



Botley West Solar Farm

Applicant's Responses to other D3 Submissions

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Approval for issue

Jonathan Alsop

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1 Introduction

1.1 Purpose of this Document

- 1.1.1 The purpose of this document is to provide the Applicant's response to submissions made by interested parties at Deadline 3 of the Examination.
- 1.1.2 The Development Consent Order (DCO) application for Botley West Solar Farm (the Application) was submitted on 14 November 2024 and accepted for Examination on 19 December 2024. Deadline 1 of the Examination was on 4 June 2025, Deadline 2 was on 1 July 2025 and Deadline 3 was on 22 July 2025.
- 1.1.3 The Applicant's responses to the additional documents provided at Deadline 3 **[REP3-064]** are outlined in this document. To the extent the comments raised by interested parties relate to the Examining Authority's (ExA's) written questions, to minimise repetition the Applicant has sought to provide cross-references to the Applicant's position set out in the Applicant's Response to the Examining Authority's First Written Questions (ExQ1) **[REP2-025]** or the Applicant's comments on Interested Parties' Responses to ExA's First Written Questions (ExQ1) **[REP3-065]** (as appropriate).
- 1.1.4 The list of Interested Parties' that submitted representations at Deadline 3 are set out in **Table 1.1** below
- 1.1.5 A total of 127 submissions were submitted to the Examination at Deadline 3. 71 of these were from the Applicant, with 56 being from Interested Parties.

1.2 Structure of this document

- 1.2.1 This document provides a response from the Applicant to Written Representations submitted at Deadline 1 and is structured as follows:
 - Table 2.1: Applicant's Responses to Representations submitted at Deadline 3 – Local Authorities and Statutory Consultees
 - Table 2.2: Applicant's Responses to Representations submitted at Deadline 3 – Non-Statutory Consultees
 - Table 2.3: Applicant's Responses to Representations submitted at Deadline 3 – Public/Landowner
- 1.2.2 Submissions received by Interested Parties are presented as verbatim text (unless it has been more appropriate to summarise) and are then responded to by setting out the Applicant's position on the matter at the time of writing.
- 1.2.3 To increase the conciseness of this document similar points have been grouped together and summarised. The reference number column in the tables below refers to the reference given to the submissions made by Interested Parties.
- 1.2.4 The documents submitted with the Application are also referenced in this document, using the reference number **[APP/x.y]**, where the last three numbers are the application document number, as set out in the Examination Library. All documents are also presented in numerical order in the Guide to the Application **[REP3-002]**.

Table 1.1: List of Interested Parties that submitted Representations at Deadline 3

| Examination Reference Number | Interested Party |
|---------------------------------|--|
| <u>REP3-072</u> | Oxfordshire Host Authorities |
| <u>REP3-073</u> | Bladon Parish Council |
| <u>REP3-074</u> | Cassington Parish Council |
| <u>REP3-075</u> | Cassington Parish Council |
| <u>REP3-076</u> | Cassington Parish Council |
| <u>REP3-077</u> | Cumnor Parish Council |
| <u>REP3-078</u> | Cumnor Parish Council |
| <u>REP3-079</u> | Cumnor Parish Council |
| <u>REP3-080</u> | Wootton Parish Council |
| <u>REP3-081</u> | Historic England |
| <u>REP3-082</u> | Anthony Thompson |
| <u>REP3-083</u> | Begbroke and Yarnton Green Belt Campaign (BYG) |
| <u>REP3-084</u> | Begbroke and Yarnton Green Belt Campaign (BYG) |
| <u>REP3-085</u> | Begbroke and Yarnton Green Belt Campaign (BYG) |
| <u>REP3-086</u> | Bladon Village Sir Winston Churchill Memorial Hall |
| <u>REP3-087</u> | Bladon Village Sir Winston Churchill Memorial Hall |
| <u>REP3-088</u> | Bojan Ivanovic |
| <u>REP3-089</u> | Church of St Peter and St Paul, Church Hanborough |
| <u>REP3-090</u> | CPRE Oxfordshire |
| <u>REP3-091</u> | David Foster |
| <u>REP3-092</u> | Elizabeth Begley |
| <u>REP3-093</u> | Forever Fields |
| <u>REP3-094</u> | Frances Stevenson |
| <u>REP3-095</u> | Frances Stevenson |
| <u>REP3-096</u> | Frank Watt |
| <u>REP3-097</u> | Harry St John |
| <u>REP3-098</u> | Harry St John obo Roderick and Christine Cooke |
| <u>REP3-099</u> | Ian Hudspeth |
| <u>REP3-100</u> | James Robert Price |
| <u>REP3-101</u> | Joanna Norton |
| <u>REP3-102</u> | Joanna Sharland |
| <u>REP3-103</u> | Jonathan Ford |
| <u>REP3-104</u> | Kenneth John Clark |

| Examination Reference Number | Interested Party |
|---------------------------------|---|
| <u>REP3-105</u> | Mary Ann Canning |
| <u>REP3-106</u> | Michael Brown |
| <u>REP3-107</u> | Michael Brown |
| <u>REP3-108</u> | Michael Field |
| <u>REP3-109</u> | Miles Tuely |
| <u>REP3-110</u> | Nigel Pearce |
| <u>REP3-111</u> | Patricia Bustin |
| <u>REP3-112</u> | Professor David Sherratt |
| <u>REP3-113</u> | Professor John Dowling |
| <u>REP3-114</u> | Rosemary Lewis |
| <u>REP3-115</u> | Rosemary Lewis |
| <u>REP3-116</u> | Rosemary Lewis |
| <u>REP3-117</u> | Southern Gas Networks plc |
| <u>REP3-118</u> | St Peter's Church, Cassington, Parochial Church Council |
| <u>REP3-119</u> | Stephen Westaby |
| <u>REP3-120</u> | Stop Botley West |
| <u>REP3-121</u> | Tim Sumner |
| <u>REP3-122</u> | Tom Lewis |
| <u>REP3-123</u> | Professor and Mrs Anne Banning |
| <u>REP3-124</u> | Gerard Mullan |
| <u>REP3-125</u> | Marina Sparks |
| <u>REP3-126</u> | Professor George Leeson |
| <u>REP3-127</u> | Steve and Lesley Chipper |

2 Applicant's Responses to Representations provided at Deadline 2

2.1 Local Authorities and Statutory Consultees

Table 2.1: Applicant's Responses to Representations provided at Deadline 2 – Local Authorities and Statutory Consultees

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
|--------------------------|------------------------------------|---|---|-----------------------------|
| REP3-072 | Oxfordshire Host Authorities | <p>REP2-014 – 6.5 Environmental Statement Appendix 7.5: Settings Assessment (Rev 2)</p> <p><u>VWHDC</u> 1.9.136 - Upper Whitley Farmhouse. The applicant states the historical, evidential and aesthetic values that contribute towards its heritage significance would not be affected by the Project. The magnitude of impact as a result of the change within its setting is considered to be no change. Similarly, at 1.9.180 - Tumbledown Cottage, the applicant states the magnitude of impact on the heritage significance of this non-designated heritage asset is considered to be low adverse. This has been assessed as resulting in a long-term, reversible minor adverse effect. In contrast, the summary response to the Joint Local Impact Report on page 41 [REP2-026], states a significant adverse landscape and visual effect has been identified and acknowledged for the NGET substation.</p> <p>VWHDC therefore query whether the Settings Assessment for these two assets is correct, as it is not clear how the scale of the NGET substation results in a significant adverse effect on landscape but has no impact on assets experienced in the same wider context. A structure that large will still be visible in that area.</p> <p><u>WODC</u> The applicant's Settings Assessment [REP2-014] provides useful explanation of the settings of high value heritage assets in West Oxfordshire. The Grade I listed Church of St Peter and St Paul (Church Hanborough) is of high sensitivity/value. The historical and evidential values that contribute towards its heritage significance would not be affected by the Project. There would be impacts on the aesthetic and communal values, but these would only occur through the change in longer views towards the church. The Page 17 Q more immediate setting of the church, comprising the churchyard and the nearby buildings and open spaces within the historic core of the village, would not be affected. Where a development might result in an impact on a church tower or spire which is visible in a wider setting 'such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, The Grade I listed Church of St Peter is of high sensitivity/value. The historical and evidential values that contribute towards its heritage significance would not be affected by the Project. There would be impacts on the aesthetic and communal values, but these would only occur through the change in longer views towards the church. The more immediate setting of the church, comprising the churchyard and the nearby buildings and open spaces within the historic core of the village, would not be affected. Any group values associated with the other historic buildings in the village would remain unchanged.</p> <p>The applicant's settings assessment concludes that overall, the heritage significance of the churches at Church Hanborough and Cassington would be barely affected, therefore the magnitude of impact as a result of the change within its setting is considered to be negligible adverse, resulting in a long-term, reversible minor adverse effect. As the church spires are visible within the surrounding landscape however, the applicant acknowledges that the wider landscape setting of these heritage assets make a reasonable contribution to the heritage significance of the churches.</p> <p>The applicants LVIA [PDB-006] identifies a number of viewpoints which the OHA regard as particularly important for understanding the impact on the landscape setting of churches at Church Hanborough and Cassington. For Church Hanborough, viewpoint 26 (View looking north from footpath 238/5/20) and viewpoint 39 (View looking west from footpath 152/6/10, near Purwell Farm) and for Cassington, viewpoint 39 (View looking southeast from footpath 152/6/10, near Purwell Farm).</p> | <p>The Applicant is aware of the comment from VWHDC in [REP3-072] and also of the images provided on page 6 of Cumnor Parish Council's comments on responses to ExQ1 [REP3-078] which appear to indicate that parts of the Grade II listed Upper Whitley Farmhouse are visible in views across the proposed development site from locations along Bushy Leaze Lane.</p> <p>A revised assessment will be presented in the next version of ES Appendix 7.5: Settings Assessment; this will be prepared following the consultation on the change request set out in Change Request 2 Notification [REP2-045].</p> <p>The Applicant's position with regard to the likely impacts and effects on the Grade I listed churches of St Peter (Cassington) and St Peter and St Paul (Church Hanborough) is set out in ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]. The assessment has been undertaken in accordance with the correct guidance, specifically the 2017 Historic England document The Setting of Heritage Assets (Second Edition). This sets out that the setting itself is not a heritage asset, but that the assessment needs to consider how the setting contributes towards the significance of the heritage asset. The Applicant has identified that the proposed development would cause harm to the significance of these two Grade I listed churches, and that in each case the harm would arise from the change within their setting. It is not necessary (or indeed possible within the guidance) to separately identify harm to the setting of the heritage assets.</p> | Historic Environment |

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| | | <p>The applicant's LVIA assesses the significance of effect for each of these viewpoints as moderate to major adverse for winter year 1, reducing to minor to moderate adverse for summer year 15.</p> <p>Although the heritage significance of heritage assets would be barely affected, the setting of the heritage assets would be affected and this should be acknowledged.</p> | | |
| REP3-072 | Oxfordshire Host Authorities | <p>REP2-017 – 7.6.2 Outline Operational Management Plan (Rev 1)</p> <p>2.2 - Operational Activities. OHA welcome the clarification for dealing with replacement infrastructure during the lifetime of the proposed development. The OHA do not believe that the applicant's revised OOMP adequately addresses the points made by the OHA in paragraphs 7.10.28-29 of the Joint Local Impact Report [REP-079]. The OHA still wish to see a climate risk assessment worked into the applicant's Outline Operational Management Plan [REP2-017] to consider the impacts of extreme weather events on the development.</p> | <p>The Applicant has presented its approach for how climate change risks have been considered and where relevant scoped out of the assessment of climate change chapter [REP3-016] as being not significant for the EIA. As is detailed within the Outline Operational Management Plan [REP2-017]. A regular schedule for visual inspection of the panels and all other solar infrastructure will be undertaken which would include consideration of signs of damage which could be impacted due to climate related hazards.</p> <p>The Applicant would note that appropriate consideration has been given towards reducing the potential risk of climate change impacts on the Project as per the Applicants Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (REP1-019) Appendix 2. Additionally, REP1-019 3h details the lessons learned from recent climate related instances from UK Solar farms. These have been repeated below here for clarity:</p> <ul style="list-style-type: none"> Storm damage to panels and racking: Botley West design response: Compliance with EN 1991-1-4 (Eurocode 1, Part 1-4) of the English/British standard BS EN 1991-1-4:2005 + UK National Annex (NA to BS EN 1991-1-4:2005) taking into account country-specific wind zones, reference velocities, terrain categories, roughness lengths etc. for the United Kingdom The design and module height of 2.2 m at a low angle reduces the risk, taking into account the standards Electrical faults leading to fires: Botley West design response: Electrical faults leading to fires are mitigated by installing high-voltage cables underground to minimize the risk of ignition, ensuring safe and secure operation. In addition, substations are equipped with CCTV for fire identification, and preventive fire protection measures and regular safety checks are carried out to enhance safety. Component overheating: Botley West design response: Component overheating in substations is monitored using infrared thermography and temperature sensors for early detection of hotspots, partial discharge monitoring to identify insulation faults, gas-in-oil analysis for thermal issues in oil transformers, and SCADA systems for real-time data integration and alerts. AI based analysis helps detect abnormal temperature trends early. Flood and water ingress causing failure: Botley West design response: Sensitive cable routing (e.g., HDD under rivers), creation of flood alleviation pond north of Cassington as a resilience measure. | Climate_Change |
| REP3-072 | Oxfordshire Host Authorities | <p>REP2-019 – 7.6.3 Outline Landscape and Ecology Management Plan (Rev 1)</p> <p>1.1.8 - Outline Monitoring Programme. OHA welcome monitoring for the lifetime of the proposed development. However, the OHA would welcome clarity as to how the applicant proposes to resource the councils for their role in monitoring the ecological enhancements as this resourcing is usually secured via a Section 106 agreement.</p> <p>10.2- Biodiversity Objectives. OHA welcome the change of beehives to read insect hotels. 16.3.1 - Replacement trees. OHA welcome the inclusion of this paragraph, but it should be further amended to cover all trees removed. Furthermore, whilst OCC recognises that the majority of trees removed would not be within the authority of the council, OCC would expect the applicant to plant at least 2 trees for every tree removed in line with Policy 3 of the Tree Policy for Oxfordshire. The OHA also considers it important that the development's scheme design should seek to avoid the impact on TPO in the first instance before considering replacement planting. In addition, OCC requests that CAVAT (Capital Asset Value for Amenity Trees) assessments should be provided for OCC trees that require removal as part of the development in line with Council's tree policy.</p> | <p>Suitable tree replanting can be agreed upon detailed design. As detailed design will provide the surety of which trees are impacted and therefore inform new tree planting to mitigate for these losses. Should Highways trees be impacted, appropriate Arboricultural Policies will be pursued, and if required a CAVAT assessment will be completed to start to inform any tree-related payments to the HA.</p> | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | <p>REP2-021 – 7.6.5 Outline Written Scheme of Investigation (Rev 2)</p> <p>Oxfordshire County Archaeological Service can confirm that this revised OWSI, dated July 2025 [REP2-021], has been agreed and is an acceptable document.</p> | The Applicant welcomes this confirmation. | Historic_Environment |
| REP3-072 | Oxfordshire Host Authorities | <p>REP2-024 –11.5 Compulsory Acquisition (CA) Schedule and Land Rights Tracker (Rev 2)</p> <p>OHA have no comment to make on the changes to this document currently.</p> | The Applicant welcomes this confirmation. | Land_Agreements |

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|--------------------------|------------------------------|--|---|-----------------------------|
| REP3-072 | Oxfordshire Host Authorities | REP2-026 – 12.3 Applicant's Responses to Local Impact Reports submitted at Deadline 1 Page 5-Revisit Heritage Impact Assessment- OHA still consider this is required. | The Applicant will produce a revised version of ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141] following the consultation on the changes set out in Change Request 2 Notification [REP2-045] . | Historic_Environment |
| REP3-072 | Oxfordshire Host Authorities | <p>Page 15-16- Waste and Resources- In response to the Examining Authority's First Written Questions [REP2-049] and within the Local Impact Report [REP1-072], Oxfordshire County Council Minerals and Waste Policy & Strategy team highlighted that whilst an Outline Site Resources and Waste Management Plan [APP-233] had been prepared which sets out the estimated types and quantities of waste that would be generated during the construction process, together with measures for how the construction waste will be managed, there was not this level of detail on Operational and Decommissioning waste. In relation to projected arisings, timescales and management routes during both operation and decommissioning.</p> <p>Due to the size and scale of this development and the potential future waste arisings, we consider that this would have a significant impact on waste management infrastructure and have implications that should be considered within Oxfordshire's future Minerals and Waste Local Plans. We therefore request that the detail on projected waste arisings and management facility requirements during both operation and decommissioning should be provided prior to any consent being granted. This information has still not been provided.</p> <p>Within the applicant's response to paragraph 7.14.11 the Applicant notes that Requirement 12 of the draft DCO [REP1-005] states that prior to the final commissioning for any part of the authorised development, an operational management plan will be agreed by the relevant planning authority, in consultation with the planning waste authority and relevant highway authority.</p> <p>Whilst we acknowledge that the Requirement 12 requires an operational management plan, it also says that it must be substantially in accordance with the outline operational management plan, we do not feel that the information currently contained within the Outline Operational Management Plan [APP-234] is sufficient. Even when combined with the [APP-233] Outline Site Resources and Waste Management Plan there is still insufficient information for the implications of the potential future waste arisings and management requirements to be adequately considered. In response to paragraph 7.14.7 of the LIR the Applicant also maintains that details on the waste arisings during decommissioning will be set out in the future Decommissioning Management Plan (as set out in the Outline Decommissioning Plan [APP 236]), which we also consider does not provide sufficient information for its impact to be considered. The Applicant states in response to paragraph 7.14.11 of the LIR that "The Applicant notes that there are existing facilities within the UK that currently recycle photovoltaic panels. The number of recycling facilities is likely to increase with the expansion of solar power. The number of panels to be replaced during the operation and decommissioning phases of the Project represent a proportion of the national figure. With this in mind, the Applicant considers there will be facilities in place to manage this waste stream"</p> <p>The Applicant has acknowledged that the "number of recycling facilities is likely to increase" and "there will be facilities in place to manage this waste stream".</p> <p>Oxfordshire County Council are the Waste Planning Authority for Oxfordshire and must plan for the management of future waste arisings. This is why we have sought information on the projected quantities and types of waste arisings, so that we can potentially plan for this future waste arising and explore facility demand to meet this future need sustainably and most efficiently. However, the Applicant goes on to state in response to paragraph 7.14.14 of the LIR that "The identification of specific waste management facilities that will be used by the Project are subject to confidential commercial discussions and therefore, are not included within the ES or DCO application documents. However, the Applicant confirms that facilities are already established and in operation to manage the key waste streams from the Project." The Waste Planning Authority seek clarity on this issue. If the Applicant believes there are facilities already in place, this conflicts with the statement that "the number of recycling facilities is likely to increase" as stated in their response to paragraph 7.14.11 of the LIR.</p> <p>It also demonstrates that to know facilities are already established and in operation, they must have details of the amount of waste arisings and assessed the expected</p> | <p>The Applicant has provided the key types and estimated quantities of waste that will be generated during the operations and maintenance phase and the decommissioning phase in ES Chapter 18: Waste and Resources [APP-055] (see Table 18.26 and Table 18.27 respectively). The tables also identify the intended management option for the key waste types. With regards to waste from the operations and maintenance phase, the Applicant has also provided estimated timescales when panels may have to be replaced.</p> <p>The Applicant acknowledges that Oxfordshire County Council as the Waste Planning Authority must plan for the management of future waste arisings. However, the Applicant notes that the Project does not represent the only source of solar panels that will require to be recycled. There are solar panels on existing developments and panels from other future projects that will also require to be managed. On this basis the Applicant suggests that planning for the solar panel waste stream is well progressed, .</p> <p>The Applicant notes there is existing infrastructure in place within the UK to recycle end-of-life solar panels. Work is underway to expand the number and capacity of recycling facilities to support the Government's plan to expand solar energy. This includes an action within the Government's Solar Roadmap (June 2025) to support new innovative recycling processes. Private companies are also progressing future recycling solutions to manage panels from large scale projects. The Applicant clarifies that it has not selected a specific facility for managing wastes from the operations and maintenance and decommissioning phases, however it will provide a list of the authorised processors for recycling the end-of life panels in the Decommissioning Plan. The Decommissioning Plan will be prepared in accordance with the Outline Decommissioning Plan [APP-236] and will be approved by the relevant planning authority prior to the decommissioning phase and secured through a requirement of the draft DCO.</p> | Waste_and_resources |

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|--------------------------|------------------------------|--|---|--------------------------|
| | | management route. This information should be provided as part of the decision-making process. If the applicant considers that facilities are already established to manage the key waste streams, but are confidential, we will hope the ExA requests to see these to ensure that they are managing their projected waste arisings most sustainably. The projected waste arisings and their management from this large scale and significant development, both during operation and decommissioning, should be a key consideration in determining this application. The Minerals and Waste Policy and Strategy Team therefore remain of the view that there is currently insufficient information within the application to ascertain its impact, particularly on existing waste infrastructure and to plan for the management of the waste arisings from this development over future plan periods. | | |
| REP3-072 | Oxfordshire Host Authorities | <p>Page 17- Mineral Safeguarding- OCC agree that within Oxfordshire's Minerals and Waste Local Plan Part 1: Core Strategy, Oxfordshire's minerals planning vision for 2031 includes ensuring a sufficient supply of aggregate materials available to meet both local development needs and wider demands. This supply is to be sourced from:</p> <ul style="list-style-type: none"> • Secondary and recycled aggregates (where practicable); • Locally produced sharp sand and gravel, soft sand, limestone, and ironstone; and • Import of materials such as hard crushed rock that are not available locally. While the vision prioritises secondary and recycled aggregates, it explicitly qualifies this with "where practicable," recognising that these sources alone cannot meet all aggregate needs. Oxfordshire supports maximising the use of recycled and secondary aggregates through Policy M1, which promotes the development of appropriate facilities to increase their contribution. The use of recycled and secondary aggregates is inherently limited by the scale of construction and demolition activity within the county and the nature of available feedstock. These materials often vary in quality and are not suitable for all applications, particularly those requiring high-specification aggregates, such as load-bearing concrete, where land-won primary aggregates remain the only viable option. According to the Minerals Products Association, it is estimated that recycled and secondary materials constitute approximately 28% of total aggregate supply. In Oxfordshire, the three-year average sales of recycled and secondary aggregates is estimated at 0.469mtpa, compared to 2.368mtpa for primary aggregates, indicating that recycled and secondary sources accounted for roughly 20% of the county's aggregate supply over the past three years . <p>In addition, the annual LAA considers this contribution of secondary and recycled aggregate towards Oxfordshire's supply when establishing the Aggregate Provision Rate for primary minerals to ensure an adequate and steady supply. Therefore, while Oxfordshire is committed to increasing the use of recycled and secondary aggregates, the continued availability and safeguarding of primary aggregate resources remains essential to meet current and future demand.</p> | As stated within the Mineral Resource Assessment [APP-195] , the potential volumes estimated do not take account of the potential constraints to mineral extraction and the volume therefore is considered to be an overestimate of a potential resource. No reserves have been proven to underlie the proposed development to date. Any mineral resource that is considered viable for mineral extraction would be available upon cessation of the proposed development. | Ground_Conditions |
| REP3-072 | Oxfordshire Host Authorities | <p>Quantity of Material In response to the applicants detailed response located in the section Mineral Safeguarding Ground Conditions, we highlight that the Mineral Resource Assessment Section 5 [APP-195] specifically explores the Extent of Potentially Viable Mineral Resources on the Site and sets out the Total volume of potentially viable mineral resource. Paragraph 5.1.1 [APP-195] sets out that "The sand and gravel deposits underlying the project represents the potentially viable mineral resource that could be of commercial interest for mineral extraction". Table 5.1 [APP-195] and supporting text specifically comments that there is "potentially viable (i.e. extractable) Sharp Sand and Gravel mineral resource... approximately 3,581,000m³"</p> <p>As previously set out within the Local Impact Report [REP1-072] this would equate to around 6.87 million tonnes of primary aggregate, which could assist in meeting the County's mineral requirements over the life of the proposed development, so the next 40 years, not just the current Local Plan period (2031). Further, the need for mineral safeguarding is supported by the NPPF, which requires Local Authorities to safeguard mineral resources, 'whilst not creating a presumption that the resources defined will be worked' (paragraph 223 c). Whilst it is recognised that there is potential overburden within the site that will need to be removed before the sand and gravel can be extracted, and there is a requirement for potential buffer zones, the demand for future minerals may be such that with the suggested overburden the site is considered commercially viable over the next 40 years. In addition, this</p> | <p>As stated previously, in line with the Outline Decommissioning Plan [APP-236], <u>all piles will be removed</u>. The proposed method of piling is driven piles, where ground conditions allow, using H or I steel piles, to a maximum depth of 3 m. In much of the mineral safeguarding area, approximately half of the pile may be driven and reside within overburden material (the Mineral Resource Assessment [APP-195] identifies potentially up to 1.50 m of overburden material), and therefore in some places, only 1.50 m into the upper layers of the safeguarded deposit. Given the type of piles proposed, they <u>do not</u> require significant force to drive them in nor remove them. The area impacted by this type of pile would be very localised and therefore considered negligible and would not impact on the overall viability of a potential mineral resource beneath the proposed development. It is anticipated that there would be no greater damage imposed by piling than there would be imposed by the method of mineral extraction (i.e. possible crushing by mechanical excavation).</p> <p>In addition to this, sharp sand and gravel reserves are typically processed following extraction, so it is considered reasonable that should any localised areas of sand and gravel resource be 'damaged' by piles, this would likely take the form of localised crushing, increasing the sand fraction of the material which is also considered to be economically valuable for future use.</p> | Ground_Conditions |

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| | | <p>safeguarded mineral resource area has historically already seen mineral working, as a previously worked quarry (now restored) falls between areas 2.120 and 2.114 of the application area, known as City Farm. This clearly demonstrates that operators find extraction in this area viable. Adverse effects on Minerals Resource In response to the Examining Authority's First Written Questions [REP2-049], Oxfordshire County Councils Minerals and Waste Policy and Strategy Team sought clarification regarding the treatment of the proposed 3m pilings following decommissioning, as the submitted reports did not clearly specify whether they would be removed or left in situ. If the pilings are to remain in situ due to the impracticality of removal, this could significantly impact the future viability of the underlying mineral resource. Any subsequent mineral operator would be required to extract and dispose of these pilings prior to commencing mineral extraction, resulting in increased operational complexity, resource requirements, potential delays, and additional waste arisings, all of which could adversely affect the economic feasibility of mineral recovery .</p> <p>Conversely, if the pilings are to be removed, this process would likely require substantial force, which could disturb and bring mineral material to the surface, potentially affecting the integrity of the resource .</p> <p>Given these implications, clarification was requested to fully understand the potential impact on future mineral safeguarding and resource viability .</p> <p>Within the applicant's response to paragraph 7.6.10 of the LIR, the applicant has reiterated that decommissioning of the Project will be undertaken in line with the Outline Decommissioning Plan [APP-236]. "All above ground infrastructure will be removed. All below ground infrastructure, which are not practicable to remove without major disturbances, will be cut to 1m below the surface to enable future ploughing. All piles are to be removed."</p> <p>This still does not provide sufficient clarity on whether the piles will be cut of at 1m or totally removed. If all below-ground infrastructure situated below 1 metre is to remain in situ, it raises the question of whether the remaining 2 metres of the 3-metre pilings will also be left in place. If so, this could have a significant impact on the future viability of working the safeguarded mineral resource .</p> <p>Alternatively, if the full length of the pilings is to be removed, this could be considered to cause major disturbance, and force required to extract them could disturb or damage the underlying mineral deposit. In either scenario, the implications for future mineral extraction are considerable, and further clarification is therefore essential.</p> | | |
| REP3-072 | Oxfordshire Host Authorities | <p>Page 21 - Hydrology and Flood Risk-OCC: The applicant has outlined that updated versions of the OCoCP and OOM will address OCC's concerns with regards to surface water drainage during construction and the maintenance of ground conditions beneath the panels during the operational phase. Whilst this is welcomed, OCC as the LLFA believe that this information should have formed part of the Flood Risk Assessment and Surface Water Drainage Strategy. The applicant indicates that they will work in collaboration with the LLFA to develop a detailed Surface Water Management Strategy later and that this collaboration is secured via the DCO. OCC would welcome clarity on how the DCO secures this collaboration with the LLFA being as Requirement 9 of the DCO only outlines that the relevant planning authority for each drainage strategy will have to approve that strategy before it can be implemented. The Requirement does not secure collaboration with the LLFA, and likewise the DCO does not in any way ensure that the LLFA will be adequately resourced for the collaboration.</p> | <p>See the Applicant's response to ExQ2.7.9 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2], submitted alongside this Deadline 3 response document.</p> | Hydrology_and_Flood_risk |
| REP3-072 | Oxfordshire Host Authorities | <p>Page 22 -Hydrology and Flood Risk- OCC: The LLFA do not believe that the applicant's commitment to a detailed OMP later is sufficient to address the LLFA's concerns regarding the ongoing maintenance of the ground beneath the panels. The LLFA would like the Outline Operational Management Plan to specifically make provision for ongoing maintenance of the area beneath the panels for the purposes of maintaining drainage. The commitment to maintain the grassland beneath the panels contained within the OLEMP [REP2-019] is not sufficient to address these concerns.</p> | <p>Appendix 10.2, Conceptual Drainage Strategy, [REP3-022] assesses the maximum design scenario for new impermeable areas, and includes initial information regarding the management and maintenance of SuDS features. The following will be prepared post-DCO in accordance with the outline CoCP and will be submitted to and approved by the relevant local planning authority or authorities prior to construction:</p> <ul style="list-style-type: none"> • Detailed drainage layout, including refined calculations, and • Further details regarding water quality, management and maintenance of SuDS features <p>The Outline Landscape and Ecology Management Plan [APP-235] sets out how grassland management will be managed throughout the development. A detailed Landscape and Ecology Management Plan (LEMP) will be prepared in accordance with the OLEMP and will be</p> | Hydrology_and_Flood_risk |

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| | | | submitted to and approved by the relevant local planning authority or authorities prior to construction. This will include provisions in respect of on-going maintenance and management of the landscape and ecology. | |
| REP3-072 | Oxfordshire Host Authorities | Page 23 -Hydrology and Flood Risk- OCC: The LLFA believe that assessments of historic flooding should be used in conjunction with other information to understand the flood risk of the proposed development. Information on local flooding should be used in conjunction with modelling and other information to assess the current flooding risks associated with the site to form the baseline upon which the assessment of the development's impacts will be assessed against. | Appendix 10.1 Flood Risk Assessment [REP3-020] includes a review of historical flooding using both Environment Agency and Lead Local Flood Authority datasets (including strategic Flood Risk Assessment data). This data has been incorporated within the baseline assessment for the project. | Hydrology_and_Flood_risk |
| REP3-072 | Oxfordshire Host Authorities | Page 24- Hydrology and Flood Risk- OCC maintains its position in relation to the DCO's drafting with regards to drainage consenting, as laid out within section 8 of the joint Local Impact Report [REP1-072]. OCC see no reason for the DCO to alter the consenting timescales as they are set out in the Land Drainage Act. The OHAs are set up to consent under the provisions of the Land Drainage Act and as such consenting under a different regime may result in delays or refusals of consent that could be avoided if the applicant were to alter the provisions of the DCO. OCC has yet to have direct engagement with the applicant on this issue but would welcome a dialogue with the applicant. | Please see the Applicant's response to ExQ 2.7.2 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. | Hydrology_and_Flood_risk |
| REP3-072 | Oxfordshire Host Authorities | Page 29- Ecology, Nature Conservation and Trees- The OHA would welcome the applicant signposting how the DCO secures individual tree surveys and protective regimes at detailed design stage. If the DCO does not adequately secure these then it is the opinion of the OHA that they should be produced pre-consent to provide certainty that they will be factored into the detailed design. | Post-consent an appropriate requirement could be embedded in the DCO to provide surety of tree protection, including full tree surveys to inform detailed tree protection regimes. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 30- Ecology, Nature Conservation and Trees- response to paragraph 7.4.9: The applicant doesn't address the need for a precautionary approach to avoidance and mitigation given the unprecedented scale of the proposals for this type of development. Instead, they have described how they have sought to deliver enhancements. | As set out in table 9.8.1 of ES Chapter 9 Ecology and Biodiversity [REP2-012] , commitment 9.1, the Project has been designed to avoid removal of any woodland, ponds and watercourses. Further, all hedgerows (other than where access required), trees, ponds, woodland, ancient woodland and water courses will have appropriate buffers placed around them to protect them during construction. The implication of this is that the Project has specifically been designed to avoid impacts to such features. Appropriate mitigation for other impacts is set out in both the oCoCP [REP3-030] and oLEMP [REP3-034] . As such, the Project has considered avoidance and mitigation measures as well as enhancements. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 31- Ecology, Nature Conservation and Trees- response to paragraph 7.4.14: The applicant has acknowledged that bat survey data is still subject to analysis and not available to inform the assessment of impacts on this nationally important assemblage, and that whilst the project has committed to 'appropriate buffers' these have not been defined and therefore have not informed design of the scheme. Concerns about the impact of large solar arrays on foraging, or vibration, noise and have not been addressed. | Full details of bat surveys and associated technical note will be provided to the Examination at Deadline 5. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 31 - Ecology, Nature Conservation and Trees- response to paragraph 7.4.16-19- The applicant has acknowledged that their assessment of impacts on otter and water vole has been made without being informed by any survey for these species. With reference to Natural England's standing advice for otters, we consider that survey should be undertaken on the basis that otters are known to be present across Oxfordshire, and the development will affect habitats near a water body through environmental effects, such as creating noise or light. Similarly, with reference to Natural England's standing advice for water voles, we consider that survey should be undertaken on the basis that water vole do occur on watercourses throughout Oxfordshire. No assessment has been provided within the ES to indicate that watercourses throughout the site are unsuitable for water vole, given the applicant's assumption they are present it is assumed they have not been discounted due to lack of suitable habitat. Therefore, in line with standing advice, water vole surveys should be undertaken. As the applicant will have ecologists surveying the watercourses to inform the BNG assessment, it would not seem unreasonable to request that they also undertake a survey for field signs of otter and water vole at the same time. | The Applicant's position on this matter is set out fully in response to ExQ2.8.1 and ExQ2.8.2 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 32- - Ecology, Nature Conservation and Trees- response to paragraph 7.4.24: The applicant agrees that skylarks are unlikely to nest within the panel arrays and have clarified that the skylark plots are intended to provide foraging habitat for | The Applicant's position with respect to skylark mitigation is set out in the Skylark Technical Note, Annex 4 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. | Local_Ecology_and_Nature |

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| | | skylark nesting within the surrounding landscape and in the archaeology areas. However, it is likely that the archaeology areas do not provide sufficiently large open areas to support nesting skylark – Defra advice on providing habitat for skylarks suggests the land parcel needs to be over 10ha to reduce predation risk. Whilst it is understood that the 'archaeology areas' cover 36ha, these are dispersed across the site amongst the solar panels, and the size of individual grassland areas is not apparent. It is unclear that the provision of skylark plots within grassland of the solar array areas is necessary or effective in improving foraging opportunities for skylark; skylark plots are designed for provision within winter cereals to increase accessibility to invertebrate prey within the crop, it is unclear that such a role is needed within a grassland habitat. 228 breeding skylarks were recorded in the breeding bird survey. Natural grassland has an average density of 0.27 skylark territories per ha (see CIEEM In practice 117 Sep 2022). If the 36ha archaeology grassland areas are large enough to accommodate skylark, they can only be expected to support around 130 territories, meaning that around 100 skylark territories would be expected to be lost to the scheme. But given that it is likely that many of the 'archaeology areas' are too small to be suitable skylark nesting habitat, it is likely that all skylark nesting habitat will be lost, resulting in the loss of 228 skylark territories. More than 60ha of grassland habitat (on land where skylarks are currently absent) would be needed to compensate for the loss of 228 skylark territories. As we previously stated this would have a significant impact on a priority species, and we request that further off-site mitigation is provided to compensate. | | |
| REP3-072 | Oxfordshire Host Authorities | Page 32- Ecology, Nature Conservation and Trees- response to paragraph 7.4.26: The applicant has dismissed our request for a 50m buffer to ancient woodland, referencing that Natural England standing advice is for provision of a 15m buffer. The standing advice indicates that 15m is the minimum requirement and that buffer zones should vary depending on the scale and type of development, and its effect on ancient woodland as well as the character of the surrounding area. Given the scale of the scheme, the rarity of the bats using the woodlands, and the identification of these areas for improving woodland connectivity in the emerging LNRS The OHA are of the view that more than the 15m minimum buffer should be applied and recommend a 50m buffer in line with good practice from the Woodland Trust. | The Applicant's position with respect to ancient woodland buffers remains as previously set out and is agreed with Natural England as per ref 4.1.8 in the Statement of Common Ground between the Applicant and Natural England [REP3-054] . | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 33- Ecology, Nature Conservation and Trees- The OHA note that buffers for individual ancient and veteran trees could be larger than that of ancient woodland. As such it is important that the applicant clarify whether ancient woodland contain ancient and veteran trees, as this may require alterations to the layout and design of the scheme which must be secured prior to the end of Examination | During our extensive veteran tree surveys, the arborists visually surveyed the edge of the ancient woodlands, as an estimate this visual survey would penetrate 10-15m into the woodland edge. This would have collected data on any ancient of veteran trees within the woodland edge zones. Any aged trees deeper into the woodland would unlikely create a greater buffer requirement than that provided by the wholesale woodland buffers already provided. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 34 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.43/44 – The fact that the survey data on bats is not yet available to allow assessment of the significance of the effect of the proposals, or the proposed mitigation, for the nationally important bat assemblage is concerning. The OHA are unable to comment further as we are not party to the discussions with Natural England that have been referenced by the applicant. | Full details of bat surveys and associated technical note will be provided to the Examination at Deadline 5. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 34 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.45- Whilst reference is made to the Bat Conservation Trust and Institution of Lighting Professionals guidelines within the oCoP, the OHA still consider that it would be helpful to flag that where there are particularly sensitive flightlines or foraging areas for bats within the oCoP. | Full details of bat surveys and associated technical note will be provided to the Examination at Deadline 5. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Survey for both otter and water vole should be undertaken to ensure that the proposals are compliant with the legislation protecting these species, and to ensure the SoS can fulfil their Duty under the Natural Environment and Rural Communities Act 2006 to further the conservation and enhancement of these species. Regarding this latter point, knowledge of the presence/absence and indication of the size of any populations of these species could inform specific conservation and enhancement measures. For example, should water vole be using the watercourses, then there is an opportunity to introduce targeted management of mink within the large area covered by the scheme. This is known to be a key element in recovering water vole populations and the scale of the scheme could be an excellent opportunity to manage the mink population in a strategic way. | The Applicant's position on this matter is set out fully in response to ExQ2.8.1 and ExQ2.8.2 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. The Applicant notes the reference to mink control and has incorporated specific reference to this issue into the oLEMP submitted at Deadline 4. | Local_Ecology_and_Nature |

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| REP3-072 | Oxfordshire Host Authorities | Page 35 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.47-50- The applicant has not addressed the suggestion of providing aquatic habitats for GCN (and other species) within the scheme. There is a notable lack of proposals for pond creation - a missed opportunity. Reference is made by the applicant to the provision of floodplain habitats, GCN are less likely to be supported within the floodplain. We recommend that a matrix of pond habitats is provided for across the site both to enhance habitats for GCN and benefit a wide range of other aquatic species. | The Applicant will consider the potential for additional water features to be created as part of the detailed landscape schemes, subject to constraints such as agricultural land quality, buried archaeology and flood zones. For example, these may be included within buffer zones to be created to protect bat flight lines. Details will be provided at Deadline 5. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 36 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.54- Lake effect – the OHA note the applicant's response but remained concerned that there is a lack of evidence of the impacts of a change to solar over such a significant area in the UK. The OHA advocate for the applicant to commit to long term monitoring to understand the impacts, both positive and negative, and would recommend the value of collaborating with universities to improve sectoral understanding of the impact of large scale solar on ecology in the UK. | The Applicant has committed to a broad range of monitoring measures, as set out in section 13 of the oLEMP [REP3-034]. This includes with respect to both wintering and breeding birds. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 37- Trees- The applicant has indicated that should consent be granted, and once detailed design drawings are available then full tree surveys can be scoped. However, the OHA are concerned that this means the applicant will wish to discharge Requirement 5 prior to the commissioning of any tree surveys. This would mean that should the tree surveys identify harm as a result of the proposed design the applicant will not be able to change the design/layout of the scheme to avoid this harm. The OHA would welcome clarity from the applicant as to how the drafting of the DCO prevents this situation occurring. | The proposed future tree survey would be used to refine detailed designs, as any major or significant arboreal issues have been accommodated within the current initial designs as part of the design process already i.e. woodland buffers and veteran trees buffers are already assigned. Any future tree surveys would provide local-level arboricultural data, which would help to micro-design specific / local design matters. It is highly unlikely any significant or wide-reaching arboreal constraints would arise from these surveys. | Trees_Plants_and_Flora |
| REP3-072 | Oxfordshire Host Authorities | Page 38- - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.71- There is scope to specifically aim habitat management to be appropriate for dormice and nightingale which have specific requirements. For dormouse: Create and/or enhance a suitable network of connecting habitats e.g. coppice, woodland, and/or thick hedgerows (these should connect to the original site where the Hazel Dormouse was recorded). Retain trees which have cracks, crevices, and deadwood and retain woody species like blackthorn and hazel in sunny, open areas. Ensure that there are arboreal connections across woodland rides at least every 50-100m and erect dormouse boxes and/or tubes to encourage nesting opportunities. Retain woodland understories in winter and avoid clear felling in known dormouse locations. Consider managing woodland through traditional coppice of non-adjacent coupes. For nightingale: Introduce coppicing to woodlands and manage it so that all stages of the coppice lifecycle are always present in the woodland. To do this, coppice coupes (groups of trees) that are cut on rotation. Within woodlands, encourage dense layers of shrub to develop (including bramble) and control deer where necessary to prevent them from eating the shrub layer. On woodland edges allow dense scrub and shrubs to develop to offer feeding and nesting habitat and create woodland rides and glades that have space for a scrub zone. Re-wet woodlands to improve invertebrate presence and food supply for these birds. Connect existing suitable habitats with tall, thick hedges. | The Applicant agrees that the provision of such features to support both dormice and nightingale are important within the detailed landscape design. As such, the Illustrative Masterplan [AS-020] includes the provision of over 26km of new hedgerow, 26km of existing hedgerow to be strengthened and over 5ha of new woodland planted. In addition, the oLEMP [REP3-034] sets out that scrub planting will be undertaken alongside hedgerows to increase the ecotones available. All of these features will support both species. Final details of management regimes, such as those suggested by the OHA, will be set out within the individual LEMPs for each area of the Project. To provide the OHA with reassurance that management to support both species will be specifically included, the oLEMP submitted at Deadline 4 has been updated to include reference to them, where appropriate. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 38- Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.72- The applicant has amended their description to 'insect hotels' this is welcome. However, as per our previous comments [REP1-079], The OHA suggest further diversity in habitats for pollinators could be incorporated through the LEMPs. | The oLEMP [REP3-034] sets out the principles of the landscape design and management for the Project. The final planting plans and detailed management will be set out within the individual LEMPs for each area of the Project. The individual LEMPs are required to be approved by the relevant Local Authority. As such, there is scope for further diversity of planting to be incorporated at the detailed LEMP stage, as requested by the OHA. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 38- - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.73- The applicant has not addressed the point raised, which is not about the benefits of the scheme with respect to ecology, but with respect to wider environmental net gains. Any consideration of this aspect is still missing from the scheme (for clarification wider environmental net gains refer to benefit derived from the natural environment such as climate mitigation/adaptation, reduced flood risk, improved water quality and benefits to health and well-being). | With respect to wider environmental gains, these are set out in the individual technical chapters that support the application. Examples include: ES Chapter 16 - Human Health [APP-053] discusses the public health implications of the Project associated with: diet and nutrition; open space, leisure and play (including physical activity); transport modes, access and connections; community identity, culture, resilience and influence; education and training; employment and income; climate change and adaptation; air quality; noise and vibration; public understanding of risk; and wider societal infrastructure and resources. The latter includes consideration of how the electricity produced by the Project would enable many aspects of everyday life that either protect or promote good health (a moderate beneficial significant effect). ES Chapter 16 - Human Health [APP-053] paragraphs 16.14.3 and | Local_Ecology_and_Nature |

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| | | | <p>16.14.4 respectively summaries the negative and positive effects of the project for population health. Whilst not reaching an overall net conclusion, as beneficial and adverse effects do not necessarily cancel each other out and may be experienced by different individuals in different geographies at different times, the conclusions may inform consideration of net environmental gain. In terms of significant population health effects, there is one localised short-term significant adverse effect related to public right of way use at the start of the operational phase, which reduces over time; however there is a wider long-term significant beneficial effect throughout operation from the public health benefits of increased renewable energy security.</p> <p>As set out in Section 9 of ES Chapter 9 Ecology and Biodiversity [REP2-012], the removal of chemical inputs associated with agriculture (fertiliser, pesticides etc.) will have a beneficial impact on the water quality of the River Evenlode and connected water courses.</p> | |
| REP3-072 | Oxfordshire Host Authorities | Page 39-Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.77- More detail is included in the BNG Assessment than in the oLEMP, including outputs from the biodiversity metric and baseline plans. It is usual practice to agree, as a minimum, the baseline biodiversity value of a site at time of the planning application. The OHA therefore suggest that it is appropriate to reference the BNG Assessment in the requirement. | <p>The BNG Assessment submitted with the Application [APP-162] sets out the assessment of the Illustrative Masterplan, as submitted, to demonstrate that the Project can deliver the BNG that it is committing to. However, since this is illustrative, the final BNG score will be determined during detailed design. That detailed design is required to be substantially in accordance with the principles set out in the oLEMP [REP3-034] (as required by Requirement 6 of the dDCO [REP3-004]).</p> <p>Therefore, since the oLEMP is the document that will determine the final landscape design (and therefore final BNG delivered), it is the Applicant's view that this is the most appropriate document for Requirement 7 (BNG) to refer to.</p> <p>Notwithstanding this, section 9 of the oLEMP has been updated at Deadline 4 to make specific reference to the baseline BNG score, as set out in the BNG Assessment [APP-162].</p> | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Page 40 - Milestone on the Oxford Road (NHLE number 1181978). VW HDC still consider protection is required. As a minimum protective fencing should be erected given the tight spaces that large machinery will be working in this location. | The Applicant acknowledges this comment. A detailed Code of Construction Practice can include measures for suitable protective fencing to avoid damage to the listed milestone. | Traffic_Transport_and_Access |
| REP3-072 | Oxfordshire Host Authorities | Page 47- Traffic Transport and Access-OCC: The Applicant states that "the proposals at the B4044 Eynsham Road/ B4017 Cumnor Road junction...have taken account of LTCP policy 1 – Transport User Hierarchy and policy 15 – Vision Zero to ensure the most vulnerable road users are prioritised...offering highway safety improvements to all road users including cyclists". It is unclear from paragraph 12.7.18 of ES volume 1, Chapter 12 [APP-049] and at Appendix 12.8 Accesses and highways drawings Part 4 of 4 [APP-209], how safe provision at the B4044 Eynsham Road/ B4017 Cumnor Road junction for people cycling is being achieved. Widening of junctions (including the B4044 Eynsham Road/ B4017 Cumnor Road junction), as is referred to in paragraph 12.7.18 of ES volume 1, Chapter 12 [APP-049] puts people cycling at greater risk (especially with the introduction of more HGVs on this route) without appropriate measures to protect people cycling (as per LTN 1/20). More information, including drawings is required to understand how safe cycling at this junction will be achieved. If it has not been considered, then it must be. | The Applicant notes this comment and is preparing drawings that show how cyclist safety will be at no greater risk following the works to the B4044 Eynsham Road / B4017 Cumnor Road junction for discussion with OCC with a view to agreement. | Traffic_Transport_and_Access |
| REP3-072 | Oxfordshire Host Authorities | Page 49-Rights of Way- The applicant has outlined that a full and detailed PROW management plan is secured via the requirements of the DCO. OCC has raised concerns around the content of the outline PROW Management Plan in both the joint LIR [REP1-079] and the council's response to question 1.7.27 of ExQ1 [REP2-049]. OCC also note that there has yet to be any engagement with the applicant on this issue since December 2024 and would welcome further meaningful and constructive engagement with the applicant. Page 51-52-Rights of Way-OCC: The Applicant states that it 'is continuing to engage with OCC regarding the implementation of the proposed cycle routes as part of this project'. The Applicant has not been forthcoming with engagement and OCC has not engaged with the Applicant since December 2024 on this. OCC is keen to have further discussions with the applicant on this matter. VW HDC: Greenways are referred to in the Landscape and Ecology Management Plan [APP-235] but there is no clear indication of where these will be located. For the south site in Vale for example, it states 'various woodlands in the Southern Site Area including the SSSI at Wytham.' There is however no PROW in the vicinity of Wytham, and it is noted 'greenways' are not keyed on the Landscape, Ecology and Amenities Plan [APP- 228]. | With regard to concerns raised by OCC in the Joint LIR [REP1-079] and 1.7.27 of ExQ1 [REP2-049] , please refer to Q2.16.4 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. A separate plan showing the location and geographic extent of greenways, as described in the Landscape and Ecology Management Plan [APP-235] , within the Order Limits will be prepared and submitted at Deadline 5 of the examination process. However, this plan will also be shared directly with OCC to inform ongoing discussions regarding onsite and offsite PROW connections/improvements. | Public_Right_of_Way |
| REP3-072 | Oxfordshire Host Authorities | Page 59- Proposed new requirement (2) - Grampian condition- OHA remain of the view this is required as the applicant has yet to provide clear evidence the substation will be delivered under the TCPA pursuant to EN-1 para 4.11.8 and | Please see the Applicant's response to ExQ 2.7.7 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document | DCO_Process |

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| | | 4.11.9. An application to VWHDC has yet to be made and there is no guarantee planning permission will be forthcoming given the significant landscape, heritage and Green Belt concerns identified with the applicant's proposed development in this location. | | |
| REP3-072 | Oxfordshire Host Authorities | Page 60- LVIA not clear in how it has been used to inform siting, scale and design. OHA consider the change request does not cover the concerns with regards to the proposed siting, scale and design of the proposed development. | <p>The effects of the Project on potentially significantly affected landscape and visual resources and receptors are assessed in section 8.9 of the LVIA [PDB-006].</p> <p>The Applicant has adapted the extent of the solar farm and increased distances from potentially sensitive receptors. The Applicant has also increased the amount of landscape mitigation, thereby minimising adverse effects on landscape and visual receptors, in line with the guidance in National Policy Statement EN-1 and EN-3.</p> <p>Hedgerows have been proposed as part of the landscape mitigation proposals, as shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. These will be managed to a height of 3m to 4m, as specified in the outline LEMP. Existing hedgerows will be reinforced and managed to a height of 3m to 4m. This will be sufficient for close views to be screened. More distant views on rising land will be available and this is acknowledged in the LVIA.</p> <p>There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement.</p> <p>Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology within the Landscape and Visual Impact Assessment [PDB-006] to support those judgements. All the landscape consultants that have worked/are working on the project are Chartered Members of the Landscape Institute and experienced in the assessment of solar farms within this type of landscape.</p> | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Page 60-Proposed mitigation methods such as hedges around Public Rights of Way- The information does not clearly present the changes to PROW from proposed mitigation. The OHA would draw the applicant's attention to comments within the joint LIR [REP1-079] , in which the OHA voiced concerns about the proposed mitigation around the PROW and the need to avoid a tunnelling effect for users of the PROW. | Please refer to the Applicant's response to Q2.15.9 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. | Public_Right_of_Way |
| REP3-072 | Oxfordshire Host Authorities | Page 64-Landscape Sensitivity- Concerns about the LVIA remain. GLVIA 5.30 states 'Individual components of landscape, including particular features, and notable aesthetic or perceptual qualities can be judged on their importance in their own right, including whether or not they can realistically be replaced. They can also be judged on their contribution to the overall character and value of the wider landscape. For example, an ancient hedgerow may be high value on its own right but also be important because it is part of a hedgerow pattern that contributes significantly to landscape character.' The applicant states "a core principle of the Project is that existing landscape features are to be retained. The removal of hedgerows has been avoided as far as practicable (paragraph 6.4.20 of Chapter 6: Project Description [APP-043]). In addition, the proposed landscape mitigation follows the management guidelines for the landscape character areas. As such, the inherent characteristics and physical landscape features would be unaffected. Based on this, the overall sensitivity of the landscape receptors is evaluated as having a medium-low sensitivity to the type of development proposed.' | In light of this and other Representations though the examination process, the Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as the reasoning for the levels of significance reached. It is not the Applicant's intention to make wholesale changes to the LVIA methodology, as this has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Page 64-Representative Viewpoint Locations-OHA concerns remain as previously stated about the Landscape Character Assessment of the site. [REP1-074] covers correspondence with regards to representative viewpoints. It is noted that representative viewpoints did not change after comments given at Scoping, and PEIR stages of the application with regards to area where additional viewpoints were requested. It should be noted that ZTV which included the substation was not issued to OHA until after the PEIR. As stated early on the process the information needs to be accessible for the general public to understand the scheme. Other NSIPs for example that include extents and labels of the Viewpoints include Cottam, Fenwick, Mallard Pass, One Earth and Springwell NSIPs. | A record of email correspondences, with host authorities, and schedule of suggested amendments / additions to Representative Viewpoints has been kept. This included reasoning for inclusion or discounting any suggestions from the host authorities and is summarised in Table 8.5 of the LVIA [PDB-006] . | Landscape_and_Visual_Impacts |

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| REP3-072 | Oxfordshire Host Authorities | Page 68- Compensate- At least 26.5km of new species-rich hedgerows are proposed and at least 26km of existing hedgerow reinforced. The proposal for new hedgerow is predominately related to creating hedgerows between existing rights of way and the site. This is not an indication of 'Short lengths of PROW impacted'. GLVIA para 6.27 covers a range of issues that can be helpful to consider including in the last bullet point 'the nature of the changes, which must be judged individually for each project, but may include. For example, changes in the existing skyline profile, creation of a new visual focus in the view, introduction of new manmade objects, changes in visual simplicity or complexity, alteration of visual scale, and change to the degree of visual enclosure'. | <p>The landscape planting has been designed in conjunction with ecology requirements and Management Plans. It should be acknowledged that hedgerows have a certain life expectancy and at some point will require to be replaced. Landscape is under constant change. In terms of landscape character, the introduced hedgerow planting is considered an enhancement measure with a consequent beneficial effect.</p> <p>The Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as the reasoning for the levels of significance reached per each recreational route.</p> | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Page 72-The LVIA information is not easily accessible-OHA note that additional plans have been submitted, but they do not contain a Masterplan layout to aid use. The applicant states that the extent of the visualisations will be reviewed and where relevant revised and reissued. In reply, the full extent of change at a viewpoint should be represented in associated Photomontage. The Representative Viewpoint 48 for example clearly illustrates that views would be achieved to west. This is like the view the Greenbelt Way will achieve as it travels southwards towards the solar arrays, but a Photomontage has not been produced to illustrate the extent the solar arrays and the NGET substation can be seen to the west. | The updated Layout and Design Principles document [APP-015] is secured by Requirement 5 of the Draft DCO, which ensures that the final Layout and Design Principles document, the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228] will be agreed with the LPAs. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Page 83-Section 9, OHA's summary and conclusions - The applicant considers OHA has failed to undertake a balancing exercise. In reply OHA draw the applicant's attention to National guidance NSIP: Advice for Local Authorities which states The LIR should include a statement of positive, neutral and negative local impacts. However, it does not need to include a balancing exercise between positive and negative. The Examining Authority will carry out a balancing exercise of relevant impacts, including local impacts specifically reported in the LIR. it does not need to include a balancing exercise between positive and negative. | <p>Noted.</p> <p>However, the Applicant is referring in particular to the Joint LIR report from the OHA's [REP1-072]. At para 1.3 it states: "<i>This report comprises the joint LIR of CDC, VWHDC, WODC and OCC. The 'Host Authorities' will be collectively referred to in this report as the 'Oxfordshire Host Authorities' (OHA).</i>"</p> <p>The Applicant is of the view that it remains unclear whether the OHA's have or have not balanced the provisions of relevant NPS when reaching conclusions on whether there is conflict with local plan policy.</p> <p><i>At para 1.7 it states: The LIR is intended as a factual document and does not attempt to conclude on the acceptability of the proposals. However, it does seek to identify where there is compliance (or alternatively non-compliance) with national and local plan policy, and to distinguish between matters that are of most potential impact and those that are either temporary or less significant in the longer term.</i></p> <p>At section 5 of that report it sets out in some detail relevant NPS policy and local policies. No conclusions are drawn in this section.</p> <p>Section 7 on Local Impacts then states in its introductory paragraphs that: <i>Chapter 7 and sub-chapters consider the local impacts of the proposed development. Each chapter identifies the relevant policies within development plans and other local policy, the key issues raised by the proposed development, the extent to which the applicant addresses them and thus the degree to which the councils consider the proposal to comply with local policy and where applicable the NPSs.</i></p> <p>With section 7 of the report it refers to environmental topics and has Key /Policies / Compliance tables, summarising policy compliance. Whilst at the beginning of each of these tables in identifies relevant NPS guidance, the next column says 'not assessed'.</p> <p>Section 9 is the OHA conclusions. It states at para 9.1 that: <i>This report has assessed the impacts of the proposed development that have been identified within the applicant's Environmental Statement, within the context of the OHA local knowledge and understanding of the area, and with reference to relevant local and national policies.</i></p> <p>In summary, whilst the Joint LIR goes to great length in setting out NPS policy and identifies where a conflict with local policy has been identified, it remains unclear to the Applicant whether the OHA's have or have not weighed NPS's into their assessment of compliance with LP policy.</p> <p>A confirmatory statement that the OHA have not weighed relevant NPS into their conclusions on compliance or otherwise with local policy would be appreciated.</p> <p>If the OHA's confirm that they have not weighed in the NPS's policies into their conclusions, then the Applicants point remains about any overall conclusions to be reached in the planning balance i.e. any conclusions reached by the OHA's regarding compliance with local plan policy are useful only insofar as they are the OHA record of compliance/conflict before the wider balancing exercise has been undertaken with NPS policy.</p> | Planning_Policy |

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| REP3-072 | Oxfordshire Host Authorities | REP2-027 – 12.4 Applicant's Responses to Written Representations submitted at Deadline 1 VWHDC Page 8- Lack of clarity on NGET substation- National Grid has provided an indicative timetable [outlined in Cumnor Parish Council's response to ExQ1, REP2-048] in conflict with the applicant's delivery programme. VWHDC therefore remain concerned over the lack of clarity with this element of the proposed development. | See the Applicant's response to ExQ2.7.7 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. | DCO_Process |
| REP3-072 | Oxfordshire Host Authorities | REP2-027 – 12.4 Applicant's Responses to Written Representations submitted at Deadline 1 VWHDC Page 8-Landscape and Visual Impact - VWHDC stands by its requirement for the complete removal of the southern site. The applicant quotes LUC as not requiring the whole removal of the southern site. LUC were providing an initial example list of where panels could be removed. It is not a finite list. The OHA will be providing further information at D4. | The Applicant notes the concerns of VWHDC. Comments provided a Deadline 1 in response to this issue were based on the information provided within the LUC review (Appendix 1 of the Joint LIR [REP1-072]). The Applicant looks forward to receiving the further information at Deadline 4 and will comment further as required. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Page 9- Inappropriate Development in the Green Belt-VWHDC simply disagree with the applicant on this. Critical National Priority (CNP) was referenced in the LIR. If the applicant's view is now reliant on CNP where the starting point is Very Special Circumstances (VSC) are met, why does the applicant then justify VSC with further assessment. In respect of VSC cited by the applicant, VWHDC fails to see what educational benefit is derived from the proposed development to justify development in the Green Belt. Reference to sub-station capacity is also misplaced as the sub-station does not yet exist to amount to a VSC for locating solar development here. Furthermore, the southern site is not well screened for the reasons set out in previous VWHDC responses. | The overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure is to be treated any tests which are set out within the NPS's, or other planning policy, including the VSC test. Arguably, because of this policy, the Applicant need not have made a VSC case. However, in the event that the ExA did not take that view, the Applicant has submitted a VSC case in the hope and expectation that the ExA and SofS will confirm that the test has been met in line with policy. There is no definition of what VSC must comprise. An educational facility is proposed by the Applicant just south of Bladon is capable of being a VSC. This facility was provided in response to the OCC suggestion for such a facility. On that basis, it can be reasonably assumed that if used by schools in the vicinity, it will have an educational benefit that would otherwise not exist (see also Applicant response to ExA first written questions, Q1.16.21 – [REP2-025] , and the Applications Change Request Notification, [REP2-045] , change no.10). | Green_Belt |
| REP3-072 | Oxfordshire Host Authorities | Page 10- Points 74 to 78 – VWHDC considers it is incorrect for the applicant to state All viewpoints were agreed with the local planning authorities for the reasons set out in previous responses. | A record of email correspondences, with host authorities, and schedule of suggested amendments / additions to Representative Viewpoints has been kept. This included reasoning for inclusion or discounting any suggestions from the host authorities and is summarised in Table 8.5 of the LVIA [PDB-006] , including a number of additional viewpoints (46 and 47) included as a direct response to comments from the VWHDC. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Page 10- Planning Balance- VWHDC has not omitted the benefits of the scheme. Paragraph 78 states in favour of the proposed development, very significant weight is attributed to the need to provide additional energy from renewable sources and the considerable wider environmental benefits associated with increased production from renewable sources. Furthermore, there is no need for VWHDC to undertake an assessment of compliance with an NPS. This assessment will be carried out by the ExA. | The Applicant welcomes the OHA support in principle for the Project and the benefits they have noted. However, please respond to the Applicants point made in their response to the OHA's 'Page 83- Section 9, OHA's summary and conclusion' above. i.e. CAN the OHA's please provide a confirmatory statement they have not weighed relevant NPS into their conclusions on compliance or otherwise with local policy. Their joint LIR is confusing on this matter. | Planning_Policy |
| REP3-072 | Oxfordshire Host Authorities | REP2-028 – 12.5 Applicant's Responses to D1 Submissions submitted at Deadline <u>VWHDC</u> Page 8-Switchgear building- The applicant's response cites table 8.19 of the LVIA [PDB-006] as the maximum design scenario that has been tested. Table 8.19 states NGET substation maximum height assumed to be 12 to 12.5 m. VWHDC wish to see further LVIA work on the revised NGET substation height of 14m, including wireframe analysis. | In light of this and other Representations though the examination process, the Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as the reasoning for the levels of significance reached. It is not the Applicant's intention to make wholesale changes to the LVIA methodology, as this has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | REP2-029 – 12.6 Applicant's Response to Rule 17 Letter Para 1.1.34 - There is very little under the Avoid section . Para 1.1.40 - Representative viewpoints were not agreed . Para 1.1.43 - 'The type of construction activities proposed is not notably discordant in nature within the agricultural landscape.' This type of statement just highlights | Please refer to the Applicant's response to REP3-072 (VWHDC) above in relation to Representative Viewpoints. The Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as to the reasoning for the levels of significance reached. It is not the Applicant's intention to make wholesale changes to the LVIA | Landscape_and_Visual_Impacts |

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| | | <p>OHA concerns about the overall assessment. The installation of a solar farm is not visually similar to agricultural use of the land.</p> <p>Para 1.1.47 - There is no description of how much each footpath has been impacted to conclude 'will be experienced within a short period of time, even during the operational phase. We therefore consider these provided assessments stating the maximum level of magnitude of not greater than Medium to be sufficient and adequate' .</p> <p>Paragraph 1.1.48 -The statements do not match with what is seen in the viewpoints and photomontages. Very little of the description in this paragraph matches what is seen in the Vale .</p> <p>Para 1.1.52 - It is not clearly explained why their professional judgement appears to be counter to the matrices in the LVIA document.</p> <p>Additional Photomontages for Historic Environment Assessment It is noted new viewpoints for the southern site are not provided. Given VWHDC queries on whether the Settings Assessment is correct in respect of Tumbledown Cottage and Upper Whitley Farmhouse, the applicant should review this.</p> <p>Hedgerow Removal Plans <u>VWHDC</u> VWHDC object to the extent of removal of H13.01 and H13.04 – the removal of hedgerow, particularly along the B4017 public highway, is considered excessive and detrimental to the landscape and public realm.</p> | <p>methodology, as this has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01, as agreed with the OHA.</p> | |
| REP3-072 | Oxfordshire Host Authorities | <p>REP2-045 – Applicant's Change Request 2 Notification</p> <p>OHA welcome the reduction and removal of panels, but the changes do not go far enough to address concerns raised. It is queried how MW generation of the proposed development is not affected by the removal of some 87Ha of panels (cumulative removal of installation areas identified in change 1, 2, 4 and 5). The OHA would like clarification from the applicant as to how many more panels could be removed without significantly reducing the operating capacity of the development. Further to this, the OHA outlined at section 6 of the Local Impact Report [REP1-079] that the full 840MW capacity proposed by the scheme is not required in order to meet the County's targets for solar generation. Whilst the applicant has outlined that the NPSs for energy place no upward limit the generating capacity of any given solar scheme, the OHA once again re-iterates its position that areas of panels should be removed from the scheme where they cause significant harm to Landscape, Heritage Assets, Minerals Safeguarded Areas, Arboricultural and Ecological assets and Public Rights of Way. The OHA have also previously indicated that further reductions to the scheme are required to remove minerals safeguarding areas from the scheme, and to ensure adequate buffers around ancient and veteran trees and ancient woodland [REP1-079] .</p> <p>Given that the applicant has indicated that approximately 87 hectares of panels could be removed from the scheme without impacting the original estimate of generating capacity, the OHA believe that the applicant must consider removing other areas of panelling where this removal would mitigate harm as, in light of Change Request 2, these omissions may not significantly impact the generation capacity of the project .</p> <p>The applicant on numerous occasions has outlined that harm identified as being caused by the scheme is outweighed by the significant positive weight attributed to delivering Critical National Priority Infrastructure. However, if the applicant can deliver the same or similar level of positive benefit with omissions that significantly reduce the level of harm then the OHA question how much weight can be given to CNP and question how the applicant has demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated in line with paragraph 4.2.11 of NPS EN-1 .</p> <p>Change 1 and 2- The OHA view the removal of the panels within the two areas indicated as an opportunity to address the impact on nesting skylarks as the fields in which the arrays have been removed could be used to secure necessary compensation for loss of skylark breeding habitat. Further provision of open habitats is likely still needed to compensate for those lost to the scheme. Over 60ha of grassland where skylarks are currently absent is likely needed to support the 228 pairs of skylarks recorded in 2024) .</p> | <p>The generation capacity can be maintained through optimisation of the solar array layout within the Order limits as shown. This includes a measured reduction in the distance between arrays, enabling more efficient use of the available space. As a result, despite the removal of certain installed areas, the overall scheme remains capable of delivering the intended generation capacity. However, this position will be compromised with any further reductions. This is explained below.</p> <p>1- Why is oversizing necessary and proportionate</p> <p>Oversizing is necessary and proportionate because MWp (megawatt-peak) ratings are laboratory values at Standard Test Conditions (STC: cool panels, high irradiance) that are rarely met on site; in real operating conditions, higher temperatures and sub-STC irradiance, the AC (alternating current) connection would be under-loaded unless DC (direct current) capacity exceeds AC, so oversizing is how we reliably "fill" the 840 MW AC export in typical UK conditions rather than only during rare STC-like peaks. In addition, output degrades slightly around 0,3% per year, so starting with higher DC preserves our ability to reach 840 MW AC later in the project life, not just in year 1. Finally, a higher DC/AC ratio increases the annual energy (MWh) delivered to the grid from the same 840 MW AC cap, especially in mornings, evenings, and winter, improving utilisation without changing the physical impacts already assessed and controlled by the Environmental Statement (ES) design envelope.</p> <p>2- Why further array reductions jeopardise the 840 MW offer:</p> <p>Cutting DC (or pushing spacing/coverage below the tested maxima) lowers the DC/AC ratio, so the plant will under-utilise the 840 MW connection for more hours and more years, especially as modules degrade which directly reduces lifetime MWh and public-interest benefits, with no environmental upside, because impacts are already tied to the ES physical parameters (area, heights, spacing, equipment counts).</p> <p>3- Design tweak already made to protect DC/AC:</p> <p>The initial optimal design used ~2.0 m N–S separation. The current design uses ~1.7 m (still within the ES range of 1.5–3.0 m) to offset DC losses from land removals and keep the DC/AC ratio adequate. This is slightly less optimal electrically (more mutual shading in low sun), but it is a necessary, ES-compliant adjustment to sustain 840 MW delivery across the life of the project.</p> <p>4-Peak shaving and why Oversizing is used:</p> <p>Peak shaving (also called clipping) occurs when direct current (DC) solar generation briefly exceeds the alternating current (AC) grid export limit, which is 840 MW AC at Botley West, so any power above that cap is curtailed. Oversizing, meaning installing more DC capacity than the AC limit, addresses the opposite day-to-day issue: with a DC to AC ratio of 1.0, UK irradiance rarely reaches laboratory conditions, so the AC power rarely reaches 840 MW, and the connection is underused for much of the day. With a ratio around 1.5, clipping losses are</p> | Project description and Design parameters |

