltage transmission lines have the potential to generate noise under certain conditions.'	Noise and vibration are assessed where relevant within the Chapter 13, Noise and Vibration. No significant adverse effects are predicted to arise. Mitigation measures are set out within the Mitigation and Commitments schedule – Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**	
2.9.27	'Line noise is most commonly caused by corona noise when the conductor surface electric stress exceeds the inception level for corona discharge activity which is released as acoustic energy and radiates into the air as sound. Transmission line conductors are normally	See Applicant response to paragraph 2.9.26 above.	.

Paragraph	Details	Applicant Comments	Planning Authority Comments
	designed to operate below this threshold.'		
2.9.28	'Surface contamination on a conductor or accidental damage during transport or installation can cause local enhancement of electric stress and initiate discharge activity leading to the generation of additional noise.'	See Applicant response to paragraph 2.9.26 above.	
2.9.34	'Transmission line audible noise is generally categorised as 'crackle' or 'hum', according to its tonal content.'	See Applicant response to paragraph 2.9.26 above.	
2.9.37	'Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.'	See Applicant response to paragraph 2.9.26 above.	
2.9.38	'Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).'	See Applicant response to paragraph 2.9.26 above.	
2.9.39	'For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards[25] are satisfactory.'	See Applicant response to paragraph 2.9.26 above.	
2.9.40	"For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and	See Applicant response to paragraph 2.9.26 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	wet weather conditions, in addition to assessing the impact on noise-sensitive receptors.'		
Electric and Magnetic Fields (EMFs)			
2.9.44 to 2.9.58	Health effects of EMF's'	Chapter 16: Human Health in Volume 1 of the ES **[EN010147/APP/6.3]** considers public understanding of EMF exposure in terms of mental health outcomes associated with concern, acknowledging that actual risks are unlikely to be significant for public health (see section 16.9 of the Chapter).	
Sulphur Hexafluoride			
2.9.59	'Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.'	Noted	
2.9.60	'It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050.'	Noted	
2.9.61	'Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.'	The Applicant will seek to avoid the use of SF6-reliant assets.	.
Secretary of State decision making			
Impacts Biodiversity and Geological conservation			
2.11.1	'Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied	The Applicant has assessed the effects upon flora and fauna arising from electrical infrastructure within Chapter 9, Ecology. **[EN010147/APP/6.3]** No	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	that all feasible options for mitigation have been considered and evaluated appropriately.'	significant adverse effects are predicted to arise.	
Landscape and Visual			
2.11.2	'The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them.'	No Overhead lines are proposed. The Applicant has assessed the landscape and visual effects arising from electrical infrastructure within Chapter 8, Landscape and Visual Effects. **[EN010147/APP/6.3]** No significant adverse effects are predicted to arise.	
2.11.3	'The Secretary of State should also be satisfied that all feasible options for mitigation – including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately.'	Noted. No Overhead lines are proposed. The Applicant has refined the layout and design of the Project to avoid or minimise adverse environmental effects. This approach is described in Chapter 5 in the ES, in the Layout and Design Principles document **[EN010147/APP/7.7]**, and the Mitigations and Commitments Schedule – Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**.	
2.11.4	'In circumstances where it can be demonstrated that a mitigation measure and/ or technological approach is appropriate and/ or necessary for a project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making.'	See Applicant response to paragraph 2.11.3 above.	
2.11.5	'Nationally designated landscapes have specific statutory purposes which help ensure their continued protection. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines	The Project does not fall within and nationally designated landscapes.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	should be reversed to favour undergrounding.'		
Noise and vibration			
2.11.7	'The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant.'	Noted. Noise effects have been assessed within Chapter 13 in the ES. **[EN010147/APP/6.3]** Mitigation measures are set out within the Mitigation and Commitments Schedule Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**. No significant effects are predicted to arise.	
2.11.8	Consequently, noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable'	See Applicant response to paragraph 2.11.7 above.	
Electric and Magnetic Fields (EMFs)			
2.11.9	'This NPS does not repeat the detail of the ICNIRP 1998 guidelines on restrictions or reference levels. The government has developed with the electricity industry a Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice', published in February 2011 that specifies the evidence acceptable to show compliance with ICNIRP 1998 guidelines and is also in line with the terms of the 1999 EU Council	Chapter 16: Human Health in Volume 1 of the ES [EN010147/APP/6.3] considers public understanding of EMF exposure in terms of mental health outcomes associated with concern, acknowledging that actual risks are unlikely to be significant for public health (see section 16.9 of the Chapter).	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Recommendation on EMF exposure.'		
Sulphur Hexafluoride			
2.11.17	'The Secretary of State should grant consent for an electricity networks development only if the applicant has demonstrated either: i. that the development will not use SF6; or ii. (a) that there is no proven commercially available alternative to the use of SF6; and (b) that a bespoke SF6-free alternative would be grossly disproportionate in terms of cost; and (c) that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.'	The Applicant will consider the use of SF6 and SF6 free alternatives in the detailed design work.	

