



BOTLEY WEST SOLAR FARM

OXFORDSHIRE HOST AUTHORITIES RESPONSES FOR DEADLINE 4 | FRIDAY 22 AUGUST 2025

- Cherwell District Council
- Vale of White Horse District Council
- West Oxfordshire District Council
- Oxfordshire County Council

Oxfordshire Host Authorities (“OHAs”)

Botley West Solar Farm (EN01014)

OXFORDSHIRE HOST AUTHORITIES

RESPONSES FOR DEADLINE 4

The Oxfordshire Host Authorities (the “**OHA**”) are comprised of the following host authorities who are working collaboratively to represent constituents on key issues during this Examination and assist the Examining Authority (“**ExA**”) with the Examination’s smooth running:

- Cherwell District Council (“**CDC**”)
- Value of White Horse District Council (“**VWHDC**”)
- West Oxfordshire District Council (“**WODC**”)
- Oxfordshire County Council (“**OCC**”)

In these submissions, the Oxfordshire Host Authorities may be referred to variously as the OHA, the Host Authorities or the Councils.

Purpose of this Submission

The purpose of this submission is to provide written confirmation of the OHA’s comments and response on documents submitted at Deadline 3 (**D3**) and the applicant’s draft Accompanied Site Inspection (**ASI**) itinerary and an update on draft statements of common ground (**SoCG**).

Comments on submissions received at D3

REP3-004 – 3.1 Draft Development Consent Order (Clean) (Rev 4)

OHA welcome the inclusion of paragraph 47 to provide clarity should the NGET substation be delivered through a TCPA 1990 application.

OHA note comments on Schedule 2, requirement 5 made at D3 [**REP3-072**] are yet to be considered by the applicant.

A full review of the outstanding issues with regards to the dDCO as of D4 can be found in the OHA’s response to ExQ2 2.7.4.

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REP3-012 – 6.3 Environmental Statement Chapter 10 – Hydrology and Flood Risk (Clean) (Rev 1)

The OHA note that all references to hydraulic modelling for main rivers and their tributaries have been removed from the ES Chapter. Fluvial flooding is the remit of the Environment Agency and so we await the response of the EA with regards to this issue.

References to surface water modelling remain. Please see the response to ExQ 2.10.2 for OHAs comments with regards to the adequacy of the applicant’s modelling.

REP3-014 – 6.3 Environmental Statement Chapter 11 – Ground Conditions (Clean) (Rev 1)

OHA have no comments to make on the changes to this chapter at this time.

REP3-016 – 6.3 Environmental Statement Chapter 14 – Climate Change (Clean) (Rev 1)

OHA have no comments to make on the changes to this chapter at this time.

REP3-018 – 6.3 Environmental Statement Chapter 15 – Socio Economics (Clean) (Rev 1)

OHA have no comments to make on the changes to this chapter at this time.

REP3-020 – 6.5 Environmental Statement Appendix 10.1 Floor Risk Assessment (Clean) (Rev 1)

The OHA note that the majority of changes to this document relate to fluvial sources of flooding which falls into the remit of the Environment Agency and so defer to them for comments on the changes.

REP3-022 – 6.5 Environmental Statement Appendix 10.2 Conceptual Drainage Strategy (Clean) (Rev 1)

OHA have no comments to make on the changes to this strategy at this time.

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REP3-024 – 6.5 Environmental Statement Appendix 10.6 Surface water abstractions, pollution incidents and discharge consents (Clean) (Rev 1)

OHA have no comments to make on the changes to this document at this time.

REP3-026 – 6.5 Environmental Statement Appendix 10.7 Water Framework Directive Assessment (Clean) (Rev 1)

OHA have no comments to make on the changes to this assessment at this time.

REP3-028 – 6.5 Environmental Statement Appendix 15.2 Outline Skills, Supply Chain and Employment Plan (Clean) (Rev 1)

OHA welcome the additional commitments for alternative apprenticeships and other workforce training opportunities made by the applicant in the plan and support the use of Thames Valley Chamber of Commerce, South and Vale Business Support Network, and the West Oxfordshire Business Development Team to distribute the supplier opportunity form to potential suppliers and local companies who can contribute to the supply chain of the proposed development.