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| | | <p>Change 2 – Reduction of solar installation near Oxford Airport. CDC welcome a reduction in the extent of panels and cabling proposed to the south of the airport which, subject to the submission of a plan identifying the area to be removed, would potentially address concerns relating to public safety (aviation activities), Green Belt, coalescence and loss of an area of Grade 2 BMV agricultural land .</p> <p>Change 8- In principle OCC support the use of the definitive map for plotting Rights of Way within the order limits and recognise that the applicant is attempting to alleviate OCCs concerns around doglegs within the PRoW network. However, OCC is concerned that unrecorded public rights may subsist on the non-definitive (walked) lines that are in use on the ground if they have been used 'as of right' by the public for 20 years or more without challenge. This may result in a situation whereby the walked route on the ground is added to the Definitive Map following a successful claim for public rights, resulting in two routes running parallel to each other, the legal line and the walked route. This may cause the applicant to unintentionally put panels across routes in use on the ground on which currently unrecorded public rights exist. If these are subsequently claimed as PRoW and added to the Definitive Map, the legal line would then be obstructed. OCC would oppose any development obstructing the PRoW. OCC believes that the simplest solution is as outlined in response to question 1.17.20 at ExQ1 [REP2-049] in so far as the applicant should divert sections of the legal line that do not align with the walked route as originally proposed but expand the order limits to prevent dog legs in the PRoW. OCC would be happy to engage with the applicant on this issue and would also be able to share the relevant PRoW GIS data to assist the process</p> <p>Change 10 – Educational facility- None of the OHAs have been involved in any detailed discussions about the proposed educational facility or its proposed location in Change Request 2. The OHA have concerns with this location including impact on the Green Belt, landscape impact and access which do not appear to have been considered within the applicant's environmental statement .</p> <p>Change 11 – NGET Substation. VWHDC consider that until the detail of the revisions proposed are known, it cannot be concluded that there are no new or materially different likely significant environmental effects that would arise a result of this change. The increase in height of the substation to 14m has yet to be tested to demonstrate visual impacts are not significant. Further LVIA work is therefore required to accompany this change.</p> | <p>typically only 2–5%, while the additional energy yield from better utilization of the inverter is much higher. The net effect is a positive gain in MWh/MWac. the plant produces more in the mornings and evenings and during winter, so the 840 MW connection is well used for longer periods. Some midday power may be clipped on the clearest, coolest days, but such events are infrequent because cloud cover, higher module temperatures, and atmospheric effects limit peaks. The net effect is a substantial increase in annual energy, about 26 percent more megawatt-hours, which far outweighs occasional clipping losses. The grid connection (AC export capacity) is usually the bottleneck; more DC capacity behind the same AC limit increases full-load hours and reduces the specific cost per kWh exported.</p> <p>5- Why “clipping” is not a reason to resist Oversizing (Mallard Pass example):</p> <p>At Mallard Pass, the Applicant explained (and the Examining Authority engaged with) the core point: the number of hours in a year when PV reaches absolute peak is relatively small; any “clipped” energy at those rare peaks is minor compared with the much larger gains secured across mornings, evenings, cooler periods, winter, and dull days. In other words, a modest increase in DC capacity (oversizing) materially raises annual MWh while keeping the AC export cap unchanged.</p> <p>6- The High Court’s confirmation of Oversizing:</p> <p>In Ross v SoS HCLG & RES Ltd [2025] EWHC 1183 (Admin), the Court upheld permission for a sub-50 MW scheme with oversizing and confirmed that oversizing is not, in principle, inconsistent with EN-3 if properly justified and assessed, and focusing on export “clipping” is not an “obviously material” planning consideration where the planning effects are assessed on the full physical envelope.</p> <p>In light of the above the Applicant remains of the view that any harm identified as being caused by the scheme is outweighed by the significant positive weight attributed to delivering Critical National Priority Infrastructure. Despite the change in coverage of panels, this balance in favour of the Project is unaffected. The Applicant do not accept the County’s assertion that they do not need the 840MW proposed by the Applicant. The Applicant does not believe it is prudent, nor accurate analysis, to claim ‘oversupply’ of schemes by reference to a register or registers of schemes the significant majority of which have not submitted planning applications, have not demonstrated that they have secured land, have not taken FID and have not made significant (irreversible) progress in construction. This is particularly relevant in relation to NESO has shown historically that “only 30-40% of projects in the [connections] queue make it to fruition” [https://www.neso.energy/news/eso-leads-way-major-initiative-accelerate-connections-electricity-transmission-grid] and is engaged in an ongoing ‘Connections Reform’ activity which seeks to remove projects which are “speculative or do not have the necessary funding or planning permission to progress” from connection queues [Page 65 of the Clean Power 2030 Action Plan].</p> <p>We note the energy needs analysis presented by IP’s. It is important to recognise that the Project is not designed solely to meet the local needs of the OHA’s but is a nationally significant scheme which is designed to contribute to meeting national decarbonisation and energy security needs as established in the National Policy Statements. Therefore, while the Applicant is not commenting on the numerical conclusions of the IP’s analysis, it notes that EN-1 confirms that this is a not a relevant point for the Examiner to consider because of Paras 3.2.6 – 3.2.8 of EN-1.</p> <p>In terms of Minerals Safeguarding, the Applicant has provided extensive comments on the issue; in responses to Relevant Representations [REP1-020] building on the Mineral Resource Assessment (MRA) submitted as Appendix 11.14 [APP-195] and in further responses to the Examining Authorities First Written Questions [REP2-025] and Written Representations submitted at Deadline 1 [REP2-027]. The Applicant’s MRA includes consideration of the need for the development against sterilization of resource (which will not be permanent), and the practicality of prior extraction. The total prior extraction of materials, and associated overburden, once buffer zones and the fragmented land parcels are factored in, has not been considered viable in the Applicant’s assessment, and the MRA considers that the need for the solar farm development does outweigh the economic and sustainability considerations of extraction, even though the resource is not permanently sterilised.</p> <p>In terms of the further loss of arrays as a result of Change Request no.2 the Applicant remains of the view that, overall, benefits continue to outweigh harms. The application of the mitigation hierarchy has not stopped since submission, and the whilst the Applicant would have preferred not to incur losses of arrays through the Change Requests, they show that they continue to be responsive to IP’s concerns. The weight to be given to CNP infrastructure remains unaltered.</p> | |

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| | | | <p>The Applicant's position with respect to skylark mitigation is set out in the Skylark Technical Note, Annex 4 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2], submitted alongside this Deadline 3 response document.</p> <p>The Applicant discussed this issue with OCC during a meeting held on 21 August 2025. The Applicant explained that the solar installation areas were amended to avoid the definitive routes of PRoW in response to a previous comment made by OCC that these permanent closures and diversions should be avoided, where possible. Change 8 avoids the requirement for the permanent stopping up and diversion of public footpaths 132/4/10, 152/8/10 and 416/24/10 during consutrction, operation and maintenance and decommissioning of the Project.</p> <p>From a visual amenity perspective, the location of the NGET Substation on the bottom slope of the landform, away from residential receptors provides an inherent mitigation opportunity. The increased height of the substation will be covered in the revised LVIA and illustrated on the relevant visualisations.</p> | |
| REP3-072 | Oxfordshire Host Authorities | A statement of progress on SoCG that remain outstanding and submission of SoCG completed since D2 (if required) OHAs continue to work with the applicant on SoCG. Updated drafts are to be provided by the applicant. | Noted. Updated SoCGs will be provided by the applicant at appropriate times. | Acknowledgment response required |
| REP3-072 | Oxfordshire Host Authorities | <p>Comments on the suggested locations to be included in any ASI .</p> <p><u>CDC</u> CDC supports the nominations by Bruce Windwood [REP2-091] and Stop Botley West [Appendix 1, REP2-082] <u>VWHDC</u> VWHDC supports the nominations by Cumnor Parish Council [REP2-047], Ben Prior [AS-043], Stop Botley West [Appendix 1, REP2-082] and Bill McGill [REP2-088] .</p> <p><u>WODC</u> WODC supports the nominations of Cassington Parish Council [REP2-046], Historic England [REP2-055], Bladon Village Hall and Recreation BVHRC [REP2-066], Stop Botley West [REP2-082], David Beaumont [REP2-095], David Foster [REP2-096], David Sherrat [REP2-097], Dustin Sean Dryden [REP2-105], Harry St John [REP2-108], Julie Hutton [REP2-112], Malcolm and Jayne Harding [REP2-118], Michael Brown [REP2-121], Ninon Linell [REP2-124], Pauline Briggs [REP2-126], Roger and Dianne Parker[REP2-133] and Simon and Dawn Leedham.</p> | The Applicant notes the comments of the OHAs and awaits further commentary from the ExA on the draft ASI Itinerary that was submitted at Deadline 3. | Acknowledgment response required |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.1.6 CROW-The OHA note the Cotswolds NL Board response from 25th June 2025 on this matter.</p> <p>This states that the CNLB has carried out their own assessment on the effects on the CNL and are satisfied that the development will not cause significant adverse effects on the landscape character and special qualities of the CNL. The CNLB considers that new planting/areas for enhancement on the land between the solar PV arrays and the CNL have the potential to provide landscape enhancements, which could be considered to contribute to furthering the purposes of the CNL designation and that these should be secured as part of the DCO should the development be approved.</p> <p>The OHA are content to be guided by the CNLB on this matter and support their request for enhancement planting to meet the s85 CROW requirement to further statutory purposes of the National Landscape.</p> <p>The Illustrative Masterplan suggests that such planting is currently not proposed, and the OHA requests that this is secured as part of the DCO process in liaison with the CNLB.</p> | <p>In response to Ex.A Q2.1.4 [EN010147/APP/14.2 Annex 3] the Applicant has expanded on the response given to Ex.A Q1.1.6 [REP2-025] and has produced a more detailed response on the effects on the 14 special qualities of the CNL.</p> <p>In summary, the findings are as set out in Chapter 8 [PDB-006]. Due to the lack of visibility of the Project from the CNL, it is not considered that any additional planting is necessary.</p> | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | <p>Q 1.1.8 Design Guides</p> <p>CDC – Agree the applicant response insofar as it states that the Cherwell Adopted Residential Design Guide is not relevant to solar developments. However, the applicant has not mentioned the Cherwell District Council Countrywide Design Summary SPG adopted June 1998 which seeks to guide all new development in the rural areas. The area within which the BWSF project would be located is defined as the 'Clay Vale of Otmoor' and includes the settlements of Begbroke, Shipton-on-Cherwell and Yarnton. In this area it identifies a number of implications for new developments which include avoiding loss of hedgerows to prevent the creation of monotonous exposed plains; avoiding undermining or interrupting views and settings of churches; retention of trees and hedgerows which integrate settlements into the landscape and ensuring that new planting maintains existing character.</p> | <p>The Applicant acknowledges the CDC references to content in these design guides. The Applicant has produced an updated Outline Layout and Design Principles document [EN01047/APP/7.7 Rev 4] providing more detail on the design parameters and how that are secured. The Applicant also submits an updated Project Mitigation and commitments Schedule. Also attached is a consolidation of the Applicant Approach to Design Note which also deals with the latest Government design guidance issued in April 2025 – Annex 4 of [EN010147/APP/14.2]. It also submits a document addressing the WODC Design Guide – Annex 1 of [EN010147/APP/14.2].</p> <p>Having considered all local policy, there is nothing in the local design guides that is not already in national policy and has not already been addressed by the process the Applicant has gone</p> | Planning_Policy |

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| | | <p>VWHDC – The Joint Design Guide is not purely residential focused. Its purpose is to improve the standard of design in all developments in South Oxfordshire and the Vale and ensure that only developments of the highest quality and sustainability are delivered. It covers the approach to design for all sites and covers using constraints and opportunities and site assessment as the starting point to site design and is relevant for all scales of development.</p> <p>WODC – The West Oxfordshire Design Guide is intended to encourage a high standard of design, and to promote new development which respects and fits in with the character of West Oxfordshire. The Guide sets out the characteristics which make West Oxfordshire unique, and which can be used to influence new design that reflects and enhances local character. The central theme linking all parts of the Design Guide is the belief that good design can only result from a comprehensive understanding of, and meaningful response to, local context in all its forms; that each context is unique and merits an individually tailored design response.</p> | <p>through (as set out in the OLDP [EN01047/APP/7.7 Rev 4] and the Applicants Approach to Design Note – Annex 4 of [EN010147/APP/14.2]).</p> <p>For the avoidance of doubt, the Cherwell District Council Countrywide Design Summary SPG adopted June 1998, makes no mention of solar development, nor renewable energy, and in the Applicant's view is a design guide aimed at residential and commercial development. As it does not anticipate solar development there is no policy or guidance for or against it. Nevertheless, the reference in the design guide to protecting the views and setting of churches in this area, is something that has been dealt with in the Heritage Chapter of the ES [CR1-003], and the views to Churches can be maintained when the layout and landscaping detail is submitted for approval to the OHA via Requirements 5 (layout) and 6 (landscape and ecology management plan) in the DCO.</p> | |
| REP3-072 | Oxfordshire Host Authorities | Q1.1.9. Design choices and functionality, 2) and 3)-OHA consider the applicant has not fully answered this and query whether sheep grazing under panels in such locations could be achieved or whether more shading of the ground and less vegetation establishment would result. | The Applicant confirms that the design flexibility described in Table 6.3 of ES Chapter 6 remains compatible with sheep grazing, even on sloped terrain. While the tilt angle or module configuration may be adjusted to ensure compliance with the 2.3 m maximum and 0.8 m typical lower edge height, sufficient clearance beneath the panels will be maintained to allow for continued agricultural use, including grazing. | Project_description_and_Design_parameters |
| REP3-072 | Oxfordshire Host Authorities | Q1.1.10. Outline Layout and Design Principles Document, 2). and 3)- OHA consider the current wording of Requirement 5 of the Draft DCO, Schedule 2 [REP2-004] does not cover fencing. Without knowing the details of the fencing and panel design/colour up front the OHA are concerned that the impacts as assessed by the LVIA are difficult to comprehend and cannot be understood prior to determination. The question about the implications of colour finishes on the visual impacts has not been answered. 4). NGET substation. VWHDC do not currently accept the applicant's assertion that the increase in height will not be significant. It has not been tested. Further LVIA work on the revised NGET substation height of 14m with wireframe evidence is required. | From a visual amenity perspective, the location of the NGET Substation on the bottom slope of the landform, away from residential receptors provides an inherent mitigation opportunity. The increased height of the substation will be covered in the revised LVIA and illustrated on the relevant visualisations. Design approach in respect of landscape and visual matters will be included in the revised LVIA and the Layout and Design Principles document, the detail of which is delivered by Requirement 5 and 6 of the Draft DCO. The current LVIA assessment considered using a colour palette for built structures that would minimize landscape and visual impacts and integrate these structures into the landscape. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Q1.1.11 Minimising glint and glare through design- This question has not been answered and therefore it appears to the OHA that there are no in-built features to reduce glint and glare. | Solar panels will utilise a low-reflectivity glass in order to minimise Glint and Glare. The solar panels have also been setback from sensitive receptors where possible and vegetation planting has been proposed to limit views where potentially significant impacts were predicted within the Glint and Glare Assessment. The layout has been revised to take account of Glint and Glare and other factors, including reorientation of panels which were predicted to occur towards the Air Traffic Control Tower at Oxford Airport. | Glint_and_Glare |
| REP3-072 | Oxfordshire Host Authorities | Q.1.1.14 Design Principles-OHA consider the Design Principles Document [REP1-014] does not adequately reference all design parameters set out in ES Chapter 6 Project Description [APP-043]. Other Infrastructure Parameters (Fence heights, CCTV and lighting) specified in table 6.4 of Chapter 6 are not referenced and these are required. | Noted, the Outline Layout and Design Principles Document will be updated at D4. | Site selection and Cable Route Alternatives |
| REP3-072 | Oxfordshire Host Authorities | Q1.1.16 Decommissioning – general - OHA support the inclusion of a decommissioning fund requirement along the lines of that used for the Oaklands Solar Farm and as specified by the applicant on page 18. | The Applicant acknowledges this comment. | Decommissioning |
| REP3-072 | Oxfordshire Host Authorities | Q1.1.17 Decommissioning- Piles and Soil stability- The Applicant has highlighted that all infrastructure (including piles) will be removed. Clarity is still sought on whether this include the piles below 1m? See previous response from the OCC Minerals and Waste Policy and Strategy Team to the ExQ1 questions [REP2-050]. If the piles are to be cut of at 1m below ground as has been suggested, then that is potentially 1,600,000 steel piles remaining in the ground below 1m, a proportion of which will fall within Mineral Safeguarding Area. If the pilings are to remain in situ due to the impracticality of removal, this could significantly impact the future viability of the underlying mineral resource. Any subsequent mineral operator would be required to extract and dispose of these pilings prior to commencing mineral extraction, resulting in increased operational complexity, resource requirements, potential delays, and additional waste arisings, all of which could adversely affect the economic feasibility of mineral recovery. | <p>As stated previously, in line with the Outline Decommissioning Plan [APP-236], <u>all piles will be removed</u>. The proposed method of piling is driven piles, where ground conditions allow, using 'H' or 'I' shaped steel piles, to a maximum depth of 3 m. In much of the mineral safeguarding area, approximately half of the pile may be driven and reside within overburden material (the Mineral Resource Assessment [APP-195] identifies potentially up to 1.50 m of overburden material), and therefore in some places, only 1.50 m into the upper layers of the safeguarded deposit. Given the type of piles proposed, they <u>do not</u> require significant force to drive them in, nor to remove them. The area impacted by this type of pile would be very localised and therefore considered negligible and would not impact on the overall viability of a potential mineral resource beneath the proposed development. It is anticipated that there would be no greater damage imposed by piling than there would be imposed by the method of mineral extraction (i.e. possible crushing by mechanical excavation).</p> <p>In addition to this, sharp sand and gravel reserves are typically processed following extraction, so it is considered reasonable that should any localised areas of sand and gravel resource be</p> | Decommissioning |

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| | | Conversely, if the pilings are to be removed, this process would likely require substantial force, which could disturb and bring mineral material to the surface, potentially affecting the integrity of the resource. | 'damaged' by piles, this would likely take the form of localised crushing, increasing the sand fraction of the material which is also considered to be economically valuable for future use. | |
| REP3-072 | Oxfordshire Host Authorities | Q1.1.21 Statement of Common Ground – content- OHA welcome the applicant's proposal to produce a SoCG for health and socio-economic matters. | Noted, updated SoCGs were submitted at D3 and will continue to be updated throughout the Examination. | Human_Health |
| REP3-072 | Oxfordshire Host Authorities | Q1.2.3 Cumulative Impact due to construction overlap- Slight correction that planning application 21/00217/OUT is a West Oxfordshire planning application | Noted, the applicant is currently undertaking an update to the cumulative assessment which will be submitted at D5. . | Cumulative_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Q1.3.3 Grampian-style requirement - Given the uncertainty around any separate NGET substation proposal and the lack of clarity in the DCO application on its design, OHA consider that such a requirement is appropriate and necessary as was set out within the LIR [REP1-072]. | The Applicant acknowledges this comment. | Acknowledgment response |
| REP3-072 | Oxfordshire Host Authorities | Q1.3.4 Reductions – The applicant has proposed a number of changes to order limits and project layout as indicated in Change Request 2 [REP2-045] to mitigate impacts on sensitive areas including Blenheim Palace WHS and London Oxford Airport. These relatively minor reductions made in response to representations from Historic England and the Airport, go some way to mitigating landscape, heritage and community safety impacts. There are many additional suggestions for removal of panels, made through relevant representations and written representations, that would result in a reduced size solar farm, but have not been reflected in the applicant's project layout to date. | The Applicant acknowledges this comment. | Acknowledgment response |
| REP3-072 | Oxfordshire Host Authorities | Q1.3.7 Other substations and PCS units – It is not clear that the noise impacts of the Power Converter Stations on users of public rights of way have been assessed. It is not clear how assessment of impacts other than on residential receptors at the edge of the project site have guided the choice of location for power converter stations throughout the proposed development. | <p>In response to the query, additional noise modelling and assessments have been undertaken to determine the distance from the PCS unit where the noise emissions will be 'slightly audible';</p> <ul style="list-style-type: none"> The measured daytime background sound level in rural locations have been assessed with 42dB LA90 being determined as the average background sound level for PROWs in the area of the proposed development. It is considered reasonable that where the sound level from the PCS units is 5dB above the background sound level, then it could be considered to be 'slightly audible'. The sound pressure level falls to 47dB(A) at between 75m and 100m from the PCS unit. This is based upon the maximum operational capacity which will only occur during warmer weather and when the electrical load is high. Therefore, most of the time, the sound emissions from the PCS units will be less than has been assessed. <p>We have determined that at a distance of up to 100m, noise from the PCS units is considered to be 'slightly audible' on a PROW. However, there are some locations where there are PCS units which are located within 100m of a PROW. These occur as follows;</p> <ul style="list-style-type: none"> Northern Area – 11 PCS Units Central Area – 15 PCS Units Southern Area – 3 PCS Units TOTAL – 29 PCS Units <p>There are some areas where a walker along path could experience noise from one or more PCS units in a single walk. These have been identified to occur in the following number of locations;</p> <ul style="list-style-type: none"> Northern Area – Once Central Area – Three times Southern Area – Once <p>In any case, we remain of the opinion that persons accessing PROWs are permitted to use the path to travel from point A to point B, and are thus not considered to be noise sensitive receptors. In any case, a walker who may experience some noise from the PCS units in some areas of the footpaths crossing the site would not experience a significant adverse effect.</p> | Noise_and_Vibration_Impact |

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| REP3-072 | Oxfordshire Host Authorities | <p>Q1.3.11 Mineral and waste resources - The Examining Authority (ExA) posed three specific questions regarding the consideration of Mineral Safeguarding Areas (MSAs) and Waste Sites. However, the Applicant has not provided a response to question 2 regarding why this land area was not avoided when designing and locating the proposed development. The question remains.</p> <p>OCC maintains its position as outlined in the joint LIR [REP1-079] that for the proposed development to be compliant with paragraph 5.11.19 of NPS EN-1, all panels and other structures should be removed from Minerals Safeguarding areas within the order limits.</p> | Please see the Applicant's response to ExQ 2.17.6 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2], submitted alongside this Deadline 3 response document. | Ground_Conditions |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.3.12 Field margins- OHA consider the applicant hasn't really looked at individual impacts and how the scheme could be adjusted to minimise them. This is particularly important for those homes with wide-open views especially from elevated locations such as in the Vale.</p> | Effects upon individual properties are included in the revised LVIA Chapter [PDB-006]. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.4.6 Clarification on calculations – The OHA do not believe that the applicant's response to this question adequately addresses the points made by the OHA in paragraphs 7.10.28-29 of the Joint Local Impact Report [REP-079]. The OHA still wish to see a climate risk assessment worked into the applicant's Outline Operational Management Plan [REP2-017] to consider the impacts of extreme weather events on the development.</p> | <p>The Applicant has presented its approach for how climate change risks have been considered and where relevant scoped out of the assessment of climate change chapter [REP3-016] as being not significant for the EIA. As is detailed within the Outline Operational Management Plan [REP2-017]. A regular schedule for visual inspection of the panels and all other solar infrastructure will be undertaken which would include consideration of signs of damage which could be impacted due to climate related hazards.</p> <p>The Applicant would note that appropriate consideration has been given towards reducing the potential risk of climate change impacts on the Project as per the Applicants Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-019] Appendix 2. Additionally [REP1-019] 3h details the lessons learned from recent climate related instances from UK Solar farms. These have been repeated below here for clarity:</p> <ul style="list-style-type: none"> Storm damage to panels and racking: Botley West design response: Compliance with EN 1991-1-4 (Eurocode 1, Part 1-4) of the English/British standard BS EN 1991-1-4:2005 + UK National Annex (NA to BS EN 1991-1-4:2005) taking into account country-specific wind zones, reference velocities, terrain categories, roughness lengths etc. for the United Kingdom The design and module height of 2.2 m at a low angle reduces the risk, taking into account the standards Electrical faults leading to fires: Botley West design response: Electrical faults leading to fires are mitigated by installing high-voltage cables underground to minimize the risk of ignition, ensuring safe and secure operation. In addition, substations are equipped with CCTV for fire identification, and preventive fire protection measures and regular safety checks are carried out to enhance safety. Component overheating: Botley West design response: Component overheating in substations is monitored using infrared thermography and temperature sensors for early detection of hotspots, partial discharge monitoring to identify insulation faults, gas-in-oil analysis for thermal issues in oil transformers, and SCADA systems for real-time data integration and alerts. AI based analysis helps detect abnormal temperature trends early. <p>Flood and water ingress causing failure: Botley West design response: Sensitive cable routing (e.g., HDD under rivers), creation of flood alleviation pond north of Cassington as a resilience measure.</p> | Climate_Change |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.6.3 Change Request 1 Outline Written Scheme of Investigation - The applicant has indicated that a revised outline written scheme of investigation (OWSI) has been submitted at Deadline 2. Oxfordshire County Archaeological Service can confirm that this revised OWSI, dated July 2025 [REP2-021], has been agreed and is an acceptable document.</p> | This is noted. | Historic_Environment |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.6.7 Group Value - An example of Group Value where heritage assets can be seen within the same view and appreciated within their settings is from viewpoint 42. The church spires of the Grade 1 Listed St Peter's church at Cassington and the Grade 1 Listed St Peter and St Pauls church of Church Hanborough are visible within the view from the Ancient Woodland at Wytham Wood across farmland towards the Ancient Woodlands of Pinsley Wood, Burleigh Wood and Bladon Heath on the horizon</p> | This is noted. | Historic_Environment |

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| REP3-072 | Oxfordshire Host Authorities | Q1.6.12 - Response to ICOMOS Relevant Representation [RR-0413] and DL1 submission- The OHA and their consultants (LUC) have carried out a joint site visit 15th July 2025 to check viewpoints and suggestions for panel removals that have been put forward by the applicant in their Notification of Intention to Submit a Request to Change the Application (dated 1st July) request and ICOMOS' Revision of Submission Reference Number 36569 (dated 27th June 2025). Having had limited time since the site visit the OHA kindly requests to respond to this question with a map outlining the OHAs proposed omissions by Deadline 4. The OHA response to the ExA first written questions [REP2-050] (Q1.6.14) indicated that the OHA do not concur with Icomos' statement that there will be no effect on the OUV of the WHS as a consequence of setting change. This is principally due to the relatively narrow approach to setting taken in the response. The areas of solar array highlighted for omission in the Icomos response are not, in WODC's view, sufficient to 'provide sufficient buffer to protect the rural landscape that is important to the setting of Blenheim Palace'. | This is noted. | Historic_Environment |
| REP3-072 | Oxfordshire Host Authorities | Q1.6.16 Blenheim Palace WHS assessment of setting 2- Historic England Summary of Written Representations [REP1- 085] paragraphs 1.11 and 1.12 indicate that the development would result in some harm to the OUV and significance of the Blenheim Palace World Heritage Site, Blenheim Palace and RPG. ICOMOS in their Technical Review report from March 2024 similarly highlighted the Scheme would likely have an adverse impact on the property's OUV. This harm to Blenheim WHS would be a significant effect in EIA terms and in policy terms would mean harm to a designated heritage asset of the highest importance. In NPS terms the harm would be less than substantial in nature and at a modest level. | <p>The Applicant welcomes the comment from the Oxfordshire Host Authorities that any harm to the significance of the Blenheim Palace World Heritage Site (WHS), the Blenheim Palace Grade I Registered Park and Garden and the Grade I listed Blenheim Palace would be 'less than substantial' with regard to the terminology used in the NPS.</p> <p>The Applicant has worked closely with Historic England on the design of the proposed development to minimise any potential harm to the Outstanding Universal Value (OUV) of the WHS and to any other designated heritage assets at Blenheim Palace, most recently in the form of the changes set out in our Change Request 2 Notification [REP2-045].</p> <p>A revised assessment of impacts and effects on the OUV of the WHS will be presented in the next version of ES Appendix 7.4: Heritage Impact Assessment; this will be prepared following the consultation on the second change request.</p> <p>A revised assessment of impacts and effects on the other designated heritage assets at Blenheim Palace will be presented in the next version of ES Appendix 7.5: Settings Assessment; this will be prepared following the consultation on the change request.</p> | Historic_Environment |
| REP3-072 | Oxfordshire Host Authorities | Q1.6.29 Upper Whitley Farm. - The applicant states that 'No element of the Project, including the project substation, would be visible in views to or from the listed building'. VWHDC consider this is incorrect | This is noted for the revised LVIA. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Q1.6.41 Surface-laid cables – OCC Archaeology is satisfied with the provision for dealing with any archaeological matters related to the provision of surface laid cabling set out in the agreed OWSI [REP2-021]. | This is noted. | Historic_Environment |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.6.45 Archaeological Investigations – As OCC Archaeology have previously indicated ([REP1-079], [REP1-068]) the actual areas needing preservation would need to be agreed based on the final evaluation report and as such the provisions for submitting this at Deadline 5 is concerning. This would leave very little time for any further considerations based on this report to be advised upon and taken into account during the Examination.</p> <p>The Evaluation Report is also likely to affect other consultees and interested parties' own responses to this scheme, as can be seen from Historic England's responses. It is essential that sufficient time is provided following the applicant's submission of the Evaluation Report for it to be read and understood to inform consultee responses.</p> <p>OCC therefore believe that this report should be submitted at Deadline 4 to allow adequate time for OCC, IPs and the ExA to review the evaluation report and comment on the suitability of the applicant's proposed archaeological exclusion areas.</p> | <p>It is currently not possible to submit the trial trenching results as there is an unresolved issue with the contractors that is urgently being addressed.</p> <p>Through the programme of embedded mitigation set out in Table 7.14 in ES Chapter 7: Historic Environment (Rev 1) [CR1-003] and repeated in ES Appendix 6.1: Project Mitigation Measures and Commitments Schedule [APP-129] , the Applicant has committed to avoiding impacts on all areas of significant archaeological remains through the design of the Project, i.e. through the establishment of the Areas of Archaeological Interest as indicated on ES Figures 2.1a-2.4c - Illustrative Masterplan [AS-020]. These are also shown on Figures 1a – 1c in the Outline Written Scheme of Investigation (Rev 2) [REP2-021] where they are referred to as Archaeological Protection Zones.</p> <p>The Areas of Archaeological Interest represent buffer zones around the significant archaeological sites and were identified on the basis of the results of the geophysical survey. The programme of trial trenching included examination of all of these significant archaeological sites with the aim of 'ground-truthing' the extent of the sites and providing information on their date and nature, as well as the examination of areas which were geophysically 'blank'.</p> <p>The trial trenching established that the geophysical survey was very accurate in identifying the location and extent of the significant archaeological sites. On this basis the Applicant considers that the examination of the reports setting out the results of the trial trenching will not lead to any major changes to the protected Areas of Archaeological Interest. Any changes would be very limited, amounting the extension of a protected Area of Archaeological Interest by no more than a few metres.</p> | Historic Environment |

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| | | | Any adjustments to the protected Areas of Archaeological Interest will be set out in the layout presented in the detailed design which has to be approved by the relevant planning authorities in accordance with Requirement 5 of the draft Development Consent Order (Rev 4) [REP3-004]. This process ensures that the Oxfordshire County Archaeology Service (OCAS) can review the extent of the protected Areas of Archaeological Interest in the light of all available information including the results of the trial trenching. Additional protected Areas of Archaeological Interest can also be added into the scheme design as part of the same review process. | |
| REP3-072 | Oxfordshire Host Authorities | Q1.7.20 Requirement 11- OCC agree with the applicant that OCC as the Highways Authority is the correct body to discharge this requirement. | This is noted. | Traffic_Transport_and_Access |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.7.26 Oxfordshire Permit Scheme for Road Works and Street Works (2019) (“the permit scheme”) OCC welcomes the Applicant's commitment to progress street works in accordance with the permit scheme.</p> <p>As stated in the Joint Authorities' Response to ExQ1 (response 1.17.11) [REP2-050], OCC notes that the latest draft DCO [REP3- 007] does not apply the permit scheme and OCC considers such application should be included. OCC notes that other DCOs, both recently made and currently being examined, include a provision which applies the relevant local authority's scheme.</p> <p>For example, in respect of the former, article 12 (application of the permit schemes) of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) provides that the “permit schemes apply to the construction of the authorised development and will have effect in connection with the exercise by the undertaker of any powers conferred by [Part 3 (streets)]”.</p> <p>Under that DCO, the “permit schemes” are “any scheme made under Part 3 of the Traffic Management Act 2004 as in force at the date on which this Order is made including the Traffic Management (Essex County Council) Permit Scheme Order 2015 as varied by The Essex County Council (Permit Scheme) (Variation) Order 2015”.</p> <p>In respect of the latter, the latest version of the Fenwick Solar Farm draft DCO [REP3-007] includes article 8A (application of permit scheme), where the scheme is the Traffic Management (Doncaster Borough Council) Permit Scheme Order 2019, and the latest version of the draft Tillbridge Solar Order [REP7-008] includes article 9 (application of the relevant permit scheme), where the relevant permit scheme means the Lincolnshire Permit Scheme for Road Works and Street Works Order 2016 or the Nottinghamshire County Council Permit Scheme Order 2020, depending on the location of the proposed works.</p> <p>OCC would welcome the inclusion in the instant Order of a provision similar to that included in the Bramford to Twinstead Order.</p> <p>Section 278 agreements OCC welcomes the Applicant's commitment that “section 278 Agreements will be progressed ... post consent”.</p> <p>As stated in the Joint Authorities' LIR [REP1-072], officers are concerned “by the scope of the powers proposed under Part 3 [street works of the draft DCO]; however, it is possible most concerns can be addressed by making the proposed works under Part 3 subject to an agreement drafted in line with OCC's standard highways agreement ...”.</p> <p>OCC would further welcome the inclusion in the draft Order of a provision which requires a section 278 agreement to be entered into before highway works can be commenced. If such a provision is not included, it is not clear how the section 278 agreement (which the Applicant states it is committed to entering into) can be secured. OCC would suggest a new article along these lines is included at the end of Part 3 – “16A The undertaker will not commence any works under this Part 3 prior to entering into an agreement under section 278 of the Highways Act 1980 in respect of them”.</p> <p>A similar provision is included in article 23(3) (agreements with street authorities) of the Sizewell C (Nuclear Generating Station) Order 2022. OCC would obviously be open to discussing alternative drafting which achieved the same aim.</p> | The Applicant notes the comments from the Oxfordshire Host Authorities regarding the Oxfordshire Permit Scheme for Road Works and Street Works (2019) and directs the Examining Authority to its response to Q1.7.7 which sets out that the Oxfordshire Permit Scheme is not disapplied or modified under the draft DCO and therefore the Applicant is committed to compliance with that Oxfordshire Permit Scheme. There is therefore no need for any addition to the draft DCO in this regard because the Oxfordshire Permit Scheme will continue to be applied if the DCO was to be granted. | Traffic_Transport_and_Access |

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| REP3-072 | Oxfordshire Host Authorities | Q1.8.3 Substations in the Environmental Statement- Consideration of the impact of construction lighting in relation to substations will need to be revisited when updated bat survey data has been provided by the applicant. | This is noted. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Q1.8.5 Buffer Zones- The locations and width of 'appropriate' buffers to bat roosting areas and flightlines are still to be identified through further survey. The OHA therefore question how these can be secured via the outline Code of Construction Practice as the applicant has indicated. | Once the full analysis of bat data has been undertaken, the Applicant will update the oLEMP and oCoCP, as necessary, to secure the appropriate buffers with respect to bats. It is anticipated that this will be at Deadline 5. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.8.6 Skylarks- The applicant agrees that skylarks are unlikely to nest within the panel arrays and have clarified that the skylark plots are intended to provide foraging habitat for skylark nesting within the surrounding landscape and in the archaeology areas. However, it is likely that the archaeology areas do not provide sufficiently large open areas to support nesting skylark – Defra advice on providing habitat for skylarks suggests the land parcel needs to be over 10ha to reduce predation risk. Whilst it is understood that the 'archaeology areas' cover 36ha, these are dispersed across the site amongst the solar panels, and the size of individual grassland areas is not apparent.</p> <p>It is unclear that the provision of skylark plots within grassland of the solar array areas is necessary or effective in improving foraging opportunities for skylark; skylark plots are designed for provision within winter cereals to increase accessibility to invertebrate prey within the crop, it is unclear that such a role is needed within a grassland habitat.</p> <p>228 pairs of skylarks were recorded in the breeding bird survey in 2024. Natural grassland has an average density of 0.27 skylark territories per ha (see CIEEM In practice 117 Sep 2022). If the 36ha archaeology grassland areas are large enough to accommodate skylark, they can only be expected to support around 130 territories, meaning at least 100 skylark territories would be expected to be lost to the scheme. But given that it is likely that many of the 'archaeology areas' are too small to be suitable skylark nesting habitat, it is likely that all skylark nesting habitat will be lost, resulting in the loss of 228 skylark territories.</p> <p>As previously stated, [REP1-079] this would have a significant impact on a priority species and OHA request that further off-site mitigation is provided to compensate.</p> <p>More than 60ha of grassland habitat (on land where skylarks are currently absent) would be needed to compensate for the loss of 228 skylark territories.</p> | The Applicant's position with respect to skylark mitigation is set out in the Skylark Technical Note, Annex 4 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Wintering bird assemblage- The OHA recommend that a farmland bird strategy is required to deliver compensation for the moderate adverse effect on wintering birds. | This is noted. | Local_Ecology_and_Nature |
| REP3-072 | Oxfordshire Host Authorities | Q1.8.7 Monitoring - There is a lack of evidence of the impacts of a change to solar over such a significant area in the UK. The OHA advocate for the applicant to commit to long term monitoring to understand the impacts, both positive and negative, and would recommend the value of collaborating with universities to improve sectoral understanding of the impact of large scale solar on ecology in the UK. | The applicant acknowledges this comment. | Summary_of_Significant_Effects |
| REP3-072 | Oxfordshire Host Authorities | Q1.8.11, Q1.8.12 Piling in the Environmental Statement- In relation to both this and question 1.8.12 The OHA have concerns particularly in relation to the lack of otter survey data and the potential for piling and other construction noise to disturb otters that could be breeding or resting in the area. | The applicant acknowledges this comment. | Noise_and_Vibration_Impact |
| REP3-072 | Oxfordshire Host Authorities | Q1.8.17 Licensing - The SoS has a legal duty to have regard to the requirements of the Conservation of Species & Habitats Regulations 2017 (as amended). It is apparent that further survey information is needed for bats and otter to inform the examiner as to whether the 3 derogation tests under these regulations would be met and therefore understand whether a licence would be likely to be granted. | <p>The Applicant's position is that, since all impacts to otter are avoided, no such licence is currently necessary. This position is supported by Natural England in their response to ExQ1.8.14 [REP2-057]. The position will be reviewed pre-construction, following appropriate surveys, as necessary, as set out in the Applicant's response to ExQ2.8.1 and 2.8.2 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2], submitted alongside this Deadline 3 response document.</p> <p>With respect to bats, no roost will be lost and the Applicant will be ensuring that all potential impacts from disturbance are avoided through the Project design and the provision of</p> | Local_Ecology_and_Nature |

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| | | | appropriate buffers. As such, at this stage, no licence is considered necessary with respect to bats. | |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.9.1 Baseline methodology and scope of assessments - VWHDC Comments about Landscape Methodology input by the VWDHC are given in Response to Issue Specific Hearing 1, Action Point 17 [REP1-074]. VWHDC scoping comments were not included in the PEIR table and there has been little change to methodology in response to comments given since.</p> <p>The applicant states that LI TGN-2024-01 further clarifies this approach stating that "...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." However, the applicant does not clearly cover in the methodology or receptor assessments why a moderate effect is significant or not, it classifies all moderate responses as not significant. This is highlighted by their response to Q1.9.1 "For the purposes of the Botley West Solar Farm Project, those effects of Moderate adverse or below are considered to be not significant. Taking the proportionality approach to the assessment, it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors".</p> | The applicant acknowledges this comment. Moderate effects may or may not be significant, depending on the particular circumstances arising and professional judgement. In this instance justification will be provided in the receptor assessment. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.11.1 Loss of Agricultural Land – The OHA do not agree with the applicant's assessment that the development is only temporary as set out in the OHA Joint LIR [REP1-072]. Therefore, the loss of large areas of Grade 2 and 3A BMV land to solar panel arrays should be reviewed and reduced where possible to retain these areas for food production.</p> | The applicant acknowledges this comment. | Agricultural_Land_Use |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.11.17 Best and Most Versatile Land – The applicant has not provided specific justification for the use of land by grade. Page 135 Green Belt – Alternatives – CDC note that BMV could be preserved 'in-situ' under the proposed panels but remain concerned about the extended period that the highest-grade land would not be available for food production whilst the solar farm is in operation. This concern may be substantially resolved if the anticipated amended plan referenced in the change request [REP2-023] removes the area of Grade 2 land from the south of London-Oxford Airport/east of A44 thereby retaining it for agricultural purposes. Page 139 Green Belt – Begbroke and Kidlington – CDC welcomes the change request ([REP2-023] which purports to remove proposals for panels and cabling from the parcel south of London-Oxford Airport) if it retains the last undeveloped piece of land between Kidlington and Begbroke.</p> | A breakdown of ALC grades according to the proposed use within the site has been provided in response to ExQ2.11.4 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2], submitted alongside this Deadline 3 response document. | Agricultural_Land_Use |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.13.5 Cycle Route Connectivity- OCC seek determination of cycle route connectivity during Examination so that there is no delay to the benefits (however marginal) being realised for the communities being impacted by the solar farm. OCC have yet to engage in detailed conversations about cycle route connectivity (beyond just 'new cycle provision with the Project, between Bladon and Campsfield and Sansom's Farm') with the Applicant. OCC would welcome discussions with the applicant on this issue.</p> | This issue was discussed with the OHA during a meeting held on 21 August 2025. Discussions between the Applicant and the OHA remain ongoing regarding onsite and offsite PRow measures and how these may facilitate and promote access to the wider PRow network. | Public_Right_of_Way |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.14.4 Residential Visual Amenity Assessment-OHA note views submitted for ASV illustrate that there is potential for private views to be adversely affected, especially where there are level changes such as in the Vale. This also relates to concerns on how settlements and their communities have been covered in the LVIA and that anything that has been assessed as Moderate or below has been assessed as not significant. OHA cover concerns with regards to the RVAA and the limited assessment of effects on settlements and communities, in the Joint LIR [REP1-072], see paragraph 7.3.117 and paragraphs 2.41-2.42 in the associated Appendix 1]. In this Appendix, LUC not only raise concerns about the appropriateness of a standard 25m buffer to residential areas but also explain why they consider step 4 of the RVAA assessment approach outlined in TGN 2/19 not to have been applied correctly (para 2.43).</p> | Applicant has reviewed the submitted LVIA [PDB-006], which considers effects upon individual properties. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.14.5 Methodology relating to duration and reversibility- The OHA's view on duration and reversibility is outlined in the OHA's Joint LIR [REP1-072]. Further to this, OHA queries how the proposed</p> | Duration and reversibility. | Landscape_and_Visual_Impacts |

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| | | development is fully reversible for LVIA purposes when elements such as the NGET substation will be permanent. Furthermore, proposed mitigation will change the character of the landscape. It will considerably change open views across a landscape to views considerably restricted by mitigation planting (once and if it establishes). OHA therefore cannot agree that such mitigation planting, by nature, is beneficial and will balance the adverse effects attributable to energy infrastructure elements and that planting will continue to provide a positive permanent contribution to the landscape. The ability to experience the landscape from the PROW routes will be lost, due to mitigation planting blocking views. | <p>The magnitude of change is stated as combining consideration of the scale or size of effect with the extent of the area affected and duration / reversibility of that effect. (GLVIA3, para 3.24).</p> <p>The relative weighting of the three main factors is not specifically discussed in the GLVIA3. Practitioners use different approaches depending on the type of development.</p> <p>One approach gives most weight to the scale of effect and extent (in terms of distance), therefore considering that the magnitude of change is at the same level as the scale of effect and duration and reversibility are stated separately.</p> <p>This LVIA Methodology approach applies equal or almost equal weight to these factors (scale, duration, reversibility), which define the magnitude. Therefore, the overall magnitude of change is less than the scale of effect alone. For the study of a development of this nature, which is low-lying, with extremely limited visual influence within the 5 km study area, where most of the representative viewpoints are located in immediate proximity to the site, and taking account of the site's inherent quality of mitigation, then this approach was considered sensible and more proportionate.</p> <p>Para 8.5.9 LVIA states that for the purposes of this assessment, the Project is considered to be fully reversible. This does not mean that baseline views will be restored, but any physical harm attributable to the Proposed Development can be rectified. The introduced mitigation planting, apart from providing the screening effect and helping the landscape to absorb the Proposed Development, would provide large-scale biodiversity enhancement. Therefore, these mitigation effects are, by nature, beneficial and will balance the adverse effects attributable to energy infrastructure elements. The proposed vegetation would be retained after the removal of the infrastructure elements and will continue to provide a positive permanent contribution to the landscape.</p> <p>On decommissioning/reversibility NPS EN-3, paragraph 2.10.68, notes that "solar panels can be decommissioned relatively easily and cheaply" ... "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</p> | |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.14.6 Viewpoints and Photomontages- Following on from OHAs reply to this question at D2 the OHA undertook a site visit on 15th July with their consultants (LUC). Below is an initial list of areas that were found to be 'under-represented' and which were visited on the 15th of July. The OHA do not consider this an exhaustive list given the uncertainty around vegetation removal and cable route options, and as further work is ongoing following the site visit. Further updates will be provided at D4:</p> <ul style="list-style-type: none"> - Hill End Outdoor Education Centre – it is evident that panels and the substation will be clearly seen within panoramic views to the south. This will be the case from the car park (446497, 206480) and within the grounds of the Education Centre, particularly from elevated positions in the north such as the 'fairy ring' (446709, 206847). The elevated views are also representative those likely to be experienced from along the edge of Wytham Woods. Significant effects are likely, given the high sensitivity of receptors and the extent of panels covering the relatively steep slopes of the hillside to the south which forms a prominent backdrop in the views. - Oxford Greenbelt Way along the River Thames (near Swinford Bridge) – a location east of Swinford Lock (444771, 208728) was visited. It is important that the likely impacts resulting from the construction works of the proposed underground cable (including Directional Drilling works) are fully understood and are adequately covered. Therefore, a viewpoint within this area should be considered by the applicant. - PRoW junction north of Shipton Slade Farm (446543, 217810) which forms part of a circular route of PRoWs extending from the northeast corner of Woodstock, and which is used locally. From this location there are open views across a large 'prairie' field that panels are proposed within. There will also be clear and very close views from properties and their domestic curtilages within the farmstead itself (446538, 217444) that are likely to experience significant effects. A RVAA was scoped out of the ES and the effects on properties has not been considered in the LVIA. As raised previously, the OHA considers this to be an omission. - Edge of Farmoor village – in summer, vegetation screens views in the direction of the site of the proposed solar panels from the edge of this settlement. There may be some filtered views of the proposed development during winter but significant effects from the panels are considered unlikely. The key issue here is the installation of the buried cable along the side of the road and the effect that it would have on roadside | <p>The concern has been noted. Applicant has reviewed the submitted LVIA [PDB-006] and made amendments where appropriate</p> | Cable_Routes |

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| | | <p>verges, hedgerows and trees. How wide would the proposed cable corridor be? – can it be accommodated in verges or is a wider clearance corridor required.</p> <p>In addition, it is considered that the LVIA should explore visual effects from the following areas, which still appear not to be covered by existing viewpoints:</p> <ul style="list-style-type: none"> - Effects of the proposed cable corridor to the east of Eynsham. How wide would the proposed cable corridor be and can it be accommodated in verges or is a wider clearance corridor required? Would the clearance corridor affect the allotments to the east of the road? - Locations with more open views from within Blenheim Park. There will be some filtered views of the proposed development during winter, and it will be important to determine if any of these would be significant. It is possible to see the Column of Victory from the area of proposed panels to the north of Shipton Slade Farm, and the ZTV indicates visibility in this area. The ZYV indicates the potential for visibility from the area to the south of Woodstock – Lower Park. - Potential visibility from the Wychwood Way and Park Road – East End area to the east of Combe, in the National Landscape – the panels on the escarpment to the northwest of Cassington are likely to be the key part of the development with wider visibility, in views from the National Landscape in this area. - East side of Woodstock, in the area around Shipton Road south of the existing VP15. - High land to the south of Wootton where the ZTV indicates the potential for longer distance views, looking to the northeast over the northern area of the proposed development (high point at 113m). - High land to the north of Wootton where the ZTV indicates the potential for longer distance views looking to the east over the northern area of the proposed development (high point at 119m). | | |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.14.8 Lighting- As referred to in appendix 1 of the OHA's Joint LIR [REP1-072], the OHA requested lighting, including temporary lighting, to be considered as part of the LVIA.</p> <p>The applicant has not addressed this request on the basis that no permanent lighting is proposed. However, temporary lighting required during construction or maintenance also has the potential to adversely affect landscape character and views, especially in rural settings. As limited detail has been provided in relation to lighting it remains difficult to judge potential effects.</p> <p>Furthermore, OHA wish to see PIR motion lighting omitted altogether from the proposed development.</p> | <p>Chapter 8 [PDB-006] considers the likely significant effects on Landscape and visual resources and receptors, as directed by GLVIA3, e.g. at paragraph 1.17.</p> <p>Landscape Institute Technical Guidance Note LITGN-2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment: Third edition (GLVIA3) (Landscape Institute, August 2024) question/issue no. 8(2) provides clarification on whether night-time effects of a development should be considered. <i>"A night-time assessment should not be a routine requirement and will only be required where lighting will have a potential significant influence on landscape character and/ or visual amenity, as a result of the combination of the sensitivity of the receiving night-time environment and the nature of the proposed lighting."</i></p> <p>The project is not located within or adjacent to a Dark Sky Reserve, or an area noted as having dark skies. It is adjacent to built-up areas, including the City of Oxford and other infrastructure, e.g. Oxford Airport and several busy A roads. The receiving landscape is not a sensitive night-time environment.</p> <p>There will be minimal or no lighting. Any construction lighting would be temporary and controlled by the Construction Artificial Light Emissions Management Plan (CALEMP). As set out in section 1.8.15 of the oCoCP [REP3-030], the CALEMP will be appended to the final CoCP(s), which will set out construction lighting requirements and the measures to control light spill.</p> <p>Construction site lighting will only operate when required and will be positioned and directed to avoid unnecessary illumination to residential properties, sensitive ecological receptors and footpath users, and minimise glare to users of adjoining public highways.</p> <p>The Applicant has considered the potential for likely significant effects to be experienced by landscape and visual resources and receptors, from incident-related lighting of the unmanned substation, during the operations and maintenance phase at a high-level (as reported in LVIA [PDB-006]). The Applicant found that there was no potential for likely significant effects, given the type of lighting that would be deployed (detailed by the Applicant within the LVIA [PDB-006] and that lighting would only be deployed during the core working hours (i.e. not overnight). Consequently, the effects of lighting at the substation were not taken forward to a full assessment.</p> | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.14.9 Suggested areas to be omitted from the proposed development- OHA are disappointed that the applicant has not produced the drawings as requested by the ExA.</p> <p>The OHA and their consultants (LUC) have carried out a joint site visit 15th July 2025 to check viewpoints and suggestions for panel removals that have been put forward</p> | <p>With regard to the potential removal of panels from areas proposed by ICOMOS-UK, the Applicant refers to their response to ExQ2.6.3 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2], submitted alongside this Deadline 3 response document.</p> | Historic_Environment |

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| | | by the applicant in their Notification of Intention to Submit a Request to Change the Application (dated 1st July) request and ICOMOS' Revision of Submission Reference Number 36569 (dated 27th June 2025). OHA and their consultants will collate the results of this site visit and look to produce a map showing the areas of panels, which the OHA believe should be omitted to mitigate impacts on Landscape and Heritage. OHA will submit this map by D4. | | |
| REP3-072 | Oxfordshire Host Authorities | Q1.14.10 Levels of Significance in LVIA Methodology- The applicant refers to only a small part of the LCA/ LCT may be directly impacted. This approach to assessment does not seem to acknowledge the role the application site plays within the wider Character Area. Many special characteristics that contribute to the Landscape Character Area will be lost or impacted on both the site and the surrounding wider landscape. The proposed development will completely change the character of sections of Character Areas. The applicant refers to whether the whole of the proposed development is visible. As previously stated in the Joint LIR [REP1-072 para 7.3.60] the application is effectively three separate sites and due to their scale, there would not be viewpoints that would be able to see the whole site. It is therefore the impact of the development on the view that should be assessed. OHA concerns about how the site has been assessed are therefore still relevant, and this is highlighted by the applicant's response to Q1.9.1. | In light of this and other Representations through the examination process, the Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as to the reasoning for the levels of significance reached. It is not the Applicant's intention to make wholesale changes to the LVIA methodology, as this has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01, as agreed with the OHA. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Q1.14.11 Landscape Effects: Construction. - As outlined in the OHA's LIR [REP1-072] the Oxfordshire Local authorities consider the impacts on landscape character inadequately assessed and underestimated. OHA considers the applicant's response further highlights our concerns on the overall LVIA assessment. There will be compounds, temporary compounds, fencing, vehicle movements, piling with associated plant and drilling machinery. These are all elements that would have an impact on the landscape character of an area which conflict with the statement 'the inherent landscape characteristics and physical framework of the landscape would be retained.' | As above. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Q1.14.12 Landscape Effects: Operation- As outlined in the OHA's LIR [REP1-072] the Oxfordshire Host Authorities consider the impacts on landscape character inadequately assessed and underestimated. The applicant's response does not address those concerns Further to this, VWHDC disagrees with the statement 'The low-lying nature of the Project, the retention of the main structural landscape elements, and the large scale of the agricultural fields, ascertain that although the change within the landscape would be noticeable, this would not be out of scale or at odds with the character of the area. The perceivable effects would be on a limited scale and to a limited extent. The perceivable scale of the proposed development would not take over the existing landscape elements or the skyline.' Landscape character changes throughout the proposed development site, and for the south area with large scale fields, open nature and elevation of the landscape, means that the change in landscape would be out of odds with the character of the area. There is also the NGET substation connection which at a proposed 14m height, is not low-lying in nature. | As above. | Landscape_and_Visual_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Q1.14.13 Residential Properties- The OHA have voiced their concern regarding the lack of assessment of residential receptors (properties, settlements and communities) in paras 2.41ff and para 2.72 (4th bullet point) of appendix 1 of the OHA's Joint LIR [REP1-072]. The applicant has stated that 'The LVIA [PDB-006] has included reference to settlements, and they are included as part of the overall assessment of effects.'. However, there is very little description of how the development will impact on residential properties, and areas of settlement such as Filchampstead. This is covered within the OHA Q1.14.6 response to Viewpoints and Photomontages [REP2-050]. | This is noted. | Community_Benefits_and_Impacts |
| REP3-072 | Oxfordshire Host Authorities | Q1.14.16 Retention of Hedgerows following Decommissioning- OHA consider the applicant has not fully addressed this question. Where hedge lined footpaths exist, they tend to relate to routes which contain farm track. Rights of way through fields | This issue was discussed with the OHA during a meeting held on 21 August 2025. The Applicant explained that the example cross sections of greenways, including relevant offset distances from existing PRoW or proposed permissive routes provided in the Outline LEMP [REP2-019] remain indicative at this stage, and the precise offset distances will be determined as part of the detailed LEMP to be prepared and submitted for approval by the relevant Local Authorities prior to the | Public_Right_of_Way |

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| | | <p>add variation and interest to walking routes and this element will be lost by the proposed development, changing the character and availability of views.</p> <p>Furthermore, the planting of hedging close to PRow can lead to other physical effects on the users of the PRow. The proposed hedges will require constant maintenance, even following the decommissioning of the scheme, to ensure that they do not encroach onto the usable width of the PRow. Many native hedge species (such as blackthorn) which undoubtedly bring ecological benefits, are thorny and can result in injury to users of the PRow. To avoid this, 5m+ needs to be the clear surfaced/grassed width of PRow with hedges etc outside of that in a green corridor of around 11m width</p> | <p>commencement of construction. It is not, generally, the intention to see the removal of new and gapped up hedgerows upon decommissioning, as their retention will continue to provide biodiversity and landscape benefits. Reference to the future management of and potential removal of proposed hedgerows after the removal of the Project infrastructure, and information regarding responsibility and heights for maintenance, will be added to the detailed Decommissioning Plan as appropriate, and at the relevant time.</p> | |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.16.21 Education facility – OCC's Public Health Team were consulted on the impacts of the development on human health as set out in ES - Appendix 16.1 Human Health Consultation and Engagement [APP-219]. Mitigation proposed in ES Chapter 16: Human Health [APP-053] includes an educational facility. The concept of educational opportunities, including children being active outdoors, is supported. However, none of the OHAs have been involved in any detailed discussions about the proposed educational facility or its recently proposed location in Change Request 2 [REP2-045]. The OHAs have concerns with this location including impact on the Green Belt, landscape impact and access which do not appear to have been considered within the applicant's Environmental Statement.</p> | <p>Change Request 2 provides the opportunity for OHA and community comment on educational facility. As noted in ES Chapter 16 Human Health [APP-053] paragraph 16.9.133, the expectation was that there would be post-consent community involvement in the refinement of design and selection of an appropriate location. That process has been brought forward (Change Request 2, August-September Targeted Consultation, Change 10) to assess the proposal as part of an ES Addendum, and provide additional consideration as to the location and design during the Examination process.</p> | Green_Belt |
| REP3-072 | Oxfordshire Host Authorities | <p>Q1.18.8 Compliance with NPS EN-1- OCC do not consider that the Applicant has adequately addressed the ExA's question concerning compliance with the requirements of National Policy Statement (NPS EN-1) in relation to the safeguarding of mineral resources. Furthermore, the Applicant has not demonstrated that appropriate mitigation measures have been proposed to protect these resources. NPS EN-1 5.11.19 clearly states that applicants should safeguard any mineral resources present on the proposed development site, as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place. Whilst the Applicant asserts that the site will be fully decommissioned at the end of the project's operational life, no further detail is provided.</p> <p>The proposed development affects approximately 6.87 million tonnes of primary aggregate, a significant resource that could contribute to meeting the County's mineral supply needs over the next 40 years—well beyond the current Local Plan period ending in 2031.</p> <p>Additionally, the impact of piling associated with the solar panel infrastructure remains unclear. As has been outlined by OCC in the response to the applicant's response to paragraph 7.6.10 of the LIR, if pilings extending below 1 metre are to remain in situ post decommissioning, this could significantly compromise the ability to access and utilise the safeguarded mineral resource in the future.</p> | <p>As stated within the Mineral Resource Assessment [APP-195], the potential volumes estimated do not take account of the potential constraints to mineral extraction and the volume therefore it is considered to be an overestimate of a potential resource. No reserves have been proven to underlie the proposed development to date. Any mineral resource that is considered viable for mineral extraction would be available upon cessation of the proposed development.</p> <p>It is acknowledged, in accordance with the currently adopted Minerals and Waste Local Plan for Oxfordshire that part of the proposed development falls within the allocated Mineral Resource Strategic Area for sharp sand and gravel, associated with the Thames, Lower Windrush and Lower Evenlode Valleys area from Standlake to Yarnton. However, the proposed development only falls within the northernmost extent of this allocation, whilst the majority of the allocation comprises land to the south and south-west of Eynsham (unaffected by the proposed development). It is also noted that two additional Mineral Strategic Resource Areas are designated for sharp sand and gravel in the county and are not within proximity of the proposed development. Therefore, whilst there may be a potentially large volume of resource beneath the proposed development (not yet proven as a reserve), the proposed development only falls within a small area of a much larger strategic resource area. It is therefore reasonable to assume that the wider Allocation is likely to overlie a significantly greater volume of sharp sand and gravel should there become a requirement for further workings to existing sites or new sites in the time that the proposed development is operational.</p> | Ground_Conditions |
| REP3-081 | Historic England | <p>Q1.6.16 The Applicant in response to this question noted that Historic England did not say the impact on setting of the World Heritage Site was greater than negligible. Our assessment is given in terms of harm to the significance of a heritage asset (through change in its setting) and our representations provide a view on whether we agree or not with the impact assessment in the Environmental Statement (ES).</p> <p>2.45. We therefore consider that there may be confusion about interpretation being made of the way our assessment of the level of harm to significance, and impact (which use two different assessment methodologies) has been phrased (Relevant Representations, p.8 RR-0398). We do not consider it is helpful to try and equate one assessment with each other. The two assessment methodologies and their conclusions should be read independently of each other.</p> <p>2.46. For the avoidance of doubt, our position, as set out in our Written Representations (REP1-086, paragraph 5.4.7) the harm to the significance of Blenheim Palace and Registered Park and Garden (RPG) and the Outstanding Universal Value (OUV) of the World Heritage Site (WHS) would be a modest level of less than substantial harm.</p> | <p>The Applicant welcomes the comment from Historic England that any harm to the significance of the OUV of the Blenheim Palace World Heritage Site (WHS), the Blenheim Palace Grade I Registered Park and Garden and the Grade I listed Blenheim Palace would be 'less than substantial' with regard to the terminology used in the NPS.</p> | Historic_Environment |

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| REP3-081 | Historic England | Q1.6.17 Historic England has set out its assessment in relation to attributes of OUV in its Written Representations (REP1–086 paragraphs 5.12-5.13, 5.19-5.31) and we will make further comments when the next iteration of the HIA is submitted (which we expect to take account of the proposed changes to the Project design set out in Change Request 2). | A revised assessment of impacts and effects on the OUV of the WHS will be presented in the next version of ES Appendix 7.4: Heritage Impact Assessment; this will be prepared following the consultation on the second change request. | Historic_Environment |
| REP3-081 | Historic England | Q1.14.8 – The Applicant has provided clarification regarding lighting in its response to this question. In our Written Representations (REP1-085 paragraphs 5.6, 6.6-7, 6.11- 13) we noted that there was no lighting strategy in the ES nor assessment of nighttime effects within the HIA. Notwithstanding the reference to no permanent lighting being proposed as part of the project we consider that the next iteration of the HIA should consider the potential for nighttime effects in relation to the WHS. | The Applicant's response to Historic England's answer to ExQ1.14.8 is set out in the Applicant's comments on Interested Parties' Responses to ExA's First Written Questions (ExQ1) Submitted at Deadline 2 [REP3-065]. We reiterate here that no permanent lighting is proposed for any part of the proposed development. Consequently, there is no potential for nighttime effects in relation to the WHS. | Historic_Environment |
| REP3-081 | Historic England | <p>2.1.Appendix 7.5 settings assessment (tracked) REP2 – 015 2.2.In the Applicant's response to Written Representations (REP2 – 027 at page 18), they respectfully disagree with Historic England's suggestion of downplaying of effects set out in the Settings Assessment and consider that the revised settings assessment is robust and accurate. 2.3.Historic England have now reviewed the revised settings assessment and set out its views below .</p> <p>2.4.For the Church of St Peter and St Paul, Church Hanborough, we welcome the additional information provided as tracked changes (REP2-015, paragraphs 1.9.36-1.9.44). We note the Applicant continues to conclude that the impact on the Church of St Peter and St Paul is negligible adverse (REP2-105, paragraph 1.9.44). Historic England continues to disagree with this conclusion and as set out in our Written Representations (REP1-086, paragraph 5.75) we consider the impact is greater than stated in the revised setting assessment and would be low adverse in Environmental Impact Assessment (EIA) terms.</p> <p>2.5.We also welcome the additional information submitted for the Church of St Peter, Cassington (Rep2-015, 1.9.45-1.9.49). However, the conclusions on the impact remain unchanged and as set out in our Written Representations (REP1-086, paragraphs 5.80-5.82) we remain of the view that the impact is greater than stated in the revised setting assessment and would be low adverse (Rep1-086, paragraph 5.82) in EIA terms.</p> <p>2.6.The additional information submitted for the Church of Michael's, Begbroke is also welcomed. However, the conclusions of the revised setting assessment remain unchanged (REP2-015, paragraph 1.9.62) and as set out in our Written Representations, we remain of the view that the impact is greater (REP1-086, paragraph 5.90) and would be low adverse in EIA terms .</p> <p>2.7.We also note and welcome the tracked changes for Sansom's Platt (REP2-105, paragraphs 1.9.5 – 1.9.16) and the refinement of the revised setting assessment. The conclusions of the setting assessment remain unchanged and we therefore do not agree with these. As set out in our Written Representations (REP1-086, paragraph 5.67) in our view, the impact would be low adverse in EIA terms. However, as referenced in paragraphs 2.33-2.41 of this submission, following submission and review of the reporting on archaeological evaluation, we expect to provide updated advice on the likely impacts.</p> | <p>The Applicant notes Historic England's position in relation to the likely impacts and effects on these designated heritage assets.</p> <p>A revised assessment of impacts and effects on heritage assets as a result of the change within their setting will be presented in the next version of ES Appendix 7.5: Settings Assessment; this will be prepared following the consultation on the second change request.</p> <p>Through the programme of embedded mitigation set out in Table 7.14 in ES Chapter 7: Historic Environment (Rev 1) [CR1-003] and repeated in ES Appendix 6.1: Project Mitigation Measures and Commitments Schedule [APP-129] , the Applicant has committed to avoiding impacts on all areas of significant archaeological remains through the design of the Project, i.e. through the establishment of the Areas of Archaeological Interest as indicated on ES Figures 2.1a-2.4c - Illustrative Masterplan [AS-020]. These are also shown on Figures 1a – 1c in the Outline Written Scheme of Investigation (Rev 2) [REP2-021] where they are referred to as Archaeological Protection Zones.</p> <p>The Areas of Archaeological Interest represent buffer zones around the significant archaeological sites and were identified on the basis of the results of the geophysical survey. The programme of trial trenching included examination of all of these significant archaeological sites with the aim of 'ground-truthing' the extent of the sites and providing information on their date and nature, as well as the examination of areas which were geophysically 'blank'.</p> <p>The trial trenching established that the geophysical survey was very accurate in identifying the location and extent of the significant archaeological sites. On this basis the Applicant considers that the examination of the reports setting out the results of the trial trenching will not lead to any major changes to the protected Areas of Archaeological Interest. Any changes would be very limited, amounting the extension of a protected Area of Archaeological Interest by no more than a few metres.</p> <p>Any adjustments to the protected Areas of Archaeological Interest will be set out in the layout presented in the detailed design which has to be approved by the relevant planning authorities in accordance with Requirement 5 of the draft Development Consent Order (Rev 4) [REP3-004]. This process ensures that OCAS can review the extent of the protected Areas of Archaeological Interest in the light of all available information including the results of the trial trenching.</p> <p>Specifically with regard to the protected Area of Archaeological Interest proposed around the Sansom's Platt Scheduled Monument, this is indicated on Figures 2.1b and 2.1c in ES Figures 2.1a-2.4c - Illustrative Masterplan [AS-020]. It was established not just on the basis of the results of the geophysical survey of Fields 1.11, 1.12, 1.13 and 1.14 as indicated in ES Appendix 7.3: Geophysical Survey Report (Part 2) [APP-134], but also on the basis of the consideration of the current setting of the Scheduled Monument. As set out above, any adjustment to the extent of this protected Area of Archaeological Interest can be incorporated within the layout presented in the detailed design, which has to be approved by the relevant planning authorities, in consultation with Historic England, in accordance with Requirement 5 of the draft Development Consent Order (Rev 4) [REP3-004].</p> | Historic_Environment |
| REP3-081 | Historic England | <p>2.8.Outline Landscape and Ecology Management Plan</p> <p>2.9.The tracked changes to the Outline Landscape and Ecology Management Plan do not appear to have taken on board our comments Deadline 2 (APP-235 paragraph 7.6.3). In our advice at Deadline 2 we advised that there should be better integration of the historic environment into the Landscape Design Objectives (2.1) and that the management plan should promote how the landscape proposals will seek to preserve and enhance the surrounding historic environment. We would therefore ask if the Applicant could consider this further.</p> | <p>The oLEMP will be updated at D5 to acknowledge these comments.</p> <p>The outline Layout and Design Principles document (APP-015) is a secured document, with the detail design and layout matters being delivered by Requirement 5 (Layout) and 6 (landscape and ecology management plan) of the Draft DCO.</p> | Historic_Environment |