Appendix E
NPPF Compliance Table

NPPF 2023 Paragraphs (As submitted November 2024)

Section/Paragraph Number	Description	Comment	Planning Authority Comment
Section 2 – Achieving Sustainable Development			
Paragraph 10	Provides that for sustainable development to be pursued positively, at the heart of the NPPF, is a presumption in favour of sustainable development.	The Project has been designed and laid out, and is subject to a number of mitigation measures, which together deliver sustainable development. The Project successfully delivers a vital contribution to the Governments solar targets and Net Zero obligations, significant BNG, and will leave a significant and positive landscape and biodiversity legacy in the region for the long term (see the oCoCP and oOMP **[EN010147/APP/7.6.1 and 7.6.2]**, the oLEMP **[EN010147/APP/7.6.3]**, the Landscape, Ecology and Amenities Area plan **[EN010147/APP/7.3.3]** and the Mitigation and Commitments schedule **[EN010147/APP/6.5]**.	
Paragraph 11	Sets out the presumption in favour of sustainable development, which for decision-taking means: *"c) approving development proposals that accord with an up-to-date development plan without delay; or* *d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:* *i. the application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed; or*	Section 2 of this PSS sets out the decision making process the Secretary of State will follow in respect of NSIP's. The National Planning Policy Framework (NPPF) and the Planning Practice Guidance, for England, has been taken into account within the energy NPSs where appropriate (Paragraph 4.1.11) To the extent paragraph 11 is relevant, the Project accords with its provisions.	

Section/Paragraph Number	Description	Comment	Planning Authority Comment
	ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."		
Section 11 – Making effective use of land			
Paragraph 124	Identifies how planning policies and decisions should encourage multiple benefits from both urban and rural land and take opportunities to achieve net environmental gains such as developments that, amongst other things, would enable new habitat creation.	The Project has evolved in a way that positively balances the impacts associated with development at scale in countryside locations, with the very significant benefits the Project will bring. Importantly, the Project is regarded by Government as being a CNP, providing as it does a vital contribution to the delivery of the Governments solar targets ; making a positive contribution to its Net Zero obligations and its BNG goals, and also by helping to positively address the Climate Change Emergencies that the host authorities have declared.	
Section 13 – Protecting Green Belt land			
Paragraph 142	Provides that the fundamental aim of Green Belt policy is to *"prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS (Appendix 8). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	
Paragraph 143	Provides the five purposes of a Green Belt, which are: " *a) The check the unrestricted sprawl of large built-up areas;* *b)To prevent neighbouring towns merging into one another;* *c)To assist in safeguarding the countryside from encroachment;*	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS Appendix 8). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point	

Section/Paragraph Number	Description	Comment	Planning Authority Comment
	d) To preserve the setting and special character of historic towns; and *e) To assist in urban regenerations, by encouraging the recycling of derelict and other urban land."*	that CNP Infrastructure will meet the VSC case.	
Paragraph 152	Details that *"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."*	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	
Paragraph 153	Highlights that local planning authorities, when considering a planning application, should ensure that *"substantial weight is given to any harm to the Green Belt."* It continues that *"Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."*	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	
Paragraph 154	Details that where development in the Green Belt is not considered inappropriate development, which range from, inter alia, agricultural buildings, provision for outdoor sport and creation to limiting infilling in villages.	The Applicant considers that the provision of electrical cables and related works (see Appendix 8 for details in this PSS) comprise engineering operations directly associated with the Project is not inappropriate development in Green Belt terms.	
Paragraph 155	The forms of development detailed are also not considered to be inappropriate development in the Green Belt, providing they preserve its openness	The Applicant considers that the provision of electrical cables and related works (see Appendix 8 for details in this PSS) comprise engineering operations directly associated	