REP3-030 – 7.6.1 Outline Code of Construction Practice Part 1 (Clean) (Rev 1)

OHA welcome the addition of water course crossings and bentonite breakout plan in Construction Method Statements and the increase in watercourse buffers to 10m.

OHA support the inclusion of pollution prevention and management of surface water runoff during the construction of the solar farm through a Construction Surface Water Management Plan.

REP3-032 – 7.6.2 Outline Operational Management Plan (Clean) (Rev 2)

OHA still wish to see limited use of PIR motion lighting due to false alarms triggered by wildlife.

The OHA support the inclusion of a commitment to include regular monitoring of surface water run off and surface water drainage features within the Detailed Operational Management Plan. The Authorities welcome that runoff pathways, soil stability, and

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vegetation cover across the site will be monitored and maintained throughout the operational phase to prevent erosion and degradation of features which would detrimentally impact the ability of the site drain surface water.

REP3-034 –7.6.3 Outline Landscape and Ecology Management Plan (Clean) (Rev 2)

OHA welcome the increase in watercourse buffers to 10m.

REP3-036 –7.7 Outline Layout and Design Principles (Clean) (Rev 3)

VWHDC consider Work No. 2 needs to be amended to reflect the latest NGET substation height of 14.495m and to include those other design changes sought by the applicant on NGET design parameters.

REP3-038 –8.3 Schedule of Changes to the draft DCO (Rev 3)

OHA have no comments to make on this document at this time.

REP3-064 – 13.2 Applicant’s Responses to other D2 Submissions (Rev 0)

OHA have no comments to make on this document at this time.

REP3-065 – 13.3 Applicant’s comments on Interested Parties’ Responses to ExA’s First Written Questions (ExQ1) Submitted at Deadline 2 (Rev 0)

Q1.6.6 Conservation Areas.

VWHDC – The applicant response does not address the point on the omission of key views cited in the Cumnor Neighbourhood Plan.

Q1.11.28 Soil Management Approach

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OHA remain of the view that Requirement 11(2)(c) be discharged by another body such as Natural England or DEFRA (i.e. the Secretary of State).

Q1.14.6 - Viewpoints

OHA concern remains on the limited range of viewpoints used for assessment. The applicant states *the assessment conclusions are not based only on the viewpoints themselves*. Further evidence / detail on this point is required.

REP3-066 – 13.4 The Applicant’s Response to the OHA’s Response to the Rule 17 Letter re Chapter 8 LVIA [PD-009] (Rev 0)

OHA remain concerned about the LVIA as covered in previous responses.

The Applicant’s response covers numerous points and OHA comment specifically on the following:

In Section 1.2.14 The applicant states that ‘*The assessment methodology used within the Botley West Environmental Statement (ES) is based on the DMRB (National Highways, Standards for Highways) as set out in paragraph 4.2.9 of Chapter 4: Approach to Environmental assessment [APP-041]. The two relevant documents published as part of the National Highways Standards are LA104 – Environmental assessment and monitoring (revision 1) (August 2020) and LA107 – Landscape and visual effects (revision 2) (February 2020).*’ The OHA note that this Guidance is designed for use for Roads and Bridges, which is a different type of development to the proposed Botley Solar Farm. It would seem entirely inappropriate to use DMRB methodology when GLVIA3 is the industry standard for us all and applies to all types of proposed development. Notwithstanding, the significance threshold should be standardised and the same throughout the EIA.

1.2.21 states “*The height of the proposed hedgerows are shown at 3.5 m in the visualisations. This need not be the case, as the height of the panels is 2.3 m. Where appropriate the hedgerows could be managed to a lower height, e.g. 2.5 m, which would retain long views, if required. Alternative methods of hedgerow establishment can be adopted. These are a matter for detailed design.*’ As covered in previous responses, Mitigation starts with avoidance, it is not acceptable to leave fundamental issues which have an impact of both landscape character and views to detailed design. This should form part of the LVIA.