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| REP3-081 | Historic England | 2.10. Outline Written Scheme of Investigation (tracked) (rev 2) REP2 – 022 2.11. Historic England would expect the County Archaeologist to lead in responses to this document, so we have no observations on the revisions made to the Outline Written Scheme of Investigation. We do however have some observations in relation to archaeological evaluation – which we raised in our Written Representations (REP1 –085, paragraph 7.4)- asking for clarification on the location of the intrusive archaeological surveys; and also the in relation to the response provided by the Applicant (REP2 - 026) to the Joint Local Impact Report submitted by the Oxfordshire Host Authorities (REP1- 072). These are dealt with in paragraphs 2.27- 2.41 below. | The Applicant welcomes the clarification from Historic England that they do not have observations on the revisions to the Outline Written Scheme of Investigation (Rev 2) [REP2-021]. | Historic_Environment |
| REP3-081 | Historic England | 2.15. No change has been made in the draft DCO (REP2 –004), however, the Applicant has responded in their Deadline 2 response (REP2- 027) that they are happy to consider Historic England being a named consultee. We welcome this. We will therefore liaise with the Applicant regarding the changes that might be made in relation to the Requirements set out in the draft DCO for Historic England to be a named consultee. | Agreed. The Applicant does not consider it necessary to add Historic England as a named consultees into the DCO because it is at the LPA's discretion to consult with any body it considers appropriate in discharging the requirements. However, the Applicant will await any suggestion from Historic England to be a named consultee if there is a specific requirement that Historic England wishes to be consulted on. The Applicant will then consider whether it is willing to update the DCO. | DCO_Process |
| REP3-081 | Historic England | 2.16. Additional photomontages for historic environment assessment – REP2 – 030 -032 2.17. i)Photomontages related to Blenheim Palace World Heritage Site 2.18. In Historic England's Written Representations (REP1-086 paragraphs 6.14- 6.20) we outlined the scope and explanation for the additional viewpoints we had requested in discussion with the Applicant to address the gap in the assessment. We identified the need: • for views to, from or including individual, sensitive, heritage receptors or groups of assets where such views are needed to illustrate the effect and visual impact of the scheme, • to corroborate the conclusion that there would be no intervisibility of the development from within the WHS, and • for viewpoints that would illustrate the impact of the change of character within the World Heritage Site's setting, particularly around Bladon. 2.19. We advised that it was important that the additional visualisations were of high quality, and that they showed all components of the Proposed Development, including associated infrastructure (such as security fencing, CCTV poles, lighting, substations etc.), and demonstrated the Proposed Development before and after mitigation, including winter views, in order to enable a worst-case scenario and the effectiveness of mitigation to be fully understood . 2.20. Historic England welcomes the submission of the additional photomontages relating to the World Heritage Site. We are continuing to review these to confirm if all the information requested has been included. 2.21. In particular, as the additional photomontages form part of the evidence base for the process of heritage impact assessment (HIA), we are keen to review these images in conjunction with the updated HIA. We understand that the Applicant is in the process of revising and updating the latest iteration of the HIA document and we expect it to take account of the proposed changes to the Project design set out in Change Request 2 . 2.22. Also associated with the additional photomontages is the issue Historic England raised (REP1-082 paragraphs 6.11-6.13) regarding the lack of a lighting strategy within the Environmental Statement and assessment of the nighttime effects of the development on the historic environment. Whilst we understand that this is due to there being no permanent lighting as part of the scheme, there is need for clarity about how much lighting is proposed and what the nature of its use will be during the life of the project (construction, operation and decommissioning). We highlighted in particular the need to understand the lighting strategy within the fields to the south of Bladon and to what extent, when in use may be appreciable within the WHS . 2.23. We will provide comments regarding the additional photomontages to assist the Examining Authority once further relevant associated information has been submitted, as outlined above and including in relation to the proposed changes set out in Change Request 2. 2.24. ii)Photomontages related to St Michael's, Begbroke 2.25. Additional viewpoints (112, 113 and 114) showing the proposed visual impact of the development in the setting of St Michael's, Begbroke (REP2-032) are | The Applicant welcomes Historic England's comments regarding the Additional Photomontages for Historic Environment Assessment [REP2-030 – REP2-032] and can confirm that, where appropriate, revised versions of these photomontages will be prepared to take account of the proposed changes to the design set out in our Change Request 2 Notification [REP2-045]. These revised photomontages will be examined and reported on within the next version of ES Appendix 7.4: Heritage Impact Assessment; this will be prepared following the consultation on the second change request. The Applicant notes the comments from Historic England's regarding the absence of a lighting strategy and refer to our response to similar comments in Historic England's answer to ExQ1.14.8 is set out in the Applicant's comments on Interested Parties' Responses to ExA's First Written Questions (ExQ1) Submitted at Deadline 2 [REP3-065]. We reiterate here that no permanent lighting is proposed for any part of the proposed development. Consequently, there is no potential for nighttime effects in relation to the WHS. The Applicant notes Historic England's position in relation to the likely impacts and effects on the Grade II* listed Church of St Michael at Begbroke. A revised assessment of impacts and effects on this designated heritage assets as a result of the change within its setting will be presented in the next version of ES Appendix 7.5: Settings Assessment; this will be prepared following the consultation on the second change request. | Landscape_and_Visual_Impacts |

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| | | welcomed by Historic England because they demonstrate the potential impact of the scheme on the church's rural setting to the west . 2.26. We consider that these viewpoints reinforce our view that the potential level of harm to the significance of St Michael's, Begbroke, as set out in our Written Representations (REP-2-086, paragraph 5.90) would be a modest level of harm arising from development in its setting. | | |
| REP3-081 | Historic England | 2.29. i)Heritage Impact Assessment 2.30. In Historic England's Written Representations (REP2-086 paragraph 3.2) we highlighted the importance of Heritage Impact Assessment (HIA) and outlined the further work and evidence that we considered was required to inform the EIA conclusions on the magnitude of impact. We welcomed the Applicant's positive engagement to address the issues we had raised and to strengthen the HIA with reference to guidance from UNESCO (REP2-086 paragraph 3.2-3.3.). We will provide further observations on the progress and contribution of this process in due course when the next iteration of the Applicant's Heritage Impact Assessment is submitted (which we expect to take account of the proposed changes to the Project design set out in Change Request 2). | A revised assessment of impacts and effects on the OUV of the WHS will be presented in the next version of ES Appendix 7.4: Heritage Impact Assessment; this will be prepared following the consultation on the second change request. The revised version will take account of any appropriate guidance. | Historic_Environment |
| REP3-081 | Historic England | 2.31. ii)ICOMOS Technical Review 2.32. In Historic England's Written Representations (REP2-086 paragraph 6.3) we highlighted the need for the Applicant's Heritage Impact Assessment to engage with the Technical Reviews from ICOMOS and the concerns they expressed. This would provide an opportunity for the Applicant to set out how they have addressed the points raised, including in relation to cumulative impacts, and how these are reflected in the current proposal. We will provide further observations on these issues in due course when the next iteration of the Applicant's Heritage Impact Assessment is submitted (which we expect to take account of the proposed changes to the Project design set out in Change Request 2). | A revised assessment of impacts and effects on the OUV of the WHS will be presented in the next version of ES Appendix 7.4: Heritage Impact Assessment; this will be prepared following the consultation on the second change request. The revised version will take account of any Technical Reviews received from ICOMOS. | Historic_Environment |
| REP3-081 | Historic England | 2.33. iii) Archaeological evaluation 2.34. The Applicant, at page 44 of their response to the Oxfordshire Host Authorities Joint Local Impact Report has noted the Host Authorities' comment "The need for the results of this field evaluation to be submitted to inform the assessment of the significance of the impact of these proposals and the suitability of the areas proposed for nonintrusive works is reiterated in Historic England's relevant representation [RR-0398], particularly for the areas around the scheduled site at Sansom's Platt" 2.35. The Applicant's response to this is "Evaluation reports setting out the results of the programme of trial trenching are currently being prepared. It is hoped that these reports will be submitted at Deadline 5." 2.36. The Applicant also comments on archaeological investigations in its response to question Q1.6.45 from the Examining Authority's First Written Questions. In its response to that question, the Applicant notes that a report on programme of trial trenching will be submitted at Deadline 5, and that a report will be sent to Historic England as soon as it is ready and then they will review Historic England's response to the document . 2.37. Historic England agree with the Host Authorities' submission in relation for the need to have the results of the field evaluation to inform the assessment of the impact. We understand that whilst the actual trench locations do not appear to have been identified in the Outline Written Scheme of Investigation, these trenches have been excavated . 2.38. Whilst the assessment of the impact to Sansom's Platt is based on the scheduled area the Applicant has also acknowledged that the area of settlement at Sansom's Platt probably extends in all directions beyond the Scheduled Monument. In their revised settings assessment (REP2 – 015, paragraph 1.9.7), they now confirm that actual evaluation has been undertaken which confirms that settlement (possibly a cemetery) does extend beyond the scheduled monument. 2.39. Until the archaeological reporting is concluded and sent to Historic England for review, it is difficult to reach a conclusive view on the impact of the proposed scheme. Until we receive the archaeological report we also cannot give a view on whether the buffer to the Scheduled Monument is sufficient to adequately minimise harm to heritage significance. We highlighted the potential need to revise the buffer to the scheduled | It is currently not possible to submit the trial trenching results as there is an unresolved issue with the contractors that is urgently being addressed. Through the programme of embedded mitigation set out in Table 7.14 in ES Chapter 7: Historic Environment (Rev 1) [CR1-003] and repeated in ES Appendix 6.1: Project Mitigation Measures and Commitments Schedule [APP-129] , the Applicant has committed to avoiding impacts on all areas of significant archaeological remains through the design of the Project, i.e. through the establishment of the Areas of Archaeological Interest as indicated on ES Figures 2.1a-2.4c - Illustrative Masterplan [AS-020]. These are also shown on Figures 1a – 1c in the Outline Written Scheme of Investigation (Rev 2) [REP2-021] where they are referred to as Archaeological Protection Zones. The Areas of Archaeological Interest represent buffer zones around the significant archaeological sites and were identified on the basis of the results of the geophysical survey. The programme of trial trenching included examination of all of these significant archaeological sites with the aim of 'ground-truthing' the extent of the sites and providing information on their date and nature, as well as the examination of areas which were geophysically 'blank'. The trial trenching established that the geophysical survey was very accurate in identifying the location and extent of the significant archaeological sites. On this basis the Applicant considers that the examination of the reports setting out the results of the trial trenching will not lead to any major changes to the protected Areas of Archaeological Interest. Any changes would be very limited, amounting the extension of a protected Area of Archaeological Interest by no more than a few metres. Any adjustments to the protected Areas of Archaeological Interest will be set out in the layout presented in the detailed design which has to be approved by the relevant planning authorities in accordance with Requirement 5 of the draft Development Consent Order (Rev 4) [REP3-004]. This process ensures that OCAS can review the extent of the protected Areas of Archaeological Interest in the light of all available information including the results of the trial trenching. Specifically with regard to the protected Area of Archaeological Interest proposed around the Sansom's Platt Scheduled Monument, this is indicated on Figures 2.1b and 2.1c in ES Figures 2.1a-2.4c - Illustrative Masterplan [AS-020]. It was established not just on the basis of the results of the geophysical survey of Fields 1.11, 1.12, 1.13 and 1.14 as indicated in ES Appendix 7.3: Geophysical Survey Report (Part 2) [APP-134], but also on the basis of the consideration of the current setting of the Scheduled Monument. As set out above, any adjustment to the extent of this protected Area of Archaeological Interest can be incorporated | Historic_Environment |

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| | | monument once we had the evaluation reports in our Written Representations (REP1-086, paragraphs 5.69 -70) . 2.40. We are therefore concerned that in their response to the Examining Authority's First Written Questions (REP2 – 025, Q1.6.45) the Applicant states that the evaluation reports generally will be supplied at Deadline 5 . 2.41. To properly inform decision making in respect of the Scheduled Monument Sansom's Platt, we consider that the reports should be supplied to both the County Archaeologist and Historic England as soon as possible and ideally within a timeframe that is sufficient to allow consideration of their content and to enable further amendments, should these be required . 2.42. Comments on responses to the Examining Authority's First Written Questions Applicant's response to the Examining Authority's First Written Questions REP2 – 025 2.43. Following on from Historic England's Written Representations, we have reviewed the responses provided by the Applicant to questions pertinent to the historic environment issues raised in those Written Representations. We have set out below our observations on those matters below, with the exception of matters raised under separate headings in this submission. | within the layout presented in the detailed design which has to be approved by the relevant planning authorities in accordance with Requirement 5 of the draft Development Consent Order (Rev 4) [REP3-004] . | |
| REP3-081 | Historic England | We note that whilst the Examining Authority had asked (Q1.14.9) for a plan for omissions to be shown as overlays with each layer being identified with the name of the proposer – ICOMOS, Historic England, local authorities and Oxford airport, this has not yet been submitted. We understand from the Applicant's response to this question that full copies of application documents will be submitted alongside the formal Change Application. | With regard to the potential removal of panels from areas proposed by ICOMOS-UK, the Applicant refers to their response to ExQ2.6.3 in the Applicant's responses to the ExA's Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. | Historic_Environment |

2.2 Non-Statutory Consultees

Table 2.2: Applicant's Responses to Representations provided at Deadline 2 – Non-Statutory Consultees

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| REP3-073 | Bladon Parish Council | <p>Q1.13.4 Applicant Community food growing areas ExA Question Paragraph 16.9.17 of ES Chapter 16 [APP-053] states that the community food growing areas would benefit vulnerable groups and provide training to support growers, provide education opportunities for children and support mental and physical health benefits. As such, the implementation of these areas is stated as supporting positive health outcomes. Given the lack of information provided in respect of the proposed growing areas, for example location and how the areas would function, it is unclear how the above conclusions have been reached. Please provide additional detail to support the above conclusions.</p> <p>Applicant's Response The Applicant has signed a memorandum of understanding with two groups to operate on the land set aside for community food growing and is actively seeking more. The Cherwell Collective is a social enterprise working to support those in food poverty, connect people isolated in the community and reduce food waste and co2 emissions. They will establish food forests on the project site, a type of allotment. These enable those they support to learn how to grow their own food, get out of the house into the countryside, learn how to recover degraded land and make it productive without using chemical inputs – they call it permaculture. A Collective staff member teaches skills and supervises activities. The Collective has clients in the villages adjacent to the Project site and will establish food forests nearby to avoid car journeys. The Collective call this Harvest @ Home; they partner with schools to teach food-growing skills.</p> <p>Surplus food is shared with their community. The second group is run by Chris Goodall. He will establish a food growing enterprise run by a professional market gardener with volunteers providing the labour. He already does this at the Cutteslowe allotments in North Oxford. The food produced will be given to local food banks such as the Cutteslowe Larder to support those in food poverty. Both sites will be open for school visits, as will the solar site.</p> <p>BPC Comment BPC have noticed that the organisations currently proposed to manage community food growing projects are presently engaged with communities located some distance from those directly impacted by the proposal.</p> <p>Both groups serve North Oxford (including Kidlington and Cutteslowe), while the Cherwell Collective additionally supports areas in North Oxfordshire, such as Bicester and Banbury. However, the proposal does not clarify whether these services will be extended to communities nearer to the project site, particularly those situated within a different district.</p> <p>Clarification is requested regarding what assurances exist that these groups will support food banks and address food poverty in the communities affected by the proposal. If these communities do not receive support, it would be difficult to classify such initiatives as a direct benefit of the proposal.</p> <p>BPC has also noticed that proposed food growing areas are all located in the central area, and apart from the area near Church Hanborough, they are all within the Green Belt.</p> <p>The proposed areas are concentrated in Bladon and Church Hanborough, with an additional parcel of land off Lower Road just north of the A40 roundabout.</p> <p>These areas are shown on the Illustrative Masterplan Figures 2.2A, 2.2B, 2.2C (Document library ref AS-020).</p> <p>There are currently no proposed areas to serve the Cassington section of the central area, nor are there any proposed sites in either the southern or northern sections of the plan. BPC notes that it is unclear how communities in these areas will benefit from the proposed food growing sites.</p> <p>The applicant has also chosen to place most of the growing areas within the Green Belt, despite the presence of large areas outside the Green Belt, such as land west of Lower Road or land north of Woodstock off the A4260, that could potentially also offer better access.</p> | <p>The Cherwell Collective serves 8,000 clients in food poverty or mental health crisis across Oxfordshire. It has people it supports in all the villages adjacent to the project boundary and will choose its food forest locations so as to allow participants to walk or cycle there. Chris Goodall's project will be growing food for Cutteslowe Larder and other food initiatives across Oxfordshire. The Applicant would like to hear from groups or individuals who would like use organic or agroecological methods to grow food on the site. Cherwell Collective is 1.4 miles from the site boundary, Cutteslowe Larder 2.5 miles.</p> | Community_Food_growing_Location |
| | Bladon Parish Council | <p>Q1.16.8 Applicant Community food growing areas ExA Question Paragraph 15.9.100 of ES Chapter 15 [APP-052] confirms that an area of up to 30ha is to be provided for community food groups. Please confirm how the scale of this initiative was decided upon. What consultation with local stakeholders was undertaken in respect of making the decision in terms of scale. How is the delivery of this community initiative to be secured and what scale of food production is anticipated to be provided. The Project Mitigation Measures and Commitments Schedule [APP-129] states that the provision of such areas is additional mitigation. Given that limited information has been provided in respect of these areas, please confirm what weight should be given to this by the ExA.</p> <p>Applicant's Response The Applicant consulted on the proposals at the Statutory Consultation and engaged in direct discussions with potential food growers throughout the pre application period. It was decided to place the areas close to settlements to reduce vehicle movements and to make access easy for villagers. The village of Bladon expressed interest in establishing an area for allotments, given current high demand and limited availability in the village. Cherwell Collective will start with five food forests and expects to build the operation from that base. Chris Goodall will take a three hectare area for production and expects demand from food banks to enable him to expand over time. Discussions were held with Good Food Oxfordshire, who run the OxFarmtoFork</p> | <p>All organisations offered licences to grow food on land set aside for community food growing will have to demonstrate a social or environmental benefit to their operations and are likely to be social enterprises like Cherwell Collective. The latter supports 8,000 people in food poverty or struggling with their mental health across Oxfordshire and Northamptonshire. They have clients in each of the settlements within the consultation zone, so they will place a food forest in locations that growers can walk to, where possible. Cherwell Collective is based in Kidlington, 1.75 miles from the solar farm boundary. Any application to grow food in the areas set aside for the purpose will be considered, as was made clear during the Phase 2 consultation.</p> <p>OxFarmtoFork was launched in 2023 and delivers significant community benefit, supporting small local producers, enhancing food security, boosting the local economy and promoting biodiversity. It provides a</p> | Community_Food_growing_Location |

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| REP3-073 | Bladon Parish Council | <p>initiative. A tour of the site for food producers was organised on 20th June 2024 and a group looked at the areas set aside and took samples of the soil. All use agroecological methods and sell their produce directly to the Oxford Colleges. These growers will operate at larger scale than Cherwell Collective and Chris Goodall. The Applicant will fill all 30 hectares with food producers and expects this to have a significant effect on the volume of food the OxFarmtoFork system is able to deliver. Given the number of lives this could touch the Applicant would give this initiative moderate positive weight.</p> <p>BPC Comment In addition to the comments previously provided (Q1.13.4), BPC wishes to highlight to the ExA that it does not consider the OxFarmtoFork initiative to constitute a community benefit. The initiative appears to function primarily as a commercial enterprise facilitating connections between producers and Oxford Colleges. Currently, there is insufficient evidence to demonstrate how local communities, including affected businesses, would derive any direct benefit from this proposal.</p> <p>The applicants have also commented in this response that the locations chosen are close to settlements to reduce vehicle movements and to make access easy for villagers.</p> <p>However, it remains unclear how overall vehicle traffic will be reduced, as all proposed growing sites are concentrated within the central area, primarily in Bladon and Church Hanborough. Consequently, residents from other communities would still need to travel to these sites to participate.</p> <p>Furthermore, a significant portion of the growing areas will be managed by third parties based outside the development area. This arrangement is likely to draw volunteers and growers from beyond the Bladon and Church Hanborough area, particularly given the relatively small populations of these villages..</p> <p>BPC would like to inform the ExA that the Parish Council has not been informed or consulted regarding any interest in additional allotments within Bladon. To date, no approach has been made to the Parish Council on this matter.</p> | <p>guaranteed market for local producers who commit to producing food using agroecological methods – these nurture soil health, promote biodiversity and reduce emissions and food waste. At launch there were 3 colleges and 4 producers in the scheme. At December 2024 17 colleges and 18 producers. Colleges joining the scheme pay a fee; this enables grants to made to get producers started. One grower, Worthy Earth, is already operating at Blenheim. Using regenerative agricultural techniques it provides organically-grown produce to the local area and serves as a natural hub of engagement and learning. All participants sign the OxFarmtoFork charter, covering wages, pricing, payment terms, zero-carbon transport, zero use of chemicals. The scheme estimates that £1 spent on local produce generates £2.50 in social, economic and environmental value.</p> | |
| | | <p>Q1.16.21 Applicant Education facility building ExA Question Please confirm how the possible location for the education facility was selected? What level of consultation was undertaken with local stakeholders in respect of the possible location? The Outline Operational Management Plan [APP-234] confirms that further detail in respect of the education facility is to be set out in the detailed Operational Management Plan. Please confirm why such detail is to be confirmed post-consent, rather than during the Examination. The Project Mitigation Measures and Commitments Schedule [APP-129] states that the provision of such an education facility to be additional mitigation. Given that limited information has been provided in respect of this facility, please confirm what weight should be given to this by the ExA.</p> <p>Applicant's Response Through discussions with the OCC team, an Education Facility was identified as an opportunity. Chapter 16 [APP-053] paragraph 16.9.133 includes the statement; "Provide open and covered space in the solar farm for use by school field trips.</p> <p>An educational area could provide local schools with the basic facilities – benches and a covered area to undertake their own learning activities.</p> <p>Potential to walk to the educational site and potential for guided access to array areas would support both physical activity and learning outcomes for population health. Indicative layout (as set out with Outline Operational Management Plan [EN010147/APP/7.6.2]) includes toilet (compost) and minibus parking (either provided or existing). Secured as a requirement of the DCO - via oOMP [EN010147/APP/7.6.2].</p> <p>Location, size and scale will be finalised during detailed design phase and included within the detailed Operational Management Plan. The educational area is illustratively shown in Figure 16.2: Illustrative 3D Views of Educational Facility [EN010147/APP/6.4]. The expectation is that there will be post consent community involvement in the refinement of design and selection of an appropriate location." A potential location was identified to the east of Bladon, on land adjoining existing community facilities (land next to a playground, MUGA, and allotments) and where there is a suitable vehicular and pedestrian access, which also serves the Bladon Primary School and the Parish church.</p> <p>In order to take this proposal forward, and to allow it to be considered as additional mitigation, it is now intended to develop the proposals through the submission of a formal Change Request. This is reflected in Change Request Notification 2, as submitted at Deadline 2.</p> <p>BPC Comment BPC would like to inform the ExA that the Parish Council has not been consulted regarding the proposed location of this facility.</p> <p>Had BPC been consulted, then the council would have raised concerns with the applicant about the current access route to the suggested location and the negative impacts a facility at this location may have on the community.</p> <p>The access road is limited to single-file traffic and does not have designated passing points. Additionally, a pinch point at the entrance further restricts the width, rendering the road inaccessible to vehicles such as ambulances and skip lorries. There has been an instance in which a resident required transport to an ambulance stationed on the main road due to these constraints.</p> <p>The use of this road as the main access point for either the educational facilities or the proposed community food growing area on the opposite side raises significant safety concerns for pedestrians. This route serves not only as</p> | <p>Change Request 2 consultation provides the opportunity for Bladon Parish Council and community to comment on the growing area and educational facility. As noted in ES Chapter 16 Human Health [APP-053] paragraph 16.9.133 the expectation was that there would be post-consent community involvement in the refinement of design and selection of an appropriate location. This is recognition of the value of community voice and local knowledge in delivery facilities that respond to local needs. Consultation was always therefore intended but has been brought forward to provide additional certainty as to the location and design during the Examination process.</p> <p>The aim of the educational facility is to provide a local children with a benefit, including that promotes being outdoors and accessing the site by active travel. It is not intended as a visitor centre for the general public. If located near Bladon this would particularly benefit Bladon children and the Bladon community. The proposed siting means that the Bladon community, which is in proximity to the Project and therefore an appropriate location at which to target mitigation, would get a disproportionate benefit, particularly the Bladon Primary School given the easy access, potentially allowing daily use of the outdoor classroom. With regards the access, the expectation is that there would be only occasional need for vehicles to access the site and that much of the access could be on foot, for example a class of local school children being dropped off by minivan, either in the village or at the site if for example additional mobility needs required. The Applicant would work with the local authority transport team to ensure access met appropriate safety standards. The parish council's insights are also very helpful and can help with refining arrangements.</p> <p>Whilst the educational facility is a mitigation that was discussed with the OCC Public Health team it would be possible to bring the Project forward without the educational facility if there is not community support for it. From the public health perspective that would be regrettable and a missed opportunity for local residents, particularly children interested in learning about climate change, renewable energy, local ecology and local heritage. We welcome further comment from the Bladon Parish Council through the Change Request 2 consultation.</p> | Human Health |

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| | | <p>the primary walking path to the recreation ground, allotments, cemetery, and St Mary's Church, including the grave of Sir Winston Churchill, but is also used daily by students and parents to access the only entrance to Bladon Primary School. Additionally, the school regularly utilises the recreation ground for physical education lessons, requiring groups of children to walk between the school and the recreation ground on a regular basis.</p> <p>Furthermore, visibility when entering the lane from the main road is limited, increasing the risk of vehicles encountering each other head-on and requiring one party to reverse onto the main road or another wider section, which presents additional safety concerns.</p> <p>BPC would like to understand the reasoning behind selecting Bladon as the location for a facility that does not appear to offer direct benefits to Bladon residents. BPC believes that any potential advantages for residents are likely to be outweighed by adverse effects on the village, including increased traffic and visitor numbers that will be using an access road that is already known to present challenges, as well as the potential disruption to the peaceful environment enjoyed by individuals walking along PRoW 132/2/10.</p> <p>BPC believes that there are other locations which would be more easily accessible, such as directly off Lower Road or A4260 North of Woodstock or a location in the Southern area and also would a location that is not within the Green Belt.</p> | | |
| REP3-073 | Bladon Parish Council | <p>PRoW 132/4/10 It has come to BPC's attention that PRoW 132/4/10 would require permanent stopping up and diversion during construction and operation of the Project.</p> <p>This is a beautiful and historic route, a mediaeval road from the top of Heath Lane across three large fields to Begbroke. It is widely used by walkers not only from Bladon but further afield, and BPC believe that to lose this PRoW would be a severe detriment both to Bladon and Begbroke Parishes</p> | <p>As explained in the Applicant's Change Request 2 Notification [REP2-045], the Applicant intends to submit a Second Change Application Request in September 2025. If accepted by the ExA, the design changes proposed as part of the Second Change Application Request would avoid the requirement for the permanent stopping up and diversion of PRoW, including public footpaths 132/4/1, 152/8/10 and 416/24/10 during construction, operation and maintenance of the Project. This will be reflected in an updated version the Outline Public Rights of Way Management Plan, which forms Annex B of the Outline Code of Construction Practice [REP3-030, APP-233].</p> | Public_Right_of_Way |
| REP3-073 | Bladon Parish Council | <p>HGV routing plan Appendix 1 of the Outline Construction Traffic Management Plan (OCTMP), which is part of the Outline Code of Construction Practice (APP-232) contains a map illustrating the designated construction access route for the delivery of PCS units to the central site area. According to the plan, twenty PCS units are scheduled for delivery via Cassington Road. To facilitate this process, the applicant proposes that HGVs transporting the PCS units utilise the A4095 through Bladon to reach Cassington Road.</p> <p>In addition to this, they are also routing HGVs to HDD compounds via the same route.</p> <p>The rationale for this routing is detailed in paragraph 1.3.5 of the OCTMP: - 1.3.5 Construction vehicles must accord with the following:</p> <ul style="list-style-type: none"> •Due to a low bridge on the northern section of Lower Road, construction HGVs delivering PCS units: – Must arrive at accesses along Cassington Road / Burleigh Road / Yarnton Road via the A44 and the A4095 as they are unable to route under the low bridge. – Must depart accesses along Cassington Road / Burleigh Road / Yarnton Road via Lower Road as they are able to route under the low bridge. • Due to a low bridge on the northern section of Lower Road, construction HGVs routing to HDD compounds on Cassington Road / Burleigh Road must: – Arrive and depart accesses along Cassington Road / Burleigh Road via the A44 and the A4095 as they are unable to route under the low bridge. <p>It is recognised that the bridge north of Lower Road may have insufficient clearance for HGVs. However, BPC expresses concern that the applicant has not adequately considered the road configuration in Bladon, specifically the section between the White House Pub and Manor Road, which features a pinch point where the carriageway narrows. This location has frequently experienced traffic delays due to two large vehicles attempting to pass simultaneously. The referenced pinch point is depicted in images 1 and 2.</p> | <p>The Applicant notes that construction HGVs delivering day-to-day materials will not travel along the A4095 through Bladon as shown at Appendix A1 of the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [APP-232]. This shows that HGVs delivering Power Converter Stations (PCS) to areas accessed via Cassington Road and Burleigh Road in the Central Area would travel along the A4095 through Bladon for which there are a total of 54 HGV movements predicted over the entire construction period. Putting this into context, Table 12.21 of ES Chapter 12 [APP-049] sets out that there is a baseline of 392 HGV movements each day along the A4095 through Bladon. Thus, the movement of 54 HGV movements delivering PCS units along the A4095 through Bladon over the 24 month construction period represents an increase in HGVs of 0.019% and was deemed to be not significant.</p> <p>The Applicant notes that there is a short section of the A4095 which narrows and there is no centre line, however, the delivery of PCS units would be infrequent and irregular (54 movements over a 24 month period) and would represent a negligible change in HGV movements (0.019%) with a subsequent negligible impact upon any traffic delays experienced.</p> | Traffic_Transport_and_Access |
| REP3-073 | Bladon Parish Council | <p>Lack of Community Consultation – Food Growing and Education Facilities In addition to the comments above, BPC would like to inform the ExA that BPC have been contacted by Bladon residents and representatives of community groups who have raised concerns about the lack of consultation regarding the proposed provision of allotments, food growing initiatives, including their various locations within the parish, and the designated site for educational facilities. These communications indicate that, as well as not consulting with BPC, the applicant also appears not to have engaged with the wider Bladon community on these matters.</p> | <p>Maps showing the food growing areas were present at all Phase 2 consultation events, including the opening event in Bladon. Numerous conversations were held with consultees at the events about food growing and the organisations involved in the initiative. OCC requested the educational facility after the consultation closed; it is included in the current targeted consultation.</p> | Community_Food_growing_Location |
| REP3-074 | Cassington Parish Council | <p>The attached document is a copy of a letter from GWP Consultants to Cassington Parish Council in response to PVDP's (RPS's) responses to the Examiners Questions and Written Representations from IPs regarding flood risk posed by the Botley West Solar Power Station submitted at D2 (mainly regarding Cassington Village) This response was slightly delayed because of difficulties in contact between the two parties during the holiday period. We now submit this document in time for D3 .</p> <p>GWP Responses to RPS Comments on Botley West Flood Risk</p> <p>The flood risk assessment has to demonstrate flood risk will not increase for up to and including 1 in 100 Year</p> | <p>We acknowledge receipt of the letter from GWP Consultants addressing flood risk concerns raised by PVDP (RPS) and appreciate the opportunity to clarify several points where their interpretation appears to misrepresent or oversimplify the findings and assessments conducted.</p> <p>GWP asserts that covering ~60% of the site with impermeable glass will result in 100% run-off concentrated into driplines, increasing flood risk. This is a fundamental misunderstanding of the hydrological behaviour of</p> | Hydrology_and_Flood_risk |

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| | | <p>Storm Events plus an allowance for climate change. A 1 in 100 Year storm event is an extremely severe and powerful event, with extreme rainfall intensities. There is a fundamental inescapable fact that ~ 850 hectares of the 1,400-hectare site (~60%) will be covered in impermeable glass. The glass will generate 100 % run-off and concentrate this into driplines. These are conditions which increase run-off and concentrate rainfall onto smaller areas of land, which will result in more run-off. This is a simple water balance .</p> <p>RPS are being too literal about the research percentages referred to in the publications. The broader and most relevant point is that over a wide range of climatic and ground conditions and solar panel designs, the research shows that rainfall run-off is always shown to increase. This is all that needs to be demonstrated, along with the obvious statement that vegetating a site does not guarantee it reduces rainfall run-off back to the baseline scenario for any rainfall events, let alone the most extreme 1 in 100 Year events. Flood risk reduction measures that are required under flood risk reduction regulations require the development to not increase flood run-off above the baseline pre-development condition .</p> <p>Gullota et al (2023)</p> <p>RPS push back on this work based upon the proposed development having 'gaps' between the solar cells within each solar panel. Our review of the documentation, and specifically the flood risk reports, do not identify any information on the width of these 'inter-cell gaps'. If such gaps have not been specifically designed and assessed against receiving run-off rates associated with extreme 1 in a 100 Year plus Climate Change Allowance storm events, it is impossible for the developer (and RPS) to conclude that they are sufficient to prevent driplines at the edge of the solar panel. The conditions generating flood risk are not those of normal rainfall events. RPS states the design ensures run-off is distributed as close to the existing baseline conditions as possible, relying as they do on these 'inter-cell gaps' to disperse the rainfall run-off more widely than from the solar panels themselves. This is a self-admission by the developer that the baseline conditions are exceeded i.e. rainfall runoff must be greater. RPS have not identified the areas of solar cells draining to these inter-cell gaps, and as such they have not estimated the increase in effective rainfall intensity at these driplines and what this means in terms of the amount of increased run-off. The fact remains that irrespective of these 'inter-cell gaps' the same area of solar panel still concentrates the rainfall into driplines which are zones of increased rainfall intensity and therefore run-off .</p> <p>The shallower the slope angle of the solar panel the larger the area of field it covers and the more rainfall it intercepts and concentrates at the drip line. The suggestion by RPS that shallower slopes reduce rainfall interception is therefore illogical .</p> <p>Whilst the use of vegetation to reduce run-off might work (compared to no vegetation being used) in non-storm rainfall conditions, there is no evidence provided by the developer (or RPS) that the vegetation can reduce rainfall run-off to pre-development levels. The use of vegetation practices to reduce flood risk, does not use ANY design process to mitigate flood risk for the specific regulated design flood events that are required to be mitigated. There is no demonstration whatsoever that vegetation practices reduce the run-off to the predevelopment rate for the 1 in 100 Year + CC allowance. Galzki et al (2024) RPS attempt to diminish the impact of the solar panels by referring to other factors controlling rainfall run-off. In most instances these other factors will either remain the same for the development site pre and post development, or they will get worse because of the development e.g. soil compaction along the access routes between the panel rows. But the parameter which does change between current situation and the proposed development, is the introduction of 850 hectares of impermeable panels, with their width and panel spacing and slope, all increasing rainfall run-off .</p> <p>This is not an issue of simplification – it is undisputable that the solar panels create drip lines. It is undisputable that the panels create shading which stunts vegetation growth beneath them. It is undisputable that the developer has no idea what the reduction in the increased run-off will be due to their proposed vegetation practices. It is undisputable that the developer has no idea whether the vegetation will fully mitigate the 1 in 100 Year + CCA storm event increase in run-off from the solar panels. Lieu et al (2023) RPS again fail to recognise that the primary conclusion of the work is that the solar panels increase run-off. RPS repeat the vegetation point made multiple times before. The fact is however that the use of vegetation as a mitigation measure, as they will be well aware, cannot be demonstrated to provide flood risk reduction of sufficient extent to ensure the baseline run-off condition is not exceeded. Indeed, it is highly likely that the effectiveness of vegetation to slow rainfall run-off will become increasing ineffective as the storm event becomes larger .</p> <p>Outline Infrastructure Drainage Strategy</p> <p>RPS refer to a Conceptual Drainage Strategy being provided. It is therefore implicit they agree that the Outline Infrastructure Drainage Strategy is not available for review and assessment. The conceptual strategy is just that, a series of concepts, articulating which approaches will be used at each infrastructure type, e.g. an attenuation basin will be used. The document states the solar panel land will not require run-off management. Outline Code of Construction Practice (CoCP) RPS states an Outline CoCP has been provided as part of the submission. What RPS fail to mention is that the Outline CoCP does not mention surface water management.</p> | <p>solar farms. While solar panels do intercept rainfall, the notion that all intercepted water is converted directly into run-off without any absorption, infiltration, or evapotranspiration disregards the complex interactions of site-specific vegetation, soil permeability, and topography.</p> <p>Multiple peer-reviewed studies show that solar farms can be designed with integrated sustainable drainage systems (SuDS) and vegetation management that effectively mitigate run-off increases, even under extreme storm events. The presence of gaps between panels, soil conditions, and slope management are all factored into the comprehensive Flood Risk Assessment (FRA) submitted by RPS.</p> <p>The updated Conceptual Drainage Strategy provides a typical image of the panels with inter-cell gaps. Further details will be provided as part of the Detailed Drainage Strategy.</p> <p>There are numerous examples of solar sites which have been developed with vegetation built beneath the panels and the choice of vegetation is designed to grow in suitable conditions, including “shading”. The Conceptual Drainage Strategy details how the use of vegetation year round promotes interception and reduces bare soil, runoff and sediment transportation.</p> <p>The developer is committed to meeting all flood risk regulations, including demonstrating no increase in flood risk for the 1 in 100-year storm event with climate change allowances. The ongoing design development and consultation with relevant authorities will ensure all necessary measures are implemented.</p> | |
| REP3-075 | Cassington Parish Council | We note that we have been unable to obtain a response from our hydrologist, most likely because he is on vacation. Whilst most of his report remains unchallenged (see submission: Cassington Parish Council Responses to Submissions for Deadline 2 (Applicants Responses to the Examiners Questions and Written Representations) For Deadline 3), we are sure that he would like to respond to the Applicant's comments on cited papers in Appendix 2 of the Applicant's Responses to the Examiner's Questions (PINS ref: EN010147 Report ref: EN010147/APP/12.2 -Appendix 2). This will be forthcoming for Deadline 4 if we cannot make contact with GWP | No response required at this time. | Hydrology_and_Flood_risk |

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| | | Consultants prior to Deadline 3. We trust this approach is acceptable as it appears to be one relied on by the Applicant for various matters. | | |
| REP3-075 | Cassington Parish Council | We note that V2 has had any mention of criminal cases removed from it. Although all information contained in V1 of our document related to criminal cases is in the public domain we were unsure of the validity of including this in our submission and so have produced a second version. | This is noted. | Human_Health |
| REP3-075 | Cassington Parish Council | <p>Cassington Parish Council contend that as a result of the oppressive impact of the Botley West Solar Power Station and the increased risk of flooding it imposes on the villages of Cassington, Worton and the settlement of Jericho Barns the scheme should be reduced to the summits of the hills above Cassington and removed altogether from areas to the east as outlined in Appendix 1. We find that the visual impacts on the residents of Cassington have been significantly underestimated because of flaws in the methodologies of the LVIA, the Glint and Glare study and the lack of a specific RVAA which have led to the imposition of a 25m buffer to the boundaries of properties and the Sports Field of Cassington Village .</p> <p>Many other aspects of our Written Representation remain unaddressed and we find little has changed in the proposal (e.g. for impacts related to ecology).</p> | <p>ES Volume 3 Appendix 10.1: Flood Risk Assessment [REP3-020] has been prepared in line with national and local planning policy which discussed the existing flood risk and in the context of the development. This includes consideration of climate change in the sequential design of the solar farm and the conceptual surface water drainage strategy. It demonstrates that the development will not increase flood risk and meets the requirement of the NPPF and NPS EN-1. Solar panels and ancillary infrastructure (including PCS units, temporary compounds and Transformers (Secondary Substations) have been sequentially steered to areas of low risk of flooding (including Flood Zone 1).</p> <p>The Cassington surface water model [APP-172] has been produced to support enhancement mitigation for existing flood risk in Cassington and is not required as part of national and local planning policy, including the NPS. The modelling has been undertaken to be used as a key tool to identify flow patterns and areas where mitigation could be most effective. The modelling will be used to inform initial mitigation concepts and ensure these concepts are grounded in the best available understanding of flood behaviour at this stage and ensures the space available in the plans to provide this mitigation. Mitigation measures will be refined post-consent at detailed design stage and will be submitted to and approved by the relevant local planning authority or authorities prior to construction.</p> | Hydrology_and_Flood_risk |
| REP3-075 | Cassington Parish Council | We question PVDP's track record in Solar Farm Development and request a more detailed description of their past role in the Solar Developments they cite and also request that the Examiners ensure that there is full confidence that sources of funding for this project are legitimate. | <p>A. Track record in Solar Farm Development, incl a detailed description of PVDP's role in the Solar Developments</p> <p>PVDP has successfully developed 980 MWp capacity with the following six solar farm projects in Japan:</p> <p>(1) Ukujima Solar Farm with a total capacity of 480 MW: this project is Japan's largest solar farm project and is currently in construction. For the 2025 construction status, please see: www.kyudenko.co.jp/en/docs/mid_management_plan_en_20250428.pdf page 31 in the original doc (page 34 pdf) . The project started in 2012. The land area for the project covers more than 800 hectares of largely unused land. To facilitate the project PVDP had established the special purpose company TeraSol G.K. , which signed more than 11,000 individual lease agreements with around 1250 landowners. The land registry had to be updated in many cases and owners to be located throughout Japan. In March 2013, the project obtained the METI approval, qualifying for participation under the Japanese Act on Special Measures concerning the Procurement of Renewable Electric Energy by Operators of Electric Utilities with a feed-in tariff as FY 2012 project.[https://www.bloomberg.com/news/articles/2013-04-12/germany-s-photovoltaic-development-plans-400mw-solar-farm-correct-] The first application for Grid Connection was filed with Kyushu Electric Power in March 2013. In July 2016 the project finally obtained Grid Connection Application approval from Kyushu Electric Power for a direct current, high voltage submarine transmission system based on VSC technology from Siemens. As parts of the construction sites are located on agricultural land, PVDP has asked the Fraunhofer Institute for Solar Energy Systems ISE in Freiburg /Southern Germany to simulate the effects of shadowing on growth of biomass and to design an Agri-Photovoltaic system that would both satisfy the requirements of METI for the use of such land and local farmers' needs. To cope with challenging topography, proximity to sea and high wind speeds PVDP undertook various simulations to propose a workable design for the solar installations and adjacent high voltage equipment, that were forming the basis for approvals obtained by Kyudenko as designated engineering, procurement and construction (EPC) company for the construction of the project. In April 2018, the</p> | Funding_and_PPA |

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| | | | <p>project was sold to a consortium of Kyocera, Mizuho Bank, Kyudenko and others.</p> <p>(2) Onikobe Solar Farm with a total capacity of 183 MWp: Onikoube Solar Power Plant is an operating solar photovoltaic farm in Osaki City, Naruko Onsen, Miyagi Prefecture, Japan and was developed by PVDP during 2013 - 2017. For this purpose PVDP had established the special purpose company PurpleSol GK, which owns the project https://www.gem.wiki/Onikoube_Solar_Power_Plant The Ministry of Economy, Trade and Industry, Japan had permitted the plant on October 23, 2013.</p> <p>(3) Kawasaki Solar Farm with a total capacity of 56 MW (https://www.gem.wiki/Kawasaki_Solar_Park) This 56MW solar power plant has been built on the site of a former golf course in Kawasaki Town, Shibata District, Miyagi Prefecture. The plant is owned by Petasol Co., Ltd., a company established by PVDP. PVDP had developed the project during 2013 - 2019.</p> <p>(4) Yamagata Solar Farm with a total capacity of 58 MW</p> <p>(5) Akita Solar Farm with a total capacity of 40 MW</p> <p>(6) Green Academy Solar Farm with a total capacity of 40 MW.</p> <p>B. Sources of funding</p> <p>PVDP Group has raised the funds for the development based on the basis of income earned from the above described six projects successfully developed in Japan. Further to the advice given by independent financial advisors, such as the EY London Energy & Infrastructure Corporate Finance team, the scheme should be able to achieve a sufficiently high internal rate of return to attract third party debt and equity investors for future funding,</p> | |
| REP3-075 | Cassington Parish Council | We believe that the socioeconomic analyses of the Botley West project have not accounted for impacts on local businesses or the substantial financial losses of residents whose properties lie within 1.5km of the project. Whilst the latter is not a planning consideration when it comes to impacts on individual properties it certainly is a major financial loss borne by the many compared to the very few who will financially benefit considerably from this project. As such it should be considered as a negative socioeconomic impact. | <p>The Socio Economics ES Chapter [APP-052] shows that unemployment will reduce and economic output will increase. It is estimated that 424 direct FTE jobs will be created in the local travel study area across all phases.</p> <p>The ES Chapter calculates £17m of Gross Value Added (GVA) for the Study Area during the construction phase, £64.7m during the operation phase, and £17m during the decommissioning phase.</p> <p>The Outline Skills, Supply Chain & Employment Plan [APP-218] also states intentions for the Applicant to work with local suppliers to procure products and services where possible. The Applicant will build upon the relationships formed with Thames Valley Chamber of Commerce and OxLEP to help facilitate this. The Outline Skills, Supply Chain & Employment Plan [APP-218] also states the intent to engage with local residents through 'Local Recruitment' initiatives as well as 'Apprenticeships' and 'Other Workforce Training'.</p> <p>The Socio Economics ES Chapter [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption to short-term accommodation businesses due to lower visitor numbers, particularly during construction however the overall significance of effect across all phases is not significant.</p> <p>The Socio Economics ES Chapter [APP-052] references a UK study ('Is NIMBYism Standing in the Way of the Clean Energy Transition?' Jarvis, 2021) which found no clear evidence of an effect on residential property values from solar Projects in the UK.</p> <p>The value of individual properties is not, in any case, a material planning consideration.</p> <p>Overall the Project will have significant business economic and resident benefits.</p> | Socio_economics |

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| REP3-076 | Cassington Parish Council | <p>1.0 Flooding and Hydrology</p> <p>1.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4</p> <p>Overall, we find very little has changed from the PEIR and the submission of the ES. PVDP and their consultants have failed to respond to our submission for Deadline 1. Leaving detailed design of mitigation measures for prevention of increased flood risk to the Detailed Drainage Designs after consent is granted is not good enough. People's homes are at risk of flooding, or increased risk of flooding should this development increase the rate of water runoff from the site. Post consent, Cassington Parish Council and the residents of Cassington will have no power to influence the design or implementation of flood prevention measures, especially if the project is sold on from PVDP which is consistent with previous projects they have been involved in (see Section 4 below). Attributing increased occurrence of flooding to the Solar Power Station will be statistically very difficult and would entail employment of further experts and no doubt legal expertise which would likely be out of reach of the Parish Council and residents. Furthermore, there are concerns regarding flood prevention measures such as balancing ponds as these require continual and ongoing maintenance, something Blenheim Estates have failed to do for a balancing pond located on the boundary of Cassington Village for two years despite numerous requests to do so by the Parish Council. Cassington Parish Council therefore urge that the precautionary principle is applied here, and areas of the development sited on the hills overlooking Cassington Village to the north and Worton Village to the north are removed as detailed in our letter to West Oxfordshire District Council, August 13th, 2024 (see appendices). This would have the additional benefits of reducing landscape and heritage impacts on the villages of Cassington and Worton as well as reducing impacts on Public Rights of Way (footpaths 152/6/10 and footpath 152/8/10).</p> | <p>ES Volume 3 Appendix 10.1: Flood Risk Assessment [REP3-020] has been prepared in line with national and local planning policy which discussed the existing flood risk and in the context of the development. This includes consideration of climate change in the sequential design of the solar farm and the conceptual surface water drainage strategy. It demonstrates that the development will not increase flood risk and meets the requirement of the NPPF and NPS EN-1. Solar panels and ancillary infrastructure (including PCS units, temporary compounds and Transformers (Secondary Substations) have been sequentially steered to areas of low risk of flooding (including Flood Zone 1).</p> <p>The Cassington surface water model [APP-172] has been produced to support enhancement mitigation for existing flood risk in Cassington and is not required as part of national and local planning policy, including the NPS. The modelling has been undertaken to be used as a key tool to identify flow patterns and areas where mitigation could be most effective. The modelling will be used to inform initial mitigation concepts and ensure these concepts are grounded in the best available understanding of flood behaviour at this stage and ensures the space available in the plans to provide this mitigation. Mitigation measures will be refined post-consent at detailed design stage and will be submitted to and approved by the relevant local planning authority or authorities prior to construction.</p> <p>Appendix 10.2 Conceptual Drainage Strategy [REP03-022] assesses the maximum design scenario for new impermeable areas and includes initial information regarding the management and maintenance of SuDS features. The following will be prepared post-DCO in accordance with the Conceptual Drainage Strategy and will be submitted to and approved by the relevant local planning authority or authorities prior to construction:</p> <ul style="list-style-type: none"> • Ground investigation reports, including infiltration testing, • Detailed drainage layout, including refined calculations, and • Further details regarding water quality, management and maintenance of SuDS features <p>The Outline Landscape and Ecology Management Plan [APP-235] sets out how grassland management will be managed throughout the development. A detailed Landscape and Ecology Management Plan (LEMP) will be prepared in accordance with the OLEMP and will be submitted to and approved by the relevant local planning authority or authorities prior to construction. This will include provisions in respect of on-going maintenance and management of the landscape and ecology.</p> | Hydrology_and_Flood_risk |
| REP3-076 | Cassington Parish Council | <p>2.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4</p> <p>2.1.1 Cassington Parish Council notes that the Applicants have failed to respond the WR from Cassington Parish Council in the Responses to Written Representations on all matters raised apart from flooding (see above). These issues included: Impacts on Landscape, Views from Individual Properties, Footpaths, Views from the Surrounding Road Network, The Buffer Zone, Greenbelt, Agricultural Land, Biodiversity, Air Traffic, Financial Considerations, and the Consultation Process.</p> | <p>These responses have now been covered within the responses provided at D4 in this document.</p> | Summary_of_Significant_Effects |
| REP3-076 | Cassington Parish Council | <p>ICOMOS Submission to the Planning Inspectorate EN-10147-001150- ICOMOS-CLHGC 27.6.25</p> <p>ICOMOS-UK, the UK part of International Council on Monuments and Sites is the official adviser to UNESCO on Cultural World Heritage Sites. ICOMOS-UK has an interest in sustaining the quality of the rural landscape in the UK, which in this instance contributes to the setting of the Blenheim Estate WHS, including large areas of the central site as well as villages such as Cassington. ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee asked one of its members, Hal Moggridge OBE VMH PPLI FIHort RIBA AADip, a landscape expert, to assess the current proposals .</p> <p>The Summary of this document states: "ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee recommends omission of those areas which would be especially oppressive to local villages or particularly harmful to this attractive landscape. Solar arrays should be kept apart from all villages by a significant landscape breathing space and never be closer than a 3-minute leisurely walk (200m) from houses on the edges of villages - Shipton Slade, Bladon, Begbroke, Cassington, Church Hanborough."</p> <p>And further on in the document P4: "However, solar arrays are proposed far too close to Cassington village.</p> | <p>The Applicant understands the principal issue raised by ICOMOS-UK in their response [REP2-069] to EXQ1.6.11 [PD-008] to be the nature and extent of the contribution of the wider rural setting of the Blenheim Palace World Heritage Site (WHS) to the identified Outstanding Universal Value (OUV) of the WHS.</p> <p>This issue is discussed in some detail in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141]. The identified 'attributes' that convey or express the OUV are set out in the 2017 WHS Management Plan Review. Attribute 7 establishes that <i>'The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it'</i> (emphasis added).</p> | Historic_Environment |

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| | | <p>There should be wide open fields between the NW edge of Cassington village with dense new hedges planted along the solar array boundary. The fields NW of Cassington village should be excluded from development to provide the village with breathing space.”</p> <p>The Cultural Landscapes and Historic Gardens Committee clearly blame the lack of consideration of villages in terms of landscape impacts, scale and proximity of the Application on the failure of the Applicants to appoint an “independent landscape consultant”. ICOMOS have illustrated on maps in document Maps 4-7 EN-10147-001145BotleyW.Central Omissions 1.2.5, the fields they believe should be omitted from Botley West because of their “oppressive” effect on the village. These omissions were discussed by the applicant and not taken up.</p> | <p>The ‘traditional English countryside and villages’ referenced in Attribute 7 extend for a considerable distance in all directions from the WHS. The understanding of the contribution of the wider rural setting of the WHS to the identified Outstanding Universal Value OUV therefore requires consideration of the physical extent of the ‘<i>traditional English countryside and villages</i>’ within the setting of the WHS, i.e. at what point does the rural landscape cease to become a relevant or material part of the setting of the WHS?</p> <p>The Applicant’s position on this is set out in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141]. Whilst it is not possible to simply draw a line on a map which defines the setting of the WHS, the Applicant has provided a detailed explanation in that document of how setting and sensitivity can be linked not just to intervisibility but to other factors such as land ownership (past and present) and land use. The Applicant has worked closely with Historic England on the design of the proposed development to minimise any potential harm to the OUV of the WHS, most recently in the form of the changes set out in our Change Request 2 Notification [REP2-045].</p> <p>The Applicant considers that the further removal of panels as requested by ICOMOS-UK and indicated on the drawings provided in their Written Representation [REP1-103] are unnecessary in that these changes would not lead to any reduction in the perceived level of harm to the OUV of the WHS. The Applicant accepts that much (if not all) of the land identified by ICOMOS-UK as a concern could be considered to fall within the setting of the WHS; the issue is more that how the level or nature of the contribution of that part of the setting to the OUV of the WHS.</p> | |
| REP3-076 | Cassington Parish Council | <p>Glint and Glare</p> <p>Cassington Parish Council also questions the methodologies and conclusions drawn by the Glint and Glare study of PVDP’s consultants. We cite evidence presented by the civil society organisation Stop Botley West in their Community Impact Report (EN010147-001254) that:</p> <ul style="list-style-type: none"> • Many properties that should have been included in the Glint and Glare Study were not represented . • The lumping of existing and proposed vegetation despite the fact that the consultants (Page Power) have separated such categories of vegetation in previous solar projects (e.g. Sunnica). This is significant because existing vegetation can provide immediate screening of views of solar arrays whereas proposed vegetation takes years to grow . • Failure of PVDP and their consultants to provide images of analysed properties from the Central Section of Botley West, including Cassington . <p>See Chapter 8 SBW Community Impact Report (EN010147-001254) .</p> <p>Unfortunately, yet again we suspect this has led to an underestimate of the visual impacts of the proposed development on residents of Cassington living adjacent to the proposed Solar Power Station to the north of the village.</p> | <p>A 1km assessment area is considered appropriate for glint and glare effects on ground-based receptors. Dwellings within this distance are identified based on mapping and aerial photography of the region. Due to the separation between panels, three separate assessment areas have been produced. Dwellings to the north of the development are not included because solar reflections would not be geometrically possible towards the north when the azimuth angle is considered.</p> <p>In residential areas with multiple layers of dwellings, only the outer dwellings have been considered for assessment. This is because they will mostly obscure views of the solar panels to the dwellings behind them, which will therefore not be impacted by the proposed development because line of sight will be removed, or they will experience comparable effects to the closest assessed dwelling.</p> <p>Additionally, in some cases, a single receptor point may be used to represent a small number of separate addresses. In such cases, the results for the receptor will be representative of the adjacent observer locations, such that the overall level of effect in each area is captured reliably.</p> <p>Existing and proposed mitigation has been considered in conjunction to determine the requirement for additional mitigation. There is no legislative guidance that outlines the requirement for screening to be mature prior to the operation of the development. On this basis, the report has considered both existing and proposed vegetation when determining the significance of effects.</p> | Glint_and_Glare |
| REP3-076 | Cassington Parish Council | <p>Q1.10.6 Potential impact of damage to existing field drainage In the view of Cassington Parish Council the Applicant has failed to justify the category of “negligible adverse significance” for damage resulting to field drainage from the installation and deinstallation of frames for solar arrays. As we stated in the Written Representation submitted on registration as an Interested Party: A letter from a Rural Business Management Consultant, Roderick Craig, on the 29th January, 2024 to the Cassington Parish Councillor, Alex Rogers is particularly pertinent to questions around flooding risk (Craig, 2024 – See appendices). Mr Craig was involved in management of the Blenheim Estates land in question from 1978 to 2001 and he has acted as a consultant for the farmers of the land until 2022. Mr Craig points out that: “A lot of the land is under drained at 22-yard intervals all of which will be severely compromised during construction. This will change water flow and certainly increase surface run off from untapped springs.” Field drainage is necessary in the areas south of Bladon and in Purwell Farm because of the presence of heavy, poorly draining clays in the area.</p> | <p>The Project Mitigation Measures and Commitments Schedule [APP-129] includes a commitment to a Soil Management Plan which includes the reinstatement, where required, of soil profiles as near as possible to their former condition, in addition to the implementation of appropriate soil aftercare following reinstatement. These mitigation measures would be included in the Outline Soil Management Plan and implemented via an Outline CoCP [EN010147/APP/7.6.1], which forms a requirement of the DCO application for the Project. Further details will be prepared post-DCO in accordance with the outline CoCP and outline Soil Management Plan and will be submitted to and approved by the relevant local planning authority or authorities prior to construction.</p> | Hydrology_and_Flood_risk |

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| | | Sinking up to over a million piles up to 3m deep will undoubtedly disrupt and possibly destroy under drains to the agricultural fields of the area and again, pose an increased risk of flooding. These drains are typically 0.7m below the soil surface and are emplaced in soil using a trenching tool deployed behind a tractor (AHDB, 2018). It is not obvious how such equipment could be deployed in the Solar Farm after construction to replace damaged drainage. | | |
| REP3-076 | Cassington Parish Council | <p>Q1.10.11 Conceptual Drainage Strategy We note here that the Applicant refers to vegetation as a mechanism to intercept rain, prevent soil erosion and aid soil cohesion. We repeat the statement in 1.1.3 above, by GWP Consultants: The Applicant suggests this increase in erosion risk is mitigated by a well-managed organic vegetation grassland – although then refer in their documentation to the vegetation being managed organically (mowed or lightly grazed), which actually consequently means there will be a continuously variable and changing seasonal vegetation cover, that is to say the mitigation measures will have no design and therefore there is no confidence they will be effective in extreme storm events, up to and including the 1 in 100 Year return period storm.</p> | <p>The impact of increased flood risk arising from additional surface water runoff is assessed within Chapter 10: Hydrology and Flood Risk [REP3-012]. During the operation and maintenance phase, fields that are currently used to produce arable crops will become vegetated year-round. As a result, there will be no periods of exposed bare soil associated with agricultural activities. The significance of effect from this impact during the operation and maintenance stage is assessed to be negligible adverse and is not significant.</p> <p>Appendix 10.2 Conceptual Drainage Strategy [REP03-022] assesses the maximum design scenario for new impermeable areas and includes an assessment of an increase in peak rainfall intensities as a result of climate change. Initial management and maintenance of SuDS features are also noted. The following will be prepared post-DCO in accordance with the Conceptual Drainage Strategy and will be submitted to and approved by the relevant local planning authority or authorities prior to construction:</p> <ul style="list-style-type: none"> • Ground investigation reports, including infiltration testing, • Detailed drainage layout, including refined calculations, and • Further details regarding water quality, management and maintenance of SuDS features <p>The Outline Landscape and Ecology Management Plan [APP-235] sets out how grassland management will be managed throughout the development. A detailed Landscape and Ecology Management Plan (LEMP) will be prepared in accordance with the OLEMP and will be submitted to and approved by the relevant local planning authority or authorities prior to construction. This will include provisions in respect of on-going maintenance and management of the landscape and ecology.</p> | Hydrology_and_Flood_risk |
| REP3-076 | Cassington Parish Council | <p>Q1.10.12 Localised flood events The U.K. Government defines extreme weather events as those weather events that are significantly different from the average or usual weather pattern and include droughts, high temperatures and heatwaves, floods and storms (U.K. Government 2024). The flood events of 2007 and 2024 in Cassington were the result of extreme weather events but the increasing trend of these floods (and near miss floods such as in 2023) shows that they are no longer 1 in 100 year events. As stated in 1.1.3. extreme rainfall events and periods of drought are increasing as a result of climate change. It can therefore be concluded that the issues related to flooding in Cassington will continue to deteriorate. This emphasises the importance of assuring that the Botley West Solar Power Station does not increase the likelihood of flooding as required by the NPPF.</p> <p>The Applicant states that the reasons for flooding are because of: “existing drainage constraints and extreme weather events unrelated to the proposed development. Responsibility for managing these off-site flood risks lies with local highway authorities and drainage agencies, rather than the solar farm project.” They do not mention here that ultimately the source of flooding is the topography of the land and its underlying geology, the hills lying to the north of Cassington and subsoils where limestone changes to clay causing water to runoff the hills and emerge as springs, flooding the village. Our contention is that there is a risk, backed up by expert evidence, that the solar arrays will increase the risk of flooding because of increased rates of runoff. This will also be compounded by damage to subsurface agricultural drainage (put in because of issues of soil structure and excess water) and compaction of the soil. Therefore, rather than pointing to the highway authorities and drainage agencies the Applicant should design Botley West to avoid detrimental increase in flood risk compared to the baseline conditions. Monitoring drainage performance on-site and cooperating with local authorities if any unforeseen drainage issues arise during construction or operation is not good enough as we foresee serious issues with intervention following construction (see 1.1.9 above). Therefore, the only safe course of action is to remove the solar arrays to the north of Cassington to the summit of the hill on which Purwell Farm is located and removing the arrays to the north of Worton altogether (as outlined in the letter in Appendix B).</p> | <p>ES Volume 3 Appendix 10.1: Flood Risk Assessment [REP3-020] has assessed flood risk to and from the project until the end of the operational lifetime by accounting for the impacts of climate change to both peak rainfall and peak river flows.</p> <p>Appendix 10.2 Conceptual Drainage Strategy [REP03-022] assesses the maximum design scenario for new impermeable areas and includes an assessment of an increase in peak rainfall intensities as a result of climate change. The conceptual drainage strategy accounts for surface water attenuation requirements for up to and including the peak 1 in 100-year storm event with an uplift to account for climate change as a result of an increase in peak rainfall intensities. Surface water runoff calculations for the PCS Units, HV Transformers, Applicant Substation and NGET Substation have been undertaken within Causeway Flow and are presented as annexes within the Conceptual Drainage Strategy. The detailed drainage strategy will be prepared post-DCO in accordance with the outline drainage strategy and will be submitted to and approved by the relevant local planning authority or authorities prior to construction.</p> <p>The Cassington surface water model [APP-172] has been produced to support enhancement mitigation for existing flood risk in Cassington and is not required as part of national and local planning policy, including the NPS. The modelling has been undertaken to be used as a key tool to identify flow patterns and areas where mitigation could be most effective. The modelling will be used to inform initial mitigation concepts and ensure these concepts are grounded in the best available understanding of flood behaviour at this stage and ensures the space available in the plans to provide this mitigation. Mitigation measures will be refined post-consent at detailed design stage and will be submitted to and approved by the relevant local planning authority or authorities prior to construction.</p> | Hydrology_and_Flood_risk |