Section/Paragraph Number	Description	Comment	Planning Authority Comment
	and do not conflict with the purposes of including land within the Green Belt, including engineering operations.	with the Project is not inappropriate development in Green Belt terms. The wider VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	
Paragraph 156	In specific relation to renewable energy developments; *"When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."*	The Applicant's VSC case supports the project being allowed in this location. Details of the Green Belt assessment are set out in Appendix 8 of this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	
Section 14 – Meeting the challenge of climate change, flooding and coastal change			
Paragraph 157	States *"The planning system should support the transition to a low carbon future in a changing climate … It should help to: shapes places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; and support renewable and low carbon energy and associated infrastructure."*	Climate Change effects are set out within Chapter 14 of the ES. Significant beneficial effects from the Botley West Solar Farm are predicted. The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.	
Paragraph 160	Seeks to help increase the supply of renewable and	Whilst the host authorities have not expressly allocated land for	

Section/Paragraph Number	Description	Comment	Planning Authority Comment
	low carbon energy and heat through the plan-making process via positive strategies which maximise the potential for suitable development, future re-powering and life extension, whilst ensuring adverse impacts are addressed, including cumulative landscape and visual impacts.	renewable energy development, all have policies which support in principle renewable energy development. The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.	
Paragraph 163	Does not require applicants to demonstrate the overall need for renewable or low carbon energy, in planning applications, and for local planning authorities to approve applications where its impacts are, or can be made, acceptable.	The Applicant notes and welcomes the position on need.	

Appendix F
West Oxfordshire Policy – Compliance Tables

West Oxfordshire Local Plan 2031 relevant planning policies (As submitted November 2024)

Policy	Brief Description	Comment	Planning Authority Comment
Policy OS2 – Locating Development in the right places	Development in the Green Belt is to comply with national Green Belt policies	The Applicant firmly believes there are VSC which support the location of the Botley West solar farm in the Green Belt. Harm to the Green Belt, and any other harm, is outweighed by the benefits the project delivers. See the Applicant's VSC case at section 5 and Appendix 8 of this PSS. Paragraph 4.2.7 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	
Policy EH1 – Cotswolds Area of Outstanding Natural Beauty	Great weight will be given to conserving and enhancing the area's natural beauty, landscape and countryside, including wildlife and heritage, including proposals which would affect the setting of the AONB.	The Project site does not fall within or adjacent to the Cotswold AONB (national landscape). The low height of the Project and distance from the national landscape will not give rise to issues of setting, The Project therefore complies with Policy EH1.	
Policy EH2 – Landscape Character	West Oxfordshire's natural environment will be conserved and enhanced.	The Project will affect landscape character during operation. The scale of the Project, necessary to meet the urgent need for renewable energy generation, and to address the climate emergency declared within West Oxfordshire, will adversely character, but that adverse effect will be limited, temporary and overtime (5 years onwards) will be offset by the significant new landscaping that will complement the existing landscape structure in the area. For most of the operational life of the Project, after new landscaping has become established, the Applicant considers landscape character will be enhanced. On decommissioning the character will be conserved and significantly enhanced with an important and valuable legacy left for the benefit of the area. On balance the Project is considered to be substantially in compliance with Policy EH2.	

Policy	Brief Description	Comment	Planning Authority Comment
Policy EH3 – Biodiversity and Geodiversity	The biodiversity of West Oxfordshire shall be protected and enhanced to achieve an overall net gain in biodiversity and minimise impacts on geodiversity.	The Project represents the most significant opportunity within the district to secure BNG, over a significant area of land. It is unique in that respect. The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. The oLEMP **[EN010147/APP/7.6.3]** will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project. The dual use proposed by the Applicant on the site, a critical renewable energy project, with a retained agricultural use beneath, managed to provide significant BNG, therefore complies with Policy EH13.	
Policy EH4 – Public realm and green infrastructure	The existing areas of public space and green infrastructure of West Oxfordshire will be protected and enhanced for their multi-functional role, including their biodiversity, recreational, accessibility, health and landscape value and for the contribution they make towards combating climate change.	See Applicant response to Policy EH3. In addition, the Project will deliver further benefits including increased public access, educational provision, and significant landscape enhancements. The Project complies with Policy EH4.	
Policy EH6 – Decentralised and renewable or low carbon energy development (except wind turbines)	In principle, renewable and low-carbon energy developments, especially run-of-river hydropower and the use of biomass will be supported. Any proposals for a solar farm involving best and most versatile agricultural land would need to be justified by the most compelling evidence which demonstrates why poorer quality land has not been used in preference to best and most versatile agricultural land.	As the project is a renewable energy development, the Applicant presumes support in principle from West Oxfordshire District Council, In terms of BMV, the Project will lead to a small loss of BMV land (refer to Chapter 17 in the ES – a permanent loss of approx. 5.5ha). Approximately 3.8ha of that loss relates to the positioning of the NGET substation. This is sited to be close to the adjacent 400kV lines and adjacent to the Applicant main substation. No better alternative siting could be established by the Applicant within the DCO Order Limits. The overall loss of BMV land is not considered to be significant in EIA terms.	