1.2.29 states *‘The Applicant’s Position – The use of the National Highways Standard significance of effects matrix (DMRB LA104, Table 3.8.1) adapted to reflect LVIA terminology (Table 8.12 of **APP-045**) is appropriate for the Botley West Solar Farm project.’* However, it is noted that on page 15 of the Design ‘Manual for Roads and Bridges (DMRB) LA104 (Highways England et al. 2020) guidance NOTE 3 *‘Significant effects typically comprise residual effects that are within the moderate, large or very large categories.’* Therefore, if the LVIA is based on DMRB guidance and their assessment tables reflects those included in this guidance it is not clear why the significance of effects also does not follow the same DMRB guidance and count a moderate effect as significant.

The OHA are still concerned that the assessment does not clearly describe how PRowS are impacted by the proposals and relies on static representative viewpoints whose description is not expanded to illustrate how the viewpoint represents views from that route. Using the southern area as an example, Section 1.4 states *‘the representative viewpoints, agreed with the LPAs are as they are named - representative views along certain routes. 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.’* VWHDC has previously covered [REP1-074] that the viewpoints were not fully agreed. The OHA have also expressed concerns in [REP1-072] para 7.3.35, 7.3.43-45 and 7.3.58-7.3.63 about how representative viewpoints are used to represent the effects of the scheme of certain routes.

Para 1.4.2 refers to changes in the table being in red text, but red text is not evident in the tables making it difficult to know what changes have been made. Having reviewed tables 1.1 -1.3 the OHA have concerns with the assessments presented in these tables. With regards to Table 1.3 Representative Viewpoints 48, 49, 50, 51 and 53 VWHDC and the OHA still have concerns with these assessments. For example, Viewpoint 49 this viewpoint is looking southwest from footpath 184/22/20 and is assessed at operation stage as Moderate not Significant effect and then Minor not Significant effect at Year 15. However, most of the slopes that can be seen from this viewpoint location will be covered with solar, and the substation area is likely also to be present in the view. Therefore, the moderate not significant effect is underplaying the effect. There is little mitigation vegetation proposed to reduce the significance to minor after 15 years. However, as the footpath travels southwards towards the solar development, the impact will increase.

With regards to Viewpoint 51: View looking northeast from footpath 184/29/10 near Upper Whitely Farm, it is queried if this viewpoint is representative of this footpath route and the views that are available and therefore an appropriate assessment of this route. It is likely the Substation will be visible in views along with solar as the path passes through solar arrays.

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Viewpoint 53 states that there will be a Moderate not significant effects from this viewpoint ‘*Mainly due to the vast scale of the landscape within which the proposed development would appear as a subsidiary effect*’. VWHDC disagree with this statement, the proposed development would cover most of the middle ground, clearly in contrast to the existing view. This is a representative viewpoint and the footpath travels down the hill to the eastern side of the solar farm and views of the solar farm and the substation would increase. VWHDC also disagree with the assessment that the effects at Year 15 will be minor not significant. As per the other viewpoints covered, mitigation will have limited impact on the viewpoint, due to the level changes and the type and location of mitigation proposed.

With regard to table 1.2 no changes appear to have been made for viewpoints 27, 40 and 41, and only minor adjustments are stated for VPs 32 and 38. Viewpoint 32 near Begbroke will become less affected due to the panel removal proposed in the applicant’s Change 2 request [REP2-045].

Viewpoint 27 in Table 1.2 states that there will be minor adverse not significant effects ‘*Mainly due to the distance from the viewpoint and the skyline would not change*’. The OHA disagree that the magnitude of impact on this viewpoint is only minor as the panels are on a slope and a focus of the view. The assessment does also only take account of one direction of the view although there are also solar panels proposed to the East of this viewpoint, which will add to the impact on users of this public right of way.