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| REP3-076 | Cassington Parish Council | <p>Q1.3.4. Reductions The Applicant dismisses the idea of a reduced-scale solar farm suggested by Bladon (interpreted as Cassington) stating that there is no policy limitation on scale.</p> <p>We note that in fact scale is a critical factor of consideration both in Cassington, its surroundings, and elsewhere in the proposed development area because the village of Cassington and much of the Parish are classified as Greenbelt Land.</p> <p>The latest government guidance on considering the potential impact of development on the openness of the Green Belt states very clearly:</p> <p>•openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume.</p> <p>(https://www.gov.uk/guidance/green-belt#considering-the-impact-on-the-remaining-green-belt-in-the-plan-area) I'm sure the Applicants are aware of this stipulation so whilst it is true, that there is no limit on potential geographic scale of a National Infrastructure proposal, scale is a prime consideration on impact of Greenbelt Land. The other major consideration is the visual impact and given this proposal converts historic farmland, forming part of the Greenbelt of Oxford, and the setting of Blenheim Palace WHS, to essentially an industrial development, the visual impacts are, in our view, significantly highly adverse.</p> <p>For the avoidance of doubt in the minds of the Applicant and the Planning Inspectorate, Cassington Parish Council have and are requesting that the development is scaled down to mitigate the overwhelming impact of it on Cassington Village and the wider area. This is because of the dominance of the Solar Farm to the north of the village and around the most used Public Rights of Way connected to it, as well as the proximity of the development to the village, it's recreation fields and residential properties, because of an inadequate buffer zone.</p> <p>We are not the only Interested Part or Statutory Consultee to have identified this as an issue.</p> | <p>The Applicant notes Cassington Parish Councils' concerns and respectfully draw their attention to three groups of responses already produced by the Applicant.</p> <p>The first relates to new Green Belt Guidance, where the Government now make it clear that when considering purposes A, B and D that it is towns not villages that should be considered.</p> <p>The new PPG on Green Belts states at paragraph: 004 Reference ID: 64-004-20250225, that:</p> <p><i>"...when making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d. Considerations for informing these judgements are set out below:</i></p> <p>Purpose A – to check the unrestricted sprawl of large built up areas</p> <p><i>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas..."</i></p> <p>Purpose B – to prevent neighbouring towns merging into one another</p> <p><i>This purpose relates to the merging of towns, not villages.</i></p> <p>Purpose D – to preserve the setting and special character of historic towns</p> <p><i>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. "</i></p> <p>So studies such as that undertaken by LUC now appear to be out of date as they have assessed the functions of gaps between <i>villages</i>, when it is <i>towns</i> that now should be considered in relation to Purpose A, B and D. Hanborough/Bladon and Bladon/Begbroke and Kidlington, and Yarnton and Cassington, are all villages in or close to the Order Limits of the Applicants Project.</p> <p>The nearest towns for these purposes are now Banbury and Woodstock to the North, Witney to the West, Oxford City to the East and Abingdon to the South.</p> <p>Secondly, the overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test.</p> <p>Arguably, because of this policy, the Applicant need not have made a VSC case. However, in the event that the ExA did not take that view, the Applicant has submitted a VSC case in the hope and expectation that the ExA and SofS will confirm that the test has been met in line with policy.</p> <p>Thirdly, the applicant has acknowledged the visual and spatial aspect of the development within the Green Belt – see REP1-012, at paras 8.3.9 to 8.4.48 inclusive.</p> <p>The Applicant, however, does accept some harm is caused to Green Belt - see REP1-012 paras 8.4.53 to 8.4.56 inclusive.</p> | Site_selection_and_Cable_Route_Alternatives |
| REP3-076 | Cassington Parish Council | The Applicant claims in its response to Q1.3.4.: "As experienced planning and environmental consultants, the Applicant team, prior to any consultation, used its combined professional experience, and its knowledge of the area, to self-impose restrictions, or 'concessions', to the development of the site." Cassington Parish Council finds this statement hard to believe. The conclusions can only be that either the methods used to "self-impose | This is noted. | Acknowledgment response |

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| | | <p>restrictions" were flawed, the team undertaking the exercise was not experienced and/not familiar with the area, or, alternatively, consideration of the local communities likely to be impacted by this development was secondary to maximising the area of solar arrays on available land and therefore profit. This may seem to be an inflammatory statement but evidence is clear that: (i) No independent landscape expert was employed to look at these aspects of the development.</p> <p>(ii) An RVAA was not carried out to assess impacts on the villages adjacent to the development despite many properties and other amenity assets in villages being within 25m of the planned Solar Power Station.</p> <p>(iii) Villages as visual receptors of the project were scoped out of the ES.</p> <p>(iv) The 25m buffer was applied without individual consideration of villages like Cassington.</p> <p>(v) Advice from experts from ICOMOS and WODC was simply ignored despite these being neutral parties and having presented good reasoning behind requests.</p> <p>We note that PVDP have now submitted a letter to the Examiners (EN-010147- 001239) notifying intent to change the application. The changes outlined include reduction of the Solar Power Station around Bladon to "protect the setting of the Blenheim Palace World Heritage Site". Unfortunately, this reduction has not been extended to Cassington village. Cassington also forms part of the wider rural setting of the Blenheim Palace WHS (see ICOMOS report above and the original proposal for WHS status of Blenheim Palace in 2017) but also the proximity of the Botley West Solar Power Station is highly intrusive to residents of the village, especially because of the narrow buffer zone and also that the land to the north of the village rises. We therefore ask PVDP to kindly recognise the oppressive nature of the proximity of the development to the village of Cassington, its destructive impact on the landscape of the Greenbelt to the north of the village on the basis of scale and visual intrusion, and impact on the Public Rights of way to the north of Cassington and Worton. The Solar Power Station should be reduced to the summit of the hills to the north (see Appendix 1) in line with the request from the District Council. This has the benefit of removing any risk of increased runoff from the land resulting from compaction of soils, loss of land drainage and the effect of the solar arrays themselves. Cassington Parish Council is very happy to discuss this directly with PVDP and/or the Examiner.</p> | | |
| REP3-076 | Cassington Parish Council | <p>Q1.3.12 Buffer Zones and Q1.3.13 Reductions The Applicant claims that the 25m buffer zone was applied on the basis of "Professional Judgement" and "Experience" and that considering one IP's request for an increase in the Buffer Zone would be unfair to others. This is hardly a scientific approach, or one based on rigorous methodology. If we were to write a scientific paper and base the conclusions on "Professional Judgement" and "Experience" it would rightly be rejected and indeed would be judged as ethically unsound. The issue, clearly, is that villages as visual receptors to the proposed development were scoped out of the ES and no RVAA was carried out.</p> <p>Furthermore, we contest that the Buffer Zone of 25m is one of the smallest proposed for a UK Solar Farm and we repeat the following text from our WR: PVDP have publicly made the point that they have increased the buffer zone of the Botley West Solar Power Station from 20m to 25m in response to comments in the consultations. This barely perceptible increase in buffer zones from the solar farm to the boundaries of properties lying immediately adjacent to the Solar Power Station is completely inadequate. Whilst data on buffer zones is often not available for solar farm developments an examination of other projects in the U.K. shows that 25m is below what other developers consider a reasonable distance. These include:</p> <ul style="list-style-type: none"> • Chimmens Solar Farm, Kent (Buffer zone of 100m. • Ship Meadow, Suffolk () Solar Panels 100m from residential properties, Inverters, 200m. • Cottam Solar Farm, Lincolnshire) Buffer zone of 50m to properties. <p>Evidence of what occurs in other countries is also hard to come by, but one example of information provided by a US solar company, Go Solar Florida (https://gosolarfloridastate.org/) recommends a buffer zone of 500m from residential property for large solar and 200m for small projects.</p> <p>Examination of the academic literature related to planning of solar farms both in the U.K. and in Europe indicates that they also use a standard buffer distance from residential property or towns and villages of 500m (e.g. Castillo et al., 2016; Palmer et al., 2019). The reasoning for this given in Castillo et al. (2016) is: "Large-scale solar PV installations have relevant implications on near residential areas, such as emission of pollutants and visual intrusion in rural settings. In terms of populated areas, the appropriated site for the solar farm should consider a buffer distance in order to avoid most direct impacts and resistance of the local communities (Turney and Fthenakis, 2011; Tsoutsos et al., 2005, Janke, 2010). In this sense, locations at distances greater than 500m from cities/residential areas (more than 1 inhab/ha) were considered more suitable for PV system installations." We also point to a recent study in the USA where a preferred buffer distance of 1- 5 miles was exhibited by residents for most land types except for land where solar farms were already installed (Carlisle et al., 2016).</p> <p>Ironically after the Applicant stated that they will not entertain reductions for specific IPs (in answers to both Q1.3.12 and Q1.3.13) on the basis it would be unfair, they then go on to explain they will be looking at reductions around Bladon. This has now materialised as a letter to the Examiners (EN-010147- 001239) notifying intent to change the application. We are also aware of several cases where the buffer zone has been increased for specific landowners. This renders the Applicant's statements about fairness to IPs in not reducing the spatial</p> | Effects upon individual properties are included in the revised LVIA Chapter. | Site_selection_and_Cable_Route_Alternatives |

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| | | extent of the Botley West proposal as not being based on fact. We repeat our request to reduce the scheme to the north of Cassington. | | |
| REP3-076 | Cassington Parish Council | <p>Q1.4.7 Health Benefits From Solar Cassington Parish Council finds the following statement difficult to believe and is likely unproven: "The assessment concludes that the Project's renewable energy provides a positive contribution to reducing the health effects associated with climate change, locally, nationally and internationally."</p> <p>We note that despite the laudability of the U.K.'s net zero ambitions, which we support, proving that a single Solar Power Station of the size of Botley West will have a significant impact on rates of global climate change and therefore health at local, national and international levels is significant in terms of health benefits is impossible. Can the Applicant provide robust statistical evidence that this is the case given:</p> <p>(i) The increase in global CO2 emissions in 2024 as a result of energy generation was 0.8% driven mainly by increases in coal and gas combustion in China, India, the Middle East, Europe, the USA and SE Asia (see:</p> <p>(ii) The intermittent nature of energy production from Solar Arrays in the UK</p> <p>(iii) Energy production from hydrocarbons and more efficient renewables such as offshore wind in the U.K.</p> <p>(iv) Given the wide range of extrinsic (e.g. pollution, disease) and intrinsic factors (e.g. genetic susceptibility) as well as social factors (e.g. lifestyle, economic status) which affect public health?</p> <p>Given the increases in CO2 emissions from other countries globally we do not think that Botley West can be justified on the basis of health benefits related to climate change mitigation and challenge the Applicant to demonstrate this statistically. Such effects, if they exist at all, are so marginal that they will not be significant and the claim made is an example of hyperbole on behalf of the solar industry in the UK. The important point we are making here is that whilst the national spectrum of energy generation as a whole may have an influence on CO2 emissions (whether significant or not would require analysis) any single project cannot make this claim and therefore such projects must be judged on a range of other criteria, especially given the current queue for solar is at 738GW (NESO;). The current Government target for solar is 45-47GW by 2030 and ~70-75GW by 2050. Approximately, 60% of these targets comprise large-scale solar the rest coming from domestic and commercial rooftop (~40%; see: https://www.gov.uk/government/publications/solarroadmap/solar-roadmap-united-kingdom-powered-by-solar-accessiblewebpage). The current queue for solar represents a massive overshoot in targets and therefore has risks in and of itself including land use conflicts (e.g. solar versus agriculture, amenity and heritage) and impacts on nature, both serious issues with the current proposed project. We note that the UK Government are promoting solar and other renewable energy sources on the basis of energy independence, fighting climate change (overall country targets) and for economic reasons."</p> | <p>Epidemiological statistical studies at the project level are rare and are not an evidential standard that is expected in impact assessment or planning determinations. As noted in the Institute of Environmental Management and Assessment (IEMA) Guide: Determining Significance for Human Health in Environmental Impact Assessment (2022) "<i>The term 'significance' in EIA should not be confused with either a statistical or a non-technical meaning of the word</i>" (paragraph 3.7).</p> <p>The Applicant is confident in the conclusion that the Project provides a significant benefit to population health in relation to the role that energy security plays for public health and that the, anticipated 840 MWe generated by this Nationally Significant Infrastructure Project (equivalent of approximately 330,000 homes) is significant in public health terms. As noted in Chapter 16 [APP-056] paragraph 16.9.232 literature is cited confirming that energy insecurity is a public health concern particularly for vulnerable populations (low-income, children, elderly) related to heat stress, cold stress, asthma, chronic disease, poor mental health, parental fear and stigma, family disruption and residential instability. In addition to energy security in general, the renewable nature of this project emphasises the relevant role of not only providing energy at scale, but doing so in a way that also contribute to a reduction in climate change.</p> <p>The health impacts of climate change should not be underestimated. The UK Health Security Agency (UKHSA) 2021 report the Health Effects of Climate Change (HECC)¹ is clear that "<i>The potential impacts of climate change on health will be significant and wide-ranging</i>". The effects are linked to heat waves, wildfires, flooding, new disease vectors and drought, to name but a few. The risks are greatest for the most vulnerable in society, particularly older people as they are less able to detect temperate changes and take adaptive action. Mortality rates associated with heatwaves are established by robust scientific literature² and are set to rise steeply in the UK due to climate change³. The Met Office Local Authority Climate Service⁴ provides data at the local authority level showing that inland locations such as Oxfordshire will experience substantial increases in summer temperatures. Action at the UK national level to reduce climate change effects will therefore have particular local benefits for inland areas of England, such as Oxfordshire, where temperature changes are not buffered by proximity to the coast.</p> <p>The conclusions reached are aligned with the guidance for assessing Human Health within Environmental Impact Assessment (EIA). Set out below is additional justification for the conclusions reached. In the IEMA Guide: Effective Scoping of Human Health in Environmental Impact Assessment (2022) the final row of Table 9.1 confirms a relevant element to scope into the EIA Human Health chapter is "<i>The wider societal effects of the project for public health [including] how the project contributes to: energy infrastructure ... on which society depends for good population health</i>". The IEMA Guide: Determining Significance for Human Health in Environmental Impact Assessment (2022) has been followed in determining the likely significant effects of energy security arising from the Projects. The guidance is authored by UK relevant experts and health specialists including representatives of the Department of Health's Office for Health Improvement and Disparities (OHID) and the UKHSA. The IEMA scope and significance methods are a refinement of a pan-European methodology for Human Health in EIA developed by the European Public Health Association and the International Association for</p> | Human Health |

¹ UK Health Security Agency (2023) Guidance: Health Effects of Climate Change (HECC) report. Available at: <https://www.gov.uk/guidance/health-effects-of-climate-change-hecc-report>

² Ige-Elegbede, J., Powell, J., & Pilkington, P. (2023). A systematic review of the impacts of extreme heat on health and wellbeing in the United Kingdom. *Cities & Health*, 8(3), 432–446. <https://doi.org/10.1080/23748834.2023.2283240>

³ UK Parliament (2024). Public health impacts of heat. POSTnote 723. Available at: <https://researchbriefings.files.parliament.uk/documents/POST-PN-0723/POST-PN-0723.pdf>

⁴ Met Office Climate Data Portal. Local Authority Climate Service. Online. Available at: <https://climatedataportal.metoffice.gov.uk/pages/lacs>

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| | | | <p>Impact Assessment (A Reference Paper for Human Health in EIA, 2020). The guidance therefore reflects the established and considered consensus of public health and impact assessment professionals for both the UK and wider European context. The IEMA 2022 methodology requires consideration of relevant populations (sensitivity) and relevance of a project change to a health determinant (magnitude of impact), the significance conclusion also draws in additional evidence to explain why an effect is significant for public health, including from the scientific literature and policy. Overarching National Policy Statement for Energy (EN-1) paragraph 4.4.1 recognises that: <i>“Energy infrastructure has the potential to impact on the health and well-being (‘health’) of the population. Access to energy is clearly beneficial to society and to our health as a whole...”</i>.</p> <p>Chapter 16 Human Health [APP-056] Table 16.8 sets out the sensitivity methodology, reproduced from the IEMA 2022 guidance. Using this method, paragraph 16.9.237 of Chapter 16 Human Health [APP-056] sets out the assessment of sensitivity in relation to the Wider Social Infrastructure and Resources determinant of health. This includes where energy security and interruption of energy supplies pose a greater risk, particularly during heatwaves. The assessment text notes the particular vulnerabilities of low income and existing poor health which are associated with high sensitivity within the national population. The high sensitivity score is used in the significance conclusion, reflecting the important role of health inequalities. This is confirmed in paragraph 16.5.18 of Chapter 16 Human Health [APP-056], which states that <i>“For the purposes of the assessment the sensitivity score of the vulnerable group population is used to ensure that the potential for health inequalities is taken into account in the population health significance conclusions”</i>. Paragraphs 16.5.15 and 16.5.16, and their bullet points, set out the specific vulnerable group points against the Table 16.8 criteria as to why the vulnerable group population has high sensitivity. The population vulnerable in relation to energy security includes those with high levels of deprivation (including pockets of deprivation), particularly in relation to low incomes that limit capacity to adapt and exacerbate financial pressures where energy supply interruption or market demand affects income generation or results in additional expense (including wasted food and household bills). This group is also much more reliant on availability of electricity supplies, including for heating, food hygiene and medical equipment, and is therefore likely to carry greater concerns around interruption, affecting mental health. Vulnerability around energy supplies is well documented, and additional supporting literature is set out later in this response. The assessment correctly characterises health sensitivity on this issue as high.</p> <p>Chapter 16 Human Health [APP-056] Table 16.9 sets out the magnitude methodology, reproduced from the IEMA 2022 guidance. Using this method, paragraph 16.9.238 of Chapter 16 Human Health [APP-056] sets out the assessment of magnitude in relation to the Wider Social Infrastructure and Resources determinant of health. The magnitude of impact on population health is driven by the following criteria: Duration is long-term (indicates a high magnitude score); Frequency is continuous (indicates a high magnitude score); Severity relates to risks for population mortality, reducing excess deaths (indicates a high magnitude score) and morbidity of physical and mental health (indicates a medium magnitude score); Population extent is for a minority of the population (indicates a small to medium magnitude score); and Implications for healthcare service quality are small benefits (indicates a medium magnitude score). Given the scale of the electricity generation, its long-term nature and its distributed benefits across the national grid, the balance of any judgement of magnitude against the methodology would be of a high to medium magnitude. The assessment has been conservative in adopting a medium magnitude score. Whilst the anticipated 840 MWe has been equated in terms of equivalent to 330,000 homes powered per year, this is only one way of conceptualising the benefit (i.e. just a convenient unit). In practice</p> | |

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| | | | <p>the electricity would have a much more distributed public health benefit to a much larger number of people, including through community services, employment, education, healthcare and operation of other utilities.</p> <p>The severity rating based on risks to population mortality and morbidity are supported by the literature as follows. The availability of energy, and the infrastructure required to deliver it, is a basic necessity for the delivery of life saving and health supporting resources. This infrastructure is so embedded into the foundation upon which healthcare and public health are delivered that it can be overlooked as a necessary condition for a healthy society. The World Health Organization affirms that “<i>energy is essential to meeting our basic needs: cooking, boiling water, lighting and heating. It is also a prerequisite for good health – a reality that has been largely ignored by the world community</i>”⁵. Health care has become increasingly dependent upon energy-consuming technologies including emergency medical services communications, electronic medical records, electronic medical devices, patient monitoring and hospital treatments. Community-based care also requires consistent, reliable energy for health service delivery including refrigeration of medicines and vaccines and diagnostic testing. At the individual level, cold food storage, cooking fuel, home heating and cooling are some of the basic energy requirements needed to support health. More broadly, energy supports the building blocks of health through lighting schools, maintaining social services, maintaining employment and economic productivity and operating technologies that improve social networking and quality of life.</p> <p>Large scale interruptions to energy associated with power outages and natural disasters have been shown to lead to immediate and severe harm to health⁶. The disruption of municipal services that rely on energy, such as drinkable water and handling of wastewater may increase community-level risk for infectious disease outbreaks⁷. Short-term interruptions to power have demonstrated health consequences ranging from carbon monoxide poisoning, temperature-related illness, gastrointestinal illness, to cardiovascular, respiratory and renal disease hospitalisations and all-cause mortality⁸. While quantitative research on the effect of power outages on public health is sparse, there is expert consensus that power loss can lead to both direct and indirect deaths⁹.</p> <p>Vulnerabilities, including socioeconomic status and age, can exacerbate susceptibility to the impacts of energy interruption. In a rapidly heating world, the risk of heat events has increased. Studies have shown that socially disadvantaged populations are more exposed to heat stress and have lower adaptive capacity¹⁰. In particular, lower socio-economic status populations, young people, unemployed people, and ethnic minorities are more at risk¹¹. These populations already experience higher environmental risks including housing quality, work environments, and neighbourhood conditions¹² making them more vulnerable to interruptions in power supply. Increased costs for residential heating and household energy needs account for a higher percentage of household budgets in lower socio-economic populations¹³. Children in moderately to severe energy insecure homes are more prone to food insecurity, hospitalisations, poorer health ratings and developmental concerns¹⁴.</p> | |

⁵ World Health Organization, 2006. Fuel for life: household energy and health, in: Fuel for Life: Household Energy and Health. pp. 42–42.

⁶ Beatty, M.E., Phelps, S., Rohner, C., Weisfuse, I., 2006. Blackout of 2003: public health effects and emergency response. Public Health Rep. 121, 36–44.

⁷ Granholm, F., Tin, D., Ciotto, G.R., 2023. Critical Energy Infrastructure and Health: How Loss of Power May Kill. Prehospital Disaster Med. 38, 279–280. <https://doi.org/10.1017/S1049023X23000274>

⁸ Casey, J.A., Fukurai, M., Hernández, D., Balsari, S., Kiang, M.V., 2020. Power outages and community health: a narrative review. Curr. Environ. Health Rep. 7, 371–383.

⁹ Klinger, C., Landeg, O., Murray, V., 2014. Power outages, extreme events and health: a systematic review of the literature from 2011–2012. PLoS Curr. 6, ecurrents-dis.

¹⁰ Slesinski, S.C., Matthies-Wiesler, F., Breitner, S., Gussmann, G., Schneider, A., 2025. Social inequalities in exposure to heat stress and related adaptive capacity: A systematic review. Environ. Res. Lett.

¹¹ Hernández, D., 2016a. Affording housing at the expense of health: exploring the housing and neighborhood strategies of poor families. J. Fam. Issues 37, 921–946.

¹² Evans, G.W., Kantrowitz, E., 2002. Socioeconomic status and health: the potential role of Environmental risk exposure. Annu. Rev. Public Health 23, 303–331.

¹³ Moore, R., 2012. Definitions of fuel poverty: Implications for policy. Spec. Sect. Fuel Poverty Comes Age Commem. 21 Years Res. Policy 49, 19–26. <https://doi.org/10.1016/j.enpol.2012.01.057>

¹⁴ Hernández, D., 2016b. Understanding ‘energy insecurity’ and why it matters to health. Soc. Sci. Med. 167, 1–10. <https://doi.org/10.1016/j.socscimed.2016.08.029>

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| | | | <p>Energy insecurity has direct health effects such as cold stress and asthma, and affects mental wellbeing through increased stress, parental fear and stigma, family disruption and residential instability¹⁵.</p> <p>Energy affordability remains a priority to the UK Government. According to a House of Commons research briefing, despite the fall in prices in late 2023 and much of 2024, typical bills under the April to June 2025 price cap will still be 52% higher than in winter 2021/22¹⁶. At the end of 2024 there were 806,508 (electricity) and 656,545 (gas) accounts with a consumer repaying an energy debt¹⁷. In 2022 (most recently available data), the percentage of English households that experienced fuel poverty (based on low income, low energy efficiency methodology) was 13.1%¹⁸. Therefore, sustained interruptions in energy supply or increases in costs would be expected to result in reduced health and wellbeing outcomes. Fuel insecurity, combined with seasonal illness and pressure on services, can have significant health outcomes.</p> <p>The evidence supports the conclusion reached that the Projects' contribution to energy security via the national grid would have a medium magnitude of impact.</p> <p>Based on the high sensitivity set out in paragraph 16.9.237 of Chapter 16 Human Health [APP-056], and a medium magnitude of impact as further justified above and set out in paragraph 16.9.238 of Chapter 16 Human Health [APP-056], guidance states that the significance could be either major or moderate (Chapter 16 Human Health [APP-056] Table 16-10 significance matrix, which reflects the equivalent table in IEMA 2022 guidance on determining significance Table 7.3). The conclusion reached in paragraph 16.9.239 of Chapter 16 Human Health [APP-056] is that the effect for this determinant of health on population health is moderate beneficial (rather than major beneficial). This reflects the scale of the Projects' contribution in the wider UK energy security context and a conservative approach to assessment. It is noted that even if it were considered that the magnitude was in fact low rather than medium, a conclusion of moderate beneficial could still be reached under the methodology and would be a reasonable public health conclusion given the outcomes and extent of the beneficial influence to population health, including vulnerable groups. It is therefore considered the significant public health benefit of the Project in relation to the contribution to renewable energy security is robust. The assessment focuses on the benefits at the national level, within this there are also inherently benefits that flow down to the regional and local level populations. This includes inland areas, such as Oxfordshire, where climate impacts such as heatwaves are likely to be particularly severe. The Project both contributes at scale to reducing climate change health impacts (compared to equivalent fossil-fuel energy generation); and contributes at scale to energy security, which is a key factor in sustaining good health, particularly for the most vulnerable within society. These are material considerations for the planning determination and the population health effect significant in EIA terms.</p> <p>Illustrative of similar considerations, whilst not a DCO, the equivalent DNS regime in Wales for nationally significant projects includes decided project CAS-02112-T2N0G8 - Parc Worlton Solar Farm. ES Volume 1 Chapter 9 paragraph 9.99 to 9.109 assess Macro-economic, Environmental and Sustainability Factors, and concluded that the energy security benefits for public health of the 42 MW development would be moderate beneficial (significant).</p> | |

¹⁵ Hernández, D., 2016b. Understanding 'energy insecurity' and why it matters to health. Soc. Sci. Med. 167, 1–10. <https://doi.org/10.1016/j.socscimed.2016.08.029>

¹⁶ Bolton, P., 2025. Gas and electricity prices during the "energy crisis" and beyond: Research Briefing.

¹⁷ Ofgem, 2024. Debt and arrears indicators.

¹⁸ OHID, 2024. Fingertips: Public Health Data. Fingertips. URL <https://fingertips.phe.org.uk/> (accessed 31/07/2025).

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| REP3-076 | Cassington Parish Council | <p>4.0 Funding of the Botley West Scheme and Past Solar Development Experience of the Applicants Cassington Parish Council note the lack of apparent funds to cover the £820M of the Botley West Solar Power Station. We do not share the Applicant's confidence that the scheme would "likely" be fully funded. The reason for this is simple, politics. Whilst Solar is currently enjoying a beneficial environment under the Labour party, including the fixing of solar energy prices to those of gas, there is good reason to believe that these conditions could change. Recent local elections and poles indicate that both the Labour Party and the Conservatives, the two dominant parties in UK politics, are rapidly losing ground to Reform UK (e.g. 17). Reform UK have a policy to remove all subsidies for renewable energy (Reform-UK, 2024).</p> <p>Reflecting these political realities, and Cassington Parish Council are keen to point out here that we are not putting forward any opinions on politics, it is possible that the financial landscape for renewable energy will change substantially in the next four years. We therefore ask whether the Applicant and Examiners have considered the impact of a change in government and government policy on Net Zero and renewable energy in the context of future financing of the project? 4.1.2 Q1.5.27 Funding and past activities Ukujima Solar Farm. Cassington Parish Council note that a consortium of Kyocera, Photovolt Development Partners, Kyudenko, ORIX and Mizuho Bank initiated the development of Ukujima Solar Farm in 2012-2014. In or around 2018 Photovolt Development Partners GmbH (PVDP) agreed that the feed-in tariff (FiT) rights will be transferred from PVDP to the newly established special purpose company named 'Ukujima Future Energy Holdings G.K.' Tokyo Century, Furukawa Electric, Tsuboi, The Eighteenth Bank and Thailand's leading PV developer SPCG then joined the consortium.</p> <p>Cassington Parish Council ask two questions here: (i) Does the fact that a Japanese Bank was involved in the project at an early stage demonstrate that the financial situation with respect to investment in this project was and is very different to that of Botley West? (ii) Are PVDP still involved with this project or did they effectively sell or move on their interests in 2018? Onikobe Solar Farm. Research suggests that the owners of Onikobe Solar Farm are Sino-Thai Engineering & Construction Public and Thai Solar Energy Public with ownership stakes at 60% and 40% respectively. It seems that initial planning permission for this scheme was obtained by Kamisol Ltd., a company registered in Belize and owned jointly by Peter Gerstmann and the Russian national Dmitri Glukhov. Interests were sold on in 2017 (TSE, 2017; document can be provided on request). Peter Gerstmann is reported to be a Director of Solar 5 and of Photovolt Development Partners GMBH, registered in Germany. Another Director of PVDP GMBH is Yulia Lezhen, the wife of the Dmitri Glukhov reported to have passed on. Peter Gerstmann and Yulia Lezhen are also Directors of Photovolt UK Ltd.</p> <p>Cassington Parish Council asks: 18 (i) Given that once planning permission was obtained for Onikobe Solar Farm it was immediately sold on to two Thai companies can PVDP (Kamisol Ltd.) legitimately claim that they obtained financing and executed the project? (ii) Cassington Parish Council would like to be assured that all of the money being invested in Botley West at all stages of the proposal, connected with PVDP, or any of the other companies owned by Peter Gerstmann is traceable and has passed financial checks that would be expected for an investment of this size and type according to U.K. law.</p> <p>We can find little information about the other Solar Farms that PVDP have supposedly developed, and these are relatively small-scale compared to Botley West. All of them have been in Japan.</p> <p>From the information we can find it seems that PVDP's business model is effectively to develop project plans for Solar Farms / Power Stations and once they have obtained planning permission their interests are sold on. This is effectively a form of speculation and is reminiscent of a wave of speculative solar farms initiated in the U.S.A. and which led to many projects collapsing through lack of finance (Mulveney, 2019). This is consistent with a conversation between Mark Owen-Lloyd and a Cassington Resident on the 25th November, 2022 at a consultation event in Cassington listened to by AD Rogers. It was stated that Botley West Solar Farm was initiated by PVDP sending land agents out across the south of England to identify large landowners who may be interested in offering their land for use for solar renewable energy in proximity to grid connections. Schemes were then developed where land offered up was deemed as suitable for development of utility-scale solar power stations, Blenheim Estates clearly being the landowner in this case. Following planning consent PVDP will go to "the city" to look for investors to invest in the scheme and pay for the substantial infrastructure costs to build the power station.</p> | <p>It should be noted that the role of a solar farm project development company is to procure the cost of development, not necessarily it would include the entire construction finance of estimated 820 mil GBP. Construction finance is usually procured by equity investors, which are not ready to take development risk but prefer to join the project by the time when the development consent order has been granted. Project Botley West is not relying on UK government subsidies. It is therefore not of relevance whether future governments may revise subsidy rules.</p> <p>Further to the question, whether "the fact that a Japanese Bank was involved in the project at an early stage demonstrate that the financial situation with respect to investment in this project was and is very different to that of Botley West", it should be noted that the fact that a Japanese Bank was involved in the project did not particularly influence the ability of Project Ukujima during 2018 – 2025 to obtain project finance loans. As of May 2025, the project is equity financed, and project finance negotiations are still ongoing. The engineering, procurement and construction company Kyudenko Corporation aims to conclude the loan agreement by the end of March 2026, and the specific timing and interest cost of the loan will be determined as soon as the company receives approval to lay the submarine cable (see para II in https://www.kyudenko.co.jp/en/enir/news/docs/2025_250514_en_setsumeikai.pdf)</p> <p>The project was sold in April 2018.</p> <p>Dmitri Glukhov had no interest, neither in Kamisol Ltd. nor in any other group entity.</p> <p>Onikobe Solar Farm it was not immediately sold to two Thai companies but developed over a period of four years from Q4 2013 (see above) to Q3 2017. Approx 10 mil EUR had been spent in 2014 for land acquisition. All required environmental surveys had been conducted and all permits were obtained. Therefore, it can legitimately be claimed that PVDP had financed the development as well as the 10 mil EUR land acquisition and that PVDP had thus executed the project</p> <p>The money being invested in Botley West at all stages of the proposal, connected with PVDP, or any of the other companies owned by Peter Gerstmann are traceable and has passed financial checks that are required for an investment of this size and type according to U.K. law.</p> <p>As for the information about the other Solar Farms that PVDP have developed, it is referred to the above, With a capacity of 980 MW. the six projects are in total in a similar scale as Botley West and one is 40% of the size of Botley-West and larger as the most sizable UK solar farm consented up to date.</p> <p>The fact that third party investors will join the project after Botley West has effectively been developed and that certain investors can only participate once planning permission has been obtained is due to the nature and fiduciary duties of asset managers, such as pension funds, who are not allowed to invest prior to ready to build ("RtB") status of a solar farm project. The business of a developer who is ready to invest prior to <i>RtB</i> status is therefore a necessity and by no means speculative. Going to "the city" to look for investors is an essential function of the free-market economy and effectively working financial markets, such as the London City.</p> | Funding_and_PPA |
| REP3-076 | Cassington Parish Council | <p>5.0 Ecology 5.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4 5.1.1 Q1.8.6 Skylarks We note, as we pointed out in our WR, that PVDP admit to the fact that "skylark plots" will not replace the breeding territories lost by this species of bird but instead are aimed at providing foraging opportunities. This means that the considerable breeding territory of this</p> | <p>The Applicant's position with respect to skylark mitigation is set out in the Skylark Technical Note, Annex 4 in the Applicant's responses to the</p> | Local_Ecology_and_Nature |

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| | | <p>species, which is Red Listed will be lost. In 19 the second year of surveys undertaken by PVDP's consultants, 228 nesting pairs of skylarks were identified by the fields proposed for the Solar Power Station.</p> <p>We repeat our statement in the WR that connectivity between habitats used by many farmland birds is critical. They rely on a mosaic of hedges, trees and farmed arable land to meet the requirements of their lifecycles (e.g. yellow hammer). It again is reflective of the broader erroneous approach of the ES in excluding connectivity between habitats. Many of these farmland birds are in decline nationally and will likely be significantly impacted by this development. A "low" level of impact or "no change" (9.9.333 EN010147/APP/6.3) for the breeding bird assemblage is therefore considered to be an erroneous conclusion of the ecology impact assessments. It is simply not credible that hundreds of hectares of arable cropped land is replaced with solar arrays and grazed grassland and there be no impact on farmland birds. Compensation with 36 ha of wild grassland over archaeological sites (Table 9.8.1 EN010147/APP/6.3) is not a credible replacement for the farmed land.</p> | <p>ExA's Second Written Questions [EN010147/APP/14.2], submitted alongside this Deadline 3 response document.</p> <p>The Applicant's position with respect to impact of solar on farmland birds is as set out in the Response to Relevant Representations [REP1-020] (for example, to Oxfordshire County Council's RR, pg 206).</p> | |
| REP3-076 | Cassington Parish Council | <p>Q1.8.8 Bat mitigation There is a high number of bat species detected in the area (12) including the rare Annex II listed barbastelle and Bechstein's bats (9.6.41; EN010147/APP/6.3). The diversity of bat species, especially within the Central Section of the proposed project, is likely a result of the mosaic of different habitats in the area including woodland, hedgerow, water bodies and open fields. So important is the bat assemblage in the area that the Applicant's own ecological consultants have classified the area as of International Importance for bats (Table 9.6.4; EN010147/APP/6.3). It is clear from the scientific literature that bats do forage over arable land to a varying extent depending on species (e.g. Heim et al., 2017; Finch et al., 2020; Tinsley et al., 2022; Foxley et al., 2023; Szabadi et al., 2023) and furthermore there is evidence in the UK and elsewhere that the presence of solar arrays has a significant impact on bat numbers over open countryside (e.g. Montag et al., 2016; Tinsley et al., 2022; Szabadi et al., 2023) which for some species is severe. The mechanism that causes bat numbers to decline is unclear at present, however, it may be related to foraging. Aquatic insects are known to be strongly attracted to sources of polarised light, the queue they use to detect water. Solar panels are a strong source of polarised light, so much so that they are more attractive to aquatic insects than water (Black and Robertson, 2020).</p> <p>These insects will lay their eggs on solar arrays which subsequently fail to hatch.</p> <p>It may be the case that association of solar panels with high numbers of aquatic insects also renders them attractive to bats which may collide with panels causing a high mortality rate. This is speculative but offers an explanation when at present there is not one.</p> <p>20 We believe that potential impacts on bats by the Botley West Solar Power Station is one of the most serious ecological implications of the project (after impacts on farmland birds). We await the further studies promised by PVDP's consultants.</p> | <p>Further details of the appropriate buffers to avoid impacts to bats will be set out in a bat technical note to be submitted at Deadline 5.</p> | Local_Ecology_and_Nature |
| REP3-076 | Cassington Parish Council | <p>Q1.8.10 Monitoring At present we are dubious that monitoring will be acted upon. For example, what would the course of action be if it was demonstrated that Botley West was having a negative impact on bat populations in the area? Would the developers remove panels from affected areas? We believe this is unlikely and unless firm guarantees are obtained for actions that mitigate impacts on wildlife as part of planning consent, we very much doubt the efficacy of such measures.</p> | <p>The Applicant's approach to the monitoring of ecology post development is set out in sections 12 and 13 of the oLEMP [REP3-034].</p> | Local_Ecology_and_Nature |
| REP3-076 | Cassington Parish Council | <p>6.0 Environmental Impact Assessment 6.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4 Q1.9.1. Baseline, methodology and scope of assessments (see also Q1.14.10) Cassington Parish Council is seriously concerned about the subjectivity apparent in the methodology used in the Landscape and Visual Impacts Assessment. The Applicant states that best practice was applied to the LVIA.</p> <p>However, we contest that scoping of "moderate effects" as non-significant had an overwhelming impact on the outcomes of the LVIA and rendered the overall impact of the proposed Solar Power Station less significant that it will actually be. This is justified by the statement by the Applicant: "it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors." Again, applying the science analogy, if we were to carry out an experiment using recommended methods and find that results were suggesting a certain outcome, and then altered the analysis of results to give another that we wanted, that would not only be judged as technically wrong but also unethical.</p> <p>As pointed out by other IPs (e.g. ICOMOS and District Councils in the LIR) this proposed project will have very severe and negative consequences in terms of visual impact on the landscape. If the applicants had not "downgraded" the category of "moderate impact" as non-significant then we would have ended up with a more realistic LVIA. We challenge the Applicants approach to downgrading of "moderate adverse impacts" and we suggest that this was 21 applied subjectively and likely with the specific aim of reducing the perceived impact of the scheme. We cannot see a valid justification for categorising "moderate adverse" impact (multiple times) as not significant.</p> <p>Here we also point again to the lack of a RVAA which again has had the result of downgrading of impacts on villages with residential properties adjacent to the proposed Solar Power Station. This has resulted in the buffer zone to the north of Cassington being far too low (25m; see 2.2.1 above).</p> | <p>In light of this and other Representations through the examination process, the Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as to the reasoning for the levels of significance reached. It is not the Applicant's intention to make wholesale changes to the LVIA methodology, as this has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01, as agreed with the OHA.</p> <p>Please refer to response to REP3-076 below in respect of RVAA.</p> | Landscape_and_Visual_Impacts |

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| REP3-076 | Cassington Parish Council | <p>7.0 Greenbelt and Very Special Circumstances 7.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4 7.1.1 Q1.11.17 Green Belt – weighting to be given to the very special circumstances VSC2 The Applicant relies on the urgent need for significant amounts of largescale energy infrastructure (e.g. NPS EN-1, para 1.1.2) and the substantial weight to be given to this need in assessing applications (e.g. NPS EN-1, para 4.2.6) as well as related policies. However, Cassington Parish Council point out that the current queue for solar is at 738GW (NESO;). The current Government target for solar is 45- 47GW by 2030 and ~70-75GW by 2050. Approximately, 60% of these targets comprise large-scale solar the rest coming from domestic and commercial rooftop (~40%; see: https://www.gov.uk/government/publications/solarroadmap/solar-roadmap-united-kingdom-powered-by-solar-accessiblewebpage). This means that despite the substantial weight in favour of solar NSIPs, the U.K. is in a position where targets will be met and exceeded with or without Botley West. This in our opinion lowers the weighting given to any single project and means that the most sustainable projects with respect to renewable energy generation, with the lowest impacts on people and nature can be selected.</p> <p>VSC4 The applicant states that there is expected to be an overall Biodiversity Net Gain (BNG) of over 80%. As we stated in our WR Biodiversity Net Gain is an algorithmic approach to assessing the conversion of habitat types including consideration of their condition during a development. As such it is primarily based on types of vegetation, water bodies etc. and not impacts of development on individual species, particularly animals.</p> <p>Examination of document Environmental Statement Volume 3 Appendix 9.13: Biodiversity Net Gain Statement (EN010147/APP/6.5) is informative as to how 22 Botley West provides a “Biodiversity Net Gain”. It shows that there is a gain in Habitat Units of 80.80% and a gain in hedgerow units of 57.93%. It is important to recognise that on the information presented, the large proportion of BNG is generated by the loss of arable farmland and conversion of it to grassland (majority) and floodplain wetland mosaic. Hedgerow gain would seem to mainly be achieved by improvement of existing hedgerows rather than including new hedgerow, which will likely be of poor habitat value until established.</p> <p>However, BNG does not reflect the negative and potentially severe impacts on other aspects of wildlife across the Botley West Solar Power Station most notably on farmland birds and bats and potentially on other wildlife as we have previously noted in our WR. We therefore believe that reliance on BNG as a VSC should be balanced by the likely negative impacts on specific elements of wildlife, including threatened and nationally / internationally rare species.</p> <p>VSC6 Cassington Parish Council, as with the vast majority of residents in vicinity of Botley West do not believe that the project will improve the landscape. In fact, all the evidence suggests the opposite including the opinion of the District Councils, ICOMOS and many IPs. Given the impacts on landscape, public rights of way and residential visual amenity we challenge VS6 as being treated entirely subjectively by the Applicant and not a reflection of reality.</p> | <p>In terms of the 'queue for solar', this was also raised by Cherwell District. The Applicant does not believe it is prudent nor accurate analysis to claim 'oversupply' of schemes by reference to a register or registers of schemes the significant majority of which have not submitted planning applications, have not demonstrated that they have secured land, have not taken FID and have not made significant (irreversible) progress in construction. This is particularly relevant in relation to NESO has shown historically that “only 30-40% of projects in the [connections] queue make it to fruition” (https://www.neso.energy/news/eso-leads-way-major-initiative-accelerate-connections-electricity-transmission-grid) and is engaged in an ongoing 'Connections Reform' activity which seeks to remove projects which are “speculative or do not have the necessary funding or planning permission to progress” from connection queues [Page 65 of the Clean Power 2030 Action Plan].</p> <p>We note the energy needs analysis claimed by the Parish and presented by Cherwell District. It is important to recognise that the Scheme is not designed solely to meet the local needs of Cherwell but is a nationally significant scheme which is designed to contribute to meeting national decarbonisation and energy security needs as established in the National Policy Statements. Therefore, while the Applicant is not commenting on the numerical conclusions of the Cherwell analysis, it notes that EN-1 confirms that this is a not a relevant point for the Examiner to consider because of Paras 3.2.6 – 3.2.8 of EN-1.</p> <p>The VSC4 and BNG point is noted. The BNG assessment follows established methodology in reaching its assessment of overall gain. Impact on ecology is dealt with in the Applicants submissions on ecology, particularly in REP2-12 (Ecology Chapter of the ES). The Applicant does not believe there will be any significant adverse effects on fauna or flora to set against the weight to be attached to BNG and VSC.</p> <p>The applicant notes but respectfully disagrees with the IP's assessment of the impact upon the landscape and the weight to be attributed to VSC6.</p> | Green_Belt |
| REP3-076 | Cassington Parish Council | <p>8.0 Views from Outdoor Recreational Facilities 8.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4 8.1.1 Q1.14.3 Views from Outdoor Recreational Facilities – errata We are pleased to see acknowledgement of the fact that Cassington Sports Fields fall within the ZTV. However, we disagree with the statement: “Due to the low-lying nature of the Proposed Development, distance and intervening vegetation, there is little potential for the proposed solar arrays and / or substation(s) to have a significant visual effect upon the above recreational resources and therefore they were not considered further within the LVIA” Cassington Sports Field is within 25m of the Solar Power Station. Whilst it is screened by trees and hedging to the north it is only partially screened during summer to the east and hardly at all during the winter. We believe this will significantly detract from the experience of exercising in the Sports field which at present have completely rural aspects to the west, north and east, especially 23 during winter when football usually takes places regularly. During the summer tennis courts and outdoor gyms are in use on the eastern sides of the playing fields.</p> | <p>It is acknowledged that users of the Cassington Sports Field may have views available to the Project. As shown on the Zone of Theoretical Visibility (ZTV) [APP-082 to 084]. Views would be of a small part of the Project area and as the Project is predominantly low-lying, at 2.3m, there would be no scope for users of the Cassington Sports Field to be significantly affected. This is further clarified by GLVIA3, which states that “people engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape” (paragraph 6.34, Page 114) would likely be less susceptible / sensitive to change.</p> | Landscape_and_Visual_Impacts |
| REP3-076 | Cassington Parish Council | <p>Heat Island Effect</p> <p>Contrary to the view given by the Applicant there is a growing literature on heating / cooling effects of large-scale solar. Interpretation of these studies is difficult because they measure a variety of different environmental parameters, using differing technologies (e.g. in-situ temperature measurements versus satellite remote sensing) and the environment in which solar farms are situated differs in terms of vegetation, soil and ambient weather conditions (e.g. solar insolation, rainfall, temperatures and wind). The Applicant cites Xu et al (2024) as providing evidence that solar farms have a cooling effect. This is a simplification of the study in the context of Botley West Solar farm as the “cooling effect” noted in Xu et al. (2024) was dependent on latitude and also, despite the average cooling effect, 22 solar farms sampled mainly on grassland and crop land showed warming .</p> <p>Other studies have demonstrated warming of air temperatures around solar farms including Barron-Gafford et al. (2016; in-situ measurements, semi-arid desert), Fthenakis and Yu (2016; in-situ; environment not fully described), Chang et al. (2018; in-situ measurements, barren/sparse grassland), Broadbent et al. (2019; in-situ measurements, semi-arid desert), Jiang et al. (2021; in-situ; semiarid desert). Several interesting points arise from examination of these papers. First, it is noted that almost all of these studies are located in desert or arid regions, because these have high levels of solar insolation and low human population, a situation eminently suitable for</p> | <p>There is no indication of the potential for a significant public health effect related to a photovoltaic heat island effect.</p> <p>It is noted that there are likely to be small micro-climate effects associated with solar arrays, as there likely would be with any infrastructure. The effects are likely to be less than experienced routinely in an urban street, as urban health island effects are driven by thermal mass, which is low in a solar array. Whilst there is some variation in the literature about the direction of thermal effects in solar arrays, driven by local context, the changes are consistently documented as small and localised. The Project's use of existing and additional vegetative screening contributes to natural cooling through shade and transpiration. Similarly, air flow and the retention of vegetation under the panels will also contribute to natural cooling by transpiration.</p> | Climate_Change |

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| | | <p>solar power generation, both stark contrasts with Botley West. Second, several studies have noted that whilst solar farms can lead to cooling of the soil underneath the solar arrays because they absorb solar radiation and shade the ground, the panels also emit heat and thus can warm air temperature above them (e.g. Chang et al., 2018). In the study by Fthenakis and Yu (2016) this effect was found to dissipate at a distance of 300m from the solar arrays .</p> <p>Given the above evidence it is very difficult to predict the impacts of Botley West on microclimate, but it certainly should not be dismissed as done by the Applicant. Where studies have demonstrated increased air temperatures above solar farms they have been elevated by up to several degrees, a difference which could turn an uncomfortable temperature (e.g. ~33-34oC which we have experienced several times in Cassington this summer) to one which is intolerable and which may have negative health consequences for our residents, many of whom in properties closest to the Solar Power Station are senior citizens. A sensible precautionary approach would be to increase the buffer zone near to residential and commercial properties as well as areas where recreation may take place. Fthenakis and Yu (2016) identified 300m as a distance where heating effects dissipated although this is one study in a particular location. This does provide a benchmark, however, that a buffer distance of several hundred meters from places where people work, live and play would be sensible and reasonable given the evidence.</p> | <p>The Fthenakis and Yu reference to 300 m to achieve close to ambient temperature is a conference rather than peer reviewed publication. Achieving ambient temperature conditions is also not a health effect threshold per se. Notwithstanding this, even in the worst case (downwind) Figure 8 of that publication shows the temperature difference is less than 2 degrees centigrade within the array (Weather Station 2 sensor), dropping to around 1.3 degrees at the edge of the array (Hawk2 sensor) and dropping to a difference of 1 degree centigrade within 100 m (interpolating Hawk2,4&9 sensors). Where sensor were not downwind of the array, dissipation rates were much more rapid with a temperature difference of less than 0.7 degrees centigrade achieved within around 25 m of the array boundary (Hawk5 sensor). There are validity concerns to applying this one study from a North America context of different climatic conditions (solar conditions able to support an ambient temperature of 28.6 degrees centigrade). Even so, such localised differences could only be of concern during extreme temperature events, which although increasing without action on climate change, remain very occasional across the lifetime of the Project. Such heatwaves do pose a significant public health threat; however, being outdoors in direct sun or undertaking long-distance walking in the middle of the day during a heatwave would be inadvisable in both urban and rural settings. See for example the UK Health Security Agency July 2025 guidance 'Beat the heat: staying safe in hot weather' that advises "<i>keep out of the sun at the hottest time of the day, between 11am and 3pm ... if you are going to do a physical activity (for example exercise or walking the dog), plan to do these during times of the day when it is cooler such as the morning or evening</i>". A buffer is not considered necessary or proportionate for such incremental effects on such rare occasions when other public health advice applies (it would also be infeasible to consistently apply such principles to urban developments with large thermal mass).</p> <p>The previous response on this issue is reiterated that any thermal effect of the Project is not considered to be on a scale to have the potential for a significant public health effect (Applicant's Response to the Examining Authority's First Written Questions [REP2-025] Q1.4.7 (pdf page 45 pf 219); Applicant's Responses to Relevant Representations [REP1-020] pdf page 79 of 545; and Consultation Report Appendix 5.1.10 [APP-034] pdf page 60 of 945).</p> <p>The heat island issue has been considered in other decided DCOs including East Yorkshire Solar Farm (400MW). That project's Examining Authority's Recommendation Report notes that the issue was discussed (paragraph 3.12.27) and no significant adverse effects are attributed to that or other health related effects (paragraph 3.12.48). Overall the Secretary of State's Decision Letter for that project attributed minor negative weight collectively to all health issues (paragraph 7.3).</p> | |
| REP3-076 | Cassington Parish Council | <p>9.0 Residential Visual Amenity Assessment (RVAA) 9.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4 9.1.1 Residential Visual Amenity Assessment (RVAA) As outlined in Section 2.0 of this document Cassington Parish Council views the Buffer Zone applied to the north of the village as too small .</p> <p>The contention that: "there is no potential for any private views to be adversely affected to an extent that would result in a level of effect, which would trigger the requirement for RVAA" is incorrect as evidenced by our own situation and that of other residents (see Section 2 and 3.1.1.2 of this document). Clearly an RVAA was required to tailor the design of the scheme to mitigate impacts on residential properties .</p> <p>The Glint and Glare study is littered with erroneous statements and conclusions many of these relating to the treatment of "existing" and "proposed" vegetation as the same (see 3.1.1.2 of this document).</p> | <p>Residential Visual Amenity Assessment (RVAA) Landscape Institute Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA) (LITGN-2/19) provides guidance on RVAAs and when they may be undertaken.</p> <p>As with LVIA, RVAA is concerned with specifically with the effects of change to the views and visual amenity from individual properties. LVIA considers the effects on groups of properties (LITGN-02/19, paragraph 3.9). care should be taken not to 'double count' effects on properties (GLVIA3, paragraph 6.36). Paragraph 1.5 of LITGN-2/19 explains that "<i>it is widely known that no one has 'a right to a view.'</i> This includes situations where a residential property's outlook / visual amenity is judged to be 'significantly' affected by a proposed development." Paragraph 1.6 explains further that "<i>It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential</i></p> | Landscape_and_Visual_Impacts |

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| | | | <p>property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before. The Residential Visual Amenity Threshold (RVAT) has to be reached before an RVAA is required. Examples of where an RVAT is reached are where “one might use terms such as ‘overwhelming/overbearing’ for tall structures, or ‘overly intrusive’ for a development overlooking a garden or principal room” (LITGN-2/19, paragraph 2.2). Even with low-profile schemes, such as road and residential projects (long-term and permanent) might only require RVAA assessments for properties 50-100 m from the development (LITGN-2/19, paragraph 4.7). Solar panels at a maximum height of 2.3 m are not tall structures and are not manned buildings, that overlook properties.</p> <p>The effect on individual properties, raised during consultation, including public consultation events, were addressed in subsequent discussions with the property owners. Where it was agreed there was the potential for significant effects, mitigation was undertaken in the form of removal of areas of panels or additional landscape mitigation to minimise these effects. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which would further limit the effects of the Project. Additional mitigation, as shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], was included to further screen available views from residential properties.</p> <p>An RVAA was not requested by the OHAs, either at Scoping or during later consultation (see consultation report, document reference [APP-024]).</p> | |
| REP3-076 | Cassington Parish Council | <p>10.0 Residential Visual Amenity Assessment (RVAA)</p> <p>10.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4</p> <p>10.1.1 Q1.14.9 Suggested areas to be omitted from the Proposed Development</p> <p>The Applicant states that a Change Request 2 notification alongside this Deadline 2 which intends to capture certain scheme refinements and Order limits reductions in response to various feedback from interested parties. The outline of this Change Request Document indicates that none of the suggested reductions for the scheme around Cassington are included. We have outlined in Sections 1 and 2 above the very strong reasons why reductions should be implemented to the north of Cassington.</p> | Please refer to response above in relation to RVAA. Applicant has reviewed the submitted LVIA [PDB-006], which considers effects upon individual properties. | Landscape_and_Visual_Impacts |
| REP3-076 | Cassington Parish Council | <p>11.0 Visual Effects: Residential Properties</p> <p>11.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4</p> <p>11.1.1 Q1.14.13 Residential properties</p> <p>The Applicant appears to try and justify the lack of an RVAA by stating that: “Views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. However, it may be helpful for an LVIA to comment on changes to views that will be experienced from groups of properties.....The LVIA [PDB-006] has included reference to settlements, and they are included as part of the overall assessment of effects.”</p> <p>It is very clear that an RVAA is required to fully understand the impact of the proposal on numerous properties (see Section 2 above). Furthermore, the oppressive impact of the proposed development on Cassington village has also been disregarded and a blanket 25m buffer applied. Both Cassington Parish Council and other experts (e.g. ICOMOS) and District Councils believe this is not correct and so we have requested reductions to the scheme to the north of the village (see Section 2 above).</p> | Please refer to response above in relation to RVAA. Applicant has reviewed the submitted LVIA [PDB-006], which considers effects upon individual properties. | Landscape_and_Visual_Impacts |
| REP3-076 | Cassington Parish Council | <p>12.0 Noise and Impacts on Residential Properties, Businesses and Schools</p> <p>12.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4</p> <p>12.1.1 Qs1.15.2 – 1.15.10 Noise</p> <p>Cassington Parish Council finds that many of the Applicant's answers to questions on noise are subjective, unconvincing and frankly dismissive of the serious nature of noise impacts of this application, most particularly relating to pile driving, but also construction traffic. The statement: The exact construction methodology has not yet been defined. However, as was discussed in the ISH1, the ‘piling’ for the solar panel stations is akin to a machine to install fence posts, as opposed to those used for substantial buildings. (Q1.15.8) is wholly unconvincing. We do not know of many fence posts that need to be driven up to 3m into the ground. We note the noise clearly audible from pile driving at Blenheim Estates Weaveley Solar Farm 1km away from pile driving (recording in the SBW Community Impact</p> | <p>A full and detailed noise and vibration assessment has been undertaken, which wholly assess the potential noise and vibration impact of the scheme on residential receptors. The assessment can be found in [APP-050]. This assessment is not subjective, or dismissive of the potential noise impacts of the scheme.</p> <p>The solar panels will be supported by metal legs which will be driven into the ground by a piling machine. This piling machine is not similar to that used for the structural support for residential dwellings, which some consultees may be aware of. Instead, the pile driving machine will be relatively small scale. The reference to the installation of fence posts was to provide useful context, and not to be dismissive of the concerns of residents.</p> | Noise_and_Vibration_Impact |

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| | | <p>Report - EN010147-001254). Cassington lies adjacent to a large swathe of the Botley West Solar Power Station to the north of the village where pile driving will potentially take place within 10s of meters of residential properties and hundreds of meters of St Peters School and Church. Given the area of land involved pile driving will take place over a significant amount of time and noise will likely be magnified by the local topography by reflecting from the slopes to the north .</p> <p>As detailed by the Local Impact Report led by WODC (Para 7.9) and the Community Impact Report by Stop Botley West, Cassington Parish Council believes the noise impacts of the proposed development on the open countryside and users of the PROW network have not been fully assessed. We believe a specific Residential Amenity Assessment of noise impacts on residents of Cassington, Jericho Farm and Worton are required. An assessment of noise impacts on Public Rights of Way to the north and northeast of these villages/settlements are also required. We also note that the ES states that Power Converter Stations (PCS) will emit 92dB of noise so noise emissions during operation of the Botley West Solar Power Stations should also be assessed as part of a Residential Amenity Assessment of noise impacts.</p> | <p>It is noted that pile driving noise has been observed by residents. However, it is not clear from the residents comments exactly where the pile driving was taking place, or the type of piling machine which was being used. This is curcial to add context to the aubility of sound 'from 1km away' Furthermore, there is no requirement for construction phase noise to be inaudible at residential dwellings. Inaibility for contrsucion works would be a wholly unrealistic target for any construction activity.</p> <p>The applicant has committed to a 7.6.1 - Outline Code of Construction Practice [APP-233]. This CoCP includes a commitment of a construction phase noise limit which has been defined in line with <i>British Standard 5228-:2009+A1:2014 - Code of practice for noise and vibration control on construction and open sites – Noise</i> (BS5228).</p> <p>To assess noise on PROWs, additional noise modelling and assessments have been undertaken to determine the distance from the PCS unit, where the noise be 'slightly audible';</p> <ul style="list-style-type: none"> The measured daytime background sound level in rural locations have been assessed , and 42dB LA90 had been determined as the average background sound level for PROWs in the area of the proposed development. It is considered reasonable that where the sound level from the PCS units is 5dB above the background sound level, then it could be considered to be 'slightly audible'. The sound pressure level falls to 47dB(A) at between 75m and 100m from the PCS unit. This is based upon the maximum operational capacity which will only occur during warmer weather and when the electrical load is high. Therefore, most of the time, the sound emissions from the PCS units will be less than has been assessed. <p>We have determined that at a distance of up to 100m, noise from the PCS units is considered to be 'slightly audible' on a PROW. However, there are some locations where there are PCS units which are located within 100m of a PROW. These occur as follows;</p> <ul style="list-style-type: none"> Northern Area – 11 PCS Units Central Area – 15 PCS Units Southern Area – 3 PCS Units TOTAL – 29 PCS Units <p>There are some areas where a walker along path could experience noise from one or more PCS units in a single walk. These have been identified to occur in the following number of locations;</p> <ul style="list-style-type: none"> Northen Area – Once Central Area – Three times Southern Area – Once <p>We remain of the opinion that persons accessing PROWs are permitted to use the path to travel from point A to point B, and are thus not considered to be not sensitive receptors. In any case, a walker who may experience some noise from the PCS units in some areas of the footpaths crossing the site would not experience a significant adverse effect.</p> | |
| REP3-076 | Cassington Parish Council | <p>13.0 Socioeconomic Effects</p> <p>13.1 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4</p> <p>13.1.1 Q1.16.1 – 1.16.19 Socioeconomic Impacts</p> <p>Cassington Parish Council believes that the socioeconomic analysis undertaken for the Botley West Solar Power Station is deficient. It focuses on jobs around construction, tourist effects related to Blenheim Palace and the overall economic impact of the project. It does not analyse impacts on local businesses in terms of operation, loss of trade, loss of clients, future viability or willingness to invest in new or expanding businesses in the area. These include high-tech industries of exactly the type the government are hoping to encourage around Oxford and</p> | <p>The Applicant acknowledges concerns regarding potential business impacts. However, the Socio-Economic Impact Assessment (SEIA) has been conducted in accordance with National Policy Statement EN-1, using a precautionary and evidence-based approach. The assessment considers direct and indirect effects on employment, tourism, and local economic activity, including proximity-based analysis of affected businesses namely tourism businesses (of which the greatest potential temporary impact could occur – see para 15.9.139 of SEIA).</p> | Socio_economics |

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| | | <p>between Oxford and Cambridge. The analysis presented in Stop Botley West's Community Impact Report (EN010147-001254) indicates that 278 such businesses will likely be impacted. Survey responses indicated that 64% of respondents felt their business income would be either significantly or moderately affected and 73% believed there would be a significant or moderate impact on the appeal of their business. Cassington Parish Council believes that a more thorough investigation of business impacts of this proposal should be undertaken by independent consultants should be commissioned by the Applicant.</p> | <p>While the Community Impact Report presents sentiment-based survey data, such methods—though valuable for gauging perception—do not constitute objective economic analysis. The SEIA relies on verifiable data, including sectoral composition and most relevant spatial relationships to the site for tourism business. Any analysis on "loss of trade, loss of clients, future viability or willingness to invest in new or expanding businesses in the area" would be not a robust economic analysis as it is purely speculative, as no logical inferences can be made. The SEIA also explains benefits to businesses within the supply chain, overall it finds no significant long-term disruption to businesses.</p> <p>Oxford's high-tech corridor is largely concentrated outside the immediate zone of influence, and the temporary nature of construction impacts, combined with mitigation measures, further reduces risk.</p> <p>Overall, the SEIA concludes that the project can be accommodated without significant adverse socioeconomic effects.</p> | |
| REP3-076 | Cassington Parish Council | <p>13.2 Applicant's Responses to Written Representations Submitted at Deadline 1 July 2025 PINS Ref: EN010147 Document Ref: EN010147/APP/12.4</p> <p>13.2.1 REP1-131 Bojan Ivanovic Property Values</p> <p>Impacts on individual property values are not a material consideration in planning. However, there are ~ 11,000 properties within 1.5km of the Botley West Solar Power Station. Loss in property value and saleability of property represents the main socioeconomic loss imposed upon the residents of Oxfordshire by the Botley West project. We already know of residents in the area who have lost £100s of thousands on property values attributed to the Botley West Proposal. When taken as a whole across the entire area of the Botley West Proposal we believe that this impact could run into tens to hundreds of millions of pounds of direct financial loss. Therefore, impacts on property values should be accounted for in Socioeconomic Analyses of the Botley West Solar Power Station. Not accounting for loss in property value omits one of the major socioeconomic impacts of the project and overall results in an unrealistic assessment of socioeconomic gains versus losses .</p> <p>In response to Mr Ivanovic's statement in Rep1-131 the Applicants quote the following report as providing evidence that Utility-Scale Solar Power Stations do not impact property prices: 'Is NIMBYism Standing in the Way of the Clean Energy Transition?' Jarvis, 2021. Cassington Parish Council points out that this is not a peer-reviewed paper on the topic but an industry report and as such cannot be regarded as independent. A thorough review of the impacts of Solar Farms and Utility-Scale Solar Power Stations on property prices by Prof. David Rogers of SolarQ indicates that overwhelmingly peer reviewed studies have identified negative impacts (SolarQ, 2024). Most of the studies cited in this study refer to property prices in the USA although some are from Europe. We also point to the recent paper by Maddison et al. (2023) which specific to England and Wales. This study concludes:</p> <p>"We find that solar farms impose disamenity impacts, at least on properties located ≤ 750 m south of a solar farm with a capacity greater than 5 MW. Specifically, we estimate a disamenity impact of -5.4%" .</p> <p>Therefore, it can be concluded that the weight of evidence is overwhelmingly that close proximity of Solar Power Stations has a negative impact on property prices. The evidence cited by the Applicant is selective and given it is an industry report there is low confidence that its conclusions can be trusted. Impacts on property prices in Oxfordshire by Botley West Solar Farm must be included in any socioeconomic analysis for it to be a true representation of positive and negative effects.</p> | <p>The Applicant appreciates that concerns about a negative impact on local property values are understandable from a local resident perspective. However, it is important to emphasise that impacts on individual property values are not a material planning consideration.</p> <p>The Applicant recognises the use of the conclusions from studies such as Maddison et al. (2023) and the SolarQ review. Nonetheless, the referenced articles having mixed context-specific findings e.g. the SolarQ review by Prof. David Rogers, although peer-reviewed, includes studies from the USA and other regions with different planning systems, land use patterns, and market dynamics, limiting their applicability to Oxfordshire. Although the Maddison et al. (2023) uses England and Wales as its geographies despite its conclusions, which have economic methodological challenges outlined below, the planning position is that no UK planning policy or guidance mandates the inclusion of property value impacts in socioeconomic assessments. Therefore, there is no requirement for the Applicant to seek to quantify any potential change to property values and attempting to do so, would introduce significant methodological challenges, such as:</p> <ul style="list-style-type: none"> • Attribution uncertainty: Isolating the impact of a solar farm from other market factors (e.g., interest rates, stamp duty changes, local amenities, housing supply) is inherently speculative and not robust. • Equity and consistency: Including property value impacts for one type of infrastructure (solar farms) but not others (e.g., roads, wind farms, schools) would create inconsistency in planning practice. • Risk of bias: Property value concerns often reflect subjective perceptions rather than measurable, long-term economic impacts. <p>Furthermore, it is worth differentiating "property" value from other types of value such as jobs or direct investment.</p> <ul style="list-style-type: none"> • Unrealized Value and Economically Unproductive: Property value is inherently unrealized which reflects potential wealth. This wealth is only realized once sold. It does not directly contribute to economic activity unless developed or sold. • Speculative and Volatile: Property values are inherently speculative and heavily influenced by market dynamics such as | Land_Agreements |

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| | | | <p>sentiment, population changes, planning policy, government policy (stamp duty or inheritance tax) or interest rates.</p> <ul style="list-style-type: none"> Lack of Multipliers: Changes in property value whether positive or negative, are self-contained in that they do not have clear direct multiplier effects unlike job creation or investment. <p>In contrast, the socioeconomic analysis for Botley West Solar Farm focuses on tangible and measurable impacts, such as job creation, local investment, community benefits, and contributions to energy security and decarbonisation which are aligned with national planning priorities.</p> <p>In conclusion, while the Applicant respects the views expressed in REP3-076, the exclusion of property value impacts from the socioeconomic analysis is both methodologically sound and consistent with planning policy. The focus remains on delivering a balanced, evidence-based assessment of the project's broader socioeconomic implications within mandated UK Planning policy.</p> | |
| REP3-076 | Cassington Parish Council | <p>14.0 Summary</p> <p>Cassington Parish Council contend that as a result of the oppressive impact of the Botley West Solar Power Station and the increased risk of flooding it imposes on the villages of Cassington, Worton and the settlement of Jericho Barns the scheme should be reduced to the summits of the hills above Cassington and removed altogether from areas to the east as outlined in Appendix 1. We find that the visual impacts on the residents of Cassington have been significantly underestimated because of flaws in the methodologies of the LVIA, the Glint and Glare study and the lack of a specific RVAA which have led to the imposition of a 25m buffer to the boundaries of properties and the Sports Field of Cassington Village .</p> <p>Many other aspects of our Written Representation remain unaddressed and we find little has changed in the proposal (e.g. for impacts related to ecology) .</p> <p>We question PVDP's track record in Solar Farm Development and request a more detailed description of their past role in the Solar Developments they cite and also request that the Examiners ensure that there is full confidence in legitimate funding sources for this project .</p> <p>We believe that the socioeconomic analyses of the Botley West project have not accounted for impacts on local businesses or the substantial financial losses of residents whose properties lie within 1.5km of the project. Whilst the latter is not a planning consideration when it comes to impacts on individual properties it certainly is a major financial loss borne by the many compared to the very few who will financially benefit considerably from this project. As such it should be considered as a negative socioeconomic impact.</p> | <p>Noted, responses have been provided to the individual queries above.</p> | Summary_of_Significant_Effects |
| REP3-077 | Cumnor Parish Council | <p>EN010147-001239-Applicant's Change Request 2 Notification (Rev 0).pdf</p> <p>Given the ExA's 11th July decision (EN010147-001300-Botley West Solar Farm - Change Request 2 Notification Response.pdf) to require a consultation on the proposed changes between 23rd July and 22nd August, can the ExA please explain to CPC how that consultation can meaningfully take place without the photomontages requested in Cumnor Parish Council's Comments for Deadline 3 on responses to Examining Authority's 1st written questions (ExQ1) being available, as that document is also being submitted for the 22nd July D3 deadline? CPC also wishes to ask the ExA how can the proposed consultation from 23rd July to 22nd August be truly open and evidence led, when the actual change request from the applicant doesn't have to be made until 12th September? Since the applicant seems to have already judged that (in EN010147-001239-Applicant's Change Request 2 Notification (Rev 0).pdf)</p> <ul style="list-style-type: none"> • For change 3 'overall there is unlikely to be any new or materially different significant environmental effects compared to those already reported. ' • For change 6 'it is unlikely that this change will lead to new or materially different likely significant environmental effects to those currently reported. ' • For change 11 'it is considered that there are no new or materially different likely significant environmental effects that would arise a result of this change.' <p>CPC asks what a 4-week consultation held in the middle of the school summer holidays with incomplete information available, is designed to achieve?</p> | <p>As part of the July 2025 consultation on targeted changes, the Applicant included an explanatory note explaining each change in detail alongside annotated maps of each change.</p> <p>The Applicant is requesting feedback from relevant stakeholders to ensure that the changes being made are refined and consultees can provide their feedback on them prior to the Change Application being made.</p> <p>The changes will be formally sought by the Applicant through the submission of a Change Application to the Examining Authority. The Applicant intends to submit this Change Application in September 2025 as encouraged by the Examining Authority in its letter to the Applicant [PD-011]. Therefore, the Applicant's intent to consult prior to the Change Application being submitted is to ensure that any feedback is considered prior to the submission.</p> <p>The proposed changes have been set out in the Applicant's Change Request 2 Notification [REP2-045], which was submitted to the Examining Authority on 01 July 2025. The proposed consultation from 23 July to 22 August was approved by the ExA. The focus of the consultation was for parish councils in affected areas, selected statutory bodies and landowners to give their feedback on the specific changes.</p> | Consultation_Process |