Policy	Brief Description	Comment	Planning Authority Comment
		The Applicant is of the view that the Project is substantially in compliance with Policy EH6.	
Policy EH7 – Flood Risk	Flood risk will be managed using the sequential, risk-based approach, set out in the National Planning Policy Framework, of avoiding flood risk to people and property where possible and managing any residual risk (taking account of the impacts of climate change).	Flood risk is addressed within Chapter 10 of the ES (ref Table 10.3). A flood Risk assessment has been undertaken amongst other assessments. No adverse effects are predicted during construction, operation or the decommissioning phases of the Project. Additional mitigation measures are proposed north of Cassington (creation of water body and bunding and ditch widening) to help alleviate the incidence of flooding that the village currently experiences. It is considered that the Project complies with Policy EH7.	
Policy EH8 – Environmental Protection	Proposals which are likely to cause pollution or result in exposure to sources of pollution or risk to safety, will only be permitted if measures can be implemented to minimise pollution and risk to a level that provides a high standard of protection for health, environmental quality and amenity.	Pollution risk has been assessed and no significant adverse effects have been identified. The Project therefore complies with Policy EH8.	
Policy EH9 – Historic Environment	All development proposals should conserve and/ or enhance the special character, appearance and distinctiveness of West Oxfordshire's historic environment, including the significance of the District's heritage assets, in a manner appropriate to their historic character and significance and in a viable use that is consistent with their conservation, in accordance with national legislation, policy and guidance for the historic environment.	Conserving and enhancing of heritage assets, including their settings, has been achieved through the design of the Project (Chapter 7, Table 7.3 and Section 7.8). No significant adverse effects are predicted. The Project complies with Policy EH9.	
Policy EH11 – Listed Buildings	Proposals affecting listed buildings and their	Conserving and enhancing of heritage assets, including their settings, has	

Policy	Brief Description	Comment	Planning Authority Comment
	settings will be permitted where the historic interest of the building is conserved or enhanced, the curtilage is respected and its special interest is retained.	been achieved through the design of the Project. No significant adverse effects are predicted. The Project complies with Policy EH11.	
Policy EH13 – Historic Landscape Character	In determining applications that affect the historic character of the landscape or townscape, particular attention will be paid to, *inter alia,* age, distinctiveness, rarity, sensitivity and capacity of a historic landscape, the extent to which key historic features resonant of the area's character and the degree to which the form and layout of the development will respect and build on the pre-existing historic character and the degree to which the development conserves or enhances the special historic character of its surrounding.	The assessment of the likely impacts and effects on the overall historic landscape is set out in Chapter 10 of the ES. No significant effects are predicted. The Project complies with Policy EH13.	
Policy EH14 – Registered historic Parks and Gardens	Development proposals must conserve or enhance special features and ensure development does not detract from the special interest of the asset.	Chapter 10 of the ES assesses the effects upon Registered Historic Parks and Gardens. No significant adverse effects are predicted. In planning policy terms, the effects predicted are not considered to be in conflict with Policy EH14.	
Policy EH15 – Scheduled Monuments and other nationally important archaeological remains	Proposals for development that would affect, directly or indirectly, the significance of Scheduled Monuments or non-scheduled archaeological remains of demonstrably equal significance will be permitted where the proposals would conserve or enhance the significance of the Monument or remains.	Assessment of effects upon Scheduled Ancient Monuments is set out in Chapter 10, Table 7.15. The detailed assessment found that the construction, operation and maintenance, and decommissioning of the Project would result in effects of minor adverse significance in respect of three Scheduled Monuments, one Grade I Registered Park and Garden, two Grade I listed buildings, two Grade II* listed buildings, eleven Grade II listed buildings and four Conservation Areas, also effects of negligible adverse significance in respect of one Grade II listed building and one Conservation	