Viewpoint 38 is assessed as *moderate/major significant* effect during Y1 and Y15 because ‘*the development would be visible across the fields up to 1.6 km away*’. At Y15 effects are assessed as *medium not significant* because ‘*The main focus of the view, formed by the distant landform, would be retained*’ with the mitigation planting. The OHA don’t agree with this assessment and consider the impact to be underplayed. This is a representative view of the footpath and users currently experience open panoramic views of the Evenlode valley and its rising landforms and a view of Church Hanborough church when travelling westwards down the slope. Most of the fields in this view will be covered in solar. The photomontage for the year 15 summer view shows mitigation hedge planting on either side of the PRow to block the views of the panels, however, due to the varied landform in this area large areas of panels will remain visible despite the high hedges. Hedge planting on both sides of the footpath is also uncharacteristic in this part of the site and will fundamentally change the character of the local landscape and the views from this footpath when travelling through the landscape.

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In addition, the photomontage for Y15 does not appear to be accurate as it shows a fence in the centre of the footpath and does not indicate any panels on the west side of Lower Road, although they would be visible on the left side of this view.

Viewpoint 40 assesses the view from the edge of Cassington considers effects to be minor, not significant “*Mainly due to the development being set back from the viewpoint and the skyline would not change*”. The OHA considers the impact on residents and recreational users to be significant. The proposed panels will be seen extending across the flat land around the northwestern side of Cassington, and then gently rising onto the sloping arable land above, beyond an overhead line which runs in the fields to the north of the village. They will occupy the slopes in views from the village and when travelling northwards on PRow 152/6/10. Views from the recreation ground, which adjoins the PRow on the northwestern side of the village have not been assessed, but this recreational open space would be surrounded by panels on three sides. The magnitude of impact on viewpoint 41 north of the village is also considered to be underestimated.

To mitigate effect the OHA are of the view that a gap needs to be maintained between Cassington, and the start of the area of panels, so as to respect the landscape setting and character of the village, and the visual amenity of residents and those using the Recreation Ground and the local paths around the village. A narrow gap is proposed at present, but an arc of around 600-750m would enable a more legible set back from the village, approximately following the 70m contour.

Regarding the assessment of effects for viewpoints illustrated in Table 1.1, it is apparent that the applicant has upgraded the assessment of effects at year 15 for viewpoints 5b, 23 and 24, with viewpoint 23 recorded as a significant effect. It is interesting that the assessment of effects has increased for these viewpoints, but the OHA still consider that these effects have been downplayed, as illustrated in our Rule 17 letter response [REP2-049].

REP3-068 – 13.6 Botley West Solar Farm Blenheim Estate ownership commentary 30 May 2025

OHA have no observations to make on this document.

REP3-069 – 13.7 Heritage Asset Concordance Tables (Rev 0)

OHA have no observations to make on this document.

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REP3-070 – 13.8 Figure 13.8 Water Crossing Plan

OHA have no observations to make on this document.

REP3-071 – 13.9 Figure 13.9 Temporary facilities, cable corridor and Flood map plan

OHA have no observations to make on this document.

Comments on the applicant’s draft ASI itinerary

REP3-067 – 13.5 Applicant’s Draft Accompanied Site Inspection Itinerary (Rev 0)

CDC note that the suggested viewpoints from Shipton Slade Farm as suggested by Bruce Windwood [REP2-091] have not been included and recommend that they are included due to this part of the site being under-represented in the LVIA viewpoints.

VWHDC recommend the suggested locations from Ben Prior [AS-043] and Bill McGill [REP2-088] are visited. The ExA is also recommended to visit the locations listed by Cumnor Parish Council [REP2-047] that are designated as Important Views in the Cumnor Neighbourhood Plan.

WODC agree with the proposed locations for accompanied site visits in the Central Area

Responses to Statements of Common Ground

OHAs continue to work with the applicant on SoCG. Updated editable drafts were provided to the OHA by the applicant on 12 August 2025.