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| REP3-077 | Cumnor Parish Council | REP1-062 - Rebuff. Relevant stakeholders and local authorities submitted extra viewpoints and adversely commented on the number and location chosen by the applicant. CPC and VWHDC have both submitted a request for deadline two asking for a significant number of new viewpoints and photomontages. Project impacts continue to adversely affect the affected landscape, visual resources and receptors. The applicant is incorrect in their statements. | A record of email correspondences, with host authorities, and schedule of suggested amendments / additions to Representative Viewpoints has been kept. This included reasoning for inclusion or discounting any suggestions from the host authorities and is summarised in Table 8.5 of the LVIA [PDB-006] . | Landscape_and_Visual_Impacts |
| REP3-077 | Cumnor Parish Council | REP1-064 – the applicant continues to ignore the evidence provided in the written representation regarding TVPs response to a neighbouring application. The proposals from the applicant are those that TVP mention as not necessarily delaying an attack for long enough. The applicant is also providing an answer that conflicts with the TVP evidence provided in that the applicant states the perceived crime effects were unlikely. TVP state the opposite. Unfortunately based on the applicant's original misconception they state that they have scoped out these issues from their project assessment. | <p>As set out in the Applicant's response to [REP1-064] from Cumnor PC, and in the Applicant's comments on IP's responses to ExA Q1 [REP3-065] to the issues of Crime and Community Safety were considered at the scoping stage, as set out in Scoping Report [APP-125] Table 7.18 and Table 7.19. That analysis concluded that actual and perceived crime effects were unlikely, including during operation, and were therefore scoped out in line with proportionate assessment. Thames Valley Police (TVP) and Crime Commissioner was consulted at the Scoping stage, and again at the PEIR and targeted consultation stages, along with the Thames Valley Local Resilience Forum, but no consultation responses were received. Similarly, there was no Relevant Representation received from TVP post submission.</p> <p>Whilst the risk of theft, of materials and equipment, and of vandalism, cannot be completely avoided the Applicant is proposing security measures (fencing, infra-red sensors, and higher levels of protection for the project substations), as described in Table 6.4 of Chapter 6 of the ES [APP-043], that are considered proportionate and appropriate for the Project, and align with those measures usually deployed to protect solar farms.</p> <p>CPC's deadline 1 submission from TVP [REP1-064] has been responded to in the Applicant's Responses to Written Representations Submitted at Deadline 1 [REP2-027] (pdf page 10 of 67), row titled 'REP1-064'. Applicant's Responses to Relevant Representations [REP1-020] (pdf page 87 of 545) row titled 'Perceived personal safety concerns from high fencing along walking routes' provides additional detail as to the issues of crime and perception of crime.</p> <p>It is noted that National Policy Statements are the relevant primary basis for determining DCO applications, rather than the NPPF. Crime is not referenced within EN-1, EN-3 or EN-5. None the less it is considered that the project is consistent with the NPPF crime related provisions as set out in the responses referenced above.</p> | Crime & Safety |
| REP3-077 | Cumnor Parish Council | <p>REP1-076 – CPC supports VWHDC regarding the Southern Site's negative impact on landscape character within the wider setting and to the rural landscape setting of Cumnor Parish. The applicant is mistaken in stating that the landscape area in question is not sensitive to the impact from the project .</p> <p>8. REP1-092 - Rebuff based on REP1-062 regarding viewpoints .</p> <p>9. REP1-120 – Rebuff. Cumnor reference in that the change in local landscape character will go from one of visual historic rural views to one of industrialisation including a substation. Refer to REP1-062 answer. The applicant has mis-portrayed the Cumnor landscape and potential project impact. The applicant has stated that Cumnor Parish has "...substantial areas of newly planted woodland" to support the assertion that the local landscape is changing. CPC asks the applicant to identify where these substantial areas are as CPC is only aware of this 'recent' additional (image appended below) near to the Hurst SSSI at the top of Cumnor Hill (not in the direct vicinity to the applicant's proposed installation). As the image shows, whilst a welcome addition of woodland it is not one that could be judged to be significant.</p> | <p>The Applicant notes the concerns regarding the southern site's negative impact and its' inclusion raised by Cumnor Parish Council and VWHDC. Comments provided a Deadline 1 in response to this issue were based on the information provided within the LUC review (Appendix 1 of the Joint LIR). The Applicant looks forward to receiving the further information at Deadline 4 regarding suggested areas to be omitted and will comment further as required.</p> <p>A record of email correspondences, with host authorities, and schedule of suggested amendments / additions to Representative Viewpoints has been kept. This included reasoning for inclusion or discounting any suggestions from the host authorities and is summarised in Table 8.5 of the LVIA [PDB-006].</p> <p>Reference within the Applicant's response to REP1-120 regarding the changes in the local landscape was making reference to the fact that the landscape within the Parish is not a preserved in aspic. I.e. the local landscape is ever changing with the addition of woodland, large residential areas and other development. The Project will be part of this evolution within the landscape. Project impacts would be minimised, as required by national policy, by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [AS-020] and the Landscape, Ecology and Amenities Plan [AS-022].</p> | Landscape_and_Visual_Impacts |

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| REP3-077 | Cumnor Parish Council | <p>10. REP1-126 – CPC supports Thames Water's concerns over construction and the lack of communication given the obvious reservoir integrity and safety concerns. CPC supports Thames Water's requirement to review the drainage strategy. CPC rebuffs the applicant's assertion that it does not need a bespoke method statement to combat noise and vibration emission to the reservoir and nearby nature reserves. Given the ecological and recreational importance of the site a bespoke statement is required to adjust to the specific issues. CPC supports Thames Water in the applicant improving communications and resolution of issues with it. The applicant has misunderstood TWUL's query as to whether the applicant should be considered a utility undertaker .</p> <p>11. REP1-137 Rebuff the wording from the applicant: "...but one of the rules is that people remain on the paths." regarding Wytham woods. The views would be possible from the woods, including during seasonal change. Two paths themselves go right to the edge of the wood boundary facing the applicant's direction.</p> | <p>10.Requirement 9 of the draft DCO secures that the written details of the surface water drainage works and (if any) foul water drainage system must be submitted to and approved by the relevant planning authority, substantially in accordance with the conceptual drainage strategy [REP3-022]. It is at the discretion of the relevant planning authority who they wish to consult in discharging this requirement, although the conceptual drainage strategy is already available for review and comment.</p> <p>Noise from the construction and operation of the main project substation is the source of sound which is most likely to affect users of Farmoor Reservoir. Rightly, noise from the construction and operation of this substation will be controlled so as to not cause a significant adverse effect on residential receptors on Cumnor Road to the east. These receptors are located approximately 150m from the main project substation. Farmoor Reservoir is located approximately 160m from the main project substation, and would also benefit from the noise mitigation measures which will be applied to the project substation, as detailed in [APP-233] 7.6.1 - Outline Code of Construction Practice and [APP-234] 7.6.2 - Outline Operational Management Plan. As a result, users of Farmoor Reservoir are considered very unlikely to experience a significant adverse noise and vibration effect from the development.</p> <p>11. Views from the permissive paths of Wytham Woods are included within the LVIA [PDB-006] assessment at Section 8.9 (Assessment of Effects). It should be noted that permits are available to access the woods, from Oxford University, but one of the rules is that people remain on the paths as stated in REP3-077. Representative Viewpoints 42 (at the edge of Wytham Woods), 43 and 44, selected and assessed within the LVIA are just that. They are representative of views available from this private woodland which does not currently have general public access without permission.</p> | DCO_Process |
| REP3-078 | Cumnor Parish Council | <p>ExA Question Q1.1.9 'Design choices and functionality' The applicant, in confirming that to maintain a maximum panel height of 2.3m on steeply sloping north facing ground in Cumnor Parish it will 'involve reducing the tilt angle, using smaller modules, or deploying a single-row landscape configuration instead of stacked panels.' provides ample illustration of the unsuitability of this location.</p> <p>That the applicant seems willing to countenance lower load factors from such sub optimal arrangements (and running counter to NPS EN-3 requirements on irradiance etc.) shows that the underlying process of choosing this Green Belt land was flawed, as has been pointed out previously by CPC.</p> <p>As such it supports the position adopted by VWHDC, CPC, ICOMOS and Layla Moran MP, that the southern site should be removed from the application.</p> | <p>The Applicant confirms that the design flexibility described in Table 6.3 of ES Chapter 6 remains compatible with sheep grazing, even on sloped terrain. While the tilt angle or module configuration may be adjusted to ensure compliance with the 2.3 m maximum and 0.8 m typical lower edge height, sufficient clearance beneath the panels will be maintained to allow for continued agricultural use, including grazing.</p> | Project_description_and_Design_parameters |
| REP3-078 | Cumnor Parish Council | <p>ExA Question Q1.3.1 Substation search The applicant's answer to the ExA's question 'why was a substation not considered on land outside the Green Belt?' seems to be because NGET didn't.</p> <p>Specifically, the applicant asserts (on page 25) that 'The site selected by PVDP for the NGET substation was within the NGET area of search which by that stage had narrowed to an area with approximately six alternative sites along a short S of the 400kV OHL corridor, and on land that was within the Applicants Order Limits. To the knowledge of the Applicant none of the shortlisted site areas lay outside of the Oxfordshire Green Belt. The Applicant did not look beyond this corridor as to do so would fetter NGET's own site search criteria.' CPC assesses that this is a poorly argued attempt at presenting the ExA with a fait accompli, further amplified by selective quoting of 'preferences' vs 'requirements' on page 26.</p> | <p>Discussions about Cowley substation were ended by National Grid as it was not deemed economic or efficient to reinforce due to land and technical constraints. NGET then decided to build a new substation alongside the 400kV line from Cowley to Walham, which had capacity once the cables at Hinksey meadow were replaced. This resulted in a connection offer at a new substation to be built at Farmoor.</p> | Grid_Connection |
| REP3-078 | Cumnor Parish Council | <p>ExA Question Q1.3.2 Substation search and underlying choices CPC assess that they have a low degree of confidence in this answer.</p> <p>The applicant asks the ExA to accept their methodology for a holistic assessment of alternatives on the grounds that (page 28) 'projects of this nature are extremely complicated to deliver.', evidently so complicated that PVDP quotes (page 28) 'Point of Connection Offer: June to August 2021', contradicting their assertion on page 24 that 'The Applicant applied for a connection on 10th February 2021. A Point of Connection Offer (PoC) was granted in June 2021 with a connection date in October 2026.' That the applicant cannot even maintain a consistent time line between its answers to two adjacent ExA questions is a cause for concern.</p> | <p>Details of the Bilateral Connection Agreement signed with NGET are set out in the Grid Connection Statement [APP-019]. The offer was made in June, amended in August and signed in September 2021. This question</p> | Grid_Connection |
| REP3-078 | Cumnor Parish Council | <p>ExA question Q1.3.6 National Grid substation In this answer the applicant tells the ExA that 'NGET and SolarFive Ltd have signed a Bilateral Connection Agreement which commits both sides to connect Botley West Solar Farm to the NETS in October 2028'.</p> | <p>The Grid Connection Statement [APP-019] states clearly that NGET and the Applicant signed a Bilateral Connection Agreement in September 2021. Subsequent to this agreement NGET asked for an Agreement to Vary, moving the connection date to October 2028. This agreement has</p> | Grid_Connection |

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| | | <p>This contradicts the answer the applicant gives to Q1.3.2 on page 25 that states 'a connection date in October 2026'.</p> <p>Both of these assertions by the applicant are in turn contradicted by the NGET Deadline 2 submission (EN010147-001280-National Grid Electricity Transmission Plc - Responses to Examining Authority's First Written Questions (ExQ1).pdf) which states (page 3) 'Late 2029 Construction completed' This 2029 construction date is confirmed by NGET's 19th June letter to Layla Moran MP, quoted in turn in CPC's responses to ExA's 1st written questions (response to q 1.3.3, page 3 of EN010147-001136-Cumnor Parish Council - Responses to Examining Authority's First Written Questions (ExQ1).pdf)</p> | <p>yet to be signed, meaning the original BCA is still in force. The Applicant expects to sign the AtV in the coming weeks.</p> | |
| REP3-078 | Cumnor Parish Council | <p>ExA question Q1.3.14 Farmoor Reservoir The answers to this question differ between the applicant and NGET, which is of concern given that the applicant has previously cited working with NGET since 2019.</p> <p>NGET quote 'approximately 105m from the Farmoor embankment', while the applicant quotes either approximately '150 to 250 m from the Farmoor Reservoir embankment' or a 'best guess' of 'approximately 80 to 100 metres from the embankment' CPC notes that it is difficult to have confidence in the applicant's application if, after by their own account 5+ years' work, they are still relying for this, as for so many other details, on a 'best guess'.</p> | <p>NGET and the Applicant have different sites for teh substation, hence the different distances.</p> | Grid_Connection |
| REP3-078 | Cumnor Parish Council | <p>ExA Q1.6.22 Swinford Bridge traffic By focusing on 'a peak of up to four minibus movements per day crossing the B4044 Swinford Bridge' given that 'construction HGVs will not travel across the B4044 Swinford Toll Bridge for any access purpose' the applicant ignores the construction traffic that will approach the bridge from both the north and the south to construct the cable route river crossing.</p> <p>Just as with HGV construction traffic currently approaching the East and West sides of the Botley Road railway bridge In Oxford, this application will undoubtedly adversely impact journey times across this already traffic jam afflicted area, a route for buses and emergency vehicles.</p> <p>Also, given current experience, and potential cumulative impacts of construction traffic for the proposed Red House Farm power station. the proposed Thames Water Farmoor power station, and the National Grid substation (see CPC submission re ExA Q 1.1.5 on page 1 of EN010147-001136-Cumnor Parish Council - Responses to Examining Authority's First Written Questions (ExQ1).pdf, CPC has a very low to zero level of confidence in the assertion that HGVs will not cross Swinford Bridge.</p> | <p>The Applicant has considered the movement of construction vehicles on the highway network to the north and to the south of the Swinford Bridge along the B4044, as illustrated by these sections of highway forming part of the traffic and transport study area shown on Figure 1.1 of Appendix 12.1 Description of Network Links and Sensitivity [APP-196] and as assessed in section 12.9 of ES Chapter 12 Traffic and Transport [APP-049].</p> <p>The cables would cross the River Thames via Horizontal Directional Drilling (HDD) for which there would be a compound on its northern side and a compound on its southern side.</p> <p>The Applicant estimates that HDD activities would be over an approximate one month period. Thus, HDD related traffic on the highway network to the north and to the south of the Swinford Bridge along the B4044 would only be generated for this one month duration.</p> <p>Vehicular access to the HDD compound to the north of the River Thames would be taken from either Wharf Road or Cassington Road which are some 460m and 1,200m from the Swinford Bridge toll respectively with queuing capacity of some 80 and 208 cars respectively between the access and the Swinford Bridge toll. Vehicular access to the HDD compound to the south of the River Thames would be taken from a private access road some 410m from the Swinford Bridge toll with queuing capacity of some 71 cars between the access and the Swinford Bridge toll.</p> <p>The Applicant notes through on-site inspections that under typical traffic conditions throughout the day, queuing for the Swinford Bridge does not extend past these accesses and thus HDD related traffic would be unlikely to add to such queues during the one-month duration for which HDD related traffic is generated.</p> <p>The access strategy does not include for HGVs crossing the Swinford Bridge and this is set out as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [APP-232] and is secured at Schedule 13 of the Development Consent Order [REP3-004]. The OCTMP [APP-232] sets out mechanisms for monitoring and complying with the access strategy together with enforcement measures and provides a key control measure in providing confidence with the access strategy.</p> | Traffic_Transport_and_Access |
| to those agreed with the OHAs REP3-078 | Cumnor Parish Council | <p>ExA q1.6.29 Upper Whitley Farm On page 80 EN010147/EN010147-001219-12.2 Applicant's Responses to ExA's First Written Questions (ExQ1) (Rev 0).pdf the applicant states 'No element of the Project, including the project substation, would be visible in views to or from the listed building' This is untrue as will be demonstrated below in Figures 9.1 and 9.2.</p> <p>This will also be clear to see should the ExA take up the CPC invitation for an Accompanied Site inspection (see sections 3.12-3.17 of EN010147-001137-Cumnor Parish Council - Nominations for any locations for an Accompanied Site Inspection (ASI), including the information requested in Annex B of the Rule 6 documentation, under 'Site Inspections'.pdf).</p> | <p>The Applicant is aware of the comment from VWHDC in [REP3-072] and also of the images provided on page 6 of Cumnor Parish Council's comments on responses to ExQ1 [REP3-078] which appear to indicate that parts of the Grade II listed Upper Whitley Farmhouse are visible in views across the proposed development site from locations along Bushy Leaze Lane.</p> <p>A revised assessment will be presented in the next version of ES Appendix 7.5: Settings Assessment; this will be prepared following the</p> | Landscape_and_Visual_Impacts |

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| | | <p>Furthermore, in admitting that the Grade II farmhouse's setting includes 'associated farm buildings and the land to the south-east' and that this setting, with the Farmhouse, are 'visible in views from elevated land to the south in which the listed building is also visible.' the applicant contradicts their own assertion that there would not be 'any change to the heritage significance of the Grade II listed Upper Whitley Farmhouse' This would have been apparent if the applicant had accurately described their proposed Viewpoint 51.</p> <p>Page 5 of 11 As submitted to ExA at Deadline 2, CPC is requesting that the applicant complete an accurate photomontage of this locality, such as from Cumnor's made Neighbourhood Plan policy DBC7 (Important Views) Important View 31 (see page 5, q1.14.6 of CPC submission to ExA EN010147-001136-Cumnor Parish Council - Responses to Examining Authority's First Written Questions (ExQ1).pdf) Now additionally, given the applicant's newly submitted EN010147-001239-Applicant's Change Request 2 Notification (Rev 0).pdf, and with it a new location for the main/secondary substation: CPC asks the ExA to request that the applicant produces accurate photomontages looking south and south west towards Upper Whitley Farm from the locations used for CPC's own photography in Figure 9.2 below, as the only viewpoint chosen by the applicant thus far (#50) looks ESE from a PRoW further away from the site than those now most impacted.</p> <p>This proposed new requirement on the applicant is especially important given the change requests are immediately adjacent to PRoW 184/30/40 and 184/29/10, and the junction of 184/29/10, 184/30/40, 184/30/30, and 184/50/20, the latter two being part of the Oxford Green Belt Way.</p> <p>Further, given the ExA's 11th July decision (EN010147-001300-Botley West Solar Farm - Change Request 2 Notification Response.pdf) to require a consultation on the proposed changes between 23rd July and 22nd August, can the ExA explain to CPC how that consultation can meaningfully take place without the photomontages requested above being available, given that this request is being made in this document to be submitted for the 22nd July D3 deadline?</p> | <p>consultation on the change request set out in Change Request 2 Notification [REP2-045].</p> <p>No additional viewpoints to those agreed with the LPAs. However, the photomontages are being updated to show the changes to the landscape and views, outlined in the Change Request 2 notification, which will be submitted with all the other information on the changes, at Deadline 5.</p> | |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.7.24 Discrepancy in details It would seem that the applicant now wishes to give the ExA details of 76m x 31m 'with a 14m height of main building' which in turn are subject to another, as yet unspecified, change in the Change Request 2 notification (EN010147-001239-Applicant's Change Request 2 Notification (Rev 0).pdf) As on page 6 of its EN010147-001136-Cumnor Parish Council - Responses to Examining Authority's First Written Questions (ExQ1).pdf CPC notes that the Zone of Theoretical Visibility) ZTV has assumed a height of 12.5m.</p> <p>CPC requests that ExA require the applicant to represent viewpoints required - and their associated photomontages - using the actual NGET substation height and location, not that assumed from the (now overtaken) ZTV assessment and previous indicated locations.</p> <p>This is required given the pronounced changes in elevation across the area in question, such as that even small changes in location and height can have far reaching (literally and figuratively) severe adverse impacts.</p> <p>This sensitivity to landscape will also require the applicant to re-assess their anodyne unevidenced assertions in response to ExA question 1.6.29.</p> | <p>The request is noted.</p> <p>The Applicant is to provide updated visualisations / photomontages, which will include the NGET substation at the height and location required by NGET, at Deadline 5.</p> <p>The ZTV is to be revised with the final height of the substation and also submitted at Deadline 5.</p> <p>Chapter 8: Landscape and visual resources [PDB-006] is also being updated to incorporate the changes.</p> | Landscape and visual impacts |
| REP3-078 | Cumnor Parish Council | <p>ExA q 1.8.3 Substations in the Environmental Statement plus q1.8.4 and q1.8.6 The applicant's assertion (page 105) that 'the only habitat of conservation significance that will be lost as a result of the construction of the substations/power converters is the hedgerow loss associated with the construction of the NGET substation in the Southern Site Area (circa 70m).' is incorrect for many reasons, as Natural England's response to ExA q1.8.6 (skylarks) demonstrates.</p> <p>This also negates the applicant's answer to q 1.8.4, which as with 1.8.3 focuses solely on hedgerows.</p> | <p>The Applicant's position remains as per the response to ExQ1.8.3 and 1.8.4 [REP2-025].</p> | Local_Ecology_and_Nature |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.8.7 Wintering bird assemblage With the applicant now confirming under questioning that 'moderate adverse impact' would be 'long term' viz the lifetime of the project, the notion of mitigation disappears, especially in regard to waterfowl and other species that currently forage in the fields adjacent to the Farmoor reservoir, where there are no other sites adjacent to the expanse of water they require.</p> | <p>The effect of habitat loss on wintering birds is described in section 9 of ES Chapter 9 Ecology and Biodiversity [REP2-012] as being of moderate adverse significance and therefore significant in EIA terms. Although there will be new habitat created to mitigate this impact, it remains a significant effect and is acknowledged as such.</p> | Local_Ecology_and_Nature |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.10.13 Flood risk in Cumnor Parish The applicant states that 'Appendix 2: Flood Risk Technical Note - Solar Panel Runoff v1' has been submitted 'alongside DL2'. Using 'Appendix 2: Flood Risk Technical Note - Solar Panel Runoff v1' as a search term on the PINS website returns a null response – see below Even if this document does subsequently appear, its title indicates that it will not fulfil the requirement of Cumnor Neighbourhood Plan Flood Risk Policy RNE2 (EN010147/EN010147- 000890-Cumnor-Parish-Neighbourhood-Development-Plan-v7.0-07072021-min.pdf), where the underlying maps and analysis and are also to be found in the associated EN010147/EN010147-000891-Cumnor-Parish-Neighbourhood-Plan-Flood-RiskAssessment-September-2020.pdf, both previously submitted to the ExA for Deadline 1.</p> | <p>This is noted.</p> | Hydrology_and_Flood_risk |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.11.15 Green Belt and BMV considerations CPC notes that the ExA asks three very specific questions of the applicant under this heading, none of which are answered, as the applicant proposes to submit a 'Change Request Notification' Given that the reason advanced for this proposed change request is that 'the scenario they now wish to consider in the scenario whereby the NGET substation moves off site, is to move the client main substation and secondary substation onto the site, thus being closer to the point of connection with the</p> | <p>Noted.</p> <p>In terms of the answer to the first part of Q1.11.15 the Applicant can confirm that by relocating the NGET substation and instead installing the PVDP main substation, the Project gained 4.2 hectares of installation area, corresponding to an additional installed capacity of 6.7 MWp.</p> | Green_Belt |

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| | | <p>repositioned NGET substation,' which in equal measures is both opaque and badly written, CPC assess it has a very low degree of confidence in any subsequent assertions by the applicant on this topic.</p> <p>CPC therefore asks ExA to ensure that answers to its three questions at 1.11.15 are answered by the applicant in sufficient detail at an early enough stage (DL3) for CPC to comment further.</p> | <p>To estimate the additional energy generation from this increase, and assuming a specific yield of 950 kWh/kWp, the calculation is:</p> <p>6,700 kWp x 950 kWh/kWp = 6.4 GWh.</p> <p>In terms of the remaining questions the answer is:</p> <p>2) The new (reduced) area of loss of BMV will be confirmed through the proposed Change Request process;</p> <p>3) The VSC will for this additional solar installation is supported by the presumptions in favour of VSC for CNP as set out in the Green Belt case in the Planning Supporting Statement.</p> | |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.11.16 Green Belt – Very Special Circumstances (VSC) While CPC welcome the applicant's decision to withdraw VSC 7 and 8 - especially as discounted electricity prices are no longer being offered and the proposed Community Benefit still falls orders of magnitude short of that delivered by onshore wind power projects elsewhere in the UK – it believes the applicant has still not answered ExA question 2 within q1.11.16.</p> <p>As the applicant has confirmed that it is still 'relying on VSC 5, economic, educational and sustainability benefits as a VSC and in the planning balance' and that is why 'powers are sought to CA this land' then it seems an oversight, at best, that it has chosen not to answer ExA's 'what is the compelling case for the compulsory acquisition of that land?' CPC would encourage ExA to seek a definitive, evidence-based answer to this question, as to so many others the applicant has failed to address throughout the application process.</p> | Noted | Green_Belt |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.13.2 Impact on schools and schoolchildren. In constructing its answer to this question, the applicant has omitted to consider the impact on schoolchildren outside of their school, yet while still in education.</p> <p>In respect of Cumnor Parish, this means the applicant has failed to consider impacts on the 16000 children per year who visit the Hill End Outdoor Education Centre (see CPC submission EN010147-000886-Cumnor Parish Council - Submission to PINS OFH Session 1 Tuesday 13th May 2025.pdf).</p> <p>Additionally in the case of Cumnor Primary School, the applicant has ignored the severe adverse impacts on the children's kinetic experience while walking from the school to Hill End along PRoW 184/15/40, 184/16/20 and 184/16/10, through what could be a sea of panels and security fencing, topped by CCTV taking pictures of them.</p> | The comment is noted. | Impact_on_School_Sites |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.14.3 Views from Outdoor Recreational Facilities CPC can find no reference in the answer given (page 150) to the recreational facilities afforded by Farmoor reservoir, including but not limited to, ornithology, fishing and sailing.</p> | The comment is noted. | Community_Benefits_and_Impacts |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.14.5 Methodology relating to duration and reversibility The applicant's assertion that 'the overall magnitude of change is less than the scale of effect alone' is contrary to the universally accepted practice of risk assessment where likelihood is multiplied by impact to arrive at an overall risk score.</p> <p>Page 10 of 11 This evidence free assertion by the applicant is then compounded by the subsequent claim that 'For the study of a development of this nature, which is low-lying, with extremely limited visual influence within the 5 km study area, where most of the representative viewpoints are located in immediate proximity to the site' As CPC's evidence-based submissions, and those of VWHDC, WODC, OCC, ICOMOS, Natural England and others has shown, these assertions are incorrect in all respects and so should be disregarded by the ExA.</p> | <p>Opinion is noted.</p> <p>The LVIA methodology has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01, as agreed with the OHA.</p> <p>Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate.</p> | Landscape_and_Visual_Impacts |
| REP3-078 | Cumnor Parish Council | <p>ExA q1.14.7 Scope of Assessment The applicant's assertion is that 'the area of the substations in the Southern Site Area assumed both would be hardstanding. As such, no correction to the BNG calculation is required' This is impossible to reconcile with the ExA position that 'The Landscape, Ecology and Amenities Plan [APP-228] for the southern site area shows the land proposed for the National Grid substation and the project substation/main substation as being areas of proposed grassland not beneath the solar arrays.' and their subsequent assessment that 'the key to the plan indicates these areas would help deliver Biodiversity Net Gain (BNG). The land cannot serve two purposes'</p> | <p>As per the response to ExQ1.14.7, the BNG calculation is correct as it is not based on the Landscape, Ecology and Amenities Plan. This was updated at Deadline 2 [REP2-016] to ensure that the substations were clearly shown as individual areas not as grass. It will be further updated at Deadline 5 to account for Project Change 2. At this point, the transparency of the NGET substation symbology will be removed to ensure there is no confusion with respect to what is intended.</p> | Landscape_and_Visual_Impacts |
| REP3-080 | Wootton Parish Council | <p>Built and Historic Environment Built Heritage</p> <p>The Northern Section of the development site is located within the wider setting of the Wootton Conservation Area with a number of Grade 2 Listed Buildings in proximity to the project boundary including a collection of listed buildings at Lower Dornford Farm, Milford Bridge Cottage and the Grade 2* Listed Hordley House. With respect to "built heritage assets" we are, like OHA's impact report, particularly concerned about development within the setting of Listed buildings at Wootton. We are concerned about the impact of proposed development to the south and east of Hordley House on the setting of the Grade 2* Listed Building, particularly as the setting of such assets can be appreciated from the Public Rights of Way network to the south and east. It is considered that the removal of PV arrays from this location could reduce the impact on these properties. Conservation Area As Wootton's Conservation Area borders the edge of some of the Northern Site we believe that the setting of Wootton's Conservation Area would be impacted. An "industrialised landscape with glint and glare" does not compliment our Conservation Area's key characteristics of a rural setting, once part of the Royal Wychwood's Forest and later</p> | <p>The Applicant's has assessed the likely impacts and effects on heritage assets as a result of change within their settings. This assessment is set out in ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]. It includes the assessment of likely impacts and effects on the Wootton Conservation Area as well as the Grade II* listed Hordley House and the Grade II listed buildings at Lower Dornford Farm. Figure 1.5 in the assessment report shows the physical relationship between the Order Limits and the Wootton Conservation Area.</p> <p>In their response to ExQ1.6.24, Historic England confirmed that they were not including reference in their submissions to Hordley House (despite its Grade II* listed status. This is because 'Historic England advice has focused on those highly designated heritage assets that have the potential to experience significant effects'; Hordley House is not</p> | Historic_Environment |

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| | | <p>Wootton Park and farmland of the old estates of Glympton and Blenheim with buildings in the traditional, honey coloured stone and design famous in the Cotswolds .</p> <p>Ideally, we would ask that arrays are placed in more suitable fields and were puzzled that this site was selected when we know Blenheim has other fields with less historical and environmental assets. At the very least, we ask that the applicant revisits their approach to our conservation areas, taking into account mitigation measures that preserve the Conservation area and landscape. Archaeology</p> <p>The Northern section also contains the significant archaeological sites with the 'Roman Villa', 'Scheduled Ancient Monument' (Policy EH15) near to 'Sansom's Farm' to the south is a notable key site in relation to 'pre-medieval' history in the area. Sansoms Platt and the Roman Akeman Street has a circular temple and recently identified cemetery that is not yet excavated. It is our understanding that there will be cabling, and a substation located near to this and we would prefer it to be located elsewhere. We request more information about this in terms of construction and operational activity and noise levels and what mitigation measures might be put in place.</p> <p>WPC supports OHA's request that there must be an archaeological written scheme of investigation and must be substantially in accordance with an outline written scheme of investigation, approved in advance by the relevant planning authority, and must be implemented as approved.</p> | <p>considered (by Historic England) to fall into this category (Historic England's Response to the Examining Authority's First Written Questions (ExQ1) [REP2-056]).</p> <p>The design of the Project in the vicinity of the Sansom's Platt Scheduled Monument has been carefully considered. A buffer zone has been established around the Scheduled Monument within which no development would take place. This protected Area of Archaeological Interest is shown on Figures in 2.1b and 2.1c in ES Figures 2.1a-2.4c - Illustrative Masterplan [AS-020]. These figures also show that no substation or cabling is proposed in the vicinity of the Scheduled Monument; the nearest project substation would be approximately 1.05 km to the north-east. The substation would be adjacent to the A4260 road and not visible in views from, towards or across the Scheduled Monument.</p> <p>The Outline Written Scheme of Investigation (Rev 2) [REP2-021] has been agreed with the Oxford County Archaeological Service. Requirement 10 of Schedule 2 of the draft Development Consent Order (Rev 4) [REP3-004] sets out that no part of the development would commence until an archaeological written scheme of investigation has been agreed by the relevant planning authority, and that any archaeological written scheme of investigation must be substantially in accordance with the Outline Written Scheme of Investigation.</p> | |
| REP3-080 | Wootton Parish Council | <p>Historical Landscape Heritage</p> <p>Wootton is recorded in the Domesday book and was in the top 10% settlements in terms of size. Unusually it had two mills, most likely one was a sawmill due to the location of the nearby two rivers, Dorn and Glyme, the royal Wychwoods reaching Wootton and Dornford Lane running to Woodstock Manor. Dornford Grove & Dornford Lane might be the last connection to that historic landscape and we seek to preserve that landscape. Wootton's historical public green pathways/bridleway will be impacted.</p> <p>Dornford Lane, an ancient green lane and drovers' road was highlighted by the CPRE as a unique local heritage green pathway linking Woodstock to the Bartons for the past 1,000 years and the role the ancient route has played as a key local supply route to Woodstock Manor over the centuries. It will be used as an access road for operational access. In addition, the Oxford Way public footpath on the Northern site and is also a bridleway called the Cheval Way by the BHS. We are concerned that the arrays will transform this ancient green lane into an industrial alley with glint and glare.</p> <p>We are concerned that cabling is proposed to be laid along Dornford Green and request more detailed information about how this will be installed and where and what the maintenance plans shall be.</p> <p>We would like more information in regard to a substation that appears to be behind a hedge on the east corner of the Dornford Field. What will be its size, purpose, operational activity and noise levels? What mitigation measures might there be?</p> <p>We also request that the applicant engages with the British Horse Society in regard to their requests for suitable widths, fencing and their concern over any noise from the substation mentioned above. It is our understanding that though BHS requested this, it has not happened.</p> | <p>Operational traffic may utilise Dornford Lane to access parts of the Northern Site Area, but all operational traffic flows associated with maintenance and inspection visits would be negligible and would be irregular (not a daily event) along Dornford Lane. This is set out in the Outline Operational Management Plan [REP3-032].</p> <p>No cabling is proposed along Dornford Lane (see Figures 2.1a - 2.1c in ES Figures 2.1a-2.4c - Illustrative Masterplan [AS-020]).</p> <p>The nearest project substation would be located adjacent to the A4260 road, well to the east of Dornford Lane. Information regarding the purpose and size of the project substations is set out in ES Chapter 6: Project Description [APP-043]. Information regarding the operational noise of the project substations is set out in ES Chapter 13: Noise and Vibration [APP-050] and ES Appendix 13.3: Operational Phase Noise [APP-213].</p> <p>The Applicant is actively liaising with Oxfordshire County Council regarding the maintenance of the Public Rights of Way network for all users. Measures for the maintenance of the PRoW network during the construction and decommissioning phase will be managed in accordance with the outline Public Rights of Way Management Plan (REP3-030). The detailed design of the landscaping proposals, will be implemented through the development of the detailed Landscape and Ecology Management Plan, in accordance with the outline Landscape and Ecological Management Plan (REP-034).</p> | Historic_Environment |
| REP3-080 | Wootton Parish Council | <p>Landscape and Visual Impact</p> <p>At the Northern site area, both Dornford Lane and the Oxford Way are located on the site with the listed buildings of Lower Dornford Farm, Hordley House and there is also the rural Dornford Cottage. WPC remains concerned that siting arrays on this site along with the proposed mitigation methods such as metal fencing or hedges around Public Rights of Way that will fundamentally change the way the landscape and views are appreciated. This open green space bordering ancient woodlands with numerous perching owls, bats and biodiverse habitat and other species such as hares existing in open land would become an enclosed sea of glint and glare solar panels. The name Dornford illustrates links to the nearby rivers that enable a vibrant ecosystem to thrive and link the site to the nearby water meadows and wildfowl .</p> <p>Ideally, we request that the arrays be removed to protect this unique, vibrant and ancient existing landscape .</p> <p>We also request that the applicant provides more detailed visualisation data such as photography, field of view of the proposed development, single frame visualisations, modelling of visualisations, accuracy of visualisations, annotations of viewpoints, including the scheme layout on location plans.</p> | <p>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 [APP-228].</p> <p>All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured.</p> <p>Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape, such as much of</p> | Landscape_and_Visual_Impacts |

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| | | | <p>Dornford Lane (PRoW 416/11/30) which passes through the middle of the northern section of the Project.</p> <p>Landscapes are not 'preserved in aspic' they are dynamic, ever-changing to suit societal needs, and in rural areas farming practices, e.g. the removal of hedgerows after the Second World War. More recently and in the future, landscapes will change due to climate change.</p> <p>As set out in previous responses, the Applicant agreed the viewpoint locations with the LPA's. Photography from additional viewpoints is not proposed.</p> <p>The viewpoint location plans [APP-082 and APP-085] include the Project site boundary. The layout of the panels is shown on Figures 2.1a and 2.1b of the Illustrative Masterplan [AS-020].</p> <p>The photography from the representative viewpoints is currently being updated for Deadline 5, to include the Changes made in the Change Request 2 Notification [REP2-045] and will include annotations of key features.</p> <p>Single frame photography is not appropriate for this project, as the Project extends beyond a single frame and would not be of any substantial use. If viewed/printed out at the correct scale the photomontages are the correct height of a single frame. It is noted that the OHAs have requested an extension of the photography from 90° to 180°, rather than a reduction to a single frame.</p> | |
| REP3-080 | Wootton Parish Council | <p>Ecology, Nature Conservation and Trees</p> <p>The most Northern field borders Dornford Grove, designated Ancient Woodland that is rich with biodiversity deemed important for the conservation of biodiversity and geodiversity in the area (policy EH3). There are numerous bat species and 2 or 3 perching pairs of barn owls. The adjacent rivers Glyme and Dorn and nearby water meadows have a water fowl and on occasion, otters. As part of Lower Dornford Farm's development in addition to their own solar park in the walled garden, they are undertaking mitigation measures to protect the biodiversity and it should be noted that a bat roosting box will be placed in the field where solar panels will be placed. See https://publicaccess.westoxon.gov.uk/onlineapplications/files/A443037DDB0A1FC7FF717C363DE19CA6/pdf/24_00147_FUL-ECOLOGY_MITIGATION_SITE_PLAN-1325906.pdf. We would like to more information in regard to how the solar arrays will mitigate for the protected bat population, it is our understanding that bats will not just fly along boundaries and where will the new field bat box on the above plan be moved to?</p> <p>Current mitigation measures state a minimum of a 15m buffer will be retained to ancient woodland areas in line with NE guidance however it should be noted that The Woodland Trust recommends at least a 50m buffer (Planning for ancient woodland: planners manual for ancient woodland and veteran trees, July 2019) unless otherwise justified. Therefore, Wootton Parish Council also requests a 50m buffer from Dornford Grove. This best practice will reduce the impact of edge effects and uncertainty of the impact of a solar farm of this scale next to woodland any deviation from best practice should be fully justified. An assessment of the impacts of the proposed development on ancient and veteran trees is also essential. We believe that the surveys and assessment submitted to date with regards to bats, hares, otters and water vole, great crested newts, water & farmland birds 'the lake effect', nature recovery, woodlands and BNG are not sufficient to consider the full impacts related to each of these receptors/issues. There is also a need to improve the enhancement methods proposed within the submitted documentation. We would require additional enhancement/mitigation measures to be provided in relation to bats, hares, otters and water voles, great crested newts, water and farmland birds, nature recovery and ancient woodlands. Cable routing should avoid the Root Protection Areas of all trees within and adjacent to the site boundary. Individual tree protection plans must be provided for all the sites.</p> | <p>The component of Dornford Grove that is designated ancient woodland is located circa 200m west of the Application boundary (see Figure 3 of ES Appendix 9.1 Desk Study [APP-150]). It is therefore already well buffered from the Project site.</p> <p>With respect to how the bat population will be protected, this is the subject of on-going discussions with Natural England with full details to be set out in a bat technical note to be submitted at Deadline 5.</p> <p>The impacts to ancient and veteran trees is considered in ES Chapter 9 Ecology and Biodiversity [REP2-012] as informed by ES Appendix 9.15 Veteran Tree Survey [REP1-048].</p> <p>The cable route will avoid RPAs, wherever possible, and will follow the principles set out in the Strategic Arboricultural Impact Assessment & Method Statement [REP1-044, REP1-45, REP1-046, REP1-047].</p> | Local_Ecology_and_Nature |
| REP3-080 | Wootton Parish Council | <p>Human Health</p> <p>Residential housing is located within and on the border of the Northern site. In particular, Dornford Cottage will be surrounded by arrays despite a small buffer. The fields will have no screening contradicting the Glint & Glare: assessment of "no impact" due to "existing/proposed vegetation" with no mitigation recommended. The industrialisation of a resident's environment to this extent, must have a serious impact on life, wellbeing, health and financial security. Hordley House will also be negatively impacted after centuries of pastoral serenity as a medieval house .</p> <p>Ideally, we would suggest that the applicant selects sites that are more suitable and not put arrays so near to residents .</p> <p>However, if this is not possible, we request that that detailed Residential Visual Amenity Assessment with relevant consultation bodies is conducted at the Northern Site and an Accompanied Site Visit is made to Dornford Cottage and Hordley Manor .</p> | <p>Applicant has reviewed the submitted LVIA [PDB-006], which considers effects upon individual properties.</p> | Human_Health |

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| | | We believe that the proposed 25m offset for properties, settlements and communities requires consideration on a case by case basis, so that aspects such as topography and vegetation are fully considered. A standard 'buffer' approach is unlikely to be sufficient in terms of mitigation of significant effects at all locations. There is no evidence to support the justification of the 25m buffer to individual properties and settlements. Good practice would advise a minimum of 50m, but due to the size, scale and disparate nature of the proposals, we recommend 100m. | | |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>Deadline 3. BYG Position Statement on Potential Reduction in BWSF Panel Area Following Change Request 2 from Applicant</p> <p>1. Background</p> <p>1.1 The Applicant has applied to change the Application scheme by removing specific areas of panels (Change request 2: letter 1 July 2025). Subject to certain conditions, ExA has indicated it would accept such changes and has set out the process required to effect them (Letter 11 July 2025) .</p> <p>1.2 The Applicant describes, these changes as being of a "relatively minor nature" which lead to "no material change to the substance of the Project" (first paragraph of the section entitled "Scope and extent of proposed changes") .</p> <p>1.3 The Case Manager has helpfully indicated to BYG that notwithstanding these changes, all representations made relating to the original Application scheme will remain part of the Examination documentation (Email 16 July 2025). We believe this is important. Not all IPs have the resources to remain closely involved in the Examination process, or to comment on changes to the Application. Given the 'relatively minor' nature of these changes it would be inappropriate to ignore representations made in respect of the original Application. BYG's current intention is to comment on these changes to the Application and the Applicant's analysis of them, but not to modify the representations we have made previously since they remain valid .</p> <p>1.4 A number of representations made previously by other IPs and the two Local Planning Authorities have suggested reducing the area of panels to reduce the impact of harms caused by the original Application scheme. The changes proposed by the Applicant meet few of the suggestions by these other parties .</p> <p>The change relating to the land adjacent to Oxford Airport is surprising only in that the Applicant ignored this issue during the Consultation when defining the original Application. Even now the details are still under discussion. Given this omission, we suggest the Applicant should be required to publish all the consultation responses to the proposed changes to the scheme, and these responses should be made Examination documents. No consultation responses have been published in respect of the Consultations held before the Application was made .</p> <p>1.5 Against this increasingly complex background, BYG would hope to facilitate the Examination at this point by summarising its position in respect of reducing the area of panels. It may be appropriate to expand on this as the Examination progresses.</p> | <p>The Applicant acknowledges this response, and the position set out regarding relevant representations remaining unchanged.</p> <p>The changes will be formally sought by the Applicant through the submission of a Change Application to the Examining Authority. The Applicant intends to submit this Change Application in September 2025 as encouraged by the Examining Authority in its letter to the Applicant [PD-011]. Therefore, the Applicant's intent to consult prior to the Change Application being submitted is to ensure that any feedback is considered prior to the submission.</p> | Consultation_Process |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>Deadline 3. BYG Position Statement on Potential Reduction in BWSF Panel Area Following Change Request 2 from Applicant</p> <p>2. Evidence</p> <p>2.1 BYG believes it has provided sufficient evidence to the Examination to demonstrate that PVDP and its associated companies should not be considered appropriate partners for the UK Government - in its pursuit of Net Zero –through the ordering of the BWSF development .</p> <p>As we have explained in other Examination documents, including in our RR-0092 and in REP2-064, the Applicant lacks the track record, credibility and funding to be given this responsibility. As it stands in the Application, the scale of this scheme is unprecedented in the UK. If it were not to be built or properly managed after the land has been transferred to the Applicant by Blenheim Estate, making the DCO would risk the Government 's Net Zero strategy as well as the value of the countryside and the historic environment in which it is proposed.</p> | Noted. | Needs_Case |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 2.2 Were the ExA nevertheless to decide that SolarFive/PVDP do represent suitable recipients of such a significant DCO, then it seems essential that the DCO include a specific provision requiring the Applicant to guarantee the funding of the decommissioning of the scheme before construction is allowed to start. This has also been covered in other representations BYG has made, where it is argued that without this provision the impacts of the scheme should be considered as permanent, rather than temporary. It seems doubtful to us that an Order for a temporary scheme could be made in such circumstances. | The Applicant's response on the provisions for funding to support the Decommissioning Plan were set out in responses to Relevant Representations [REP1-020] at Section 11. This confirms that with respect to financing of the decommissioning, if made, the draft Order [REP3-004] would require the decommissioning of the Project to be carried out in accordance with a Decommissioning Plan (requirement 14, Schedule 2). | Decommissioning |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>2.3 If the ExA were to recommend that the DCO should be made in some form, our concern would be that the area currently proposed to be covered in panels be substantially reduced. Our knowledge and direct interest relate to the Central Site; our comments on this subject are limited to this area. [This does not mean we think the other Sites comprising the scheme are appropriate or acceptable.]</p> <p>2.4 BYG supports the approach adopted by WODC in its WR (Rep1-081) in layering the various constraints upon land on which panel locations are proposed by the Applicant. It arrives at the logical conclusion that the Central Site should have a far smaller area of panels</p> | This is noted | |

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| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 2.5 In reviewing panel locations in its area of responsibility (REP1-052), CDC agrees with the WODC suggestion that panels be removed from the field in the Green Belt east of the A44 adjacent to the airport. In their representations, a number of organisations including ICOMOS, Garden's Trust, and HE have suggested that significant areas of panels need to be removed to protect the WHS setting, as well as other assets of historic and ecological value. | The Applicant has worked closely with Historic England on the design of the proposed development to minimise any potential harm to the OUV of the WHS, most recently in the form of the changes set out in our Change Request 2 Notification [REP2-045]. The Applicant will prepare a further revision of ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141] following the consultation on the changes set out in our Change Request 2 Notification. | World_Heritage |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 2.6 However, and as described in our RR (0092, Section 5), BYG believes it is also appropriate and necessary to give consideration and weight to the impact the proposed scheme would have on reducing the gaps between Oxford and Woodstock along the A44 corridor. Once constructed, the extensive housing development currently proposed in the CDC Local Plan 2031 will substantially erode these. The current Regulation 19 CDC Local Plan Review 2041, due to be submitted to PINS at the end of July 2025, includes an allocation of 450 houses on land in just such a gap (KID H1). Showing little regard for this issue, or for its impact on the WHS, Blenheim Estate has made three applications for development of this site, including one for up to 500 houses as recently as in June 2025 (APP/01510/OUT). | This is noted. | Cumulative_Impacts |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 3. Analysis 3.1 What emerges from this brief summary and the evidence which supports it, is that the Central Site has multiple planning designations and constraints, resulting in suggestions for extensive removal of panels being made by responsible, important and knowledgeable organisations . 3.2 This explains why we have requested for an ASI to include the Spring Hill area of Begbroke. From the viewpoints we have suggested in this, it will be possible to see the integrity of this area of countryside. This may not be easily apparent on plans or in aerial photography, particularly the visibility effects of rising ground on either side of the Evenlode valley. | This is noted. | Acknowledgment response |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 3.3 Against this background our approach to suggesting panel reduction is very simple. As our name indicates, we have previously been focused primarily on the protection of the Oxford Green Belt. The Applicant appears to have tied itself in intellectual knots with its analysis of "very special circumstances" to justify using a large area of Green Belt for this scheme. Without entering this debate, we would point out that the Applicant's argument ultimately depends upon the scheme being temporary; and on its being returned after c.40 years to a physical state that would maintain its contribution to the Green Belt. This assumes, of course, that in that lengthy period it has not been given any other designation or allocated for any other purpose | The applicant acknowledges this comment. | Green_Belt |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 3.4 BYG's contention is that there is no need to use Green Belt for the Central Site of this scheme. The Applicant's attempts to explain how and why the Application Site was selected are unconvincing. It is clear to us from the Applicant's evidence given to this Examination that it was chosen primarily because land was made available by Blenheim Estate. Land outside the Green Belt could easily have been identified and used. The absence of an impartial, fact-driven, site selection process explains why the Applicant has not provided –and cannot provide - a convincing answer to the question of why it did not identify another site or sites which did not use Green Belt and best and most versatile agricultural land; and which were not located near a WHS. | The applicant acknowledges this comment. | Site_selection_and_Cable_Route_Alternatives |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 3.5 Consequently, we conclude that the use of Green Belt in the Central Site has not been justified and cannot be justified. There are extensive areas of non Green Belt land in this general area (Map 2; REP1-081); in the south-east region(which the Applicant indicates was its search area); and in the country as a whole which could be used instead. Only 12.5% of land in England is Green Belt; in the South East it is only 16% (Local Authority green belt: 2023-24 - statistical release: GOV.UK). Siting solar farms is a highly "footloose" activity. There are few physical constraints on their location. As the proposed configuration of BWSF shows, fields of panels can be cabled together in virtually any combination. | The applicant acknowledges this comment. | Green_Belt |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 4. Conclusions 4.1 Begbroke and Yarnton Green Belt Campaign (BYG), although a voluntary organisation, has involved itself deeply in planning issues in the local area in order to protect its countryside, largely designated as Green Belt for half a century. 4.2 Because of the adoption by CDC of its current Local Plan 2031, large parts of the Green Belt in our area will be lost to housing in the next few years, many of the houses for those working in Oxford. We unsuccessfully opposed those allocations at Judicial Review. People do need houses near where they work, regrettably sometimes at the expense of the Green Belt. By comparison, solar farms are developments which can serve their purpose of supplying electricity to the national grid from an extremely wide range of locations. Provided they can be connected somewhere to the grid they can be located almost anywhere which has not already been developed. | The Applicant notes the BYG concerns but the Applicant has given detailed explanations and justification for the proposed development. | Green_Belt |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 4.3 BYG has had no prior involvement in a DCO Examination; its officers are finding its intensity challenging. We have nevertheless diligently applied our knowledge and experience to the many documents submitted so as to objectively evaluate the Applicant and its scheme. We find neither of them convincing, nor the Applicant worthy of being granted this DCO. We have explained our reasons for reaching these conclusions in the various representations we have made at each stage of the Examination. These include RR-0092; AS-033; PDA-001; | The Applicant welcomes the engagement from BYG and will continue to respond to the submissions being made as part of the ordinary course of Examination. | DCO_Process |

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| | Campaign (BYG) | REP1-089; REP1-090; REP1-092; REP1-094; REP1- 095; REP2-060; REP2-061 and other Deadline 3 representations yet to be given Examination reference numbers. | | |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | 4.4 Among the many defects we have identified is the way the Application Site was chosen. The suggestion by the Applicant that it emerged from an independent evaluation of the options available is clearly not an accurate description of what happened. Even in the South East of England, to which the Applicant says it limited itself, it is incredible to suggest that a site could not be found which did not require the use of Green Belt land. The Applicant's attempt to justify the use of a significant part of the Oxford Green Belt does not stand up to scrutiny. The evidence suggests the key factor determining the choice of site was the offer of land from the Blenheim Estate. This appears to have been confirmed by the Director of PVDP (RR-0092 Appendix 1). | <p>The Applicant notes the BYG concerns but the Applicant has given detailed explanations and justification for the proposed development. The Applicant would remind the IP that the SoS should not refuse an application on one site simply because fewer adverse effects would result from developing similar structure on another suitable site – all suitable sites may be needed – NPS EN-1 para 4.3.24. Similarly, alternatives that are not commercially viable or physically suitable (para 4.3.27), or proposals that are vague or immature, (para 4.3.28) can be excluded from consideration.</p> <p>Also whilst NPS EN-3, para 2.3.9 states that the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land), (Appendix 2 Table 2 NPS EN-3 Compliance Table, page 59, para ref 2.3.9), the Applicant did in its search for suitable sites, consider the use of previously developed or brownfield land, but none were considered more favourable than the subject site.</p> | Site selection and Cable Route Alternatives |
| REP3-083 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>4.5 We therefore conclude that if a large-scale solar farm scheme is to go ahead based on BWSF, all the Green Belt land in the Central Site should be excluded from carrying panels. As the WODC WR concludes (REP1-081, para 58), a viable scheme of NSIP scale would still result. As we indicated in our RR-0092 (para 6.9) the scale of BWSF is the equivalent of over 16 NSIPs .</p> <p>4.6 Removing panels from all Green Belt land in the Central Site would have the additional and significant benefit of ensuring the protection of the setting of the Blenheim Palace WHS. It would also significantly reduce the area of Best and Most Versatile agricultural land required for the scheme. It would reduce BWSF's impact on historical and ecological assets in this area. And of course, far fewer people and dwellings would find themselves in close proximity to panels and fences - and the construction work required to put them in place.</p> | The Applicant notes the BYG concerns and conclusion. | Green Belt |
| REP3-084 | Begbroke and Yarnton Green Belt Campaign (BYG) | Deadline 3, BYG Comments on Draft DCO (REP-004) BYG does not believe that BWSF should proceed, nor therefore that the DCO should be made. However, it recognises that the SoS may decide to authorise a DCO. In other representations we have suggested that the DCO should then contain some form of guarantee for the cost of decommissioning the scheme at the end of its life. | The Applicant's response on the provisions for funding to support the Decommissioning Plan were set out in responses to Relevant Representations [REP1-020] at Section 11. This confirms that with respect to financing of the decommissioning, if made, the draft Order [REP3-004] would require the decommissioning of the Project to be carried out in accordance with a Decommissioning Plan (requirement 14, Schedule 2). | Decommissioning |
| REP3-084 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>This WR suggests a further, simple modification to the DCO should it be made .</p> <p>1. The draft DCO contains within PART 5 POWERS OF ACQUISITION a section dealing with the "Time limit for exercise of authority to acquire land compulsorily". In sum, clause 20(1) provides that the Applicant would have five years following the Order being made to start the compulsory acquisition process for BWSF. Clauses 20(2)-(5), which follow, describe details relating to this period .</p> <p>2. We believe that this period is too long, and that it should be shortened significantly to a maximum of two years. There is no justification, specified or implicit, for a period longer than this in the Application documents or any other documents submitted to the Examination by the Applicant or any other party .</p> <p>3. Our reasons for suggesting this are simple and we believe consistent with the Government's Net Zero policy and its regularly stated desire to speed up the planning and development process .</p> <p>3.1 Assuming the SoS decides to proceed with BWSF as programmed, that will happen before the middle of 2026. If five years were then spent before the Compulsory Purchase process got under way, 2030 would have passed without a single panel being erected. The scheme would probably not be operational until approaching the mid 2030's, a decade from the start of consultation .</p> <p>3.2 The Applicant has attested to BWSF's importance to the Government's Net Zero strategy and the significance of its electricity contribution. It has also told us that - courtesy of PVDP's funding from Cransetta in Cyprus -there are no constraints to financing the project. The sooner the scheme is operational the sooner revenue will flow to PVDP, to Cransetta, and indeed to Blenheim. There therefore seems to be no reason why it would not wish to move as rapidly as possible. Two years should be more than enough time to get the scheme started .</p> <p>3.3 The DCO Examination process ensures that decisions on NSIPs are made in around a year. Considerable pressure is put on all parties to achieve that. It would be inconsistent and incongruous for that pressure to be lifted by allowing the next phase to take five years, particularly as the scheme would be agreed and described in detail in the signed DCO. 3.4 Any such delay would also throw into question the practicality of constructing a scheme of this scale in such a developed and constrained area .</p> | The Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects (NSIPs) guidance notes guidance on this point. Regulation 6 of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) (IPMPP) Regulations 2015, which limits the period for exercising compulsory acquisition powers to five years and in practice five years has become the established norm for such developments. The period allows undertaker a window to complete design finalisation, land negotiations, and any phased construction, while avoiding open-ended uncertainty for landowners. Similar such wording has been used in recent NSIP DCOs, such as Norfolk Vanguard Offshore Wind Farm, A428 Black Cat to Caxton Gibbet DCO and Cottam Solar Project. | Land Agreements |

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| | | <p>3.5 Furthermore, an inability to get the Scheme going within a two-year period would be another reason to doubt the Applicant is a credible developer of BWSF .</p> <p>4. The scale of this project causes profound uncertainty for very many local residents, including those we directly represent in Begbroke and Yarnton. One of the consequences is a blight on the residential property market. Some of this is the inevitable result of development but the larger the project the worse it tends to be. It must be an important consideration for the Government to reduce the level of uncertainty that BWSF, indeed any project, generates in local communities. Reducing the five years to two years would make a material difference to those living in the area. It would also, of course, enable the earlier contribution by the project to the Government's Net Zero targets .</p> <p>5. The Applicant can have no problem agreeing to these objectives and to adopting two (2) years in 20(1) instead of five (5) years. This would authenticate the Applicant's concern to support government policy, and to mitigate disturbance to local residents who have already experienced years of uncertainty in the planning stages of this project. Any suggestion by the Applicant that it needs to retain flexibility over a longer period would imply a higher valuation placed on its commercial interests.</p> | | |
| REP3-085 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>Deadline 3, BYG WR: Comments on the Applicant's Responses to the ExA's First Written Questions (ExQ1) 1 Funding and past activities (Questions 1.5.21-1.5.30).</p> <p>1.1 Throughout the course of the application and examination process the Applicant has presented information about its corporate structure, funding and track record that is incomplete, unsubstantiated, false or misleading. This pattern has continued in answers to questions put by ExA about these matters.</p> <p>1.2 As an example, in Written Question 1.5.27, the Applicant was asked: Paragraph 4.5 of the Funding Statement [APP-022] suggests that, since 2009, PVDP has developed 980W across 20 solar projects worldwide. It is assumed that is meant to read MW (Megawatts). If that is indeed the case, this averages at 49MW per project. 1) Does the Applicant have any experience in the delivering or financing of a project the size and scale that is proposed here? 2) Has the Applicant got demonstrable experience in raising the financing required for a project of the size proposed? 3) If not, what reliability is there in the optimism that the finances required for the project will materialise?</p> <p>As BYG has pointed out (RR-0092), the Applicant has repeatedly claimed that they have "developed" or "built" large projects. In our RR we highlighted statements made by the Applicant about this matter: 1.2.1 At the initial planning meeting with PINS on 19 October 2022, PVDP stated that it "has had 1000 MW of energy generation connected to date".</p> <p>1.2.2 In a press statement made after an article in Private Eye, PVDP claimed that "Projects developed by PVDP are a matter of record. The company has successfully developed projects with a combined capacity of 870MWp in Italy and Japan".</p> <p>1.2.3 The introduction to the Environmental Statement (APP-038 1.3.2) claims that PVDP has 1.0 GW "built to date". This is repeated elsewhere in the Application. For example, in APP 038 1.3.2, it is stated that "PVDP has been building solar assets in Europe and Japan for the last 18 years with 1.0GW built to date." 1.3 BYG has provided evidence in both our RR (0092) and our Deadline 2 submission (REP2-060) demonstrating that PVDP has not been responsible for building or developing any project of significance. The Applicant has made no detailed comment in response to our RR. If these projects had been developed as claimed, it would have been a simple matter to get written confirmation from other parties to these; for example, from those responsible for operating them now. Nothing has been forthcoming. As our research has shown, the claims cannot be substantiated.</p> <p>1.4 It is noticeable that the Applicant's words in response to the ExA's question are now being chosen more carefully. PVDP is not named as the developer, presumably in the hope that the reader will simply accept PVDP's implied involvement. "980 MW have been developed in the following six projects in Japan: Ukujima Solar Farm with a total capacity of 480 MW, Onikobe Solar Farm with a total capacity of 183 MWp, Kawasaki Solar Farm with a total capacity of 56 MW, Yamagata Solar Farm with a total capacity of 58 MW, Akita Solar Farm with a total capacity of 40 MW, Green Academy Solar Farm with a total capacity of 40 MW" 1.5 As reiterated in our Deadline 2 WR 2 (REP2-060), Ukujima Solar Farm - by far the largest project that PVDP has been involved with - was sold before any development took place. It was then plagued with serious problems. It has still not been constructed.</p> <p>1.6 The only reasonable conclusion from the evidence available is that PVDP does not have the proven track record required for the development of a project on the scale of the Botley West Solar Farm. Given the remaining problems at the Ukijima project, it is also questionable whether sufficient attention is paid to the detail in projects intended for sale to third parties for onward development.</p> <p>1.7 In response to the ExA's question regarding evidence of funding and accounts (1.5.28) nothing further has been submitted; only the vague promise of 2024 accounts "in due course". More than 6 months after the 2024-year end, any well organised company would already have had its management accounts for that year available for some time. The accounts of PVDP or SolarFive are not audited, but turning management accounts into pro forma statutory accounts is a simple exercise. This could have been done quickly after the ExA put this question.</p> <p>1.8 In its answer to 1.5.22, the Applicant claims to be in discussion with independent financial advisors such as EY. It is therefore extraordinary, if not unbelievable, that up-to-date financial information cannot be provided in</p> | <p>PVDP has successfully developed 980 MWp capacity with six solar farm projects in Japan:</p> <p>(1) Ukujima Solar Farm with a total capacity of 480 MW: this project is Japan's largest solar farm project and is currently in construction. For the 2025 construction status, please see: www.kyuden.co.jp/en/docs/mid_management_plan_en_20250428.pdf page 31 in the original doc (page 34 pdf). The project started in 2012. The land area for the project covers more than 800 hectares of largely unused land. To facilitate the project PVDP had established the special purpose company TeraSol G.K., which signed more than 11,000 individual lease agreements with around 1250 landowners. The land registry had to be updated in many cases and owners to be located throughout Japan. In March 2013, the project obtained the METI approval, qualifying for participation under the Japanese Act on Special Measures concerning the Procurement of Renewable Electric Energy by Operators of Electric Utilities with a feed-in tariff as FY 2012 project. [https://www.bloomberg.com/news/articles/2013-04-12/germany-s-photovoltaic-development-plans-400mw-solar-farm-correct-] The first application for Grid Connection was filed with Kyushu Electric Power in March 2013. (2) Onikobe Solar Farm with a total capacity of 183 MWp: Onikobe Solar Power Plant is an operating solar photovoltaic farm in Osaki City, Naruko Onsen, Miyagi Prefecture, Japan and was developed by PVDP during 2013 - 2017. For this purpose PVDP had established the special purpose company PurpleSol GK, which owns the project https://www.gem.wiki/Onikobe_Solar_Power_Plant The Ministry of Economy, Trade and Industry, Japan had permitted the plant on October 23, 2013.</p> <p>(3) Kawasaki Solar Farm with a total capacity of 56 MW (https://www.gem.wiki/Kawasaki_Solar_Park) This 56MW solar power plant has been built on the site of a former golf course in Kawasaki Town, Shibata District, Miyagi Prefecture. The plant is owned by Petasol Co., Ltd., a company established by PVDP. PVDP had developed the project during 2013 - 2019.</p> <p>(4) Yamagata Solar Farm with a total capacity of 58 MW</p> <p>(5) Akita Solar Farm with a total capacity of 40 MW</p> <p>(6) Green Academy Solar Farm with a total capacity of 40 MW</p> <p>Other than claimed in the RR, the project was not sold before any development took place. The project started in 2012 . The land area for the project covers more than 800 hectares of largely unused land. To facilitate the project PVDP had established the special purpose company TeraSol G.K. , which signed more than 11,000 individual lease agreements with around 1250 landowners. The land registry had to be updated in many cases and owners to be located throughout Japan. In March 2013, the project obtained the METI approval, qualifying for participation under the Japanese Act on Special Measures concerning the Procurement of Renewable Electric Energy by Operators of Electric Utilities with a feed-in tariff as FY 2012 project. [https://www.bloomberg.com/news/articles/2013-04-12/germany-s-photovoltaic-development-plans-400mw-solar-farm-correct-] The first</p> | Funding_and_PPA |