Policy	Brief Description	Comment	Planning Authority Comment
		Area. In all cases the effect would be long-term, not significant in EIA terms and fully reversible. In planning policy terms, the effects predicted are not considered to be in conflict with Policy EH15.	
Policy EH16 – Non-designated heritage assets	When considering proposals that would affect, directly or indirectly, non-listed buildings, non-scheduled, non-nationally important archaeological remains or non-Registered Historic Parks and Gardens, as such assets are also irreplaceable, the presumption will be in favour of the avoidance of harm or loss.	Chapter 10 of the ES assesses the effects upon non-designated heritage assets. No significant adverse effects are predicted. In planning policy terms, the effects predicted are not considered to be in conflict with Policy EH16.	
Policy EW9 – Blenheim World Heritage Site	The exceptional cultural significance (Outstanding Universal Value) of the Blenheim World Heritage Site will be protected, promoted and conserved for current and future generations.	Chapter 10 sets out the assessment of effects upon The Blenheim Palace World Heritage Site. A separate Heritage Impact Assessment (HIA) has been undertaken for the Blenheim Palace WHS, in accordance with the appropriate guidance produced on behalf of the United Nations Educational, Scientific and Cultural Organisation (UNESCO). This is presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES. The HIA identified that the construction, operation and maintenance, and decommissioning of the Project would result in a minor negative impact on one of the seven defined attributes which contribute towards the Outstanding Universal Value (OUV) of the WHS. On this basis, the magnitude of impact on the significance of the WHS is predicted to be **negligible adverse**. This impact would be time-limited and fully reversible. The Applicant does not believe there to be a conflict with Policy EW9.	

Eynsham Neighbourhood Development Plan relevant policies (As submitted November 2024)

Policy	Description	Comment	Planning Authority Comment
Policy ENP4 – Green Infrastructure – The Setting for New Developments	New developments should integrate all aspects of design, connectivity and the natural environment. Consideration should be given to the setting of new development and the relationship between village and countryside.	The Applicant has adopted key layout and design principles themselves designed to avoid adverse effects upon sensitive receptors, and to enhance landscape, ecology and biodiversity (see Layout and Design Principles Document **[EN010147/APP/7.7]**. and the Mitigation Measures and Commitments Schedule ref Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**. Where relevant these measures are secured through the management plans and Requirements within the DCO. As a result the Project complies with Policy ENP4.	
Policy ENP4(A) – Enhancing Biodiversity	In order to contribute to the achievement of increased biodiversity within the ENP Area proposals for both residential and non-residential development should where appropriate, *inter alia,* including a biodiversity action plan demonstrating how bio-diversity net gain will be achieved and seek to protect 'Best and Most Versatile' agricultural land unless demonstrably impractical.	The Project presents a unique opportunity for the planning authority to secure significant BNG. This will achieved by retaining an agricultural use beneath the solar arrays and on other undeveloped land, and by managing it in a way to deliver significant BNG. The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. **[EN010147/APP/6.3]** The oLEMP [**EN010147/APP/7.6.3]** will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project. The Project complies with Policy ENP4(A).	
Policy ENP5 Sustainability – Climate Change	Particular support will be given for proposals that help meet the intentions of the Climate Change Act 2008 including development that makes the most efficient use of the land and materials and maximises the opportunities for the use of renewable and low-carbon forms of energy in	Climate Change effects are set out within Chapter 14 of the ES. Significant beneficial effects from the Botley West Solar Farm are predicted. The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.	

Policy	Description	Comment	Planning Authority Comment
	accordance with WOLP Policy EH4.		

Cassington Neighbourhood Development Plan relevant policies (As submitted November 2024)

Policy	Description	Comment	Planning Authority Comment
Policy CAS1 - Cassington Nature Recovery Network	Development proposals that affect the Network must maintain and improve the functionality of the Network, including delivering at least 10% net gain to general biodiversity assets, in the design of their layouts and landscaping schemes.	Throughout the Project site, the Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. The oLEMP **[EN010147/APP/7.6.3]** will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.	
Policy CAS3 – Dark Skies	Development proposals that require the installation of external lighting should be designed to minimise the occurrence of light pollution, with energy-efficient forms of lighting expected, which reduce light scatter and comply with the Institute of Lighting Professional guidelines for rural areas. Proposals for all development will be expected to demonstrate how it its intended to prevent light pollution.	The Project will require lighting in targeted areas for security reasons. The measures implemented will be agreed in the oOMP **[EN010147/APP/7.6.2]** and will avoid or minimise the potential for light pollution. The Project complies with Policy CAS3.	
Policy CAS4 – Cassington Conservation Area	Development proposals should sustain and enhance the historic environment, particularly the special architectural and historic significance of the designated Cassington Conservation Area and its setting.	Chapter 7 of the ES considers impacts on heritage assets. No adverse effects are predicted upon the Cassington Conservation Area or its setting. There is no conflict with Policy CAS4.	