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| | | <p>answer to a direct question from ExA. This suggests that no funding plan exists and any discussions with financial advisors are, at best, preliminary.</p> <p>1.9 A further example of the inaccurate statements made by the Applicant is the response to our WR REP1-095. It is stated that the accounts for Cranssseta Investments Ltd, the Limassol based company 100% owned by Yulia Lezhen and the claimed source of the funding for the project, are publicly available. This is not true. Given the apparent significance of this opaque entity within the funding structure that is claimed by PVDP to support BWSF, it is surprising that the Applicant is not better informed about the status of its accounts. If the Applicant has decided not to disclose these accounts, this would suggest that it would rather they were not made available to ExA.</p> <p>1.10 The failure to provide any financial information in respect of Cranssseta Investments is a fundamental gap in the Applicant's funding evidence. The Applicant claims that £11 million has been provided to date by Cranssseta Investments to support the project but has provided no evidence relating to the amount or to the source of these funds. Nor has it given any indication relating to the funds that might remain available to the project.</p> <p>1.11 It is not therefore possible to conclude from the evidence provided if there are sufficient funds to finance the CPO acquisitions or the project as a whole. The Applicant has given no indication that the necessary evidence will be provided during the remainder of the Examination.</p> <p>1.12 Finally in this section, we feel it is appropriate to repeat our original concerns: that no one person with authority to speak on behalf of the Cranssetta/PVDP/SolarFive group of companies stands behind any of the statements made about their track record or funding. Yet these are businesses that wish to be entrusted with the largest solar farm in the UK. The Funding Statement has no author accreditation. None of the answers to these questions or any other statements made on these subjects have been credited to any director, owner or even manager of any of these companies.</p> <p>1.13 Mr Owen-Lloyd has appeared at the Examination on behalf of the Applicant. He claims to have been a director of Botley West Solar Farm since January 2020. There is no company registered as Botley West Solar Farm in the UK. He also claims to be Principal of Owen-Lloyd Futures and Union Energy Trading, although the latter company was struck off and dissolved in 2010. Companies House shows him to be a director and majority shareholder of both London Grade Coffee Ltd and Ddraig Capital Ltd. Both companies are shown to be late in filing their accounts and under threat of being struck off, although in both cases the strike-off action was suspended in May 2025. None of this confers any authority or credibility to speak about the track record or funding of BWSF. The ExA therefore has little reliable evidence in respect of these critical matters. The answers given by the Applicant to the questions put by ExA have clarified little of any significance.</p> <p>1.14 It may be helpful at this point to recall that at ISH 1 Mr Sheik asked the Applicant if it could "provide any assurance that there will be money available in 37.5 years time to restore land back to its original condition?" The lead solicitor for the Applicants that day replied: "on behalf of the Applicants I personally cannot provide that assurance". (ISH1 Transcript Part 3: 1:05:38-1:06:29) That an instructed solicitor cannot guarantee his client's financial position is not surprising. However, it is surprising that he could not offer any witness to provide the assurance requested, and that no representative of the Applicant has subsequently come forward to provide such fundamental evidence. As a result, it has not been supplied. The Funding Statement does not provide that evidence and furthermore it is not verified or verifiable.</p> | <p>application for Grid Connection was filed with Kyushu Electric Power in March 2013. In July 2016 the project finally obtained Grid Connection Application approval from Kyushu Electric Power for a direct current, high voltage submarine transmission system based on VSC technology from Siemens. As parts of the construction sites are located on agricultural land, PVDP has asked the Fraunhofer Institute for Solar Energy Systems ISE in Freiburg /Southern Germany to simulate the effects of shadowing on growth of biomass and to design an Agri-Photovoltaic system that would both satisfy the requirements of METI for the use of such land and local farmers' needs. To cope with challenging topography, proximity to sea and high wind speeds PVDP undertook various simulations to propose a workable design for the solar installations and adjacent high voltage equipment, that were forming the basis for approvals obtained by Kyudenko as designated engineering, procurement and construction (EPC) company for the construction of the project. In April 2018, the project was sold to a consortium of Kyocera, Mizuho Bank, Kyudenko and others.</p> <p>The RR claims that Project Ukujima has still not been constructed. However, Ukujima Solar Farm is currently in construction. For the 2025 construction status, it is referred to www.kyudenko.co.jp/en/docs/mid_management_plan_en_20250428.pdf page 31 in the original doc (page 34 pdf). The project is not "plagued with serious problems" but has one remaining issue delaying the construction, which is treated by the Engineering, Procurement and Construction Company Kyudenko Corp. with confidence as negotiations with fishermen associations in Japan are typically time consuming. Japanese fishermen associations often pose challenges to renewable energy projects, due to concerns about disruptions to fishing grounds and potential impacts on their livelihoods. These concerns stem from the fact that renewable energy projects can encroach on traditional fishing areas, and fishermen worry about reduced catches and overall economic hardship. In Japan, the influence of fisheries on offshore wind developments is substantial, with permission needed from the relevant fishing cooperatives in addition to consent from the regulator (https://www.rpsgroup.com/projects/fisheries-co-existence-study/) "The local fisheries systems or cooperatives are so site specific, and this makes the introduction of offshore wind farms very difficult," said Satoshi Tajima, a doctoral student studying coastal hydrology at the University of Tokyo who has done field research on Japanese fishers. These cooperatives can stall a project, though they may not always be able to stop them. Still, developers need consent from local stakeholders to establish promotion zones for offshore wind. But because of their historical rights, fishers have a strong legal basis to refuse or challenge development. https://www.earthisland.org/journal/index.php/articles/entry/in-japan-wind-development-encounters-resistance.</p> <p>Companies in the size of SolarFive Ltd have nine months from the end of their accounting period to file their annual accounts with Companies House</p> <p>Financial information on Cranssseta Investment Limited is available on https://cyprusregistry.com/companies/HE/286460 Funds have been provided by way of inter-company loans provided to and by PVDP GmbH, as subsidiary of Cranssseta Investment Ltd.</p> <p>Funding for decommissioning is secured by the sales proceeds from selling used solar panels upon decommissioning. Monocrystalline panels tend to have a longer lifespan of over 40 years, arriving at 83.1% after 38 years. At a remaining useful life of 6 years panels will still be producing 80%, i.e 12.6% x 108 million GBP total panel CAPEX or 0.02 USD/per watt. That's half the price of 0.05 USD/per watt quoted online for used panels (https://www.nerdwallet.com/article/mortgages/used-solar-panels). The decommissioning of utility-scale solar power plants costs an estimated \$30,000 to \$56,300 per megawatt (MW). This translates to roughly \$0.03 to \$0.20 per watt. https://solarrecycling.com/crafting-an-effective-solar-decommissioning-</p> | |

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| REP3-085 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>2 Decommissioning (Question 1.1.6(5) 2.1 In Written Question 1.1.6(5) the ExA requested the following: "Although the Applicant stated it was not necessary to include a requirement securing decommissioning bonds, the ExA would request the Applicant provide, on a without prejudice basis, text for such a requirement".</p> <p>2.2 The Applicant has responded by including the text of such a requirement that was included in the draft DCO of the 50 MW Oaklands Solar Farm (PINS reference EN010122). The Applicant then makes the point that the Secretary of State rejected this in the decision on that project, citing the basis for that decision as the following: "The Secretary of State notes there is no policy requirement for a decommissioning fund to be imposed as paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments".</p> <p>2.3 However, the Applicant omits to indicate that the Secretary of State did not reject the idea in principle that such a requirement could be made but had reached the Oaklands Farm decision on consideration of several factors, as explained in the conclusion.</p> <p>"In light of all of these considerations the Secretary of State does not consider that imposing a decommissioning fund requirement is necessary. This is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only relevant requirements should be imposed" 2.4 The most pertinent consideration was that explained in the paragraph immediately preceding the paragraph quoted by the Applicant, to which the Applicant does not draw attention. This paragraph reads as follows.</p> <p>"In terms of financing the decommissioning stage, the Secretary of State notes the Applicant's funding statement, which it stated was a demonstration that it had sufficient funds to construct, operate and decommission the Proposed Development, and also notes paragraph 2.10.68 of NPS EN-3 which states that solar panels can be decommissioned relatively easily and cheaply".</p> <p>2.5 When considering Oaklands Solar Farm and concluding that a decommissioning fund was unnecessary, the Secretary of State was clearly satisfied that adequate funding was in place, not only for decommissioning but also for construction and operation. As we have pointed out in our RR (RR-0092) the BWSF Applicant's Funding Statement (APP-022) provides no basis for believing that funds will be available for the CPO, for construction, or for operation let alone for decommissioning. Furthermore, and given the Applicant's statement in response to question 1.1.7 that there may be between 780,000 and 1,600,000 piles to a depth of between 1m and 3m, they can clearly have little idea of the potential cost of decommissioning. In BWSF's case, decommissioning is unlikely to be easy or cheap. It would be a significant cost to the public purse if the Applicant was to default with no guarantee in place.</p> <p>2.6 BYG therefore still believes that a bond or similar arrangement is necessary in this DCO to ensure that the full funds required for decommissioning are in place before construction is allowed to start. The form of words would need to be recommended by the ExA to SoS. We are not lawyers, but that offered in respect of Oaklands Farm (a significantly smaller scheme) seems a reasonable place from which to start.</p> | <p>plan-key-considerations/ Due to utility scale effects, Botley West will be able to reduce such \$0.03 cost by half to \$0.015 and can thus recover the decommissioning costs with used panel sales proceeds.</p> <p>The Applicant's position remains that a decommissioning bond is not necessary. Its full position is set out in previous submissions, including the Applicant's Responses to Relevant Representations [REP1-020] and the Applicant's Response to the Examining Authority's First Written Questions (specifically ExQ1.1.16) [REP2-025].</p> <p>The need for a decommissioning bond is not supported by national policy or the recent solar DCO precedent, including the Oakland Solar Farm referred to by BYG, where the SoS rejected the ExA's recommendation for a decommissioning bond requirement.</p> | Legal |
| REP3-085 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>3 Assessment of Alternatives 3.1 The ExA's Written Questions 1.3.1 and 1.3.2 relate to Assessment of Alternatives; in particular, why Cowley had been chosen and why no alternative site outside the Green Belt had been considered.</p> <p>3.2 The Applicant's responses to these questions continue to demonstrate the lack of consistency and credibility shown from the outset regarding this matter. In our RR (RR-0092) we highlighted the seemingly implausible explanation set out by the Applicant in paragraph 5.6.5 of Alternatives Considered (APP-042), shown below.</p> <p>"The Project site evolved over a period of several years, beginning in July 2019. From the outset, the general location, overall size, and then the precise project boundaries, have been influenced by the availability of a suitable grid connection, voluntary landowner negotiations, commercial viability, national planning policy, and environmental constraints. In 2019, as part of the Applicants general site search exercise, discussions were held with National Grid to identify where their priorities lay in order to meet demand and manage the UK electricity supply network. Following a review of the Transmission Network Usage System (TNUoS), managed by National Grid as the Electricity System Operator (ESO), and regulated by Ofgem, it was clear that the South East remained an area where demand was greatest".</p> <p>3.3 We contended and still believe that this summary could not be accurate since National Grid does not express preferences for scheme location. In its responses to the ExA's questions on this matter, the Applicant now makes no reference to discussions with National Grid about site selection. This suggests that paragraph 5.6. was only included to justify the location of BWSF on a site that might otherwise be considered unsuitable.</p> <p>3.4 In answer to the ExA's question, the Applicant now asserts that: "Cowley was chosen because it was the substation that had the capacity to provide a connection of the size sought by the applicant, and NGET were receptive to the Applicant making such a connection".</p> | <p>The comment is noted, and we refer to the Applicant's response to Q1.3.1 in the Response to the ExA's First Written Questions [REP2-025].</p> | Alternatives_and_Roofs |

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| | | <p>3.5 This statement is inconsistent with statements that the Applicant has previously made.</p> <p>3.5.1 In paragraph 5.6.5 quoted above, there is reference to the general location being influenced by “voluntary landowner negotiations”.</p> <p>3.5.2 As pointed out by the ExA, it is made clear in the later paragraph 5.6.8 that the existence of willing landowners was known when Cowley was selected. It reads as follows: “There was one substation in particular where the Applicant considered that it offered good potential to deliver a solar farm at scale. This was at Cowley in South Oxfordshire District. National Grid confirmed there was space at the substation to accommodate a new connection, were supportive of the Applicant to pursue the connection and this was also relatively close to landowners who were also willing to offer land to build a solar farm”.</p> <p>3.5.3 As we pointed out in our RR Appendix 1, Peter Gerstmann, Director of PVDP, made a statement to The Times newspaper (reported 16 Jan 2024) that “finding a good landlord in the Blenheim Estate was one of the key factors in choosing the site for BWSF”.</p> <p>3.6 The chronology of events set out on page 27 in the response to the ExA’s questions contradicts statements previously made by the Applicant on this matter. It is difficult to have any confidence in its accuracy.</p> <p>3.7 Despite the convoluted and inconsistent arguments used by the Applicant to justify the selection of the BWSF site, several things are clear: 3.7.1 Whatever the precise argument about degree of impact and level of harm caused by the scheme, the site chosen for BWSF contains significant areas of designated land, historic and ecological assets of value, and an area with a sizeable population already under pressure from urban development.</p> <p>3.7.2 It defies logic that experienced consultants such as RPS would select this area as the most appropriate when starting from an apparently blank canvas covering the whole country, and when only c.12.5% of England’s land is green belt (MHCLG: Local authority green belt: England 2023/24 –statistical release, 5 December 2024).</p> <p>3.7.3 By PVDP’s own admission, it was selected in significant part because Blenheim Estate was willing to provide a substantial area of land.</p> <p>3.7.4 Unlike many other NSIPs, such as airports and major roads, solar farms benefit from considerable flexibility in respect of scale and location. There is no need, particularly this early in the net zero transition, to use Green Belt land, Best and Most Versatile agricultural land, or to put the setting of a WHS at risk.</p> <p>3.8 Our research suggests no other solar farm, built or proposed, impacts on multiple designations in this way. We believe BWSF is the only NSIP solar farm proposed on Green Belt land. Others proposed are spread across the country and are not just in the southeast, as the applicant argues was necessary for BWSF.</p> <p>3.9 The only rational explanation for the location of this application site is that the BWSF site selection process was driven primarily by land availability. RPS would appear to have been given the broad site and then done its best to shape it to reduce impacts. It was seemingly instructed not to reduce the size materially, even when under significant pressure to do so during the consultation periods. The defects in that approach have been clear from the outset.</p> | | |
| REP3-085 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>4 Analysis 4.1 The responses we have provided in this paper relate to particular and separate issues the ExA wishes to understand more fully.</p> <p>4.2 As part of our preparation for the Examination we researched these issues in detail. That work was summarised in our RR-0092. It appeared to us during our research that the Applicant was being less than candid about all of them; and that this lack of candour has continued through each stage of the Examination, now including the responses to the ExA questions addressed above.</p> <p>4.3 As a result the Applicant is not providing the ExA with the detailed and consistent information required for a full understanding of why the scheme is located where it is, or why it needs to be as big as proposed despite significant consultees suggesting it should be much smaller. Furthermore, there is no credible evidence in respect of the Applicant’s ability to fund or execute BWSF.</p> | <p>The size of site was an alternative considered by the Applicant and is explained at [APP-042].</p> <p>Detailed responses have been provided by the Applicant concerning Alternative site assessment in Section 2.3 of the Applicant’s Response to the ExA’s First Written Questions [REP2-025].</p> <p>With regard to funding, please refer to the Applicant’s Funding Statement [APP 022] and responses provided in Q1.5.21 to Q1.5.29 within the Applicant’s Response to the ExA’s First Written Questions [REP2-025].</p> | Site_selection_and_Cable_Route_Alternatives |
| REP3-085 | Begbroke and Yarnton Green Belt Campaign (BYG) | 4.4 The Applicant’s approach has been to avoid answering questions or providing detailed evidence in respect of all these matters. A small German company, apparently inadequately capitalised and which has consistently and significantly exaggerated its track record in developing solar farms, wants the UK Government to believe it will be adequately funded by a Cypriot company which has produced neither accounts nor evidence of its financial capability to do so. Without first hand evidence on these fundamental issues, we believe the Applicant lacks the capability, credibility and suitability to warrant the granting of this DCO. | The applicant has provided detailed responses to the questions raised. Photovolt Development Partners GmbH is an engineering company providing project management service. As of FY 2023, the Applicant had adequate equity of 1.6 mil EUR well in commensuration with its inter-company engineering service revenues of 4.7 mil EUR. Both Photovolt Development Partners GmbH and SolarFive Ltd have provided their accounts. | Funding_and_PPA |
| REP3-085 | Begbroke and Yarnton Green Belt Campaign (BYG) | Deadline 3. BYG Comments on Historic England’s Response (REP2- 056) to the ExA’s First Written Questions (ExQ1) The Importance of Aerial Views in the Examination 1. In its first Written Questions, the ExA rightly raised the relevance of aerial views of Blenheim Palace and its surroundings as a matter for consideration during the examination. In their answer to the question, Historic England agreed that these views should be considered (REP2-056). | The Applicant has worked closely with Historic England on the design of the proposed development to minimise any potential harm to the Outstanding Universal Value (OUV) of the WHS and to any other designated heritage assets at Blenheim Palace, most recently in the form of the changes set out in our Change Request 2 Notification [REP2-045] . | Landscape_and_Visual_Impacts |

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| | | <p>2. This is an important consideration, the effect of which has yet to be fully understood. In Deadline 2 submission (REP2-064), we provided the Google Earth image below. This shows the panels that would surround Blenheim Palace if the Botley West Solar Farm were to be developed. [Note: since submitting this image two small areas of panels are being removed by the Applicant (REP2-045) but this will make no significant difference to the impact of seeing the WHS surrounded by this scale of industrialisation.]</p> <p>3. Brize Norton and London-Oxford airports generate a significant amount of activity in the air over Blenheim Palace and its wider setting. Both airports, particularly Brize Norton, receive international flights carrying political and commercial VIPs.</p> <p>4. Furthermore, and yet to be appreciated, is the impact the proposed BWSF development would have on all car drivers and others approaching Blenheim or its vicinity who are using Google Maps for navigation in Live View. They will be seeing the same Google Earth image as seen from the air (as shown above).</p> <p>5. A recent Martin Lewis poll in June (38,953 votes) would suggest that, for those drivers using navigation systems, around half are using Google Maps. Many others following proprietary inbuilt satellite navigation will also be using Google Earth. A photograph of the standard navigation screen for a Tesla is shown below revealing the extent of the landscape that is visible while driving the car.</p> <p>6. In the Applicant's response to the ExA's question 1.1.14 it is stated that the layout of BWSF's infrastructure has been informed by the following: Desire to avoid uninterrupted views of the solar farm from any public vantage point, by the introduction of either new planting of hedgerows and woodland, and the effective management of that resource. The need to avoid any unacceptable direct or indirect effect upon the Blenheim Palace World Heritage site 7. West Oxford District Council (REP1-081 6) and Historic England (REP1-085 1.14-1.16) have both indicated that the Applicant has understated the impact of the development on those observing the site at ground level. We would argue that the Applicant has also failed to address the visibility of the site to those in the air, and to those using Google Earth while travelling by car and by other means of transport.</p> <p>8. The industrialisation of the landscape surrounding Blenheim would be clearly visible to both. New hedgerows or woodland would not, of course, mitigate the impact. The Applicant would have failed in its stated objective to "avoid any unacceptable direct or indirect effect upon the Blenheim Palace World Heritage Site".</p> <p><i>[Please refer to full WR for satellite images]</i></p> | <p>A revised assessment of impacts and effects on the OUV of the WHS will be presented in the next version of ES Appendix 7.4: Heritage Impact Assessment [APP-141]; this will be prepared following the consultation on the second change request. The revised assessment will include consideration of aerial views.</p> <p>Verified aerial photography is not possible and was not requested by any of the councils during consultation.</p> <p>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.</p> <p>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.</p> | |
| REP3-086 | Bladon Village Sir Winston Churchill Memorial Hall | <p>I am responding on behalf of BVHRC which owns the Recreation Ground in the village of Bladon. The Recreation Ground provides a playing field and MUGA for children and the pupils of the nearby primary school, a children's play area and an outdoor gym and boules court. There is also a community orchard and a wildflower meadow.</p> <p>We have serious reservations about this proposal to site the facility at the top of School Lane. The Lane is very narrow, there are no passing places and access and egress at the bottom of the lane is narrow and dangerous, with limited sight lines and often involving vehicles having to reverse back on to the busy A4095. Vehicular traffic is currently limited to the school, the church (for access to the graveyard and cemetery)) and the four residencies along its length. There is limited vehicular access for the allotment holders, With the planned increase in vehicular traffic up School Lane to access the site, we are concerned about the safety of the pupils at Bladon Primary school. This school has a high proportion of SEND pupils who are at risk of wandering away, and already there is a high risk of collision between children and vehicles at dropping off and collection times.</p> | The proposed education facility forms part of Change Request 2 for which the Applicant will submit further assessment at Deadline 5. | Impact_on_School_Sites |
| REP3-086 | Bladon Village Sir Winston Churchill Memorial Hall | <p>The creation of an educational centre at the top of the lane will also impact on the access for the residents of the properties , one of whom needs access at all times in an emergency medical role.</p> <p>It would also impact on the access of villagers to the Recreation Ground. This is the only such facility in the area, and it is pedestrian access only, with many villagers of all ages using the facilities provided. Vehicles passing this to reach the educational centre would pose a hazard to unaccompanied children, parents with toddlers and buggies and generally impair the social function of the Ground, a facility which is unavailable elsewhere. Any impairment of access to the Recreation ground would have a negative impact on the mental and physical health of all those who currently use it.</p> | The proposed education facility forms part of Change Request 2 for which the Applicant will submit further assessment at Deadline 5. | Traffic_Transport_and_Access |
| REP3-086 | Bladon Village Sir Winston Churchill Memorial Hall | Q1.16.8 Community Food growing area The same reservations apply to vehicular access to the proposed Food growing area at the top of School Lane. The Bladon Allotments group have not been consulted about the possible provision of more allotments . | The Applicant will cooperate with the Bladon Allotments group on the provision of more land for. It is intended that growers would access this site on foot. | Community_Food_growing_Location |
| REP3-087 | Bladon Village Sir Winston Churchill Memorial Hall | <p>ENO 10147 Q1.16.21 Educational Facility Building As Chair of the Trustees, I am responding on behalf of The Bladon Village Hall and Recreation Committee (BVHRC), an established charitable organisation, which owns and manages the Recreation Ground situated at the top of School Lane in Bladon.</p> <p>This response is submitted on behalf of the BVHRC to express our grave concerns regarding the proposal to construct an educational facility at this location. Our primary concern is the safety and welfare of the very many users of School Lane. Community Role of the Recreation Ground: The Recreation Ground serves as the primary outdoor space for residents of all ages in Bladon. Its facilities include:</p> | The proposed education facility forms part of Change Request 2 for which the Applicant will submit further assessment at Deadline 5. | Traffic_Transport_and_Access |

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| | | <ul style="list-style-type: none"> • A playing field and Multi-Use Games Area (MUGA) for children and pupils from the local primary school • A fully equipped children's play area • An outdoor gym and boules court for all age groups • A community orchard and a wildflower meadow This space is the only such facility in the area and is accessible primarily on foot, ensuring a safe, traffic-free environment for recreation and social interaction. <p>School Lane – a bustling hub of village life:</p> <ul style="list-style-type: none"> • Constantly used as a public right of way, connecting people to fields for walking and outdoor recreation • Access to the Recreation Ground, Community Orchard, and wildflower meadow • The primary access point to thriving Community Allotments, where residents actively grow vegetables and flowers throughout the year • Essential entry for those attending burial ceremonies at the church graveyard • A well-trodden pedestrian route leading to the Church, renowned for the graves of Winston Churchill and ancestors of the Duke of Marlborough, attracting locals and visitors • Home to four residential properties, ensuring daily comings and goings • The key pathway for children and families heading to the village Primary School every weekday morning and afternoon <p>Safety and Accessibility Concerns: Our concerns regarding the proposed facility are serious and multi-faceted:</p> <ul style="list-style-type: none"> • Road Safety: School Lane is exceedingly narrow, lacks passing places, and the entry and exit points at its base are both restricted and hazardous. Vehicles often have to reverse onto the busy A4095, significantly increasing the risk of accidents. • Current Vehicular Access: At present, vehicular use of School Lane is limited to essential journeys for the school, church and graveyard, the Community Allotments, and four private residences only. • Pupil Safety: Bladon Primary School has a notably high proportion of pupils with Special Educational Needs and Disabilities (SEND), some of whom are at risk of wandering off. The risk of collision between children and vehicles is already substantial, especially during drop-off and pick-up times; any increase in traffic would heighten this risk considerably. • Emergency Access: One resident requires guaranteed, unimpeded access for emergency medical purposes at all times – a necessity incompatible with increased vehicle congestion. | | |
| REP3-087 | Bladon Village Sir Winston Churchill Memorial Hall | <p>Impact on Community Access and Social Wellbeing: The Recreation Ground is a vital amenity whose pedestrian-only access is essential to its role as a safe community space. Increased vehicular movement along School Lane in order to access a new educational facility would:</p> <ul style="list-style-type: none"> • Impair access for villagers, including children, families with buggies, and elderly residents • Reduce the safety and enjoyment of the space for all users • Restrict the only facility of its kind in the area, to the detriment of the community's mental and physical health <p>Wider Community and Heritage Considerations: It is important to acknowledge that School Lane is also a heavily used public right of way, providing pedestrian access to the historic village church, the burial place of Winston Churchill, which attracts thousands of visitors annually. The lane also gives access to surrounding fields, popular with villagers and dog walkers. Any increase in traffic will disrupt these established patterns of community use and enjoyment.</p> <p>Conclusion: In summary, while a superficial assessment of the site may suggest School Lane could accommodate an educational facility, this fails to consider the daily lived realities and requirements of the community. The proposed development poses unacceptable risks to safety, restricts access to essential communal facilities, and would profoundly undermine the quality of life for residents and visitors alike. We therefore strongly urge that this proposal be reconsidered. The integrity, safety, and wellbeing of the Bladon community must remain paramount in any planning decision.</p> <p>Yours sincerely, Dr Gillian Forrest Chair, BVHRC</p> | This is noted. | Recreation_and_Amenity |
| REP3-089 | Church of St Peter and St Paul, Church Hanborough | <p>Comments on Responses to the Examining Authority's (ExA) 1st Written Questions (ExQ1) from St Peter & St Paul, Church Hanborough This comment is about the Applicant's response to question 1.6.18 (Ref: REP2-025) to the Examining Authority's First Written Questions ExQ1) We are disturbed by the Applicant's response to the examining Authority's Question 1.6.18 in which they seem to dismiss the impact of the solar panels surrounding the Village of Church Hanborough on the landscape amenity and in particular on the current clear visibility of the Historic Grade 1 Church and Spire of St Peter and St Paul, Church Hanborough. We strongly dispute the Applicant's response that it is only the Church and surrounding churchyard which are of historical importance and refute their assertion that the heritage significance of St Peter and Saint Paul Church is "barely affected" by the panels. St Peter & St Paul is a Grade 1 and a building of national importance and exceptional interest, noted as one of the finest examples in Oxfordshire if not England.</p> | The Applicant's position regarding the likely impacts and effects on the significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough is set out in paragraphs 1.9.36 - 1.9.44 of ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014] . This states that 'The setting makes a reasonable contribution to the heritage significance of the church, with the greatest contribution coming from the enclosing churchyard' (paragraph 1.9.37). The wider landscape which provides the longer views in which the church spire is visible is still considered to be part of the setting, but of reduced significance in comparison with the churchyard. | Historic_Environment |

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| | | <p>The Church is a Norman church (1108) and in 1130, Henry I granted its advowson to Reading Abbey.</p> <p>It retains much of the Norman fabric remaining visible including the fabulous north door - the tympanum of which is carved and features St. Peter flanked by a lion and the Agnus Dei, and an equally impressive Norman south door. Internally, the church has an embarrassment of architectural riches. The most notable are the fine concave octagonal perpendicular columns of the arcades, the font (early 15th century), the wine glass stem pulpit (also 15th century), and the complete set of polychrome rood screens to nave and side chapels (mid-15th century), which feature heavily in Howard and Crossley's "English Church Woodwork".</p> <p>Consequently, it welcomes a steady flow of visitors from across the world who come to admire both the internal treasures and its outstanding Spire, which can be seen for many miles round, set in beautiful Oxfordshire countryside. The importance of the Church and Spire thus extend to the immediate surroundings of the conservation village of Church Hanborough and the wider setting. The Church has stood as a landmark for centuries, part of the cultural heritage of the West Oxfordshire. As ICOMOS ((the operational wing of UNESCO) stated in their response to ExQ1 (Ref REP2-070) "Church Hanborough's soaring limestone steeple can be seen across fields from every point of the compass" (England's Thousand Best Churches by Simon Jenkins). To conserve most of these views and the setting of the village in particular the rural scenery of the valley passing the Western side of the village, no solar array should be placed on the sloping side of the ridge to the south of Church Hanborough Village." In recognition the visual importance of the Spire of St Peter and St Paul to our local community, the Parish has already raised from with the community some £380,000 to restore, repair and maintain this historic emblem. Further funding has also been granted from the Oxfordshire Historic Churches Trust, in recognition of its importance. We should also like to highlight the response of the Oxfordshire Host Authorities (OHA) in their Joint Local Impact Report on the importance of the setting of heritage assets throughout the central site. In considering the impact on, among other heritage assets, the Grade I churches of Saint Peter and St Paul at Church Hanborough and Saint Peter's at Cassington the Oxford Host Authorities write in paragraph 7.6.62 of their Joint Local Impact Report (Ref. REP1-072j "The OHA's are concerned about the impact of development within the setting of the assets. 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, design and prominence, may cause substantial harm to the significance of heritage assets. The OHAs consider that the scale and prominence of the Botley West proposals will result in local impacts to the significance of these heritage assets and that the removal of solar arrays from a number of locations that form the setting of these assets is necessary to mitigate the impacts." <i>[Please refer to full WR for photographs of views included]</i></p> | <p>The Applicant considers that any harm to the heritage significance of the Church of St Peter and St Paul at Church Hanborough would be less than substantial. As such the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1 'Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use'.</p> <p>In a section regarding factors influencing site selection and design, NPS EN-3 advises 'In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether it 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 urgency of meeting the net zero target' (paragraph 3.3.8).</p> | |
| REP3-089 | Church of St Peter and St Paul, Church Hanborough | <p>We entirely agree with this assessment and request that the ExA require the Applicant to remove panels from fields numbered 2.66, 2.68, 2.69, 2.70, 2.71, 2.84, (views from Lower Road and PRoWs to the East) and 2.115, 2.116, 2.118 (views from PRoW to the South) and 2.120.</p> <p>Finally, may we remind the ExA that the Applicant has already agreed (at the suggestion of Historic England and others) to omit panels from some fields considered within the setting of Blenheim Palace. Given the close involvement of Blenheim Palace Estate with ownership of the land on which the solar panels are to be built, and in the light of your response to this body, it is unclear as to why the Church and Spire of St Peter and St Paul, like Blenheim Palace a Grade I building of Historic importance, should not be similarly treated.</p> | <p>The Applicant has worked closely with Historic England on the design of the proposed development to minimise any potential harm to the Outstanding Universal Value (OUV) of the Blenheim Palace World Heritage Site (WHS), most recently in the form of the changes set out in our Change Request 2 Notification [REP2-045]. The proposed changes would further reduce or avoid any potential harm to the OUV. There would also be a further reduction or avoidance of harm to the Grade I listed Blenheim Palace (and to other designated heritage assets), but the principal driver for the changes here is the OUV of the WHS rather than any specific listed building and this is due to the international significance of the WHS.</p> | Historic Environment |
| REP3-090 | CPRE Oxfordshire | <p>Project: EN10147 Registration identification number is: 20055135 17th July 2025 Subject: Request for additional information on Soil Sampling Plan Referenced in Blenheim's Submission Dear Planning Inspectorate, I am reviewing the document titled EN010147-001193 - Blenheim Palace – Responses to the Examining Authority's First Written Questions (ExQ1) as part of the ongoing examination of the Botley West Solar Farm proposal. In particular I have focused on the response to question 1.11.11 by Blenheim Estate. I am writing to request access to the soil sampling plan referenced in Blenheim's response to the Examining Authority's first written questions. It appears that Blenheim has provided data solely for phosphorus index levels, which presents an incomplete and potentially misleading picture. Crops require a range of elements, not just phosphorus. A basic soil analysis for general cropping should include results for not only phosphorus but also pH, potassium, and magnesium. This information is vital for the farmer to understand the fertility of their soils.</p> <p>In addition, the inspector recommended considering organic matter content, yet Blenheim has not supplied this information either. Instead, they appear to have selectively shared only part of the available data.</p> <p>Please could we be provided with the full soil analysis, including: - pH levels - Phosphorus, potassium, and magnesium levels (expressed in parts per million, rather than an index) - Organic matter content According to the Fertiliser Manual (RB209) a phosphorus index of 2 represents the recommended target level of fertility for agricultural land for general cropping purposes. The Fertiliser Manual (RB209) is published by DEFRA. It is the reference book used by farmers and agronomists for fertiliser recommendations and recognised as the industry standard by organisations such as Environment Agency and Natural England. RB209, Section 1 Principles of nutrient management and fertiliser use, updated June 2023 RB209, page 24 states: "Typically, maximum yield of arable crops or of grass is reached at Index 2 for phosphorus." The manual further notes that when levels fall below this target, yields may be reduced, and additional phosphate should be applied. Therefore, land at index 2</p> | <p>Please refer to Q2.11.14 of the Applicants Response to Second Written Questions [EN010147/APP/14.2].</p> | Agricultural_Land_Use |

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| | | <p>cannot reasonably be described as degraded, and where levels are at index 1, this can be easily and readily corrected through standard fertiliser applications. This is common agricultural practice and happens annually on farms across the UK. Certified agricultural advisors inform me crops can be grown on land of index 1 with little to no yield penalty. Describing such land as degraded is inaccurate and misleading.</p> <p>In addition, I note that Blenheim has been unable to supply data for the northern section of land. Given that basic soil analysis combined with organic matter costs as little as £33.54 per sample / field would it be possible for Blenheim to provide this data for all of their land? The cost is minimal, and having comprehensive data would enable a much more accurate and informed assessment.</p> <p>I do hope you will assist with this request.</p> <p>Yours sincerely Director CPRE Oxfordshire</p> | | |
| REP3-117 | Southern Gas Networks plc | <p>Dear Recipient,</p> <p>Botley West Solar Development Consent Order (the "Order") Southern Gas Networks PLC</p> <p>Withdrawal of Objection We are writing on behalf of our client, Southern Gas Networks PLC ("SGN"). SGN is an interested party in the examination of the Order. The Promoter and SGN have agreed the protective provisions for SGN's benefit and the Promoter will secure these in the Order .</p> <p>SGN hereby withdraws its objection to the Order.</p> <p>Yours faithfully</p> | This is noted and welcomed by the Applicant. | Acknowledgment response |
| REP3-118 | St Peter's Church, Cassington, Parochial Church Council | <p>This comment is about the Applicant's response to question 1.6.19 (Ref: REP2-025) to the Examining Authority's First Written Questions ExQ1).</p> <p>The PCC of St Peter's Church Cassington strongly disagrees with the Applicant's assessment that the heritage significance of this Grade 1 Listed church would be 'barely affected' by the Project's solar panels. The heritage significance of the church and its landmark significance to the surrounding landscape would be very adversely affected by the solar panels if the Project is allowed to go ahead.</p> <p>St Peter's Church Cassington is Heritage Category: Listed Building Grade 1 - A building of national importance and exceptional interest.</p> <p>This Norman church was constructed in the early 12th century, before 1123.</p> <p>There is an abundance of significant features in St Peter's church including for example: 12th century tub font 14th century pews 15th century Last Judgement painting at the east end of the nave and saints painted in the splays of the eastern nave windows 17th century choir stalls 17th century glass mounted in 14th century window. St Peter's Church sits at the centre of the Conservation Area of Cassington.</p> <p>The adverse impact of the Project on the church's heritage significance not only applies to the significant features inside the church but also to the external views of the church. St Peter's has a very tall and elegant spire that was added in 1345. This is visible for miles around and has been a local landmark for centuries. It is a quintessential part of the cultural heritage of the entire surrounding area. Filling this landscape with fields full of solar panels can only have a massively detrimental effect on its heritage significance.</p> <p>We understand that the Applicant has already agreed (at the suggestion of Historic England and others) to omit panels from some fields considered within the setting of Blenheim Palace. Both Blenheim Palace and St Peter's Church are Grade 1 Listed buildings and we believe the same rules should apply.</p> | <p>The Applicant's position regarding the likely impacts and effects on the significance of the Grade I listed Church of St Peter at Cassington is set out in paragraphs 1.9.45 - 1.9.49 of ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]. This states that '<i>The setting makes a reasonable contribution to the heritage significance of the church, with the greatest contribution coming from the enclosing churchyard</i>' (paragraph 1.9.46). The wider landscape which provides the longer views in which the church spire is visible is still considered to be part of the setting, but of reduced significance in comparison with the churchyard.</p> <p>The Applicant considers that any harm to the heritage significance of the Church of St Peter (Cassington) would be less than substantial. As such the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1 '<i>Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use</i>'.</p> <p>In a section regarding factors influencing site selection and design, NPS EN-3 advises '<i>In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether it 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 urgency of meeting the net zero target</i>' (paragraph 3.3.8).</p> <p>The Applicant has worked closely with Historic England on the design of the proposed development to minimise any potential harm to the Outstanding Universal Value (OUV) of the Blenheim Palace World Heritage Site (WHS), most recently in the form of the changes set out in our Change Request 2 Notification [REP2-045]. The proposed changes would further reduce or avoid any potential harm to the OUV. There would also be a further reduction or avoidance of harm to the Grade I listed Blenheim Palace (and to other designated heritage assets), but the principal driver for the changes here is the OUV of the WHS rather than any specific listed building and this is due to the international significance of the WHS.</p> | World_Heritage |
| REP3-118 | St Peter's Church, Cassington, Parochial | <p>Question 1.6.20 states: 'It is considered that this photomontage will not convey the potential impact of the panels on the setting of the Church. Provide an additional photomontage from a more appropriate location and reassess the potential impact'. It seems that the Applicant has ignored this instruction and failed to provide an additional photomontage showing the negative impact on the setting of St Peter's Church within the surrounding landscape.</p> | <p>The Applicant would refer to their response to ExQ1.6.2 in the Applicant's Response to the Examining Authority's First Written Questions (ExQ1) [REP2-025] regarding the accuracy of the photomontage from Viewpoint 42.</p> | World_Heritage |

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| | Church Council | <p>Since the Applicant has provided no photomontage, nor even a viewpoint from the Track (PRoW 152/6/10) looking south towards Cassington, it is impossible to illustrate the significant negative impact of the solar panels on the setting of St Peter's within the landscape surrounding the conservation village of Cassington.</p> <p>We also endorse what the Oxfordshire Host Authorities (OHA) say in their Joint Local Impact Report on the importance of the setting of heritage assets throughout the central site. In considering the impact on, among other heritage assets, the Grade I Listed churches of St Peter's Cassington and St Peter & St Paul at Church Hanborough, the Oxford Host Authorities write in paragraph 7.6.62 of their Joint Local Impact Report (Ref. REP1-072j): 'Although the proposed development will not impact the fabric of such heritage assets, the OHA's are concerned about the impact of development within the setting of the assets. 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, design and prominence, may cause substantial harm to the significance of heritage assets. The OHAs consider that the scale and prominence of the Botley West proposals will result in local impacts to the significance of these heritage assets and that the removal of solar arrays from a number of locations that form the setting of these assets is necessary to mitigate the impacts.' We entirely share this OHA concern and request that the ExA require the Applicant to remove panels from all the fields likely to be adversely impacted. From the map provided, we understand these field numbers to be: - 2.87 to 2.91 inclusive (5 fields) - 2.93 to 2.99 inclusive (7 fields) - 2.100 to 2.110 inclusive (11 fields) - We also attach two example photographs showing St Peter's church spire within its heritage landscape setting. - View of St Peter's, Cassington from PRoW 152/6/10 ("The Track") from Cassington to Purwell Farm looking South East over fields 2.096, 2.102 - View of St Peter's, Cassington from PRoW 152/6/10 ("The Track") from Cassington to Purwell Farm taken looking South over panel fields 2.095, 2.103 and 2.110</p> | | |
| REP3-120 | Stop Botley West | <p>Previous Submissions</p> <p>1.2. SBW have previously made detailed Relevant Representations and Written Representations in relation to the project in February 2025 and subsequently on 1st July 2025. In summary, the SBW's key concerns with the project are as follows:</p> <ul style="list-style-type: none"> • There would be less than substantial harm to heritage assets up to the highest level of importance; • There would be significant and extensive impacts upon the landscape character of the area and visual amenity given the Project's design and scale; • The project design and scale has not considered the necessary mitigation; • There would be significant harm arising from the loss of a substantial amount of Best and Most Versatile ("BMV") agricultural land; • There would be substantial harm to a variety of Public Rights of Way ("PRoW") which are of importance to the local community; • There would be significant impact on the local economy because of reduced tourism; and • There would be substantial harm to the Green Belt because of inappropriateness, conflict with the Green Belt purposes and loss of openness . <p>1.3. SBW's most recent submission (dated 1st July 2025) inter alia, provided comments on responses to relevant and Written Representations, comments on the LIRs and nominations for locations of Accompanied Site Inspections. - 1.4. The applicant has since provided responses to these submissions (and those from others submitted at D2) published on 4th July 2025. This document provides comments on these responses and the other submissions made at D2.</p> <p>1.5. In addition to this, the applicant has submitted a change request in respect of a series of elements of the proposal. Comments on the proposed change are also set out within this document. 1.6. The document is hereby set out as follows: • Section 2 provides commentary in respect of the responses provided by the applicant and other parties to submissions made at D1; • Section 3 considers the applicant's change request.</p> | This is noted. | acknowledgment response required |
| REP3-120 | Stop Botley West | <p>Landscape</p> <p>2.17. These following comments respond to the Applicants Response to Rule 17 Letter (17th June 2025) on ES LVIA Chapter 8. This will be referred to as ARtR17LVIA170625 in this report. <u>Point 1 - Moderate effects and Significance</u></p> <p>2.18. The ExA have raised the matter that the LVIA is the only report which does not determine that effects are deemed significant when concluded as moderate and above. 2.19. The applicant's response at 1.1.1 – 1.1.11 relies on the GLVIA3 guidance and the TGN clarifications which do indeed set out that there are no hard and fast rules. However, it is beholden on the author of the LVIA to explain robustly their reasons for their methodology, in this case that Moderate effects are not significant, which is not explained. Additionally, it is our understanding that when an ES is presented as a composite set of documents, rather than individual reports, the methodologies are aligned. 2.20. Finally, given the scale, size and nature of this application we would expect, and in our experience, it is best practice to determine that Moderate effects are Significant. <u>Point 2 - Reversibility of the scheme</u></p> <p>2.21. There is no dispute that construction effects are temporary although for a scheme of this nature, the duration can be a long period of time .</p> <p>2.22. The temporary or permanent nature of the solar array is a point for planning, although we understand that consensus now judges that a 40-year lifespan is the tipping point and is considered a 'long term generational</p> | <p>The other ES chapters can base their conclusions on quantifiable data. LVIA deals with perceptual qualities and therefore we keep our position which is in line with the industry best practice guidance. However, it is acknowledged that the LVIA requires revisions, which are also determined by layout changes.</p> <p>EIA Methodology as LVIA Methodology has to define the duration of effects. This was also covered in our previous response. The missing section of duration and nature of effects will be included in the revised LVIA. However, it is generally accepted that construction effects are short-term in nature as most of the impacts are temporary, stemming from the construction phase itself, rather than being permanent. Although the end of the construction phase is marked by the completion of the built development these effects are regarded as permanent and are assessed as part of effects at Year 1. As construction effects are short term effects, even if they last 5 years, the factor of their short duration reduces the magnitude of effects. However, we could have</p> | Landscape_and_Visual_Impacts |

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| | | <p>feature of the landscape' 2.23. However, the landscape planting is not a temporary feature as acknowledged by the applicant at 1.1.19 where they state that 'the proposed landscape mitigation would be retained after the removal of the infrastructure elements. This has the effect of permanently changing the landscape character and the visual amenity. The ARtR17LVIA170625 response persists that the proposed landscape is 'in character' with the defined LCAs however whilst this may be at a high level, it is not on a field or area by area basis. With reference to Viewpoint and Photomontage 32, this is currently an agricultural field with open views towards Blenheim WHS. The introduction of the solar array dilutes those views to a high degree but maintains some longer views. However, the introduction of the hedgerows fundamentally changes the landscape from one of an open undulating field, with intervisibility and physical relationship to the WHS to a field with a hedge through the middle which results in the loss of the intervisibility and the experience of the wider landscape which contributes to the setting of Blenheim Palace. Once the solar array is removed the landscape character and visual experience will be left permanently changed. <u>Point 3 - Mitigation and level of effect</u> 2.24. The ExA have raised the question on how potentially likely significant effects from planting mitigation have been assessed in the LVIA Chapter 8. 2.25. We do not understand the point made at 1.1.21 regarding proposed planting at Blenheim Palace outside of this application. This is not for consideration regarding the existing baseline position .</p> <p>2.26. At 1.1.25 the ARtR17LVIA170625 sets out that 'Public rights of way flanked by hedgerows and or trees is characteristic elements in the existing landscape' However this is a broad-brush statement as demonstrated at VP32 (set out above) and is not true of the detailed character of the study area. They go on at 1.1.26 to acknowledge that there will be a change in the views but that they have allowed for suitable widths to PRoW corridors1 and will not result in the loss of the views of the wider landscape and key visual features such as church spires and distinctive landscape features. 2.27. Not all the viewpoints have been montaged so this cannot be verified however we do not believe this to be the case. It is likely that, as an example view intervisibility and views of the conservation area and key features looking southeast on ProW 124/5/10 (as referenced above) between Bladen and Begbroke will be lost as will views of the church at Church Hanborough from Purwell Farm .</p> <p>2.28. The inherent flaw in the assessment process is that the mitigation is not considered in terms of how it changes the landscape and visual amenity. The LVIA Chapter 8 judges simply that by virtue of screening the solar arrays there is a reduction in the level of effect. This is born out through Table 1.1 and 1.2 where the change in levels of effect between Year 1 – Yar 15 and at Year 15 reduces because the mitigation for example hedgerows, screen more of the proposals. There is no consideration of how the mitigation adversely effects visual and landscape receptors .</p> <p><u>Other</u></p> <p>2.29. The applicant seeks to judge that effects are beneficial in nature regarding landscape character. As set out previously, where the proposed mitigation is contrary to the landscape character of the locality, for example between Bladen and Begbroke, the effects are not beneficial .</p> <p>2.30. There is no narrative on the agreement of the photomontage locations. 2.31. No Residential Visual Amenity Assessment (RVAA) has been submitted despite it being agreed in the Scoping Response. The ARtR17LVIA170625 persist in the position that 25m buffer to properties is appropriate with no evidence to support this.</p> | <p>provided a statement that in this case the effects during the construction phase would not exceed the effects in completion, which is at Year 1, and not carrying out receptor based assessment during the construction period.</p> <p>The landscape planting has been designed in conjunction with ecology requirements and Management Plans. It should be acknowledged that hedgerows have a certain life expectancy and at some point will require to be replaced. Landscape is under constant change.</p> <p>The proposed planting will not affect or cause any adverse effects for the setting of Blenheim Palace. VP32 represents the footpath which connects Bladon with Begbroke. There is no intervisibility with the Blenheim Palace grounds.</p> <p>Design approach in respect of landscape and visual matters' will be included in the revised LVIA. The layout design has taken into account views by setting the panels back, thereby preserving views of local landmarks/church spires, as presented by VPs 28, 38, 53, 54.</p> | |
| REP3-120 | Stop Botley West | <p>Other Matters</p> <p>2.32. In addition to the points noted above in relation to heritage and landscape, commentary in response to the applicant's submissions at D1 on other key issues are set out below. <u>Residential amenity impacts</u></p> <p>2.33. As we set out in SBW's relevant representations at D1 and again in written submissions at D2, there is no evidence to support the justification of the 25m buffer to individual properties and settlements .</p> <p>2.34. The applicant has failed to provide sufficient justification as to why 25m is considered to be sufficient mitigation, simply saying that they "believe" this to be sufficient. This claim is not supported by evidence, and indeed good practice would advise a minimum of 50m. We would recommend 100m taking account of the size, scale and disparate nature of the proposals.</p> | The revised LVIA considers effects on individual properties. | Landscape_and_Visual_Impacts |
| REP3-120 | Stop Botley West | <p><u>Socio-economics</u></p> <p>2.35. The applicant dismisses SBW's valid concerns with respect to the visitor economy, simply stating that "the overall significance of effect across all phases is not significant". Despite reaching this conclusion they do recognise the potential disruption and loss of visitors numbers, particularly during construction that the development will cause. 2.36. The response from the applicant fails to address the concerns raised by SBW in their D1 representation. No further substantive assessment has been carried out with respect to the impacts of the project on the experience of visitors to Blenheim Palace. There continues to be no cross-reference to the significance of the landscape effects, with the applicant simply dismissing this by "professional judgement" rather than any substantial evidenced based conclusion.</p> | <p>The Applicant acknowledges SBW's concerns regarding potential impacts on the visitor economy. However, the Socio-Economic Impact Assessment (SEIA) and Landscape Visual Impact Assessment (LVIA) presented in the Environmental Statement (ES) provide a robust, evidence-based evaluation in line with National Policy Statement EN-1.</p> <p>Visitor surveys conducted in summer 2024 show minimal tourist use of nearby Public Rights of Way (PRoW), with only 15% (68) of total users (451) being tourists recorded across three days and of this 15% almost This is not significant in EIA terms. This suggests limited recreational tourism reliance on the affected paths. Additionally, most local accommodation is concentrated in Woodstock, where tourism is driven by heritage and town-based attractions rather than countryside views.</p> <p>While 12 viewpoints are expected to experience significant visual effects in Year 1 post-construction, these are temporary and will diminish by Year 5, becoming not significant by Year 15. The LVIA confirms that the</p> | Socio_economics |

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| | | | <p>wider landscape character will be maintained, with mitigation planting enhancing long-term visual amenity.</p> <p>The SEIA takes a precautionary approach where data is limited and considers both direct and indirect impacts. Its conclusion—that overall effects on the visitor economy are not significant—is supported by empirical data, professional judgement, and mitigation measures.</p> <p>In summary, the assessment meets national policy requirements and demonstrates that the project can be accommodated without significant long-term impact on Oxfordshire's visitor economy.</p> | |
| REP3-120 | Stop Botley West | <p>Hydrology and Flood Risk</p> <p>2.37. The applicant has noted that there are areas of development proposed in locations at risk of surface water flooding, however they state that avoidance of all surface water flood risk areas within the site boundary is not feasible without compromising other critical project objectives or causing greater overall impacts. It is not clear however what these impacts are as no details have been provided .</p> <p>2.38. As such, we maintain that the applicant has failed to provide sufficient evidence to demonstrate that the sequential approach to flood risk has been followed. Whilst the applicant suggests that the design of the solar panels will place them above the surface water flood depths in the areas of flood risk, it has not been demonstrated that these areas cannot be avoided within the Site. Similarly, it has not been demonstrated that placement of panels in these areas will not increase flood risk elsewhere.</p> | <p>The sequential approach to flood risk management has been applied at a strategic level throughout the site design process. Areas of highest surface water flood risk have been avoided where practicable, and the placement of solar panels in zones with lower flood depths reflects a balanced approach between flood risk avoidance and project objectives.</p> <p>Where panels are proposed in areas of surface water flood risk, the design includes elevating panel structures above predicted flood levels to prevent obstruction of flood flows and to ensure the safety and resilience of the infrastructure. This approach is consistent with established guidance for solar farm developments in flood risk areas.</p> <p>The location of the site has been chosen based on numerous factors and these are detailed in the site selection process.</p> | Hydrology_and_Flood_risk |
| REP3-120 | Stop Botley West | <p>3. Applicant's Change Request</p> <p>3.1. The applicant gave notice to the Examining Authority (ExA) at Deadline 2 of their intention to submit a request for eleven proposed changes to the proposed development, as follows:</p> <ul style="list-style-type: none"> • Change 1: Complete removal of 31ha of land from the Order limits near Bladon. A further additional area of 17.6ha would remain within the Order limits but repurposed for biodiversity net gain (BNG) instead of for solar installation. • Change 2: Reduction in the Order limits of a total of 53ha in proximity to Oxford Airport, including relocating a planned secondary substation some 50 metres north of the originally shown location. A temporary construction compound would also be reorientated. • Change 3: An alternative included in the DCO so that, if the National Grid substation is provided outside of the Order limits, the space vacated would be filled with the applicant's own main project substation, with backfill of solar panels. • Change 4: Removal of solar installation from 2.7ha of land in proximity to Lower Road, though the land would remain in the Order limits, remain in agricultural use and managed for BNG. • Change 5: Removal of approximately 0.72ha of solar installation where the installation would have overlapped either Flood Zones 2 or 3 . • Change 6: In the southern site area, in the existing Order limits, an increase in the solar installation by a total of 2.41ha onto land previously thought to be Flood Zone 2 but actually falls into Flood Zone 1 . • Change 7: Removal of 0.005ha of land owned by Oxfordshire County Council in an Estates capacity. • Change 8: The Applicant original sought powers to alter the alignment of Public Rights of Way (ProW) to reflect desire lines observed on aerial mapping. Following discussion with Oxfordshire County Council, the applicant is seeking to remove those powers and stick to the adopted definitive alignments for ProW. • Change 9: Part of plot 11-29 (Siemens Healthcare Limited) are to be removed with cable routing to run to the north of that land. • Change 10: Formal recognition of the proposed community educational facility as part of the Proposed Development. • Change 11: Should the National Grid substation be delivered within the Order limits, updated parameters for that substation would be incorporated into the Outline Layout and Design Principles document. <p>3.2. The Applicant's notification letter indicates that no additional land outside of the Order Limits would be required. The letter also states that none of the proposed changes would be expected to result in any new or different likely significant environmental effects compared to those which have already been reported in the submitted Environmental Statement, albeit the applicant intends to submit an addendum to the ES relevant to the change request .</p> <p>3.3. Based on the above, the ExA have confirmed that they are satisfied that the proposed changes would not be so substantial as to amount to a materially different project .</p> <p>3.4. The applicant has offered to undertake a targeted consultation for a period of 30 days prior to formal submission of the change request. We also acknowledge that all Interested Parties will have an opportunity make representations of the changed application during the Examination. We reserve the right to comment upon the changes within these consultation periods.</p> | <p>The Applicant acknowledges this comment.</p> <p>The Applicant also emphasised when notifying relevant stakeholders of the proposed changes, that feedback is welcome prior to the submission of the Change Application</p> | Planning_Policy |
| REP3-120 | Stop Botley West | <p>Historic Environment 2.1. In their response to ExA Written Question 1.6.9, Historic England address whether the aerial views of the World Heritage Site (WHS) and wider landscape available from aircraft flying to and from Oxford Airport and RAF Brize Norton should be considered. They state that 'these aerial views can offer a unique perspective in which the relationship between the WHS and its wider landscape can be appreciated in a way that isn't possible from the ground' and advise that 'aerial views therefore could be considered as part of the</p> | <p>The Applicant can confirm that the issue of aerial views will be addressed in the next revision of ES Appendix 7.4: Heritage Impact Assessment. This revision will be prepared following the consultation on the changes set out in our Change Request 2 Notification [REP2-045].</p> | Historic_Environment |

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| | | <p>assessment'. SBW strongly agree with this position and welcome the Applicant's expanded assessment of the impact of the Proposed Development on the WHS and associated heritage assets to take account of these views.</p> <p>2.2. With regard to the views which will be obtained from the seasonal rooftop tours of Blenheim Palace, SBW agree with Historic England's position that the rooftop views do not require specific consideration, subject to the review of the visualisations that Historic England have requested.</p> <p>2.3. ExA Written Question 1.6.13 relates to the absence of a buffer zone to the WHS and whether the omissions proposed in the Deadline 1 submissions from both Historic England and ICOMOS would provide a sufficient buffer to protect the rural landscape that forms the setting of Blenheim Palace.</p> <p>2.4. It is considered that Historic England do not provide a complete response to this question. They only consider the omissions they put forward in response to Deadline 1, which were much less extensive and more focused on the area to the south of Bladon than those proposed by ICOMOS. The response to this question also appears at odds with other comments from Historic England where they have discussed the importance of the links between the WHS and its surrounding landscape. In the response to this question, they state that 'these targeted changes [i.e. the limited omission of panels from fields advised in response to Deadline 1] to the scheme would be sufficient to avoid harm to the contribution made by the rural landscape to the significance of the WHS and to the maintenance of its attributes of OUV'.</p> <p>2.5. However, elsewhere in their response to the first set of Written Questions, Historic England consider at length the intrinsic and far-reaching interrelationship between the WHS and its setting, stating that 'the influence of Blenheim, and by association the Duke of Marlborough's family, is therefore strongly felt in the surrounding landscape (Attribute 1)'. Furthermore, they go on to say that the 'estate farmland, traditional villages, extensive woodland, plantations and copses frame the WHS, which continue to reflect the land use and character of the landscape largely as it was shaped in the 18th-century (Attribute 7)'.</p> <p>2.6. It is the view of SBW that the elements of the countryside setting of Blenheim that convey and contribute to this relationship are not simply limited to the fields in closest proximity to the WHS. Historic England's proposed omissions appear to relate only to proximity and visibility, which sits at odds with their discussions around why the wider landscape is important as part of its setting, particularly given their view that aerial views which by their very nature are expansive could be considered as part of the setting study. The limited omissions proposed by Historic England do not seem to reflect the importance of the intangible and experiential elements of the wider landscape they allude to in their response and as such, the extent of removal they set out would not be sufficient to 'avoid harm' as they conclude.</p> <p>2.7. Furthermore, SBW would highlight Historic England's reference in their response to the first Written Questions to the 'time depth of the area and patchwork of historic landscape features', and their acknowledgement of the enduring and relatively little altered character of the surrounding landscape. SBW do not consider that these qualities simply terminate at the boundaries of the fields identified by Historic England and that the targeted removal of these fields only would entirely avoid harm to the contribution of the surrounding landscape. Indeed, the strength of the language and breadth of points raised about the important elements of the landscape character of the WHS's setting by Historic England does not appear to equate with the limited changes they have proposed. As such, SBW's previous concerns regarding Historic England's undervaluing of the intrinsic tangible and intangible aspects of setting as well as the intimate connection between the WHS's landscape surroundings remain.</p> <p>2.8. It is noted in the Applicant's response to ExA Written Question 1.6.13 that they have agreed to omit the fields identified by Historic England from the developable area. The Applicant continues to reiterate in their response to ExA Written Question 1.6.12 that the Proposed Development would have a 'negligible adverse' magnitude of impact based on the 'minor negative' impact on a single attribute of the OUV. This reflects their previous position that harm is principally derived from visual impacts, reiterating that 'the proposed solar farm has been carefully designed to ensure that no part of the development would be visible in any of the defined key views out of the Blenheim Palace WHS, or indeed from any location within the WHS'. SBW remain concerned that there is no expansion of the Applicant's assessment to consider the more experiential and functional elements of settings.</p> <p>2.9. In the response to ExA Written Question 1.6.16, the Applicant responds to Historic England's previous comment that the impact on the WHS would be greater than negligible in their Relevant Representation (RR-0398). They state that this comment was in relation to the impact on the Blenheim Park Registered Park & Garden (RPG) but that 'this assessment is not extended to the setting of the WHS'. Historic England state that the harm to the WHS and the RPG would be less than substantial and modest in degree. Due to the largely shared significance between these heritage assets, it is not clear why only the impact on the RPG was considered to be 'greater than negligible' and the impact on the WHS was not similarly quantified in relation to the Applicant's assessment.</p> <p>However, whether this exact phrase was used by Historic England in relation to the WHS, it does not diminish concerns they have raised about impacts on its significance and that the Proposed Development would result in harm to a heritage asset of the greatest possible importance. Additionally, in their response to Deadline 1, Historic England state that the harm to the WHS would be a significant effect; in accordance with the Applicant's ES methodology this would by implication be an impact greater than negligible.</p> | <p>The Applicant understands the principal issue raised by ICOMOS-UK in their response [REP2-069] to EXQ1.6.11 [PD-008] to be the nature and extent of the contribution of the wider rural setting of the Blenheim Palace World Heritage Site (WHS) to the identified Outstanding Universal Value (OUV) of the WHS.</p> <p>This issue is discussed in some detail in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141]. The identified 'attributes' that convey or express the OUV are set out in the 2017 WHS Management Plan Review. Attribute 7 establishes that <i>'The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it'</i> (emphasis added).</p> <p>The 'traditional English countryside and villages' referenced in Attribute 7 extend for a considerable distance in all directions from the WHS. The understanding of the contribution of the wider rural setting of the WHS to the identified Outstanding Universal Value OUV therefore requires consideration of the physical extent of the 'traditional English countryside and villages' within the setting of the WHS, i.e. at what point does the rural landscape cease to become a relevant or material part of the setting of the WHS?</p> <p>The Applicant's position on this is set out in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141]. Whilst it is not possible to simply draw a line on a map which defines the setting of the WHS, the Applicant has provided a detailed explanation in that document of how setting and sensitivity can be linked not just to intervisibility but to other factors such as land ownership (past and present) and land use. The Applicant has worked closely with Historic England on the design of the proposed development to minimise any potential harm to the OUV of the WHS, most recently in the form of the changes set out in our Change Request 2 Notification [REP2-045].</p> <p>The Applicant considers that the further removal of panels as requested by ICOMOS-UK and indicated on the drawings provided in their Written Representation [REP1-103] are unnecessary in that these changes would not lead to any reduction in the perceived level of harm to the OUV of the WHS. The Applicant accepts that much (if not all) of the land identified by ICOMOS-UK as a concern could be considered to fall within the setting of the WHS; the issue is more that how the level or nature of the contribution of that part of the setting to the OUV of the WHS.</p> <p>The Applicant does not agree that any of the land identified by ICOMOS-UK as a concern within the Southern Site Area could reasonably be considered to form part of the setting of the WHS that could contribute towards its OUV.</p> <p>Much of the land identified by ICOMOS-UK as a concern within the Northern Site Area has already seen the removal of panels as a result of the consideration of various constraints such as landscape and buried archaeology.</p> <p>Some of the land identified by ICOMOS-UK as a concern within in the Central Site Area would see the removal of panels if the changes set out in our Change Request 2 Notification [REP2-045] are accepted. The Applicant agrees that the remaining land identified by ICOMOS-UK as a concern within in the Central Site Area could reasonably be considered to form part of the setting of the WHS, but that this land makes little or no contribution to the OUV of the WHS.</p> <p>One way to examine this is to look at how other proposed developments in the area have been assessed against the potential to cause harm to the OUV of the WHS. ICOMOS-UK have requested the removal of panels from fields located to the east and north of the allocated large residential-led development known as Salt Cross Garden Village. The Expression of Interest seeking financial support from the UK Government for what was then known as the West Oxfordshire Garden Village was produced by West Oxfordshire District Council https://www.westoxon.gov.uk/media/vrcivylm/west-oxon-garden-village-</p> | |

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| | | <p>2.10. The Applicant's response to ExA Written Question 1.6.17 reiterates their reliance on visual relationships as being where the contribution of the setting of the WHS and RPG is principally vested in relation to the impact on Attribute 7 of the OUV. No further expansion of the setting of these assets in relation to other qualities is given and SBW continues to sustain their concerns around the undervaluing of these aspects and therefore the impact of the Proposed Development.</p> <p>2.11. Historic England reiterate in their response that the focus of their advice has been on highly designated heritage assets that have the potential to experience significant effects. Swinford Bridge and Hordley House are identified by the ExA as being two further Grade II* Listed Buildings that may be sensitive to the Proposed Development. These are not on the list of highly graded assets provided by Historic England in response to ExA Written Questions 1.6.24 and no further consideration of these assets is given. It is therefore assumed that Historic England do not believe that there would significant effects on these Grade II* assets, but they do not confirm whether they consider there would still be any harm to their significance. Due to their high grading, SBW would welcome clarification on this point.</p> <p>2.12. Historic England's response to ExA Written Question 1.7.27 sets out they would consider widening the PROW through the fields with solar development where the Church of St Michael, Begbroke can be experienced to mitigate some of the development. SBW would reiterate the concerns that have previously raised about the fundamental and permanent impact on the landscape qualities of the Site by the introduction of hedgerows as mitigation against the visual impact of the panels. 2.13. Notwithstanding the acknowledged high sensitivities associated with the WHS and Registered Park & Garden (RPAG) at Blenheim, SBW would highlight other designated heritage assets they consider would experience significant changes within their settings as result of the Proposed Development. A number of these are included within Historic England's scope – namely the churches at Church Hanborough, Cassington and Begbroke – but SBW are conscious that the effects on these other assets have been overlooked. These include the Church of St Michael in Cumnor and the Church of St Bartholomew in Yarnton which are both Grade I Listed Buildings. Furthermore, there are a number of Grade II Listed Buildings where the Proposed Development would result in harmful changes within their settings. The impacts on these heritage assets do not appear to have been addressed or captured sufficiently in either the Applicant's assessments or the proposed mitigation. These assets are summarised below:</p> <ul style="list-style-type: none"> •Burleigh Farmhouse (NHLE: 1198551) •Shipton Slade Farmhouse & Barn (NHLE: 1210435 & 1290426) •Lower Dornford Farm (NHLE: 1052906, 1199705, 1052907 & 1199714) •Hall Farm, Begbroke •Mill Farm, Church Hanborough (NHLE: 1283600) •Rectory Farm, Worton (NHLE: 1367912) •Old Rectory, Worton (NHLE: 1283794) •Upper Whitley Farm, Cumnor (NHLE: 1368588) •City Farm, Eynsham (NHLE: 1052428, 1198172, 1052429 & 1198161) •Swinford Bridge (NHLE: 1284764) •Hordley House (NHLE: 1283262) <p>2.14. SBW's concerns in relation to the impacts on these heritage assets being overlooked are also highlighted by the Applicant's response to ExA Written Questions 1.6.18, 1.6.19 and 1.6.20. The Applicant notes the updated Setting Assessment in relation to the Church of St Peter in Cassington, the Church of St Peter & St Paul in Church Hanborough and the Church of St Michael in Begbroke. The Applicant refers to GPA3 and cites that 'even where church towers and spires are widely visible, impacts of proposed developments are more likely to be on their landscape values rather than their heritage values'. Whilst this reflects some of the guidance relating to church spires, it fails to make clear or consider the wider context that this guidance is placed. This section of guidance from GPA3 is quoted in full below for ease: 'Being tall structures, church towers and spires are often widely visible across land and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely on the landscape values of the tower or spire rather than the heritage values, unless that development impacts on its significance, for instance by impacting on a designed or associative view'.</p> <p>2.15. It is therefore considered that the Applicant has taken a narrow view of this part of the guidance and has not acknowledged the associative views of these assets that will be affected by the Proposed Development and which contribute to their respective significance. It is also contended that the Proposed Development will impact on the significance of the heritage assets within the wider setting which they are appreciated in. Additionally, the guidance highlights that churches are 'unlikely to be affected by small-scale development'; SBW would highlight that the Proposed Development could not feasibly be described as 'small-scale'. The Applicant acknowledges that some views would be affected by the Proposed Development in their response, but continues to sustain the original assessment that their significance would be 'barely affected'; this is disputed by SBW.</p> | <p>expression-of-interest.pdf. There is no reference anywhere within the Expression of Interest to the Blenheim Palace WHS or its setting. An Outline Planning Application for the development was submitted in July 2020. The Historic Environment section of the Environmental Statement (ES) makes no mention of the Blenheim Palace WHS or its setting. In fact, there is no mention of, or consideration of, the potential for harm to the OUV of the WHS in any of the application documents or in the responses from consultees. This observation is not meant as a criticism of WODC or the applicant (for the Salt Cross Garden Village development) or the consultees; rather it demonstrates how land that could reasonably be considered to form part of the setting of the WHS does not always make a measurable contribution to the OUV of the WHS and therefore this issue is not material within the planning process.</p> <p>The Applicant notes that the changes set out in our Change Request 2 Notification [REP2-045] may result in the need to reconsider the likely impacts and effects on certain designated heritage assets. A revised assessment will be presented in the next version of ES Appendix 7.5: Settings Assessment; this will be prepared following the consultation on the change request.</p> | |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| | | 2.16. It is noted that the Applicant has submitted an updated Settings Assessment (Revision 1) which includes expanded assessments in relation to a number of heritage assets. The amendments are set out in relation to individual assets in the responses to the ExA's Written Questions 1.6.23-33. Whilst the additional information and assessment is welcomed, there are no changes to the Applicant's original conclusions and it is considered that the Applicant continues to take a narrow view of the contribution of an assets' setting to its significance. The focus remains primarily on visual considerations . An exploration of historic functional associations and the overall landscape character and qualities are given no weight or full consideration in their impact assessments. | | |

2.3 Public / Landowner

Table 2.3: Applicant's Responses to Representations provided at Deadline 2 – Public / Landowner

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| REP3-082 | Anthony Thompson | <p>Submission ID: 37158 Reference : My submission ID 36625 at D1 which was not acknowledged by Mr Dominic Hare. Whilst some of the questions in my previous submission (36625) were partly answered by Mr Hare in his D1 submission REP 1-098 he did not acknowledge my questions at D2 and still has not made it clear exactly how the financial arrangements between The Blenheim Estate and PVDP will work if Botley West were given approval. This is important because it remains unclear exactly how the charity, Blenheim Palace Heritage Foundation will benefit, what the scale of incremental benefit might be and whether that benefit is guaranteed. I would appreciate Mr Hare acknowledging my questions and answering them. The Blenheim Estate is a complex organisation with dozens of commercial and charitable entities that have been organised in such a way as to make it difficult to understand. Charitable elements of the Estate appear to be interchangeable with Commercial entities both in terms of how the CEO describes The Estate or in the actions of The Estate. I can understand how this might happen, but in the context of Botley West it is important that the issue of whether there is some form of 'public' benefit via the charitable status of Blenheim Palace Heritage Foundation is explained with more transparency .</p> <p>With this in mind, in order to ensure there is no misunderstanding and in the spirit of transparency, PINS could request that anyone speaking or writing on behalf of The Blenheim Estate be clear about which element they are representing; either 'not for profit', or 'for profit' parts of The Estate? Further, it would also be helpful in respect of potential benefit claimed in favour of the UNESCO World Heritage Site that anyone speaking on behalf of The Blenheim Estate make it clear which 'charity' they are referring to when it is stated that additional funds will flow to Blenheim Palace for repairs and maintenance if Botley West goes ahead. This is because 'Blenheim Palace Heritage Foundation' (currently the charity responsible for Blenheim Palace and its grounds) is not the same as 'The Blenheim Foundation.' Each have different objectives and funding structures. Mr Hare has confirmed in writing to me previously that Blenheim Palace Heritage Foundation will NOT directly benefit from ANY proceeds from Botley West whereas in his D1 responses he says that Blenheim Palace Heritage Foundation WILL benefit via the Blenheim Palace 1984 Maintenance Fund. However, it may help those following this line of enquiry if Mr Hare would describe which financial vehicle will actually fund the Blenheim Palace 1984 Maintenance Fund. Will it be 'The Blenheim Foundation' (a separate charity to Blenheim Palace Heritage Foundation? And if so, will the incremental funding be guaranteed for the life of Botley West? Or is it that Blenheim Palace 1984 Maintenance Fund, actually funds 'The Blenheim Foundation' which then flows funds to Blenheim Palace Heritage Foundation? There is an urgent need for transparency.</p> | <p>The IP's remarks are directed at Blenheim Estate. The Applicant has a commercial relationship with BE which gives it a level of understanding about its organisation. "Blenheim Estate" is an overarching collective description of the entities related to Blenheim and the Spencer-Chruchill family. The Blenheim Palace 1984 Maintenance owns some of the land under option to the Applicant, so will benefit from the flow of rent should the DCO be granted. Under the terms of its heritage designation it is required to remit its net income to fund the World Heritage Site. It does this by remitting the funds to the Blenheim Palace Heritage Foundation. As an HMRC approved heritage maintenance fund, the 1984 Fund reports its income each year and identifies what projects were funded to preserve the WHS. The Blenheim Palace Heritage Foundation delivers all conservation at Blenheim Palace and Park.</p> | Community_Benefits_and_Impacts |
| REP3-082 | Anthony Thompson | <p>Submission ID: 37158 Mr Hare is also in a position to make the following very clear: What the terms of the land options agreement with PVDP consist of. Specifically, what is the position of The Blenheim Estate in respect of Compulsory Purchase Order powers . That the Applicant is seeking Compulsory Purchase Order powers as part of the application seems at odds with one of the main arguments the Applicant was making during consultation that the key reason they were proposing the utility scale solar power station in West Oxfordshire rather than anywhere else, was because they had a willing landowner owning 95% of the land required. If the land options agreement between Blenheim and PVDP were made public it would become clear whether CPO powers are necessary or desirable by either party</p> | <p>Details of any private agreement with a landowner or 3rd party cannot be made public due to the confidentiality of any such agreement. Compulsory acquisition powers in the DCO provide for a statutory backstop so any rights can be secured if the voluntary agreement fails or becomes unenforceable across the scheme. The CA powers also allow for the extinguishment of potential 3rd party rights that private agreements cannot deal with alone.</p> <p>Compulsory powers are sought across the whole of the development for Permanent Freehold Acquisition, Permanent New Rights and Temporary Possession of land. While an agreement with the Freehold owner might be in place, rights over those areas, or to 3rd parties may need to be</p> | Land_Agreements |
| REP3-082 | Anthony Thompson | <p>Submission ID: 37158 Which Blenheim Trusts own the land on which Botley West sit and what proportion of the funds flow will be to the benefit of 'not for profit' versus 'profit' entities within the Blenheim Estate .</p> <p>In any other circumstance such questions relating to this level of transparency would be unusual given the private nature of the various Blenheim Trusts and Companies. However, The Blenheim Estate cannot expect complete privacy when they have such a complex corporate structure that has fully integrated entities with charitable status which enjoy considerable tax efficiency and relief. As I stated in my D1 submission ID 36625, The Charity Commission website explains that Blenheim Palace Heritage Foundation is 'for the benefit of the public and mankind. This would suggest that full transparency in terms of the financial structure of Botley West as it relates to The Blenheim Estate is a reasonable request</p> | <p>Please see answer about Blenheim Palace Heritage Foundation above.</p> | Community_Benefits_and_Impacts |
| REP3-088 | Bojan Ivanovic | <p>Dear Sir/Madam, BWSF Inspectorate, I note that Botley West has made certain adjustments to its proposed scheme. However, it is apparent that my previous objections — specifically those concerning the demonstrable and material risk of flooding — have not been adequately addressed, nor does it appear that the supporting evidence I submitted has been given due consideration. In particular, I refer to the significant flooding risk in the vicinity of Jericho Farm Barns and along Yarnton Road, which has been evidenced and raised previously. I therefore seek clarification on the Planning Inspectorate's position with respect to this specific objection, and whether the matter has been properly assessed within the current iteration of the proposal. Regards, Bo Ivanovic</p> | <p>ES Volume 3 Appendix 10.1: Flood Risk Assessment [REP3-020] has been prepared in line with national and local planning policy which discussed the existing flood risk and in the context of the development. This includes consideration of climate change in the sequential design of the solar farm and the conceptual surface water drainage strategy. It demonstrates that the development will not increase flood risk and meets the requirement of the NPPF and NPS EN-1. Solar panels and</p> | Hydrology_and_Flood_risk |

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| | | | ancillary infrastructure (including PCS units, temporary compounds and Transformers (Secondary Substations) have been sequentially steered to areas of low risk of flooding (including Flood Zone 1). | |
| REP3-091 | David Foster | <p>Unique Reference number is: 20051823 REF: EN010147 Botley West Solar Farm Representation: Feedback to PVDP Change Dear Inspectors Further to my first submission on 5 th June, I would like to feedback on the proposed PVDP change proposal .</p> <p>PVDP Proposed Changes I welcome some of the PVDP changes, although very frustrated at the route it has taken to force the change. My areas for concern however are as follows: 1. My observation having walked the fields with reference to the proposed changes, is that If PVDP conceded the two fields outlined with the red outline, then most of the concerns would be removed, and the current natural environment would be maintained. The main walks of Bladon, and visitors to Churchill's Grave, is down Orchard Field Lane and across two footpaths towards St Martin's Church, the main one being the furthest pathway which runs along the Rowel Brook, and ends up at St Martin's Church. The hedge row is mature and would act as a natural barrier to the solar panels behind. This would provide a 30 – 45 minute walk without observing any solar panels. My concern is the concentration of walkers from their regular 30 – 60 minute walks to the narrow section of fields now proposed.</p> | The Applicant acknowledges concerns in REP3-091 about changes to walking behaviour and the impact on the natural walking experience, particularly along Orchard Field Lane and paths to St Martin's Church. While no further solar infrastructure will be removed in this area (beyond that set out in the Applicants Change Request Notification [REP2-045]), the Applicant recognises the route's community value and will maintain public access across the Order limits, including paths within and around the solar arrays. To ensure a positive and accessible walking experience, the Applicant will reflect feedback from regular users in detailed management plans—namely the Landscape and Ecology Management Plan, the Landscape, Ecology and Amenities Plan, and the PRow Management Strategy. These plans will include measures such as hedgerow retention, screening, signage, and route connectivity, and will be submitted to the relevant Local Authorities for approval before construction begins. The Applicant remains committed to ongoing engagement with stakeholders and the local community to ensure the final design and site management align with local priorities and minimise disruption to valued walking routes. | Public_Right_of_Way |
| REP3-091 | David Foster | 2. My concern is the migratory nature of the deer located within the woods. Deer are regular visitors to the fields behind Grove Road, Bladon, and can be seen in the adjoining fields. It would be good to get some expertise to see how animals living in the woods could travel from the woods across to fields they currently inhabit. The ICOSMOS proposed plan for the area around Bladon Heath Wood and Begbroke offers some protection in the fields surrounding the woods and Begbroke. | The Ecology Strategy for the Project, set out in section 7 of the oLEMP [REP3-034] sets out that a key goal is to main connectivity across the Project site between woodlands and other features through the delivery of buffers to all linear features such as watercourses and hedgerows. As such, it is not anticipated that deer in woodlands would be isolated from areas of grassland. | Local_Ecology_and_Nature |
| REP3-091 | David Foster | 3. The addition of the ICOSMOS buffer zone around Begbroke and Bladon Heath Wood would extend the Bladon walk 60 minutes. A main walk is between St Micael's Church across the pathway to Heath Lane, or via the woods, which both come out at Heath Lane. This then drops down through the fields for options of St Martin's Church, or back towards Orchard Field Lane. | With regard to the omissions suggested by ICOMOS-UK, please refer to Q2.6.3 of the Applicants Response to ExAs Second Written Questions [EN010147/APP/14.2] . Taking this into account, there would be no extension to the walking route at this location as a consequence of the suggested ICOMOS-UK buffer zone around Begbroke and Bladon Heath. | Public_Right_of_Way |
| REP3-091 | David Foster | 4. 500m buffer zones need to be put in place for all properties which face onto the proposed Solar Farm across the whole application. The current changes are very much focussed on the view from the Palace, from guidance from English Heritage and ICOMOS. The surrounding 15 villages affected by the solar farm should have the same focus as Bladon. | Visual effects upon individual properties are considered in the Landscape and Visual Impact Assessment [PDB-006] . This has been tested through design iterations and landscape mitigation. | Project_description_and_Design_parameters |
| REP3-091 | David Foster | <p>In summary, the removal of two more fields marked in the image provided, along with the ICOSMOS recommendation, would see the current Bladon walks unaffected. Investigation is required to ensure that migrating deer/animals from the woods are not affected by the solar farm. Buffer zone protection for the wider villages needs to be in line with that offered to Bladon .</p> <p><i>[Summary of Points 1-4 Above]</i></p> | This is noted and points 1-4 have been answered above. | Community_Benefits_and_Impacts |
| REP3-092 | Elizabeth Begley | Submission ID: 37135 I strongly support West Oxfordshire District Council's written representation to the Examining Authority on Botley West Solar Farm Proposals dated 4 June 2025 and its conclusion that this application should be substantially downsized and that, in its present form "....would be detrimental to many of the special and protected characteristics that make West Oxfordshire such a special place to live". The harm that would be caused to PRowS, wildlife habitat/nature conservation, landscape/historic environment, economy (in terms of tourism), flooding, physical/mental health of residents, loss of green belt, loss of productive farmland, far outweigh any positives. | <p>This is noted.</p> <p>The size of site was an alternative considered by the Applicant and is explained at [APP-042].</p> | Needs_Case |
| REP3-092 | Elizabeth Begley | It is also extremely concerning that the worrying issues around its proposed funding, as raised in Parliament in June 2023 and elsewhere, seem to have received little, if any, of the scrutiny which one would expect for a National Infrastructure project | There are no worrying issues around funding as about 90% of the applicants liabilities are inter-company loans ultimately financed by the shareholders. | Funding_and_PPA |
| REP3-093 | Forever Fields | Submission ID: 37146 Reference REP 2.028 Applicants Responses to D1 Submissions Submitted at Deadline 1 REP 1 - 101 Forever Fields Book: Acknowledgement . | The Applicant attended the exhibition upon which the book is based and spoke to Mr. Thompson and a number of the artists present. They acknowledged the work involved, as well as asking attendees whether they saw climate change as being a threat to the landscape depicted in the exhibition. | acknowledgment response required |

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| | | <p>The Forever Fields Book is 155 pages long with contributions from over 100 artists. The Exhibition was visited by 1200 people, over 250 of whom made written comments and asked questions that are also contained in the book. It is a significant piece of work .</p> <p>Art is a powerful way of understanding how people are feeling about an issue that is important to them. Creating art is not a simple straightforward process - it takes time, care and consideration. An art exhibition with a singular focus with contributions from over 100 people; both professional and non professional, all offering their work for view unpriced and not for sale, is an unusual and important event. It represented an enormous amount of work and effort by the local community and reflects how seriously they view the potentially negative impact of Botley West in its current proposed form .</p> <p>This is why we expect the applicant to review and comment on the content of the Forever Fields Book and Exhibition, as it could be helpful to them in more accurately assessing the impact of Botley West on local people and their way of life .</p> <p>The applicant has not addressed specific questions raised in the Forever Fields Book, or seriously acknowledged the scale of the exercise undertaken by local people in creating this unique response to the application. Ultimately we hope that Forever Fields will influence the design and size of the proposal to be more appropriate given the negative impact this utility scale solar power station would have on such a sensitive, predominantly green belt area .</p> <p>Forever Fields therefore requests more than just an 'acknowledgment' that the book has been submitted. We request a serious response to the serious questions it raises.</p> | | |
| REP3-094 | Frances Stevenson | <p>Submission ID: 37122 Comments on the submission by the Applicant at D2: Notification of Intention to Submit a Request to Change the Application 2 .</p> <p>I look forward to seeing detailed information about the proposed 'community' food growing initiative and education facility when the Change Request is submitted. At this point I have the following comments .</p> <p>The Applicant intends to remove the solar installation area, fence, maintenance roads and gates from the fields to the south-east of Bladon in order to preserve the visual setting of the Blenheim Palace World Heritage Site, as advised by Historic England. At the same time the Applicant proposes to construct an educational facility building on the same area of land. Surely the rationale for refraining from installing solar infrastructure should preclude the construction of an education facility building?</p> | The educational building was included in the scheme at the request of OCC. | Community Benefits and impacts |
| REP3-094 | Frances Stevenson | <p>The proposals for so-called 'community' food growing and for the education facility have not been informed by consultation or dialogue with the local community (as I outlined in my comments on the Applicant's responses to Q1.16.8 and Q1.16.21). A locally-informed and more locally-appropriate plan for the use of land that will not be used for solar panels and other infrastructure could be achieved if the proposals were submitted through the Local Planning Authority process .</p> <p>Surely proposals for initiatives that are not an integral part of the solar farm should be subject to the usual Local Planning Authority process rather than being subsumed in the DCO application for the solar farm?</p> | The community food growing areas were consulted on at the Phase 2 consultation and are part of the mitigation scheme for the solar panels. They are part of the biodiversity net gain (BNG) plan [APP-235] . They are therefore part of the DCO application. | Planning_Policy |
| REP3-095 | Frances Stevenson | <p>Comments on Applicant's response to Q1.16.8: Community food growing areas The Examining Authority asked the Applicant how the scale of the initiative was decided upon and what consultation was undertaken with local stakeholders.</p> <p>I would like the ExA aware that there has been no consultation with the local community about the scale or any other aspect of the proposed 'community' food growing initiative.</p> <p>The Applicant's response states it consulted on the proposals at the Statutory Consultation; however the information provided at the statutory consultation was too minimal to enable adequate or meaningful consultation.</p> <p>The Applicant's response indicates some food producers were consulted but it should be noted that none are from the local community.</p> <p>The only reference to the views of stakeholders in the local community is the Applicant's claim that: 'the village of Bladon expressed interest in establishing an area for allotments, given current high demand and limited availability in the village'.</p> <p>It is unclear who the Applicant is referring to as 'the village of Bladon'. Existing groups that might represent the village on this subject are Bladon Parish Council, Bladon Gardens Society and Bladon Allotments Association. I have spoken to each of these groups and all confirm that they have not been approached or consulted by or on behalf of the Applicant for their opinion on the community food growing proposal.</p> <p>The Chair of Bladon Allotments Association, which is responsible for managing the existing allotments site in Bladon, also explained that the provision of allotments in Bladon is roughly in balance with demand. Occasionally there may be a waiting list of one or two people but usually for less than a year. The facts do not support the Applicant's claim that there is high unmet demand for allotments in Bladon.</p> <p>It should also be noted that while the Applicant claims the village of Bladon expressed interest in establishing more allotments, their proposal does not reflect this: the community food growing proposal does not include any allotments for the local community. The rationale for the proposal remains opaque</p> | The community food growing areas were consulted on at the Phase 2 consultation. Cherwell Collective and Cutteslowe larder were stated as potential growers. All are local and will benefit the local communities. Cherwell Collective has clients whom it supports in all the villages adjacent to the solar farm. The Applicant welcomes approaches from anybody interested in growing food in the food growing areas. | Community_Food_growing_Location |

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| REP3-095 | Frances Stevenson | <p>Comments on Applicant's response to Q1.16.21: Education facility building The ExA asked how the possible location for the education facility was selected and what level of consultation was undertaken with local stakeholders about the location.</p> <p>The Applicant's response to the ExA's question states it has had discussions with OCC. However I would like the ExA aware that there has been no consultation with the local community about the location or any other aspect of the proposed education facility. As the Applicant's response states, they intend to permit community involvement only after consent is obtained and only for refinements to the design and location.</p> <p>It would be reasonable to expect the Applicant to have consulted Bladon Parish Council as well as the County Council.</p> <p>However the Parish Council confirms it has not been approached or consulted by the Applicant for their opinion on the educational facility proposal.</p> <p>The education facility proposal does not reflect a wish or need expressed by the local community and does not benefit from the knowledge of the local community. For instance, if the Applicant had consulted the local community about the potential location mentioned, they would know that the narrow access lane that serves the school does not offer suitable vehicular access to the land proposed for the education facility building as the Applicant claims. The history of planning discussions and applications linked to this lane confirms this.</p> | The educational facility was requested by OCC after the Phase 2 consultation had finished. It is being consulted on in the current targeted consultation, to which Bladon PC have responded. | Community_Benefits_and_Impacts |
| | Frank Watt | <p>Re: Botley West Solar farm project. Errors in document EN010147-001239: Applicant's Change Request 2 Notification? Dear I am an interested party in the proposed Botley West solar farm (I live at 2 Hall Farm Paddocks, Begbroke, OX5 1FW, which is adjacent to the proposed solar farm site). I am of course worried about the solar farm project, since this will alter the quality of life for the residents of Begbroke, particularly of Spring Hill Road and Hall Farm Paddocks .</p> <p>I was particularly interested in the report from the BBC on the 5th June 2025 stating that the fields around Oxford Airport were subject to a reduction in solar panel construction by a total of 10 hectares, due to safety concerns. However, so far we have been unable to determine the extent of the changes in the proposed reduction in solar panels? I was therefore particularly interested in the document EN010147-001239-Applicant's Change Request 2 Notification, sent to you by Photovolt Development Partners GmbH (PVDP) on behalf of SolarFive Ltd, and dated 1st July 2025: In this report we assumed that the changes pertaining to the region around Oxford airport would be addressed. Disappointingly, the relevant part of the document pertinent to us, appears to be wrong or at best confusing. Let me explain further .</p> <p>On Page 26 of EN010147-001239 (shown below), on the right hand side there is a map of the region under consideration depicted as a blue rectangle, and this blue rectangle encompasses Hall Farm Paddocks. However, the main figure bears no resemblance to the area depicted in the blue rectangle! In my opinion the map is completely incorrect or at best confusing? <i>[Please refer to full WR containing the image referred to]</i> .</p> <p>I note that contained in letter EN010147-001239 is the statement '....The Applicant trusts that this letter is useful to the ExA in setting out the intention of the Applicant to submit the Change Application and providing an overview of the scope and nature of the changes proposed....' In my view, this letter does not adhere to the principle of transparency, and worse, if the letter contains factual errors then how can we ascertain the validity of the proposed changes? May I request clarification of the proposed changes to the planned solar farm around Oxford Airport, since this is very relevant to the quality of life of myself and my neighbours. Thanks Professor Frank Watt Email copies to Stop Botley West.</p> | The Change Request 2 submitted by the Applicant on 1 July 2025 sets out a reduction of approximately 53 hectares to the Order Limits in the vicinity of Oxford Airport, including the removal of around 41 hectares of proposed solar installation. These revisions are specifically intended to address operational safety concerns raised by Oxford Airport and other stakeholders. The full extent of the revised Order Limits will be included in the formal Change Application along with a complete and corrected suite of updated plans. | Project_description_and_Design_parameters |
| REP3-097 | Harry St John | <p>My Name is HARRY ST JOHN.</p> <p>My IP ref no is 20054858 I have made various representations to the EXa process and my most recent ones were numbered REP 1 -147,148 and 149. (Submission ref 36928) and then Rep 2 -107 and 108.</p> <p>My Rep3 Below are a summary of further points and questions that arise from what has been said by various parties up to 1st July in response to the Exa Inspectors Questions.</p> <p>National Grid Electricity Transmission Rep 2- 076 In their response to the EXa Inspectors questions, it is clear that NGET don't expect to complete their sub station, that would connect the whole project into the 400KV grid line near Cumnor/Farmoor, until the end of 2029 assuming they manage to obtain planning consent for the substation from The Vale of White Horse planning committee.</p> <p>The VoWH planners have stated that as yet no formal pre application discussions have started with NGET which is somewhat surprising given we are now in the second half of 2025.</p> <p>Compare this timeframe to the Applicants one (in Rep2-025 para1.3.6) who estimate their project would be built and ready to connect up to the Grid by the new extended deadline of October 2028 when their Licence to connect expires - that seems mighty ambitious given they have yet to put funding in place to meet the build cost -c. £900 million, by the middle of next year to enable work to commence in early 2027.</p> <p>There appears to be gap of at least a year between the Licence expiry and the NGET substation being commissioned - and NEG T may also have to exercise compulsory powers to acquire land for their substation - all which may delay matters still further.</p> <p>No doubt the Inspectors will examine this glaring mismatch further.</p> | As set out in the Grid Connection Statement [APP-019] the Applicant signed a Bilateral Connection Agreement with NGET in September 2021. The connection date does not indicate expiry of the contract. After signature NGET asked to change the connection date, which the contract allows for, using an Agreement to Vary. The new connection date is now the subject of negotiation between NGET and the Applicant, with the connection date likely to move to Q1 2029. The Applicant has included a site for the NGET substation within its order limits in case NGET is unable to obtain consent for its site. | Grid_Connection |

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| | | I am not sure if the Applicant has actually produced the Connection Licence extension document in evidence of the new date of October 2028. If they have not, one assumes they will be asked to produce it. | | |
| REP3-097 | Harry St John | The applicant's answers in the Applicant's response REP2-025 - A number of answers are not given at all. Many are vague and or merely repeat material from earlier documents with little robust explanation. No doubt the Inspectors will hold the Applicants feet "closer to the fire" on anything missing | The Applicant notes Mr St John's comment. | acknowledgment response required |
| REP3-097 | Harry St John | <p>Compulsory Acquisition issues (see paras in section 1.5) On the question of lack of clear comparison of alternatives, the Applicant has produced little concrete evidence - for example the simple solution of just omitting some land from the scheme and compulsory acquisition - such as the land subject to restrictive covenants at Mill Farm Lower Road - in that case the potential overall reduction in private loss far exceeds any public benefit or significant loss of energy generation - given the enormous size of the remaining site where the three principal land owners are all willing parties and have signed up to lease or sell their land via binding agreements - as stated clearly by all the parties.</p> <p>Their land will not need to be acquired compulsorily - no landowner would renege on the deals they have entered into for risk of being sued for specific performance and massive damages.</p> <p>Their land alone is ample to deliver a viable power station envisaged albeit now slightly reduced as a result of the Notification of change issued recently.</p> <p>So if the timeframes are tight, as it seems they are, it surely makes sense to avoid extended arguments and delays over whether or not CA powers should be granted in the DCO to acquire rights that are of very significant value to the adjacent owners.</p> <p>The Applicant has partially recognised the problem and reduced the panel area immediately adjacent to Mill Farm but about another similar area subject to the same restrictions remain and should be removed too.</p> <p>The Applicant do not appear to have made a reliable assessment the potential private loss faced by the owners of Mill Farm or any other properties similarly affected - if they had, they would have sent a professionally qualified RICS valuer to visit the property by appointment to assess the before and after values. No such inspection has been done or requested at Mill Farm. As I have said previously, no clear evidence has been produced of the Applicants ability to pay for compensation to anyone entitled to make a compensation claim. The Inspectors have still no concrete evidence backed up with appropriate paperwork. The S o S will require such evidence to reach any decision. here has to be compelling evidence that the public benefit of the project exceeds the private loss exercise of CA powers would incur - in the subject case, as the vast majority of the site will not actually be acquired under compulsion then where is the compelling case to justify the use of CA powers for the actual benefit of the three principal landowners and the Applicant? This is not what Parliament envisaged when agreeing to empower Ministers with powers of compulsion.</p> | <p>The majority of the site is already covered by voluntary agreements with willing landowners, and the Applicant's strong preference is always to proceed on that basis for those agreements that are outstanding. However, the inclusion of compulsory acquisition powers in the DCO is a standard safeguard on NSIPs. It ensures delivery certainty in the event of unforeseen issues such as changes in ownership, third-party rights, or covenants, and provides the legal assurance required by funders and the Secretary of State. Importantly, the existence of these powers does not mean they will be exercised where agreements are in place.</p> <p>The Applicant has also submitted a Cable Optionality Report at Deadline 4 which summarises the need for the cable optionality being sought and the corresponding compulsory acquisition for that optionality. This makes reference to the balance of private loss against the public benefit of the Project and explains what legal controls are in place to manage the scope of that optionality.</p> <p>In relation to Mill Farm, the Applicant has agreed that the formal change application will reduce the redline boundary to remove the entirety of the land at Mill Farm which is subject to the restrictive covenants, and therefore have recognised the feedback and have agreed to extend Change Number 4 as described.</p> <p>A full summary of the Applicant's alternatives in accordance with national policy is set out in Chapter 5 of the ES [APP-042].</p> | Land_Agreements |
| REP3-097 | Harry St John | The applicant seeks to rely on landscape enhancement as a public benefit - a statement which truly beggars belief - given the comments of Historic England, ICOMOS, the host authorities LIRs and many hundreds of local residents. The removal of 100 hectares of land from the scheme is a clear admission of guilt. Equally astounding is the claim that the scheme would significantly improve Biodiversity Net Gain and thus be a public benefit. | The Applicant acknowledges the concerns and comments raised in REP3-097. | Landscape_and_Visual_Impacts |
| REP3-097 | Harry St John | Furthermore, claiming enjoyment of the local PROW system within the site would barely be impacted is equally totally ignoring reality or understanding of the facts. Granting a new but permissive right of way for 40 years might qualify but only as a marginal temporary benefit. | The Applicant's Responses to Relevant Representations [REP1-020] response sub-issue 'Access to open space, public rights of way, recreation, and physical activity' (pdf page 74 of 545) explains that the ES Chapter 16 Human Health assessment [APP-053] does not downplays the adverse effects to the PROw network for public health. It also explains the mitigations secured, including the approach to creating greenways (with width, hedges, trees and trail/signage) that promote the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The Chapter 16 assessment [APP-053] paragraphs 16.9.78 to 16.9.85 explain the assessment conclusions, including not overstating the minor benefits of the permissive paths. | Public_Right_of_Way – reallocated to Human Health |
| REP3-097 | Harry St John | <p>BMV and other related soil issues paras 1.9 and 1.11 The repeated obfuscation over the amount of BMV land - of which the site we now know contains over 41% before the proposed removal of around 250 acres around Bladon and south west of the Oxford airport runway - the majority of the land proposed to be taken out being grade 3b, which will result in the proportion of BMV land remaining in the scheme increasing to nearer 45% - this represents a flagrant attempt to bypass well established Government policy to protect BMV in the long term national interest for food security. That approach has been directly contrary to National Policy, the public interest and a potentially significant loss of public benefit.</p> <p>After 40 years under panels and inevitable lack of sunlight etc, nobody knows what state the soil might be in; the land drainage will certainly have been compromised as a result of cable trenching and panel table piles being driven deep</p> | With regard to the amount of BMV within the Order Limits, please refer to Q2.11.4 of Applicant's Response to the ExAs Second Written Questions [EN010147/APP/14.2] . In addition, the Applicant acknowledges the importance of food security and reiterates that, as stated in ES Chapter 6 - Project Description [APP-043] and the Outline Landscape and Ecology Management Plan [APP-235] , agricultural land use within the Project site would be retained during the operation and maintenance phase in the form of conversation grazing. | Agricultural_Land_Use |

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| | | <p>into the ground and then removed 40 years later, let alone the panel and fence replacement exercise necessary around 25 years hence and all the heavy vehicles running up and down panel corridors for 40 years in all weathers.</p> <p>In my experience reinstating land, the land Grading will be reduced permanently and soils are likely to take many years to recover maybe never.</p> | <p>With regard to soil compaction, please refer to Q2.10.6 of Applicant's response to the ExAs Second Written Questions [EN010147/APP/14.2], submitted alongside this Deadline 3 response document.</p> <p>With regard to underground cables and land drainage, please refer to Q2.11.9 of Applicant's response to the ExAs Second Written Questions [EN010147/APP/14.2].</p> <p>With regard to the ALC grade and reinstatement of land following decommissioning of the Project, please refer to Q2.11.8 of Applicant's response to the ExAs Second Written Questions [EN010147/APP/14.2].</p> | |
| REP3-097 | Harry St John | <p>Para 1.11.2 Blenheim are not party to the DCO document or conditions imposed - so how are they tied into the land and hedge management plan to deliver the land and hedge management in its various guises should the operator go bust or disappear or owners die? In the same way the agreed lease between the applicant and Blenheim Estate may have a guarantee bond arrangement built in to ensure delivery of land reinstatement - should not the Examination be shown the relevant wording to enable the Inspectors to be confident that that work will be delivered - come what may in 40 years time when most of the protagonists involved in this examination will be either long retired or many cases long dead.</p> | <p>The Outline Landscape and Ecology Management Plan sets the overarching vision for the Project and the principles to deliver coherent landscape and ecological features and management. The obligations within the document are secured through a requirement in the Draft DCO [APP-015].</p> <p>The Applicant is lawfully responsible for ensuring the requirements of the DCO are implemented but will be entering arrangements with a range of contractors and landowners regarding how specific aspects of the DCO will be managed. Blenheim Estate have declared an interest in the management of the land and BNG and have developed Memorandum of Understanding with the Applicant Memorandum of Understanding</p> <p>The content of commercial agreements is confidential. Financial security for delivery of decommissioning and reinstatement will be in place for the term of the lease.</p> | Land_Agreements |
| REP3-097 | Harry St John | <p>Paras 1.5.21 to 30 in Applicants response Where is the evidence that professional RICS Red Book qualified valuers have assessed the likely levels of compensation that might arise? It seems more than likely that if any such work has been done it would have been a desk top exercise, as no formal inspections have been made as far as myself others are aware.</p> | <p>The level of compensation was assessed by a RICS Accredited Surveyors in accordance with the Compulsory Purchase Code. The report is excepted from the mandatory requirements of the RICS Valuation - Global Standards (the Red Book), see "VPS 1-5 exceptions" by virtue of Professional Standards 1, paragraph 5.4, given the advice is in respect to performing a statutory function, being CPO.</p> | Land_Agreements |
| REP3-097 | Harry St John | <p>Which shareholder has advanced £11m to the applicant and on what basis for repayment ? Why doesn't this loan appear in the 2022 accounts? The applicants have promised to provide audited accounts to the end of 2023 -surely that should be end of 2024 if we and especially the S of S are all to fully understand the current financial standing of the applicant. Is PVDP an engineering company or an environmental consultant? They seem to infer both. Both Solar Five Ltd and PVDP are controlled by Herr Gerstmann and his equal shareholder in Cyprus. It is a mystery why Herr Gerstmann has not volunteered to or been invited to give evidence on his companies financial standing and funding preparations. Given they hope to start construction in early 2027, if the scheme were to be approved, one would have expected them to have had serious discussions with lenders/investors by now and maybe even in principle commitments in place from a number of potential lenders and/ or investors who are out there seeking renewable energy projects to back.</p> | <p>The shareholders of the applicant are Lockend Services Ltd holding 50%, owned by Peter Gerstmann while the remaining 50% are held by Julia Lejeune. Inter-company loans, such as mentioned 11m GBP, are provided by Photovolt Development Partners. Further to Note 6 of SolarFive Ltd.'s Financial Statements as of December 31, 2023, the amounts owed to associated companies had amounted to 8,513,573 GBP on December 31, 2023 and to 3,850,020 GBP on December 31, 2022. SolarFive Ltd. FY 2024 financial statements will be disclosed in due course, i.e. nine months after the year end in September. They will comprise of the aforementioned 11 mil GBP plus further inter-company liabilities.</p> <p>SolarFive Ltd will provide audited financial statements when being obliged to do so under Section 477 of the UK Companies Act. With a turnover of not more than £10.2 million, at present the company is exempt from the requirements of this Act relating to the audit of accounts. SolarFive Ltd.'s FY 2024 financial statements will be disclosed in due course, nine months after the year end by September 2025.</p> | Funding_and_PPA |

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| REP3-097 | Harry St John | Latest Ministerial letter and Energy Select Committee report I attach these two documents that were published either side of the 1st July Exa deadline, as some people may not have seen them. The Minister's letter makes specific reference to community benefit which the Government says it will make mandatory shortly. I hope this letter and report can be included in your evidence. | Through its membership of Solar Energy UK the Applicant has been part of the consultation with DESNZ on community benefit funds. The community benefit fund is not part of the planning balance but will be agreed with the OHAs should consent be granted, at a figure of £525 per MW. | Community_Benefits_and_Impacts |
| REP3-097 | Harry St John | I would also draw the Inspectors attention to a very recent court decision in Scotland (also attached) - which is pertinent to the periods when wind farms are paid not to generate electricity when there might be too much electricity in the grid - via the Contracts for Difference system run by the Governments wholly owned company Low Carbon Contracts. I am unclear whether, for the same reason, solar farms can be shut down if there is too much electricity in the grid - one can stop a wind turbine turning but can you stop PV panels generating when its sunny, especially if you do not have any battery storage available as is the case here? Perhaps the applicant could be asked to explain how that would all work in this project. | Electricity generated will be exported directly to the grid, with balancing and curtailment managed by the relevant network operator in accordance with the Grid Code. National Grid or the distribution network operator retains full authority to instruct temporary reductions or shutdowns in generation output to manage grid capacity. | Principles_of_Solar_Development_and_Amount_of_Electricity_Generated |
| REP3-097 | Harry St John | <i>[summary of above responses]</i> Conclusion It remains clear that, despite the reduction of the site to allow for the closer setting of the WHS, this scheme is still way too large in the wrong place in planning terms, on the wrong sort of land - almost 45% of it being BMV land. In addition the compelling case for CA powers is clearly not proven. The applicant is of a questionable status in respect of the sort of funding anticipated. In short the S of S should be recommended to refuse this application and therefore I respectfully ask the Inspectors to make such a recommendation. Harry St John July 22nd 2025 | This is noted. | Acknowledgment response |
| REP3-098 | Harry St John obo Roderick and Christine Cooke | Comments on the Applicants Responses to the EXa first questions by July 1st 2025 etc REP 3 - On behalf of Mr and Mrs R Cooke of Background Mr and Mrs Cooke first purchased [REDACTED] . BE retained most of the land he had rented but sold the house, farm buildings and some land to the Cookes. The farm had been rented by at least two generations of the Margetts family since before WW2; [REDACTED] also owned their own freehold land nearby in Long Hanborough, [REDACTED] had been a working farm for many years, as the mill had long ceased to be operational. So, contrary to the Applicants claim, [REDACTED] has been part of a small working farm for many years. The Cookes run a small beef suckler herd . In 2005/6 I acted for the Cookes in a negotiation with the BE to buy some more of their adjoining land and buildings; there was quite a lengthy negotiation which resulted in the Cookes purchasing the red verged land in the conveyance of July 2006 (see attached). The purchase price was substantially higher due to the Cookes seeking to buy more land adjoining but BE not being willing to sell . However a happy compromise (driven by the enlarged consideration) was achieved at the time, because BE agreed to impose a restrictive covenant on their adjoining (reserved) land that would, as far as the Cookes were concerned, ensure that nothing but agricultural use could be made of that reserved land in perpetuity . The restrictive covenant on the reserved land The covenant stated "...that the Vendor/Transferor would not erect any buildings on the Reserved land - and for the avoidance of doubt this included huts, greenhouses, sheds and barns." Whilst that list does not specifically include solar panels (as the concept of such a use was in its very early stages and not widely in common use), it is clear that the definition of a building can be either permanent or temporary and unless the context otherwise requires, it includes other structures or erection of whatsoever kind or nature (whether temporary or permanent) . As such, arrays of metal tables, secured on spikes drilled deep into the ground as stabilisers, and supporting solar photovoltaic panels plus any inverter shed type structures would fall into the definition and thus be precluded. If greenhouses were banned, it seems equally logical to include acres of solar panels on supporting tables - all made of glass like silicon panels and metal . When one considers the facts, the parties had in effect agreed that nothing would be put on the reserved land that could detract from the unique rural and riparian setting of Mill Farm and its long views out over the Evenlode valley, near to Oxford - property characteristics that are always high on any criteria list of discerning, wealthy and very particular purchasers (some international) known to be seeking such properties in such popular and convenient locations. This applied in 2006 as it does now . In this subject case, planning consent has to be obtained for all the land within the BW application because, as defined by the 1990 T&CP Act, it involves "engineering works in over or under land and making a material change of use of the land" - from agricultural to solar farm power station . So there is a physical change of the appearance and use of the land involving structures made of metal and glass standing up to 2.3metres high - a typical height for a green house as it happens . Added to this 65 miles or so of 2 metre high fencing. Again such, a dramatic change of use and appearance, as is contemplated, completely conflicts with what objectives were envisaged/agreed/accepted between the parties back in 2006 . So it is not unreasonable to expect any action, brought in a civil case for an injunction/breach of covenant in a Court, to uphold the clear intention of the parties and in turn enforcing the restricting effect of the covenant. This agreement was reached less than 20 years ago by the same parties - not 100 years ago and parties long gone; there are ample | Opinion acknowledged | Land_Agreements |

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| | | <p>legal precedents indicating that such recent covenants - where there are clear dominant and subservient tenements involved (as is the case here) involving well defined benefits for the dominant property ie - should be enforced .</p> <p>Given the actual facts here, it would not be surprising if the Court were to grant additional exemplary or punitive damages to reflect the potential blatant breach of covenant by Blenheim Estate by agreeing to lease the land to Solar Five Ltd for the solar power station use - despite warnings from the the Cookes lawyers.</p> | | |
| REP3-098 | Harry St John obo Roderick and Christine Cooke | <p>Temporary Use of the land Much is made by the Applicant and BE that the scheme is only a temporary use. But whilst c.40 years may seem a short span for a long standing estate of Blenheim's 300 year plus existence, the Cookes are [REDACTED] - indeed that of any purchaser of their property .</p> <p>Temporary means "for a limited period or short term" - leases over 21 years are generally considered long term leases - as the Leasehold Reform legislation attests. So grasping the concept of 40 years being temporary is for most folk a real struggle .</p> <p>Hiding behind the NISP process with its threat of CA of rights or land to serve their own private (not public) benefit, smacks of a frankly bullying approach with little or no apparent consideration (some might even say reckless and/ or cynical in nature) for other people's interests - which might be expected of the people associated with Solar Five Ltd but not of the Blenheim Estate trustees and its leading Directors.</p> | Opinion acknowledged | Land_Agreements |
| REP3-098 | Harry St John obo Roderick and Christine Cooke | <p>The lack of compelling case for the exercise of CA powers in this case .</p> <p>As has been abundantly clear to date, the vast majority of land included in the Application for a DCO belongs to Blenheim Estate and two other lesser owners - all known to be willing to make their land available. The other parcels of land and rights required etc are owned by a myriad of minute ownership interests .</p> <p>The compulsory powers sought in the DCO are quite unjustified given the main ownerships have already entered into legally binding agreements for lease or sale and so CA powers will not be needed for their land. It is only the very small ownership interests that might be required by the Applicant and the three big owners just to make their project work. If the scheme were approved the applicant and willing owners must negotiate terms privately with the rest or just avoid their land altogether; in that way there is no need to the use of CA powers when there is minimal public benefit compared to the private loss .</p> <p>Furthermore the guidance on CA clearly says there must be a compelling case in the public interest for such CA powers to be granted - especially to a private company and indirectly for the benefit of one of Englands larger landed estates. Where is the public benefit, when any electricity generated has to be sold at a market price to NGET /NESO and onto the likes of Scottish and Southern or other providers around the national electricity grid, and finally in turn sold on to the consumers - all at a market price .</p> <p>It is good to hear that the Applicant has at last seen sense to reduce the panel arrays south of Bladon and the Oxford airport take off safety zone plus a small area adjoining [REDACTED] - reducing then extent of panels by some 86 hectares(c.213 acres) of which 2.7ha (6.6acres) are part of the Reserved land subject to the BE covenant. It is clear that the project must still remain viable even with 213 acres fewer panels - no doubt they can tell us what the power output reduction is estimated to be.</p> | Opinion acknowledged | Land_Agreements |
| REP3-098 | Harry St John obo Roderick and Christine Cooke | <p>What they have overlooked is that whilst the overall size of the solar power station is reduced, the proportion of BMV increases to nearer 45% as most of the land they propose removing is grade 3B.</p> | <p>The proportion of BMV has no bearing on the outcome of the assessment reported in Volume 1, Chapter 17: Agricultural Land Use and Public Rights of Way [APP-054], which considers the overall quantity of BMV to be temporarily or permanently lost during construction of the Project. In addition, the design changes proposed as part of the Applicant's Change Request 2 Notification [REP2-045] would result in an overall reduction in the quantity of BMV, including ALC Grades 1, 2 and 3a agricultural land.</p> | Agricultural_Land_Use |
| REP3-098 | Harry St John obo Roderick and Christine Cooke | <p>The Cookes case, therefore, can be summarised very simply .</p> <p>The applicant has now acknowledged the legal restriction by now proposing to omit part of parcel 6.18 - all the Cookes are asking is for the applicant not to place any panels or inverters on the other part of the restricted land - probably a similar additional area of 6 acres or so .</p> <p>The omission of that further small amount of land (the rest of parcel 6.18 and the northern triangle of 8.06) would have very little impact on the overall output of the power station and only a marginal reduction of income for the applicant and BE .</p> <p>In contrast however, the result of such removal for the Cookes would mean a significant reduction in the potentially massive private loss they currently face suffering, even if the very latest variation proposed were to be approved.</p> | <p>The Applicant can confirm that all of the Cookes' land, including the remainder of parcel 6.18 and the northern triangle of parcel 8.06, is now proposed to be removed from the Order limits. These modifications will be formally included in Change Request 2. While the removal has a minimal impact on the overall capacity and income of the scheme, it significantly reduces the private impact on the Cooke family.</p> | Project_description_and_Design_pa rameters |
| REP3-098 | Harry St John obo Roderick and Christine Cooke | <p>If the scheme omits the reserved/restricted land ie there are no panels or inverters on any of it, the Cookes would only be Part 1 claimants based on the criteria that apply under Part 1 claims under the 1973 Act and related legislation - the most important aspect being no account can be taken of any loss of view, whereas in the real world all valuers and agents know that views /settings are an integral part of LOCATION and thus VALUE .</p> <p>However if an owner, such as the Cookes, are affected by the exercise of CA powers and loses any freehold land or rights - such as the Cookes have over the BE land, they are entitled to be full claimants and can claim for every</p> | Opinion acknowledged | Land_Agreements |

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| | | aspect of loss - namely reduction in the OMV of their whole property due to the impact on setting and views, disturbance, injurious affection, consequential losses, costs VAT etc etc. In this case, the amount is likely to be in the order of at least a large six figure sum, possibly more. | | |
| REP3-098 | Harry St John obo Roderick and Christine Cooke | As far as the Cookes are aware, no formal inspection by any professional valuer representing the Applicant has been made, so any estimate that may have been made (but not yet declared) on behalf of the applicant, is bound to be a desk top one and thus wholly unreliable as an RICS Red Book valuation that is legally required in such circumstances. | Opinion acknowledged. | Community_Benefits_and_Impacts |
| REP3-098 | Harry St John obo Roderick and Christine Cooke | Furthermore, if that task has not been done, the applicant cannot satisfy the test about comparing private loss etc with the claimed albeit minuscule public benefit; in addition no clear evidence of where the compensation money, referred to in the Funding Statement, is coming from. The Applicant seems to have avoided any further provision of meaningful and reliable financial detail despite being requested to supply that. | The current cost estimate for the Project that is the subject of the Application is £820 million. This cost estimate covers all aspects of the Project and includes construction costs, preparation costs, supervision costs and land acquisition costs (including compensation payable in respect of any compulsory acquisition). Through cooperation with investment banks and specialised consultants such as EY, the Applicant has the ability to procure the financial resources necessary to fund the works to be authorised by the DCO. There are multiple parties interested in investing in the construction and operation of the Project. These parties will make their investment public once they have made their final investment decision. Under non-disclosure agreements, the Applicant is obliged to keep the names of those parties confidential at present. | Funding_and_PPA |
| REP3-098 | Harry St John and Christine Cooke | [Summary of above points] CONCLUSION So the Applicant has a simple choice - keep the panels where indicated and suffer a very large compensation claim or just withdraw the panels from the relevant reserved land and avoid the greater cost and consequential complications . We would ask the Inspectors to direct the Applicant to reduce their application a tiny bit more and if they do not, to recommend to the S of S that he should not confirm the CA powers sought in respect of the Cookes property rights in any part of parcels 6.18 or 8.06 that are restricted . Harry St John On behalf of Mr and Mrs Cooke . July 22nd 2025 | Opinion acknowledged. | acknowledgment response required |
| REP3-099 | Ian Hudspeth | Q1.16.8 Applicant Community food growing areas The applicant has failed to consult adequately on the education facility and should restart the process including all local interested parties. It is my understanding that the main groups in Bladon, the Parish council, Bladon Gardens Society and Bladon Allotments Association, were not approached or consulted by the applicant. There are well used allotments in Bladon that some years are over subscribed and others under subscribed, overall, there is not a demand for more. | The educational facility was included at the request of OCC and is the subject of the targeted consultation running until Friday August 22 nd . The food growing areas were consulted on during the phase two consultation. During the consultation events, consultees expressed a desire for new allotments as well as community food growing. Should the DCO be granted the Applicant will work with local stakeholders to ensure delivery of the community growing areas accommodates all those who want to take advantage of the opportunity. | Community_Food_growing_Location |
| REP3-099 | Ian Hudspeth | Q1.16.21 Applicant Education facility building The applicant has failed to consult adequately on the education facility and should restart the process including all local interested parties including the highway authority. Had they consulted with the highways authority they would have understood that the recreational facility at Bladon was only allowed with no parking facilities for any vehicles. The width of the lane means that ambulances do not access the lane but stop at the bottom with operators walking to any incidents at the school or residential properties. The lane is not appropriate for minibuses. | Please see the previous answer. | Community_Benefits_and_Impacts |
| REP3-100 | James Robert Price | 8th July 2025 Project: EN10147 Subject: Update on Northern Land area and soil quality referenced in Blenheim's Submission Dear Planning Inspectorate, I am reviewing the document titled EN010147-001193 - Blenheim Palace – Responses to the Examining Authority's First Written Questions (ExQ1) as part of the ongoing examination of the Botley West Solar Farm proposal . I have farmed a significant area of the Northern Land area for over 20 years and have more experience and data available than anyone else. I would like to update you on farming practices and point out the inadequacies in the response from Blenheim. Firstly I have significantly improved the productiveness of the land that I farm as it was in a similar state to the land referenced in the central area when we started farming it in 2003. The datasets that they claim aren't available for this land are available and the results are not similar as the farming practices that I use are significantly different to those practised in the central area. A farmer does not grow crops by applying "significant intervention through artificial fertiliser" he grows crops by farming well. I have improved soil quality and productivity through regenerative farming practices. These include but are not limited to the use of organic manures, cover crops, livestock integration, direct drilling and crop rotation. Blenheim confirm this where they mention the higher indices to the North of the central area and how these were achieved just with the use of organic manures . Secondly and with reference to my last sentence above Blenheim contradict themselves with their claim as to what the solar project will achieve. They stated, incorrectly, that the only way to grow crops is with significant intervention | Please refer to Q2.11.14 of the Applicants Response to Second Written Questions [EN010147/APP/14.2] , submitted alongside this Deadline 3 response document. | Agricultural_Land_Use |

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| | | <p>of artificial fertiliser but then state that the reason the land has been improved in the northern central area is through the previous tenants use of anaerobic waste and green compost. This last statement for the northern area is true as I have done the same with the regenerative practices mentioned in the paragraph above and seen fantastic results. This has taken significant investment over a number of years and yet they claim they will achieve similar increases by “resting” the land. It is absurd to suggest that simply leaving land fallow with no interventions other than shading it with solar panels will somehow improve it. The solar panels aren’t connected to the ground, they are connected to the national grid .</p> <p>Given the importance of these results in supporting Blenheim's argument that the land is agriculturally degraded and not Best and Most Versatile (BMV), it is crucial to understand where their evidence is that “resting” the ground will improve it .</p> <p>Could you please ask Blenheim to provide this evidence and data that they are using to support their argument? Thank you for your assistance .</p> <p>[REDACTED] - Partner [REDACTED]</p> | | |
| REP3-101 | Joanna Norton | 1. Botley West Solar Farm Written Submissions – D2 (ID20055258) I agree with points highlighted in this submission included the heritage and visual aspect. Particularly important to me if the note that the residential ‘Buffer Zone’ should be at least 100m and not 25m. | The Applicant acknowledges the concerns and comments raised in REP3-101. | Landscape_and_Visual_Impacts |
| REP3-101 | Joanna Norton | <p>2. Application by Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd (the applicant) for a Development Consent Order for Botley West Solar Farm Whilst I do not think the reductions go far enough, I agree with the point 1 that there should be a reduction on the solar installation in areas south-west and south-east of Bladon and north of Heath Lane .</p> <p>3. Submission ID 36973 from Callum Miller MP Endorse his view that it is good to have renewables projects but the scheme is too large for the area – agree that it “is not appropriate and does material harm.” 4. Submission ID 36921 Layla Moran MP Endorse her view that although there are proposed modifications from the applicant, the scheme is “just too big” at its current size.</p> <p>I agree with both politicians that there is not enough benefit going back to the local communities that the solar farm will affect.</p> | <p>The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects.</p> <p>Large-scale solar installations represent one of the most effective ways to generate clean electricity while using relatively little land. Such projects are typically located in rural areas, where suitable land is more widely available and conditions like solar irradiance and grid access are more easily met.</p> <p>Developing the Project at its proposed size and with its substantial benefits is an important contribution to meeting the urgent need for renewable energy identified in the National Policy Statements. The Project design is the result of an iterative design process which delivers the Project’s functionality, the generation of a large amount of renewable electricity, whilst addressing the local context and setting within which it is located. See section 5.5 of Chapter 5: Alternatives Considered [APP-042]. last part community benefit</p> | Project_description_and_Design_parameters |
| REP3-101 | Joanna Norton | 5. Bladon Village Hall and Recreation BVHRC As a Bladon village resident and user of the recreation ground, I agree with the viewpoint expressed here – that there would be an impact to the health and wellbeing of the residents, and particularly children, of the village | Comment is acknowledged. | Community_Benefits_and_Impacts |
| REP3-102 | Joanna Sharland | Dear Sirs I write as a registered interest party with reference to Botley West Solar Farm. I strongly support the reservations noted in the Joint Local Impact Report of WODC and others. In particular: The Norther Sector should have a 50-metre buffer zone to protect the biodiversity of the ancient woodlands near Dornford Farm and Dornford Cottage; | The Project includes buffers to ancient woodlands in line with Natural England guidance. Dornford Grove (the designated ancient woodland near to Dornford Cottage) is circa 170m west of the Project Order Limits. | Local_Ecology_and_Nature |
| REP3-102 | Joanna Sharland | <p>Not enough is being done to mitigate against the detrimental visual effect of the development around the Wootton Conservation Area;</p> <p>The public ancient footpath and bridleway running up the Dorn Valley which will be directly impacted;</p> <p>The visual impact on Akeman Street and Sansoms Platt, both valuable historic assets, will be significant;</p> | <p>Opinion acknowledged.</p> <p>Visual impact assessment considers the impact on visual receptors (people). The effects on visual receptors from publicly accessible locations is considered in Chapter 8: Landscape and Visual Resources [PDB-006]. The setting of heritage assets is considered in Chapter 7 [CR1-003]. The effects on the PRoW assets are considered in Chapter 17 [APP-054].</p> <p>The Applicant's position regarding the likely impacts and effects on the significance of the Sansom's Platt Scheduled Monument and the Wootton Conservation Area are set out in ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014].</p> | Landscape_and_Visual_Impacts |
| REP3-102 | Joanna Sharland | The developer did not respond to the major concerns of the British Horse Society about buffer zones and fencing. Why? | <p>The Applicant has endeavoured to engage with and respond to questions raised by the British Horse Society throughout pre-application engagement and during the examination process.</p> <p>The Applicant respondent to the British Horse Society's relevant representation [REP1-020] which included responding to comments on environmental mitigation, buffer zones, and fencing.</p> | Consultation_Process |

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| REP3-102 | Joanna Sharland | In essence, why is so much land with invaluable assets - biodiverse habitats, archeologically significant sites, ancient byways, historic buildings in conservation areas - being used for this project when Blenheim has so much other less significant acreage which could be used instead? | <p>The Applicant has previously addressed this question for the IP's convenience the answer is set out below.</p> <p>The NPS policy on site selection, is not overtly prescriptive, there is no absolute criterion that <i>has</i> to be followed when site finding. Fundamentally, the Applicant has been led by:</p> <ul style="list-style-type: none"> - Factors that are noted as influencing site selection are set out in NPS EN-3, para 2.10.18 - Plus guidance relating to the assessment and minimising adverse effects – the applicants assessment section of EN-3 <p>The Applicant has followed this policy. The chronology followed and the reasons for the location is set out in Chapter 5; substation location was very important but there was no one overriding or determinative factor that drove the site selected or size. It was a combination of factors.</p> <p>In NPS EN-3, para 2.3.4, it states that</p> <p><i>'The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in Section 4.1 of EN-1, will not grant consent in any given case.</i></p> <p><i>At para 2.3.5, It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure....</i></p> <p>In NPS EN-3, para 2.3.9 states that 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, <i>the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land).</i></p> <p>The Applicants approach to site selection is consistent with all relevant aspects of the NPS's. It has responded to 'preferences' in so far as the site search did include brownfield land.</p> <p>A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. [APP-042].</p> <ol style="list-style-type: none"> 1. Do nothing 2. Site location and scale; 3. Site layout and design; 4. Choice of solar array; 5. Cable corridor route and laying method <p>These sections answer in detail the way in which the site was selected and how the Applicant has dealt with cable routing (see Figures 5.1 to 5.5 [APP-119 to APP-123]).</p> <p>The Applicant notes that the SofS should not refuse an application on one site simply because fewer adverse effects would result from developing similar structure on another suitable site – all suitable sites may be needed – NPS EN-1 para 4.3.24. Similarly, alternatives that are not commercially viable or physically suitable (para 4.3.27), or proposals that are vague or immature, (para 4.3.28) can be excluded from consideration.</p> | Site_selection_and_Cable_Route_Alternatives |
| REP3-102 | Joanna Sharland | And, finally, how will the developed land be protected should the developer sell the project on to another owner who is even less invested in the promises made to safeguard it for the future? | Should the ownership of the project change so does the responsibilities within the DCO including management of the land. | Land_Agreements |
| REP3-103 | Jonathan Ford | Botley West Solar Farm: Deadline 2. 1st July 2025 - Responses to Examining Authority's First Written Questions Q1.1.14 DESIGN PRINCIPLES Dear Examiners I write as a member of the public and a landscape architect. I was a Chartered Member of the Landscape | Opinion acknowledged. The design approach is set out in the updated Layout and Design Principles document [REP3-036] . This document cross refers to | Landscape and visual impact |

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| | | <p>Institute for twenty years. GOV.UK Guidance – Nationally Significant Infrastructure Projects: Advice on Good Design. Updated 16th April 2025 This document includes a section entitled 'Definitions of good design'. Here there is reference to 'venustas' meaning delight or charm or beauty. I am concerned that while there has been much discussion of the social, environmental, technical and management aspects of the proposed development, there has been little consideration of how buildings and infrastructure well designed may also be beautiful.</p> <p>Much of Oxfordshire is famous for the beauty of its buildings. In addition to buildings, dams, reservoirs, motorway service areas, flood defence barriers, prisons and hospitals can all be beautiful. The guidance document referred to above ends by asserting that: "Good design is one factor which ExAs need to consider when reporting on the planning balance" I propose that the following questions are added to your Q1.1.14 Design Principles What attention has been given to 'delight'? A conscious effort should be made to reveal or create beauty.</p> <p>The reference document refers to the need for "a succinct and ambitious vision" and "strong design leadership, driven by the vision." What is the vision for the Development as it refers to 'delight'? The reference document refers to the need for a design champion. Who is this design champion? The reference document refers to the need for an independent design review. Has there been an independent design review? <i>[Please refer to full response for photographs included in response]</i></p> | <p>the Management plans which guide and control the design and layout in order to avoid or minimise adverse impacts upon the environment and sensitive receptors. The Applicant also submits a note on the Applicants Approach to Design [EN010147/APP/14.2 Annex 5], which sets out the process it went through and design principles it adopted. It also addresses the recently issued national policy on Good Design for NSIP's, April 2025.</p> | |
| REP3-104 | Kenneth John Clark | <p>Submission ID: 37160 Q1.5.26 - Funding and Corporate Structure [REDACTED] (Head of Mission Control at Dept of Energy), when interviewed on BBC World at One on Dec 13, 2024, said that "The biggest barrier [to achieving the energy system that we need] is actually the way in which we manage the queue of projects to connect to our grid. So, we already have in the queue more capacity than we will ever need for our energy system." Indeed, I understand that the existing pipeline of projects offering renewable energy will already provide more than five times the energy that the government says it will need by 2035 - so why do we even need to consider another massive project like this?</p> | This is noted. | Needs_Case |
| REP3-105 | Mary Ann Canning | <p>The response below is limited to the main points concerning topics that I have some understanding of as a retired Landscape Architect. and is based largely on Responses to ExA's First Written Questions: Q1.6 Cultural Heritage and Q 1.14 Landscape Resource and Visual Amenity.</p> <p>ExA Q1.6.14, WHS Buffer zone EN010147-001282: OHA's Response to Botley West Solar Farm, p.62 I agree with all aspects of the OHA answers to this question: the approach taken by ICOMOS-UK was too narrow, merely concentrating on intervisibility. It does not reflect current understanding of the concept of setting, for example the need to consider the wider contribution to the setting of the 18th and 19th century working landscape, and the importance of the sense of arrival at the designed landscape through this rural agricultural setting.</p> <p>Therefore I agree with their conclusion that the areas highlighted for omission by ICOMOS are not sufficient to provide a 'sufficient buffer to protect the rural landscape that is important to the setting of Blenheim Palace'. Their reasons given are important – such as the lack of consideration of the potentially detrimental effects of landscape mitigation (hedges, tree planting) on the understanding, appreciation and experience of the WHS from the surrounding landscape. I do welcome the removal of panels from the escarpment above the Evenlode valley, to help reduce the prominence of the panels in longer views to the WHS.</p> <p>I note that some of these areas have been put forward for omission in EN010147-001239-Applicant's Change Request 2 Notification (Rev 0). However having viewed these (with some difficulty, as the plans aren't clear), I consider they are insufficient to have the required effect, and the escarpment is not included</p> | <p>The Applicant understands the principal issue raised by OHA in their response [REP2-050] to EXQ1.6.14 [PD-008] to be the nature and extent of the contribution of the wider rural setting of the Blenheim Palace World Heritage Site (WHS) to the identified Outstanding Universal Value (OUV) of the WHS.</p> <p>This issue is discussed in some detail in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141]. The identified 'attributes' that convey or express the OUV are set out in the 2017 WHS Management Plan Review. Attribute 7 establishes that '<i>The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it</i>' (emphasis added).</p> <p>The 'traditional English countryside and villages' referenced in Attribute 7 extend for a considerable distance in all directions from the WHS. The understanding of the contribution of the wider rural setting of the WHS to the identified Outstanding Universal Value OUV therefore requires consideration of the physical extent of the '<i>traditional English countryside and villages</i>' within the setting of the WHS, i.e. at what point does the rural landscape cease to become a relevant or material part of the setting of the WHS?</p> <p>The Applicant's position on this is set out in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141]. Whilst it is not possible to simply draw a line on a map which defines the setting of the WHS, the Applicant has provided a detailed explanation in that document of how setting and sensitivity can be linked not just to intervisibility but to other factors such as land ownership (past and present) and land use. The Applicant has worked closely with Historic England on the design of the proposed development to minimise any potential harm to the OUV of the WHS, most recently in the form of the changes set out in our Change Request 2 Notification [REP2-045].</p> <p>The Applicant considers that the further removal of panels as requested by OHS (and ICOMOS-UK) are unnecessary in that these changes would not lead to any reduction in the perceived level of harm to the OUV of the WHS. The Applicant accepts that much (if not all) of the land identified by OHS as a concern could be considered to fall within the setting of the WHS; the issue is</p> | Historic_Environment |

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| REP3-105 | Mary Ann Canning | ExA Q1.6.15 - I cannot agree with the Applicant's response that they have sought to enhance Public Rights of Way, when in fact this has involved diversions in places and tall divisive hedgerows. These hedgerows are likely to be permanent features and will prevent expansive views out across the landscape over long distances (i.e. the reason for many walkers' choice of route). | more that how the level or nature of the contribution of that part of the setting to the OUV of the WHS. The Applicant notes the concerns over the loss of open aspect in views from PRoWs. The landscape planting has been designed in conjunction with ecology requirements and Management Plans. It should be acknowledged that hedgerows have a certain life expectancy and at some point will require to be replaced. Landscape is under constant change. In terms of landscape character, the introduced hedgerow planting is considered an enhancement measure with a consequent beneficial effect. Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate. | Public_Right_of_Way |
| REP3-105 | Mary Ann Canning | ExA Q1.6.16 - The Applicant's response on the level of harm is unclear, but it appears that, in the opinion of others, the methodology used is questionable. I would also like to endorse the comments by SBW which highlight the interconnectedness of the villages affected by the proposals, (EN010147-001254-Stop Botley West - Comments on responses to RRs, paras 6.5 – 6.10). The network of villages around the WHS has evolved over at least the last 1000 years, as demonstrated by the numerous ancient rights of way, historic churches with their spires visible over long distances. | As above | Public_Right_of_Way |
| REP3-105 | Mary Ann Canning | ExA Q1.6.17 - The Applicant appears to dismiss many of HE concerns over Attributes 1, 4, 5 and 7. For example: Attribute 1, the way the family have influenced the wider estate (its setting) to support its running of the estate has not been assessed. Attribute 5 – the response only addresses the ancient oak woodland area of High Park within the Park boundary. This was part of the former Wychwood Hunting Forest and formed the original setting into which Blenheim Palace was constructed. This has been ignored. The Wychwood Forest boundary c1219 extended east to include the fields and meadows around Long Hanborough and Church Hanborough, and south to include Eynsham and land to the east of the River Thames. I have attached a plan of Wychwood Forest, which illustrates the extent of the forest. It also shows Pinsley Wood in much the same shape as the present day. Views across from these areas are important in helping to illustrate the evolution and time depth of the setting to the WHS. (See attached figures 1 and 2 – map and detail, ref: study by Della Hook, prepared for Lawson Price as part of a landscape project funded by English Heritage, and published by the Friends of Wychwood.) | The Applicant would refer to their response to ExQ1.6.17 in the Applicant's Response to the Examining Authority's First Written Questions (ExQ1) [REP2-025]. Attribute 1 of the Outstanding Universal Value (OUV) of the Blenheim Palace World Heritage Site (WHS) states ' <i>It remains the home of the same aristocratic family, the successive Dukes of Marlborough, for whom it was built</i> '. The Applicant considers that this refers only to the WHS itself and not to any part of its wider setting. Attribute 5 of the OUV of the Blenheim Palace WHS states ' <i>The UK has by far the greatest concentration of veteran trees in northern Europe and within High Park, which sits in the south-west section of Blenheim Park, is one of the finest areas of ancient oak- dominated woodland in the country. It is partially descended from the ancient Wychwood Forest, a 12th century deer park and an Anglo- Saxon chase</i> '. The Applicant considers that this Attribute clearly refers to High Park and not to the wider landscape including the former Wychwood Forest. | Historic_Environment |
| REP3-105 | Mary Ann Canning | ExA Q1.11.12 - EN010147-001282: OHA's Response to Botley West Solar Farm p.116-117 sets out reasons why this proposal cannot be considered appropriate development for the Green Belt, based on the criteria for defining openness set out in new PPG Guidance, February 2025. I.e. that development should be viewed in spatial 3D terms, not a flat two dimensional footprint. It also makes the point that visual impact should also be considered – i.e. visual intrusion can result from development that appears out of place in the countryside, especially when it extends over very large areas. The other important consideration is the duration of development and its ability to be remediated. The forty-year lifespan of these solar arrays and their infrastructure cannot be considered temporary. Factors affecting reinstatement including many unknowns, such as future ownership, viability of the owner at the time, land degradation due to soil compaction by vehicle movements, etc. | The Applicant has set out how it has considered openness in terms of the visual and spatial aspects of the development in the Planning Supporting Statement [REP1-012], paras 8.3.9 to 8.3.10. Whether solar farms are considered out of place in the countryside, rather goes against the Government's policy of needing such development to be deployed at scale and speed, (NPS EN-1, para 4.1.2). Government also acknowledges that there will inevitably be impacts on the landscape with NSIP development NPS EN-1, para 5.10.5). The country is going through an energy transition where the old and very large coal fired power stations are being replaced by a different form of energy development in the landscape. The need for this is unquestioned. The Applicant accepts that some harm to openness will occur but it will be mitigated to an acceptable level. (see REP1-012, Appendix 8, paras 8.4.32 to 8.4.48, and para 8.4.56). Paragraph 2.10.66 of NPS EN-3 confirms: "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." | Green_Belt |

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| | | | <p>Paragraph 2.10.65 of NPS EN-3 also confirms that “An upper limit of 40 years is typical”.</p> <p>Requirement 14 (Decommissioning and restoration) of the draft DCO confirms that “Decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning”.</p> <p>The consent being sought is time limited and therefore it is temporary under national policy, with considerable benefits arising during its lifetime (through energy production improved biodiversity and access etc) but will also have a lasting legacy post decommissioning e.g. in terms of enhancement to the landscape.</p> <p>A decommissioning plan has been produced [APP-236] which will govern the reinstatement of the land. This plan, amongst other things, addresses land and soil issues e.g. at section 2.</p> <p>The Applicant provided a detailed response to questions and concerns raised about decommissioning in Section 11 of the Applicant's Responses to Relevant Representations [REP1-020]. This included comments in relation to the decommissioning phase of the work, the decommissioning plan, its funding, guarantee and the overall intentions for reinstatement of the site.</p> <p>In its response to [REP3-085] above, the Applicant reiterates that the Applicant's position remains that a decommissioning bond is not necessary. Its full position is set out in previous submissions, including the Applicant's Responses to Relevant Representations [REP1-020] and the Applicant's Response to the Examining Authority's First Written Questions (specifically ExQ1.1.16) [REP2-025].</p> <p>The need for a decommissioning bond is not supported by national policy or the recent solar DCO precedent, including the Oakland Solar Farm referred to by BYG, where the SoS rejected the ExA's recommendation for a decommissioning bond requirement.</p> | |
| REP3-105 | Mary Ann Canning | ExA Q1.14.4 - Having read EN010147-001254-Stop Botley West - Comments on responses to RRs, I would endorse the important point made that the continued lack of a RVAA is of particular concern to the large number of residents directly adjoining fields of solar arrays, as well as those within 100m. (Note: I am not personally affected – living at least 1.5km from any panels.) The cumulative effect of so many individual impacts on residential properties and the fact that the views from many of these are completely dominated by panels into the distance, including on rising ground, makes the need for an RVAA imperative. Appendix A sets out photomontages of representative properties as assessed by SBW and clearly demonstrates the high degree of impact on many residents. | Applicant has reviewed the submitted LVIA [PDB-006], which considers effects upon individual properties. | Landscape and Visual Impacts |
| REP3-105 | Mary Ann Canning | ExA Q1.14.9 - The map requested, which would depict as labelled overlays omissions proposed by ICOMOS, Historic England, the Local Authorities and Oxford Airport has not been provided, as far as I can tell. This would be a very useful tool to assess potential areas to be removed. | This is noted. | acknowledgment response required |
| REP3-105 | Mary Ann Canning | ExA Q1.14.10 - Levels of Significance in LVIA Methodology I struggle to understand the Applicant's answer to this question, however EN010147-001283 OHA Response to Rule 17 letter covers the concerns felt by many over the methodology used. | In light of this and other Representations through the examination process, the Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as to the reasoning for the levels of significance reached. It is not the Applicant's intention to make wholesale changes to the LVIA methodology, as this has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01, as agreed with the OHA. | Landscape_and_Visual_Impacts |
| REP3-106 | Michael Brown | These comments relate to the Applicant's responses within REP2-027 (pages 50-52) to my Written Representations at REP1-155 Page 51 Cultural/Historic Environment The Applicants response cross refers to the Revision 1 Settings Assessment. This is at REP2-015. The section relating to the conservation village of Church Hanborough is at paragraphs 1.9.159 to 1.9.163 and includes a map (Fig. 1.11) showing the boundary of the conservation area . The Applicant's assessment at 1.9.61 is that: 'Overall, this wider setting makes some contribution to the heritage significance of the Conservation Area'. And further at 1.9.62 that: Areas of solar PV panels and PCs would be visible in views out of, towards and across the Conservation Area'. Q1.6.32 in (REP2-025) also relates to this. The Applicants response refers to the visibility of the church spire only. Because there are still no viewpoints or photomontages along Lower Road between viewpoints 22 and 30 there is no pictorial evidence of the setting of | <p>The Applicant has adjusted the design of the proposed development to the south of Church Hanborough following the consultation on the PEIR. The design is shown on Figure 2.2d in ES Figures 2.1a-2.4c - Illustrative Masterplan [AS-020]. The design seeks to minimise impacts on the significance of the Grade II listed building known as Dunbar (formerly New Barn Farmhouse) as a result of the change within its setting.</p> <p>The Applicant's assessment of the likely impacts and effects on this listed building are set out in paragraphs 1.9.109 to 1.9.113 of</p> | Historic_Environment |

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| | | <p>Church Hanborough showing the view up the sloping land from Lower Road to the conservation village. However I wrote to the Applicant at the time of the Information Event in December 2022 with amateur photographs from Lower Road and from viewpoint 24 both looking north west towards Church Hanborough Please find a copy of that letter below at appendix 1 .</p> <p>In the letter, and in order to provide a degree of protection, I suggested moving the line of panels from our garden wall as then proposed to a line which would correspond to the general boundary of the rest of the conservation area as a minimum. Despite my efforts I could not get a reasoned reply from the Applicant. However when the PEIR appeared at the Statutory Consultation the line of panels had been moved a little way from our garden wall but nowhere close to the line I had suggested in my December 2022 letter. I asked repeatedly for this to be reviewed but to no avail.</p> <p>It still seems to me that if the project is to go ahead in anything like the form proposed there should be greater protection for the conservation village of Church Hanborough and its heritage assets of the Grade 1 church and 21 listed buildings including mine and my wife's home. The removal of panels from the whole of the hatched triangular area shown in my December 2022 letter was intended as a compromise but not an ideal solution. So far I have not seen any evidence that this has been reviewed let alone now proposed by the Applicant since the production of the PEIR.</p> | <p>ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]. This concludes that there would be a long-term reversible minor adverse effect. In policy terms the Applicant considers that any harm to the heritage significance of the Grade II listed building known as Dunbar (formerly New Barn Farmhouse) would be less than substantial. As such the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1 'Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use'.</p> | |
| REP3-106 | Michael Brown | <p>Page 51 Agricultural Land I referred to the Applicant's own document at APP-110 (Fig. 17.3) which shows most of the land on the west side of Lower Road within project site to be Grades 2 and 3a, and therefore regarded as BMV. The Applicant fails to answer the point directly.</p> | <p>As outlined in REP-155 of the Applicant's Responses to Written Representations [RE2-027], Agricultural Land Classification (ALC) grades are based on long-term physical characteristics and limitations, such as soil quality, drainage, and climate. These grades do not necessarily reflect current agricultural productivity or economic yield. While Figure 17.3 of ES Chapter 17 [APP-054] identifies areas of Grade 2 and 3a Best and Most Versatile (BMV) land, this classification may not correspond directly with actual crop performance.</p> | Agricultural_Land_Use |
| REP3-106 | Michael Brown | <p>Page 51 Noise and Vibration Despite the Applicant's reassurance, as a resident and as a user of the PRoWs I remain sceptical because: (a) the Applicant has been shown by those more expert than me to be generally playing down various impacts; (b) judging by the Applicant's own statements the contractors will be under pressure to work fast thus tempting breaches of the Code it refers to; (c) piling or screwing to a depth of up to 3m will be noisy and cause vibration compared with the comparative peace of the ambient sound level in the countryside; and (d) it is acknowledged by the Applicant that each PCS will make a noise, thus many acres of panels containing many PCs's will amplify this. I am afraid that I have not established whether this latter would only be when the sun shines or longer or indeed 24hrs a day.</p> | <p>In response to the various queries, we provide the following reassurances;</p> <p>(a) A full and detailed noise and vibration assessment has been undertaken, which wholly assess the potential noise and vibration impact of the scheme on residential receptors. The assessment can be found in [APP-050]. This assessment does not 'play-down' potential impacts of the scheme.</p> <p>(b) There is no evidence to suggest that this will occur. In any case, the applicant has committed to a 7.6.1 - Outline Code of Construction Practice [APP-233]. This CoCP includes a commitment for a construction phase noise limit which has been defined in line with British Standard 5228-:2009+A1:2014 - Code of practice for noise and vibration control on construction and open sites – Noise (BS5228).</p> <p>(c) Our assessment has not identified a significant adverse noise and vibration effect from piling form the solar panel supports. In any case, the applicant has committed to a 7.6.1 - Outline Code of Construction Practice [APP-233]. This CoCP includes a commitment for a construction phase noise limit which has been defined in line with British Standard 5228-:2009+A1:2014 - Code of practice for noise and vibration control on construction and open sites – Noise (BS5228).</p> <p>(d) The main source of noise from the PCS units is from the cooling fans for the various items of electrical plant within the PCS unit. Thus, the PCS unit will only produce noise which has the potential to adversely affect residents when there is an electrical load, which is when sunlight falls onto the panels. In addition, the fans will only need to operate at a higher rate (which is the scenario which has been assessed) when electrical loads are high, and during higher ambient temperatures. Therefore, during much of the time, the fans may not be required, or would operate at a lower level than has been assessed in the noise and vibration impact assessment [APP-050]. Noise would therefore not be emitted from the PCS units 24 hours a aday. Further, the panels themselves are likely to provide some screening of noise from the PCS units, however, this effect has not been included in the assessment.</p> | Noise_and_Vibration_Impact |

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| REP3-106 | Michael Brown | <p>Page 52 Landscape and Visual Impacts The Applicant has separated my paragraphs on this subject under three headings: -lack of photomontages, -absence of photomontage for viewpoint 24, and -Landscape and Visual Impact .</p> <p>-lack of photomontages .</p> <p>I have been emphasising this at every opportunity (eg RR-0998, REP1-154, REP1-155) since the Statutory Consultation and explaining why more photomontages are needed especially for non-experts like myself to gain a better understanding of the true nature and extent of the impacts on the landscape and visual amenity if this project goes ahead. Each time, and again this time, the Applicant merely responds without justification that the number of locations is considered proportionate .</p> <p>-absence of photomontages for viewpoint 24 The Applicant has not directly answered this at D2 nor following previous requests. However it does say: It would not have been appropriate to have illustrated photomontages from all viewpoints as there were a number with limited or no views of the Project'. The reason why photomontages for viewpoint 24 has been especially requested is because this viewpoint provides a wide panoramic view of the Evenlode valley. So the reason given for not providing a photomontage for it has no merit .</p> <p>Indeed the photomontages for the new viewpoints 112 – 114 (Figs. 46 – 57) at REP2-030 (described at paragraphs 2.13 – 2.15) looking southerly towards Begbroke provide only a limited view. The Applicant has agreed to produce these new photomontages but is refusing to produce photomontages for any of the 20 or so un-montaged original 55 viewpoints. I am not aware of any explanation having been given and would, with respect, ask the ExA to require the Applicant to produce them .</p> <p>Contrary to the Applicants contention in its response here (but also previously) that: 'These (the photomontages) were agreed with the local planning authorities and considered appropriate and proportionate to the Project at winter Year 1 and summer Year 15', the three Planning Authorities have told me in separate emails that they were not consulted about the limited selection of the viewpoints for photomontages. As I have referred to previously, Table 7.2 of the PINS Scoping Opinion required that: 'the Applicant should seek agreement from the relevant consultees regarding the appropriateness of the selected photomontages and evidence of this agreement should be provided within the DCO application' (APP-125 at pages 13 and 14). So far as can see amongst the multitude of documents such evidence has still not been provided .</p> <p>-Landscape and Visual Impact There is no specific response from the Applicant under this sub-heading.</p> | <p>A photomontage was not selected from Representative Viewpoint 24 due to the nature of available views. Representative Viewpoint 24 is located along PRoW 238/5/20 to the east of Church Hanborough. It has been captured through a gap in a mature hedgerow along the majority of the PRoWs length at this location. To the north and south of the viewpoint the mature hedgerow vegetation prevents clear views towards the Project. As such, it was deemed that a photomontage from this fleeting view would not be necessary.</p> <p>The Applicant acknowledges the concerns raised in REP3-106, regarding Representative Viewpoint 24, and will consider this further.</p> <p>A record of email correspondences, with host authorities, and schedule of suggested amendments / additions to Representative Viewpoints has been kept. This included reasoning for inclusion or discounting any suggestions from the host authorities and is summarised in Table 8.5 of the LVIA [PDB-006].</p> | Landscape_and_Visual_Impacts |
| REP3-107 | Michael Brown | <p>Comments on responses by the Applicant to the Examining Authority's First Written Questions Part A General Comments 1. Despite searching questions by the ExA the Applicant's contention about minimal impact on both heritage, landscape and visual effects still appears primarily to rely on the partial judgement of its consultants and confusing reliance on 'moderate adverse' and 'not significant'.</p> <p>2. There is still no attention by the Applicants to the cumulative impacts or the repetitive effects of miles of panels, fencing, PCS's in all directions as residents and visitors pass through even parts of the north, middle or south sites.</p> <p>3. There is still little recognition of the industrialisation of the countryside 4. The value of conservation areas and heritage within them is largely dismissed.</p> <p>5. A 25 metre buffer zone is asserted as reasonable and proportionate only because the Applicant says so.</p> <p>6. The pretence continues that the Applicants have been listening to and addressing concerns. The reality is that the changes that have been made throughout this nearly three year's process since the original informal consultation have been minimal in the context of the enormity of the project.</p> <p>7. Regarding insufficiency of viewpoints and photomontages, the only response seems to be that the numbers are proportionate. But there is no attempt to explain how that view is reached.</p> | <p>In light of this and other Representations though the examination process, the Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as the reasoning for the levels of significance reached. It is not the Applicant's intention to make wholesale changes to the LVIA methodology, as this has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01.</p> <p>A record of email correspondences, with host authorities, and schedule of suggested amendments / additions to Representative Viewpoints has been kept. This included reasoning for inclusion or discounting any suggestions from the host authorities and is summarised in Table 8.5 of the LVIA [PDB-006], including a number of additional viewpoints (46 and 47) included as a direct response to comments from the VWHDC.</p> <p>Please refer to Applicant's response to ExA Q2.13.15 for further clarification regarding analysis undertaken in respect of buffer zones to residential properties.</p> <p>It should be noted that, as a result of Change Request 2, buffers from a number of residential receptors will be further increased. Including, but not limited to, a large area around the village of Bladon (Change 1), and its' conservation area and setting of Blenheim Palace WHS, and Begbroke (Change 2) [REP2-045].</p> | Historic_Environment |
| REP3-107 | Michael Brown | <p>Q1.14.10 - 8.1 The 'proportionality principle' on which the Applicant relies seems to depend on a proposition that each impact being assessed is only a very small proportion of the whole project site. If the site was not so large then each impact would be proportionately greater. This seems to me to be a flawed argument.</p> <p>8.2 At one end of the spectrum a glimpse of an individual panel would not have a significant impact, but at the other end repeated sights of thousands of panels in an otherwise rural landscape would have a very significant impact. So just because an individual impact is small in relation to the vast scale of the project, and is therefore a small proportion of the project, does not mean that the cumulative effect of repetition is not of the highest significance.</p> <p>8.3 The assertion by the Applicant on the second page of its response to this First Written Question that: 'most of the visibility is from PRoWs, which represent transient, varying views' is a repetition of what it has been saying throughout. It too is flawed. If less time was spent on desk investigation and more time was spent walking and indeed</p> | <p>The Applicant notes the concerns over the loss of open aspect in views from PRoWs. The landscape planting has been designed in conjunction with ecology requirements and Management Plans. It should be acknowledged that hedgerows have a certain life expectancy and at some point will require to be replaced. Landscape is under constant change. In terms of landscape character, the introduced hedgerow planting is considered an enhancement measure with a consequent beneficial effect. Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate.</p> | Landscape_and_Visual_Impacts |

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| | | driving around the area the reality would be clear namely that there are and will remain a myriad of views across the countryside from the PRoWs. Some are wide open whilst others are limited in size and therefore encourage stopping and looking. Even if some are blocked by the proposed mitigation by summer 15 there will still be views during the winter and many views of panels in the gaps of the new planting – see for example new viewpoint 113 (Fig. 53) at REP2-030. Also Fig 51 at this viewpoint shows clearly a highly visible Power Converter Station (one of about 160) dominating the left foreground. | | |
| REP3-107 | Michael Brown | <p>Q1.14.11 - 9.1 The clear question has received another tortuous answer. Perhaps what it means is that adverse effects would be greater but only for that part of the site being worked on at the time. Another conclusion seems to be that because there will be no quarrying but rather activity only on the surface this somehow does not affect the landscape.</p> <p>9.2 Elsewhere the Applicant asserts that the current patchwork of hedges, so typical of this part of the country, will not be spoilt by regimented and serried lines of new thick hedging in 15 years. I beg to disagree.</p> | As above | Landscape_and_Visual_Impacts |
| REP3-107 | Michael Brown | <p>Q1.14.12 - 10.1 With respect to the ExA, it has focussed here on one of the central issues about impact. The Applicant's response that 'change within the landscape would not be noticeable' makes no sense to me. The sentence carries on: 'this would not be out of scale or at odds with the character of the area', and in the next sentence: the perceivable scale of the proposed development would not take over the existing landscape elements or the skyline.' I'm afraid that I just do not understand what the Applicant is trying to say.</p> <p>10.2 As for the 'skyline', I referred in paragraph 6 of my Written Representation (REP1-155) to the Applicant's misleading statement about 'keeping off high ground' (APP-034 at page 79). For example, the Illustrative Masterplans clearly show panels along the Purwell Farm ridge. Parts of this ridge are shown on the 3rd and 4th photographs in my 'Nomination for location for an ASI' (REP2-121).</p> | Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate. | Landscape_and_Visual_Impacts |
| REP3-107 | Michael Brown | <p>Q1.14.14, Q1.14.15 - 11.1 The Applicant responds by merely referring to the corresponding Landscape Effects question. To my understanding, even if the responses to the corresponding Landscape Effects questions have any merit, I doubt such merit could possibly extend to the corresponding Visual Effects.</p> <p>11.2 A difficulty for us all is that despite my and others repeated requests for more viewpoints and photomontages, there are for example still none along Lower Road in the long stretch between viewpoints 22 and 30, and important current viewpoints such as 22, 24, 26, 33 and 39 still have no photomontages. I suspect that the Local Planning Authorities would have asked for more viewpoints if they had anticipated that the Applicant would assert that the impact on the landscape and visual effects would be so modest.</p> <p>11.3 In this context I also note Historic England's view that additional visualisations are required so we can better understand all impacts on the historic environment. I would add landscape and visual amenity to this as well.</p> | A record of email correspondences, with host authorities, and schedule of suggested amendments / additions to Representative Viewpoints has been kept. This included reasoning for inclusion or discounting any suggestions from the host authorities and is summarised in Table 8.5 of the LVIA [PDB-006]. | Landscape_and_Visual_Impacts |
| REP3-107 | Michael Brown | Q1.14.16 - 12.1 The Applicant appears to accept that the current open views will be lost for ever. This is obvious but appears to need to be said, namely that one of the major reasons for walking in the countryside is to enjoy the distant views. Retaining the new hedging will remove many distant views for ever and will also change the informal hedging that characterises this countryside. In the flatter parts of the country such hedging might be appropriate but I do not believe it is in the undulating countryside in this part of the country, and it will create a different perspective to other adjoining areas outside the proposed Order boundary. It is for future generations to decide how they want the countryside to look and I don't think that our generation should be imposing such a degree of permanent change on one part, albeit a large part, of the Oxfordshire countryside whilst the rest continues in an informal way as now. | The Applicant notes the concerns over the loss of open aspect in views from PRoWs. The landscape planting has been designed in conjunction with ecology requirements and Management Plans. It should be acknowledged that hedgerows have a certain life expectancy and at some point will require to be replaced. Landscape is under constant change. In terms of landscape character, the introduced hedgerow planting is considered an enhancement measure with a consequent beneficial effect. | Landscape_and_Visual_Impacts |
| REP3-107 | Michael Brown | Q1.14.14 - 13.1 Professional judgement and applicable guidance is said to have been used to determine a minimum 25m buffer zone from individual properties and settlements. An exception is said to be Purwell Farm (which I believe is owned by one of the Blenheim companies or trusts) where the Applicant says: it was considered appropriate to have a greater buffer zone.' We are not told why or by how much. | The topography and location of both Purwell Farm and Goose Eye Farm, situated in amongst the Project, led the landscape and design teams to suggest the creation of a larger buffer in those locations. Parts of Purwell Farm were not, in any case, offered for lease to the Applicant. | acknowledgment response required |
| REP3-108 | Michael Field | Practical matters The Applicant's recent responses [REP2-027, p52 &c] did not resolve many of the identified real-world shortcomings in the proposal [REP1-156]. These span issues from the inadequate analysis of sheep grazing logistics to the lack of security, maintenance facilities and staff. Of these, the most pertinent from an environmental perspective is probably the selection of a location for a landfill site (as early as by year 25). The CEO of the Blenheim Estate might welcome the opportunity to volunteer some Palace land for this. | All decommissioned PV Panels would be sent off site for recycling. It is expected that the majority of materials would be recycled with only a very small percentage being landfilled at an existing licenced landfill. Further information on decommissioning and recycling is detailed in the Applicant's Response to Relevant Representations [REP1-020] at Section 11. | Site_selection_and_Cable_Route_Alternatives |
| REP3-108 | Michael Field | Power rating Doubt has been expressed elsewhere about the claimed 840 MW power rating [REP1-169]. Indeed, this seems to be based solely on the value specified in BWSF's 2021 grid connection contract. The ExA would probably like to know the solar farm's proposed Installed Capacity and make its own evaluation of the projected output rating. The Installed Capacity is the number of panels (grey box areas in the masterplan layout [APP-062, REP2-045]) multiplied by the panel rating, 575 W [REP2-027, p54]. The ExA would likely wish the Applicant to first convert the masterplan from its current 'desktop' conceptual solar farm into a real-world solar design: 1) Increase the north-south gap between tables to at least 3 or 4 metres, as for other UK solar farms. Tractors and maintenance vehicles have to be able to access these areas. | The Applicant applied for and has signed a Bilateral Connection Agreement to export 840MW to the National Grid. The figure 840MW was chosen by the Applicant. | Grid_Connection |

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| | | <p>2) Delete the theoretical mini-tables. Prospective table suppliers can advise the minimum real-world table length (8 metres?) .</p> <p>3) An HGV (e.g. fire tender, PCS-delivery articulated lorry, livestock transporter) is 2.5 metres wide. It will not be able to negotiate any curve on 2.5-metre-wide track, let alone the tight-radius curves shown. 'Swept-path' analysis (as incorrectly claimed [REP2-027, p56]) was used only for the access routes from the highways .</p> <p>4) Adhere to the 7-metre fencing–panel separation specification [APP-043, Table 6.3] .</p> <p>5) Leave sections of the construction sites free of solar panels. Bases will be needed when panels are being dismantled to restore the full construction sites (at year 25 and for decommissioning). 6) The ExA might insist that each of the three sites includes a maintenance building and associated infrastructure, given that this is intended to be a functional solar farm</p> | | |
| REP3-108 | Michael Field | <p>Batteries</p> <p>Notwithstanding the overwhelming benefit to both constructors and NGET of having batteries embedded in the solar circuitry [REP2-122, p3], the ExA might be persuaded by PVDP's argument that third-part BESS providers will be able to satisfy BWSF's energy storage requirement (estimated at 3.1 GWh [REP2-122, p1]) .</p> <p>If so, the ExA would probably want to have confidence that Power Purchase Agreements (PPAs) will be in place to ensure that BWSF's surplus midday energy will not be discarded. The Applicant has specified two potential BESS providers for this: EDF's 50MW BESS at Cowley substation [APP-043, 6.4.3] and a 250MW connection agreement at Farmoor NGET substation [REP2-027, p39] .</p> <p>EDF's 50MW/55MWh Cowley facility is part of Oxford's £41m multi-agency project for city decarbonisation: Energy Superhub Oxford .</p> <p>As PVDP must be aware, this is a grid-support battery – it is not available for bulk solar energy storage. It is not clear which 250MW facility the Applicant is referring to. By "Farmoor NGET" PVDP presumably mean the proposed Botley West substation. Grid connection agreements for this potential substation are listed in NESO's Transmission Entry Capacity (TEC) register.</p> <p>Botley West substation currently has four TEC entries: BWSF, the Buckland Marsh PV array with BESS, and two BESS projects of unspecified energy capacity. Some scepticism must be exercised when reviewing TEC connections: unscrupulous operators appear to be exploiting the system by bagging gigawatts of grid connection in order to sell them when a genuine developer turns up needing grid capacity (see Appendix). The application for LPA consent that Ethos Green reports as 'awaiting consent' could not be found on the SODC/Vale planning websites. No reference to the TELIS proposal could be found on the internet</p> | <p>The Applicant is in discussions with a number of potential PPA counterparties. It is aware of the Ethos Green 250MW BESS at Farmoor and has discussed the TELIS proposal with the developer. It should be noted that the description "awaiting consents" on the TEC register does not mean that an application has been submitted, only that consent has not yet been obtained.</p> | Grid_Connection |
| REP3-108 | Michael Field | <p>Appendix – the TEC register The ESO division of National Grid plc (NESO's predecessor) was generous in handing out connection agreements with little oversight as to whether the applicants were viable energy businesses with genuine projects or just market speculators. Fortunately, NESO has recently started its Reforms Process (approved April 2025) to eliminate speculative TEC entries that do not meet its 'readiness criteria' (Gate 2 to Whole Queue process) .</p> <p>The TEC register spreadsheet should be a much quicker download by the end of the year. The West Botley High Impact Green Energy Hub is one of 18 TEC projects registered by Telis Energy UK Ltd. Ownership can be traced back to a Luxembourg-registered company, CRSEF II GLOW S.A.R.L. It looks like a typo may have been responsible for the uniquely low connection capacity for their Botley West project. The accounts at Companies House are now several months overdue. Simon Wragg (Ethos Green Energy Ltd) is a more prolific TEC contributor, with numerous companies registered for the purpose – some directly owned by Mr Wragg and others via holding companies. Curiously, many are listed as being at the 'awaiting consent' stage, although superficial attempts to find corresponding LPA applications were not successful.</p> | <p>Botley West Solar Farm meets NESO's readiness criteria.</p> | Grid_Connection |
| REP3-109 | Miles Tuely | <p>Hello Inspector As the owner of (-), I wish to comment on the applicant's reply to your request for more information. It is quite wrong to assert that there is no "intervisibility between the house and areas of solar panels ". The writer has clearly not visited the house from which we can clearly see to the south east the field 12 which will be covered by panels. Your request to explain in detail how they came to their conclusion has not been answered and no " clear assessment or reasoning " (your words) has been given. They might be asked to explain what " evidential values " of a house mean. It is our contention that " heritage significance " of the Grade 2* listed house will indeed be very much affected.</p> | <p>This comment is noted.</p> | acknowledgment response required |
| REP3-110 | Nigel Pearce | <p>The following comments refer to the Applicant's responses relating to Best and Most Versatile (BMV) agricultural land. Their response to my Written Representation and the ExA's Written Questions on this subject constitutes what might have been a masterwork of evasiveness, if it wasn't so transparent.</p> <p>(1) 12.4 Applicant's Responses to Written Representations Submitted at Deadline 1 REP1-162 As someone new to NSIP Public Examinations, I was surprised to see that my Written Representation, 14 pages (over 5,000 words) of detailed text backed up by evidence, could elicit no more than "The Applicant notes" it, and an "Acknowledgement". Will there be no further response to the many points made? REP1-163 The Applicant makes no attempt to respond to what are serious allegations on my part about the "misleading, inaccurate, and structurally biased approach that PVDP and its consultants have taken on this issue" throughout the process. Instead, they needlessly describe the ALC system (we all know about this) and introduce a distraction about grading not necessarily reflecting current</p> | <p>The content of the document was based on an assessment of the Preliminary Environmental Information Report. The assessment of BMV has been updated within the final ES within Chapter 17 of the ES [APP-054]. Further clarification on the distribution of ALC grades within the site has been provided in responses to ExQ1.11.8 [REP2-025] and in response to ExQ2.11.4.</p> <p>The comments in relation to the assessment methodology and matrix are addressed in response to the ExQ 1.9.2 and the response within REP3-110 below.</p> | Agricultural_Land_Use |

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| | | economic value of yield, which is not what is being questioned. (In any case, current economic value of yield could be higher, rather than lower as the Applicant wishes to imply.) | In relation to the use of the land during the operational period for grazing, this is secured through the outline landscape and ecological management plan [REP3-035] . Further responses on the implementation of this are provided in the applicant's response to ExQ 1.10.11 [REP 2-025] and to ExQ2.11.1. | |
| REP3-110 | Nigel Pearce | Q1.11.1 - The Applicant makes no attempt to address the operational lifetime of the project – at least 35 years, maybe more – or explain in what way, and to what extent, they sought to avoid BMV land in their choice of location for this lengthy period of time. (Presumably because they have made no effort to avoid it.) Instead, they restrict their 2 responses to the permanent infrastructure only, and the short-term construction phase. However, as PVDP said in their Scoping Report in paragraph 5.2.4, “the need to generate cheap, subsidy-free power means these power stations must be utility scale – in excess of 250MW _e .” In other words, the Applicant could easily have avoided BMV land and restricted the panel coverage to areas of “moderate” agricultural land, while ensuring the economic viability of the project. | The Applicant notes the IP's comments but has nothing further to add over and above its answer to Q1.11.1 and the detail set out in its ES Chapter 17, Agriculture [APP-054] and its Chapter 5 on Alternatives Considered [APP-042] , the latter which sets out in detail how the site as selected and the process gone through. The Applicant would also draw the IP's attention to the 'Applicants Approach to Design Note' submitted at Deadline 3 provided as Annex 4 of the Applicants response to the ExAs Second Written Questions [EN010147/APP/14.2] . In terms of the operational period, no further effects on bmv are assessed during this period as there would be no disturbance of soil resources and their inherent physical quality during the operational phase of the project. | Site Selection |
| REP3-110 | Nigel Pearce | Q1.11.7 - I am sure that the ExA has noticed that the Applicant has ignored the question at the end of the second bullet point completely. Likewise, the Applicant has failed to answer, directly, the request in the first bullet point about the operational lifespan. Instead, they confirm the 100% loss of current agricultural operations “at the commencement of construction”, and confirm that the operational effects have been scoped out of the assessment in Table 17.7. But it is precisely these operational effects that the ExA is questioning, because they have been arbitrarily scoped out. Too uncomfortable for the Applicant to answer? | With regard to Q1.11.7 [REP2-025] , please refer to Q2.11.7 of Applicants response to the ExAs Second Written Questions [EN010147/APP/14.2] . | Agricultural_Land_Use |
| REP3-110 | Nigel Pearce | Q1.11.8 - No doubt the ExA has also noticed that the Applicant has responded to the first part of the request (the easy part – the data are readily available), but completely ignored the second, about “specific justification for the use of land by grade”. This omission is a particularly stark one . . . | With regard to Q1.11.8 [REP2-025] , please refer to Q2.11.8 of Applicants response to the ExAs Second Written Questions [EN010147/APP/14.2] . | Agricultural_Land_Use |
| REP3-110 | Nigel Pearce | Q1.11.11 - . . . but not as stark as the total failure to respond at all or in any way (as yet) to the ExA's question about degraded soil on the Blenheim Estate. Were Mr Hare's extravagant claims too difficult for the Applicant to substantiate? | We refer to the representations submitted by Blenheim Palace in response to the Examiners' questions at Deadline 2. These set out the management tools used by the farmers working the land. | Agricultural_Land_Use |
| REP3-110 | Nigel Pearce | Q1.1.20 - The admission that “the matter of agricultural land use is not relevant” was an error is revealing in two senses. First, it sums up their cavalier and careless approach to agriculture generally (see for example, their dismissive response to Q1.16.12); and, second, I would suggest that it was not an error at all, but another manifestation of the poor soil narrative that pervades the Applicant's written material and oral exchanges. The mistake was being found out. | The reference to agricultural land use, in the context in which it was made, concerns whether the land is used to grow cereals, grass, fallow, or other crops within the definition of “agricultural”. “Agriculture is defined in Section 336 of the Town & Country Planning Act 1990, and the growing of crops, grassland meadows, keeping of livestock etc. does not comprise 'development' “ | Agricultural_Land_Use |
| REP3-110 | Nigel Pearce | Q1.9.2 - The response to this question is evasiveness at its most evasive. The challenge is to the choice of matrix (and matrices generally). The Applicant does not address this challenge. Instead, they simply regurgitate a description of the methodology they have used, as if repeating it is sufficient to brush off any criticism. It does not answer why they chose the matrix they did, rather than other, more objective, options available. The methodology itself may otherwise be sound; the point is, the choice of matrix is where the methodology is tainted and “expert” judgement is undermined. The Applicant says that the author has taken this approach for many years. I am sure the author is very experienced, and will therefore know exactly how to manipulate the methodology, and especially the choice of matrix, to favour the client. I note also that, in spite of having my surname in front of them when responding, they got it wrong in their response. Rather symbolic of their lack of seriousness. | The applicant apologises for the omission of the respondent's surname within the response to Q1.9.2. The application of the Design Manual for Roads and Bridges LA 109 Geology and Soils methodology for the assessment of the effects on agricultural land quality is a robust and frequently applied method for the assessment. | Agricultural Land use |
| REP3-110 | Nigel Pearce | Q1.16.7 - The Applicant's unsatisfactory response to this question skates over the operational phase of the project, which will bring long-term visual change to the “traditional English countryside”, and ignores the “agricultural productivity” part of the question. It also raises the “temporary” problem. Solar farms may be “time-limited and fully reversible”, but energy companies are increasingly seeking to extend their lifetime, and it is fair to assume that Botley West is likely do so too (before or after PVDP sell it on to someone else). At what point is “temporary” no longer temporary? With a Freudian slip, the Applicant goes on to say that the direct benefits to Blenheim will be long-term revenue. Precisely. Never-ending, perhaps. | The Applicant acknowledges the concerns raised in REP3-110. In light of this and other Representations through the examination process, the Applicant has reviewed the submitted LVIA [PDB-006] and amended the assessment of effects where appropriate, giving more explanation as to the reasoning for the levels of significance reached. It is not the Applicant's intention to make wholesale changes to the LVIA methodology, as this has been | Landscape_and_Visual_Impacts |

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| | | | produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01, as agreed with the OHA. | |
| REP3-110 | Nigel Pearce | REP1-100 No doubt CPRE will respond to this separately, but it is ironic that the Applicant suddenly acquires an interest in accuracy by saying that there is no reference to "low productivity" in Volume 1, Chapter 17. This is correct as far as the two words themselves are concerned. However, the Applicant's whole approach to BMV land has been to minimise its importance and to imply that the "poor quality" of the soil throughout the project area means that its productivity is correspondingly low. | The Applicant has provided the Agricultural Land Classification of the Site in Volume 1, Chapter 17, based on the MAFF ALC Guidelines 1988, which do not take into account variations in the management practices that may be applied to the land and may vary over time. The classification system is based on the assumption of a good, but not outstanding level of management (Page 2, subheading 1 of the ALC Guidelines). | Agricultural_Land_Use |
| REP3-111 | Patricia Bustin | Could you please explain how the electricity generated is going to be moved to where it is eventually going. ie underground cables or overhead pylons. The river Thames appear to be forming a barrier | All cables will be buried. The river Thames will be crossed by means of Horizontal Directional Drilling. | Grid_Connection |
| REP3-112 | Professor David Sherratt | Q1.11.11 - The low phosphate levels provided by Blenheim Estate indicate that the land indicated in red and orange (index 1&2) in the Blenheim's new map needs fertiliser (artificial or natural organic), likely because of previous poor management. The provided phosphate levels are irrelevant to the quality of the land ALC classification above (PVDP map), which indicates the potential for BMV use in productive agriculture. Furthermore, Index 2, as Lisa Warne has pointed out is 'the ideal level for general cropping'! Parenthetically, in conversations with a local farmer yesterday (whose land is not affected by the solar farm proposal), he stated that index 1 and 2 phosphate levels could be readily 'improved by addition of fertilisers (organic and/or artificial) and that these lower phosphate levels are no indication of potential high agricultural productivity, as I have stated in the attached pdf. The Blenheim Estate response is therefore misleading and irrelevant to the potential productivity of the land'. | Please refer to Q2.11.14 of the Applicants Response to Second Written Questions [EN010147/APP/14.2] . | Agricultural_Land_Use |
| REP3-113 | Professor John Dowling | This is a Deadline 3 Update to the Botley West Solar Application before the Examining Authority Of the Planning Inspectorate. In earlier Submissions at the Pre Application and Deadline One stages dated February 7 and June 2, this year, I put before you a number of largely contextual matters including National Security concerns, the national priority of Grid Development, and the existence of active planning applications not least that of the Research Park and 2,200 residences at Salt Cross, adjacent to Eynsham on the A40 to the west of Oxford City. Since then the DHLGC have abolished the District Council model calling for Strategic Unitary Authorities. Three models of Strategic Unitary Authorities have emerged as possible successors for Oxford City as an economic hub for the relevant area of greater Oxford. This simplification of local government arises for two interacting reasons. The first is that the existing District Councils are felt to have formed a constricting ring of suburban authorities around urban hubs unsympathetic to economic expansion. This has resulted in the frustration of both housing supply and natural economic development. The second aim is to facilitate greater inward investment by creating directly elected mayors with economically focussed leadership, infrastructural competence and centralised authority. Put simply to create a city driven economy with increased housing supply at reasonable cost . Oxford University has already expanded in all directions and has spin-off early stage management capacity and external yet dedicated sources of venture capital including Oxford Science Enterprises, which together with the City of London shows ready access to capital resources. As the oldest and one of, if not the, most significant of the world's research universities it has that rare capacity to compete for the best minds of any centre in the world. In an age led by the competition for research talent Oxford is and, this is the point, must remain a highly attractive setting for those most capable of this work. With this as background, may I briefly turn to the projected models offered by the City and District Councils, soon to lose their current public franchise. There are three, but each of them is unsatisfactory considered against the reforms considered above. The County proposes to use the County boundary as the strategic authority, but this seems to replace the current pattern of NIMBYism with a wider body likely to be only too similar, in effect no change. Of course certain non economic concerns, SEND and Care provision would benefit from a larger administrative reach and financial support but that is to change the subject. The five Districts have an even less plausible plan: two strategic authorities one to the north one to the south of Oxford. This replaces five Districts with two, but splits the economic expansion of Oxford City e.g. separating Culham to the south from Oxford North and Salt Cross to the west . Thirdly, the City offers an enlarged Oxford, which is closer to DHLGC's intention but has unfortunately a gerrymandered feel. Salt Cross extends Oxford North along the A40. It already has its WODC Area Action Plan complete but for its Net Zero standard which is being currently determined by the Examiner. Salt Cross and Eynsham, together some 6,000 residencies, includes an Oxford facing P&R in place; the A40 is being expanded with bus lanes and similar infrastructure but is now unreasonably excluded from the City's proposal for a Greater Oxford. An explanation is that it might threaten Labour hegemony in the larger Oxford. So it is that each of the three models reads as a vain hope to save what each might from the wreckage of the passing District Council era. Fortunately, the DHLGC have appointed an Oxford Growth Commission with its chair, Neale Coleman CBE. His purpose is to drive forward the UK economic expansion around the area of the Oxford-Cambridge Arc. This high level Commission will ensure the infrastructure necessary to unleash the formerly bounded potential of Oxford's housing, innovation and research. As the second shoe to fall in the plan for a strategic unitary authority, it will be able to address competently the true economic scale for the future of Oxford and the surrounding area, so as to include Eynsham and Salt Cross. It is still for DHLGC to decide on a strategic unitary authority for the greater Oxford and determine what its natural economic boundary will be. It therefore would be wise were you to consult Mr Coleman and the Oxford Growth Commission on their views on so vast a solar generation Application, as you would with statutory or interested bodies. In the light of these DHLGC decisions on strategic unitary authorities and the appointment of an Oxford Growth Commission, the | <p>The Applicant notes Professor Dowling's wider concerns about the potential changes to the structure of Local Government in Oxfordshire, and West Berkshire, and is aware of the current consultation on Unitary status and the varying models being promoted by the Host Authorities, in response to the DHCLG's requirements.</p> <p>The strategic importance of renewable energy generation in Oxfordshire, to meet both existing demands and projected growth, has informed the need for the Project. The impacts of major development proposals, including Salt Cross, have also been assessed cumulatively within the application.</p> <p>An updated Cumulative Assessment Chapter 20 [APP-057], including the proposals for improvements to the A40 which have been advanced since submission, will form part of the submission at Deadline 5.</p> <p>Early consultation with the Host Authorities included representatives of the 'Future Oxfordshire Partnership' (formerly the Oxfordshire Growth Board, and now re-titled Oxfordshire Growth Commission).</p> <p>The Applicant has also raised the emerging structure of any new Unitary authority with the host authorities in terms of emerging policy, and the host authorities have commented that, if reorganisation takes place, it is likely to be 2028 at the earliest, and existing plans will still continue until such time as a new plan is prepared / adopted by any new authority.</p> <p>It remains that the Project should be determined primarily in accordance with National Policy Statements.</p> | Planning_Policy |

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| REP3-114 | Rosemary Lewis | <p>loss of so much of Oxfordshire to solar generation would seem to condemn highly-valued incomers to living among the panels, which is a desecration of unspoiled countryside, where the expanded workforce of the Greater Oxford economy will be housed. This seems particularly pertinent to the Southern area of the Application along Lower Road and Cassington.</p> <p>Dear Inspectors</p> <p>I am responding to PVDP's answer to ExA WQ1 number 1.5.27 regarding their previous experience in developing solar farms.</p> <p>Their answer states: "980MW have been developed in the following six projects in Japan: Ukujima solar farm with a total capacity of 480 MW, Onikobe solar farm with a total capacity of 183 MW, Kawasaki solar farm with a total capacity of 56 MW, Yamagata solar farm with a total capacity of 58 MW, Akita solar farm with a total capacity of 40 MW, Green Academy solar farm with a total capacity of 40 MW.</p> <p>The applicant had raised the funds for the development in some cases, including construction finance and had enabled the acquisition by entity continuing and completing the construction and commissioning of the projects." This carefully worded answer fails to tell the true story of their experience in developing solar farms.</p> <p>Throughout the ES documents, PVDP have always given the impression that projects they have been involved with have been seen through to completion, for example, in this statement on previous experience in ES Chapter 1: Introduction, paragraph 1.3.1 (Ref EN010147/APP/6.3) "PVDP has been successfully developing solar assets in Europe and Japan for the last 18 years, with 1.0GW built to date." But this is not the case. The only project of similar size (though still only a little over half the size of BWSF) is Ukujima solar farm. It should also be noted that the population of Ukujima island is approximately 1,000 compared with approximately 26,000 living within 1.5km of BWSF. As an article from Mainici, Japan's National Daily (May 14, 2023) makes clear, this project - originally approved in 2013 - has still not been constructed and may never be. In 2018 PVDP left the project due to the time needed to secure leases for the large amount of land needed.</p> <p>Thereafter, the project suffered multiple delays. It would appear that flaws in PVDP's original design have contributed to the delays.</p> <p>The full Article from Mainici follows at the end of this response. I would respectfully urge the ExA to give serious consideration to the very limited evidence of any success for PVDP in getting a project successfully developed even as far as the start of construction and certainly not for any project approaching the size of BWSF. This track record throws considerable doubt on their ability or intention to see the BWSF proposal, if approved, through to construction let alone completion.</p> <p>1. Please could ExA ask PVDP for a further response to this? My fear is that, in the worst case scenario, if not properly financed, the BWSF site could be started and then abandoned with infrastructure scattered around the site but never connected (as in Ukujima) with the countryside ruined and no electricity being generated either. I would expect that Blenheim Estates (BE) should be worried about this too.</p> <p>2. Please could ExA ask BE what arrangements or contracts are in place with PVDP to safeguard against this? With thanks Yours sincerely</p> | <p>As has been stated in previous answers, it is not unusual for a developer to sell a project post-consent in order to recycle capital for new projects. In the case of Ukujima, PVDP was approached by a group of Japanese entities to which the project was sold in 2028. The solar farm is currently under construction.</p> | |
| REP3-115 | Rosemary Lewis | <p>Comments on responses to Examiners Questions 1: Surplus Generation, Battery Storage, Need and Very Special Circumstances.</p> <p>1. SURPLUS ENERGY GENERATION and PANEL EFFICIENCY.</p> <p>1.1.Since the Botley West Solar Farm was first proposed the applicant has made much, in communications and in the press, of "the agreement to supply 840 MW". In some articles they implied that the size of the proposal could not be reduced because they could not fall short of this amount. However, this is not the case.</p> <p>1.2.In the ExA 1st written questions, the ExA asks two questions about panel efficiency.</p> <p>1.2.1.Question 1.1.18 part 4. Whether using more efficient or productive panels, likely to be available by the time construction started, would result in waste.</p> <p>1.2.2.Question 1.1.18 part 5 Whether there would a reduction in the number of panels in order to limit the output. due to the of panels with greater efficiency or productivity by the time BWSF was built.</p> <p>1.3.In their answer to 1.1.18 (4), the Applicant admits that the 840MW is the upper limit to what they can supply. They go on to say that "any additional generation would primarily offset natural performance degradation over time." They fail to answer 1.1.18 (5).</p> <p>1.4.They do not provide any evidence of either the timing or amount of this degradation but if there was surplus generation, particularly in the early years, there is no guarantee that this surplus could be used and therefore the answer to question 4 should be "yes, there will be waste" (especially without battery storage - see below).</p> <p>1.5.I can confirm the fact that 840MW is the agreed maximum to be supplied - as shown in a letter I received from NESO (see Appendix A) on March 2023 which states clearly that: "The amount that a developer applies for forms the basis of a right to connect to and use the system. This is a right rather than an obligation. A developer can apply to change the amount and there are provisions within the CUSC for cancellation etc." 1.6.So, the CAP by NESO means there is no need or even commercial advantage in generating more MW than the 840MW limit, especially without any on-site battery storage (BESS) planned and, further, there is no financial penalty for not reaching that cap.</p> | <p>The Bilateral Connection Agreement allows for either party to request a change to the connection date. NGET has requested that the Applicant sign an Agreement to Vary, moving the connection date back to 2029. It is expected that the AtV will be signed in the coming weeks.</p> <p>The responsibility for balancing the National Grid lies with NESO. It should be noted that there is 34GW BESS under construction or awaiting construction. This is in excess of the 28GW NESO estimates it needs to balance the system. The Applicant intends to sell the output of the solar farm via physical PPA and is in discussions with several local offtakers. BESS does not need to be co-located with a solar farm – BWSF's output can be stored by any Grid-connected batteries, as OFGEM's Long Duration Energy Storage scheme acknowledges. Electricity from BWSF will enter the Grid on the Cowley-Walham 400kV overhead line, meaning it is available to charge the EDF BESS at Cowley substation.</p> <p>The UK has 18GW installed solar generation and is adding capacity at 1GW per year. In order to meet the CP30 targets for 2030 and 2036 this annual rate needs to rise to 6GW. At current rates both targets will be missed by a large margin.</p> | Needs_Case |

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| | | <p>1.7. In the light of this, the Applicant needs to justify the over-specifying of panels using current technology and their failure to consider a reduction in panel area due to the improved performance of new panel technology.</p> <p>2. BATTERY STORAGE.</p> <p>2.1. In ES: Para 5.8.2 Alternatives considered (Ref: APP-042), the Applicant confirms that "The Project does not incorporate any battery storage. Energy generated by the Project will be despatched to the grid but stored, as required, by Battery Energy Storage Systems (BESS) that are connected to the Grid elsewhere, including the EDF 50MW BESS located at Cowley substation." 2.2. However in his response to ExQ1 submitted for deadline 2, (Ref: REP2-122) Michael Field gives an engineer's perspective on this. He writes: "EDF's 50MWh Cowley battery provides inertial grid support for the Oxford area. It can absorb or inject energy at 50MW for up to 30 minutes. It is neither suitable nor available as storage for solar energy." 2.3. On the consequences of this for BWSF Michel Field concludes that "it is far from certain a [suitable] third party battery storage will ever exist, let alone commit to purchasing BWSF energy. This has two further consequences: BWSF's Surplus energy will be curtailed (discarded) in the daytime and, in the evening, demand will be satisfied by alternative generators."</p> <p>2.4. This conclusion casts doubt on the accuracy of Applicant's statement of the availability of alternative battery storage.</p> <p>3. THE NEED and VERY SPECIAL CIRCUMSTANCES</p> <p>3.1. Within their answer to ExQ1 question 1.3.3, the Applicant writes: "in terms of the weight to be given to the contribution of the Project to the urgent need for renewable energy generation, NPS EN-1 paragraphs. 3.2.6-8 are clear that the need should be given substantial weight".</p> <p>3.2. Recent data suggests that the need for an one particular project can and should be considered on more than this need alone, in view of the current high number of other proposals either approved, in planning or awaiting connection in the queue.</p> <p>3.3. On Radio 4 in World at One on 13th of December, Head of Mission for Clean Power at the Department for Energy Security and Net Zero, Chris Stark, described his role as; "unique, being within the department for Energy but also looking across Whitehall so that we can get all the various leavers pulled and blockages removed to get to where we need to get to by the end of this decade".</p> <p>3.4. He went on: "What we're doing today is being much more specific about why do we need to do this and where this new infrastructure needs to go? That will be a signal back into the planning regime itself about the priority that we're giving to these projects for 2030 and again that's a new step."</p> <p>3.5. In answer to the question "Can you be clear about what the blockages are at the moment?", he replied "The biggest barrier is how we manage the Grid so we already have in the queue more capacity than we will ever need for our energy system."</p> <p>3.6. These needs are identified by National Energy Systems Operator (NESO) formerly ESO. An article from Feb 2023 states; "The ESO Future Energy Scenarios modelling shows that Great Britain needs between 123-147 GW of low carbon transmission generation by 2030 to be on a net zero compliant pathway, and there is already 83 GW connected. As of February 2023, Great Britain had 257 GW of generation with contracts for future connection to the transmission system. That's three times as much than is needed."</p> <p>3.7. In ES Chapter 5 paragraph 5.5.4, (APP-042) the Applicant also acknowledges that 'there are many schemes currently in the consulting process' but then goes on to consider only the largest, NSIP solar schemes, claiming they would "only add approximately 15.2GW to the 15.8 installed capacity ie a total potential capacity of 31GW." This fails to give an honest assessment, and contradicts the data supplied by NESO, because the Applicant has been arbitrarily selective in counting just "the largest schemes", ignoring many smaller but equally important - indeed in many cases, more appropriate - schemes. In terms of national energy needs they have also ignored the contribution of schemes offering alternative and more efficient sources of energy such as on- and offshore wind to the overall national energy target.</p> <p>3.8. NESO continues to face a significant bottleneck in grid connections. Over 1,700 applications were received in 2023/24, creating a backlog exceeding 700 GW of capacity, far surpassing the UK's projected needs for 2030 and 2050. This backlog is hindering the progress of renewable energy projects seeking to connect to the national electricity transmission system. The 700+ GW backlog is significantly larger than the UK's projected energy needs for the next few decades, highlighting the severity of the issue, according to the Energy Advice Hub and the National Energy System Operator (NESO).</p> <p>3.9. Since then applications to join the queue have continued to expand rapidly with the NESO website reporting that they will begin the process of reorganising the over 3,000 projects in the transmission connection queue after July 2025.</p> <p>3.10. In April 2025 Kayte O'Neill, Chief Operating Officer at NESO said "approximately, 296GW of projects are expected to receive gate 2 offers." [in September 2025]. This is still 3 times the predicted need by 2030.</p> <p>3.11. The conclusion is that the Applicant can no longer simply rely on the "National need to avert the Climate Crisis" as the very special circumstances for building on Green Belt and BMV land and the Inspectorate can be more selective about which projects to recommend based on these factors.</p> <p>3.12. The connection date for BWSF currently shown on the TEC register is 30 October 2026. This is confirmed in NESO's letter of 23 Dec 2024. With this examination not ending until November 2025 and a decision not expected</p> | | |

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| | | <p>until mid 2026, there is no way that the Project will be reading to connect until at least mid to late 2028 at the earliest (even if the 2+ years construction was started immediately) with the risk that it will lose its place in the queue to connect.</p> <p>3.13.Further, as ExA point out in question 1.3.3, “the likelihood of the National Grid substation being constructed fully and ready to receive the proposed development is in doubt”. Again, in this eventuality it is likely that other projects, able to proceed, would be offered connections ahead of BWSF in order to meet the urgent need already described.</p> <p>4. CONCLUSIONS</p> <p>4.1.With the current specification, surplus generated electricity would be wasted - particularly in the early years.</p> <p>4.2.Without battery storage on site, or guaranteed to be available elsewhere as the Applicant claims, there is no need or advantage to the Applicant to over specify the number of panels to be installed, particularly without regard to improvements in panel technology.</p> <p>4.3.Based on the Governments own figures, there is capacity among projects likely to accepted at gate 2 of the queue to provide 3 times the energy needed by 2030.</p> <p>4.4.The Applicant can no longer simply rely on the “National need to avert the Climate Crisis” as the “very special circumstances” and a reason for approval to build on Green Belt and BMV land and the Inspectorate can be more selective about which projects to recommend based on these factors.</p> | | |
| REP3-115 | Rosemary Lewis | <p>1.1.The Examiners ask: “ES chapter 8 [PDB-006] table 8.5 shows that the scoping opinion required assessment for RVAA. Paragraph 8.6.78 to 80 of this document referred to RVAA. However, the very brief paragraphs do not clearly demonstrate that the 4-step assessment suggested in The Landscape Institute Technical Guidance note TGN2/19 has been undertaken.” and go on to request a more in depth assessment</p> <p>1.2.In their response PVDP seem to have ignored this question, simply replying: “professional judgement and applicable guidance was used to determine 25 meter buffer zone from individual properties and settlements”.</p> <p>1.3.They do not identify or even provide a number for these properties. They claim, with no justification, that “many of the individual properties have existing vegetation within their boundaries which would further limit the effects of the project”.</p> <p>1.4.Again, without any evidence provided, they add “Due to the low level of the project and proposed mitigation, it is anticipated that there is no potential for any private views to be adversely affected to an extent that would result in a level of effect that would trigger the requirement for RVAA.”</p> <p>1.5.The Stop Botley West (SBW) Community Impact Report [Ref: REP2-081, para 7.3-7.6] has already criticised PVDP's conclusion that the requirement for an RVAA has not been triggered.</p> <p>1.6.By PVDP's own admission there are at least 699 individual properties that “have a potential view of the panels” and “are within the 1Km assessment area” as these were the criteria used in deciding the properties to be assessed for the Glint and Glare report. [Ref APP-128 ES 6.5 Appendix 4.4 Glint & Glare Study, para 5.4.1]</p> <p>1.7.It is difficult to understand why the Applicant has ignored these when assessing and dismissing the need for an RVAA.</p> <p>1.8.The Stop Botley West (SBW) Community Impact Report [Ref: REP2-081, para 7.7] identifies “255 residential properties within 100m of the site and a least 70 on or within the red line boundary”. SBW data also shows over 5,000 properties in total within 1km of the site.</p> <p>1.9.I can personally attest, having visited nearly all of the impacted properties/settlements within 100m of the site, that most do not have existing vegetation affording any screening from the panel area. Additionally, due to the steep contours in the Central and Southern sites, NO amount of hedging or fencing would screen the views for many properties eg all those along Lower Road, Church Hanborough or on Tumbledown Hill, Cumnor and for some of the properties in Bladon, Cassington and Begbroke.</p> <p>1.10.A sample of around 20 of the most impacted property owners have requested an ASI so that ExA can judge for themselves the level of impact on Residential Amenity involved.</p> <p>1.11.PVDP go on to say “The impact of glint and glare upon residential amenity has been assessed within the Solar Photovoltaic Glint and Glare Study [APP-128] (section 7.4). The Glint and Glare report identified a moderate impact upon residential amenity for seven dwellings for which mitigation was recommended. This recommendation was looked at and changes made to the design as required. These recommendations can be revisited to ensure that all have been considered properly and any further mitigation can be added as necessary.”</p> <p>1.12.This assessment has already been questioned in The Stop Botley West (SBW) Community Impact Report [Ref: REP2-081, section 8.0 Glint and Glare Study] due to a number of failings:</p> <p>1.12.1. Over 600 properties were assessed as requiring no mitigation. In the majority of cases this was incorrect due to a failure to distinguish between existing and proposed vegetation.</p> <p>1.12.2. Only 7 properties were assessed as requiring mitigation and, of these, two do not require it due to a well established hedge.</p> <p>1.12.3. Thirty impacted properties in Bladon within 100m of the site were omitted from the study altogether.</p> | <p>Residential Visual Amenity Assessment (RVAA)</p> <p>Landscape Institute Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA) (LITGN-2/19) provides guidance on RVAAs and when they may be undertaken.</p> <p>As with LVIA, RVAA is concerned with specifically with the effects of change to the views and visual amenity from individual properties. LVIA considers the effects on groups of properties (LITGN-02/19, paragraph 3.9). care should be taken not to ‘double count’ effects on properties (GLVIA3, paragraph 6.36).</p> <p>Paragraph 1.5 of LITGN-2/19 explains that “<i>it is widely known that no one has ‘a right to a view.’ This includes situations where a residential property’s outlook / visual amenity is judged to be ‘significantly’ affected by a proposed development.</i>” Paragraph 1.6 explains further that “<i>It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before.</i>”</p> <p>The Residential Visual Amenity Threshold (RVAT) has to be reached before an RVAA is required. Examples of where an RVAT is reached are where “<i>one might use terms such as ‘overwhelming/overbearing’ for tall structures, or ‘overly intrusive’ for a development overlooking a garden or principal room</i>” (LITGN-2/19.paragraph 2.2). Even with low-profile schemes, such as road and residential projects (long-term and permanent) might only require RVAA assessments for properties 50-100 m from the development (LITGN-2/19, paragraph4.7). Solar panels at a maximum height of 2.3 m are not tall structures and are not manned buildings, that overlook properties.</p> <p>The effect on individual properties, raised during consultation, including public consultation events, were addressed in subsequent discussions with the property owners. Where it was agreed there was the potential for significant effects, mitigation was undertaken in the form of removal of areas of panels or additional landscape mitigation to minimise these effects. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which would further limit the effects of the Project. Additional mitigation, as shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], was</p> | Landscape_and_Visual_Impacts |

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| | | 1.13.The case for not carrying out a residential visual amenity assessment relies on the applicant's insistence that very few properties are impacted. The fact that they identified nearly 700 properties "within 1km with potential sight of the panels" and the data collected by Stop Botley West contradicts this conclusion. NB A full analysis by SBW of the presence or absence of vegetation was not possible due to the lack of images/maps provided by the Applicant - see para 2. below | included to further screen available views from residential properties. An RVAA was not requested by the OHAs, either at Scoping or during later consultation (see consultation report, document reference [APP-024]). | |
| REP3-115 | Rosemary Lewis | <p>2.1. The ExA ask: "Section 9 of the assessment refers to dwellings railways roads and aviation as receptors were vegetation has been specified as a possible means of mitigation for potential impacts. What assurances can the applicant provide that, should this form for mitigation be selected, it will be effective immediately with no reliance on plant growth which could take several years.</p> <p>2.2.NB. This question applies equally well to the 606 dwellings assessed for Glint and Glare assessed as needing no mitigation due to "existing or new vegetation". (See para 1.12.1 para above) 2.3.Response from PVDP. "If vegetation is proposed which would not initially screen views of the reflecting panels temporary fencing will be utilised the screen views towards the sensitive receptors until vegetation mature sufficiently." 2.4.This option has not previously been mentioned in relation to dwellings and no plans exist showing where this would happen.</p> <p>2.5.Building a 2m high solid fence (not specified but presumably solid and up to 2m high) would have an immediate, overwhelming and unsightly impact on the outlook from the many impacted properties with no existing vegetation.</p> <p>2.6.It is impossible to independently assess which of the 606 properties assessed for Glint and Glare would be affected in this way. This is because, apart from the Northern Site, images identifying whether individual properties have existing vegetation or whether new vegetation is proposed have not been provided by the Applicant despite being described as "provided on request" on page 190 of the Glint and Glare report [APP-128: Appendix 4.4 Glint and Glare Report] .</p> <p>2.7.An email was sent by this respondent to Mark Owen-Lloyd on 28 March 2025. A copy of the e-mail exchange is attached at Annex A. The email asked him to: 2.7.1.Explain the difference between "proposed vegetation" and "mitigation" 2.7.2.Supply the missing maps</p> <p>2.8. Mr Owen-Lloyd replied on 15 April 2024</p> <p>2.8.1.To the first point, he has not answered the question either through intention or failure to understand or appreciate the importance of this distinction as used in the Glint and Glare Report. .</p> <p>2.8.2.To the second point, he acknowledged the request but, to date, no maps have been received.</p> | <p>The applicant has committed to temporary screening to mitigate the effects towards road users and residential properties immediately upon installation. This is secured by the oLEMP.</p> <p>Pager Power can provide further images depicting the desk based analysis for a specific dwelling upon request.</p> | Glint_and_Glare |
| REP3-116 | Rosemary Lewis | <p>Comments on ExQ1 Responses-Missing Viewpoints and Heritage Assets</p> <p>1. ExQ1 Question 1.6.18. St Peter and St Paul, Church Hanborough</p> <p>1.1.Question 1.6.18 asks why only one viewpoint of St Peter and St Paul was included and why no views closer than 1.5km are used.</p> <p>1.2.In fact there are 2 views of St Peter and St Paul. They are #27 which is 1.5km South and #36 which is 2km East.</p> <p>1.3.The Applicant points out there are 2 viewpoints but fails to answer the question as to why there is no viewpoint nearer than 1.5km.</p> <p>1.4.In view of this omission, I provide here three closer views of St Peter and St Paul, Church Hanborough</p> <p>1.5.View of St Peter and St Paul from PRoW 238/5/20 (Eynsham to Church Hanborough) taken looking over panel fields 2.115, 2.118 and 2.120 at a distance of 1.2 km.</p> <p>1.6.View of St Peter and St Paul from Lower Rd (from A4095 to A40 at Eynsham) taken looking over field 2.115 and 2.116 at a distance of 1km. This photograph, taken from a field entrance, is one of many glimpses of the Church seen through gateways or gaps in the hedges when driving or cycling north on Lower Rd.</p> <p>1.7.View of St Peter and St Paul from Gooseye Farm looking West towards Lower Rd and Church Hanborough from field 2.84 whose northern boundary is proposed, by the Applicant, to be a new PRoW. Visible fields 2.84, 2.115, 2.116. Distance 0.9km.</p> | <p>The Applicant would refer to their response to ExQ1.6.18 in the Applicant's Response to the Examining Authority's First Written Questions (ExQ1) [REP2-025] regarding the number of photomontages available for use within the assessment of likely impacts and effects on the Grade I listed Church of St Peter and St Paul at Church Hanborough. The Applicant would also point out that their assessment is not based on the photomontages but on a thorough examination of the setting of the church within the wider landscape including a number of site visits and walkovers. The photomontages are used within the assessment to evidence the opinions expressed therein.</p> | Historic_Environment |
| REP3-116 | Rosemary Lewis | <p>2. ExQ1 Question 1.6.20</p> <p>2.1.Question 1.6.20 states "It is considered that this photomontage will not convey the potential impact of the panels on the setting of the Church [of St Peter's, Cassington].</p> <p>Provide an additional photomontage from a more appropriate location and reassess the potential impact"</p> <p>2.2.The Applicant has ignored this instruction and failed to provide an additional photomontage showing the setting of St Peter's Church, Cassington</p> <p>2.3.In view of this omission, I provide here two views from the north, clearly showing the setting of St Peter's, Cassington.</p> <p>2.3.1.View of St Peter's, Cassington from PRoW 152/6/10 ("The Track") from Cassington to Purwell Farm looking South East over fields 2.096, 2.102. 2.3.2.View of St Peter's, Cassington from PRoW 152/6/10 ("The Track") from Cassington to Purwell Farm taken looking South over panel fields 2.095, 2.103 and 2.110. 3. Views from listed churches</p> | <p>The Applicant would refer to their response to ExQ1.6.2 in the Applicant's Response to the Examining Authority's First Written Questions (ExQ1) [REP2-025] regarding the accuracy of the photomontage from Viewpoint 42.</p> | World_Heritage |

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| | | <p>3.1.In two representations submitted by Harry StJohn (Ref: REP1-148 and REP2-107) there is a request for the Inspectors to gain access to the towers and steeples of the various listed churches in villages impacted by the applicants proposal - [including grade 1] Cassington and Church Hanborough because “the landscape settings of these historic community buildings are critically important and those who really know what they are talking about are very concerned about the damage this proposal will make if approved.”</p> <p>3.2.In order to give an idea of the settings viewed from these churches, 3 photographs are shown here:</p> <p>3.2.1.View from steeple of St Peter & St Paul, Church Hanborough Grade 1 listed looking South East showing fields 2.114, 2.115, 2.116, 2.84, 2.92 and beyond. 3.2.2.View from the steeple St Peter & St Paul, Church Hanborough Grade 1 listed looking East over fields 2.69, 2.70, 2.71, 2.72, 2.74 and beyond.</p> <p>3.2.3.View from tower of St Martin's, Bladon, grade II listed, looking South-East over fields 2.02 and 2.03. Field 2.2 is already proposed for panel omission - on heritage grounds.</p> <p>4. Conclusion</p> <p>4.1.I believe that these views clearly illustrate the impact on the historic setting of these the grade 1 listed churches and conservation village buildings around them.</p> <p>4.2.Please would the examiners require the Applicant to remove panels from at least the following fields forming the setting of these heritage assets as listed here: 4.2.1.Church Hanborough: 2.69, 2.70, 2.71, 2.72, 2.74, 2.84, 2.92, 2.114, 2.115, 2.116, 2.118 and 2.120 4.2.2.Cassington: 2.95, 2.96, 2.97, 2.101, 2.102, 2.103, 2.104 and 2.110 4.2.3.Bladon: 2.02 (already removed) and 2.0</p> | | |
| REP3-119 | Stephen Westaby | <p>I would like to bring this article to your attention. I wrote it as an educational piece for the local community impacted by the huge proposed solar development between these busy airports. In particular I believe that there are real dangers to both pilots and the public in the vicinity of Oxford Airport with its busy training school. When these were pointed out to PVDP they made a derisory small adjustment at the end of the runway. As a cardiac and trauma surgeon in Oxford for the past 35 years I cannot believe that their proposals can be taken seriously for land in proximity to the airport. I have (purely by chance) attended two fatal crashes on Bladon Heath and been asked to certify the pilot and passengers as dead. Perhaps that is why I hold strong views on this matter. The developer, their lawyers and Blenheim cannot be unaware of the reported dangers expressed in my article simply as a member of the public. The same views were presented by the airport well ahead of the PINS process. They were ignored in the interests of profit when we are talking about risk to life. I do not believe that, in the light of accumulating evidence, solar panels should be deployed within a mile of an airport's perimeter to allow for crash landings and the other issues I describe. There is an abundance of other sites for solar sites which do not carry risk. The dangers have only been documented through experience (eg Schiphol Airport and glare) and the Botley West site is huge. It simply cannot be allowed to go ahead in its current form and I concur with the revisions proposed by WODC. The real question is whether PVDP who have not completed a similar site, have the integrity or credibility to be allowed to go forward. In many respects they were the subject of derision during the first PINS examination. Yours sincerely, Professor Stephen Westaby FRCS, MS, PhD(Bioeng) DSc, FECTC, FESC, FICA</p> | <p>This issue, in terms of the removal of panels from the area south of Oxford Airport runway to address air safety concerns relating to take off and landing, will be covered in Change Request 2 to be submitted at Deadline 5.</p> | Community_Benefits_and_Impacts |
| REP3-121 | Tim Sumner | <p>Q1.6.38. Sansoms Platt (SM) In response to Historic England's concern over Sansoms Platt (a scheduled Historic Monument) the developer states: “ The Applicant considers that the heritage significance of the Scheduled Monument would be barely affected.....however, elements of the project would be visible...” This contorted submission sits alongside the Applicant continuing to reference Sansoms Platt as “a Roman Villa or possibly a small settlement.” Vol 3. Appendix 7.6.10. Page 61 The developer further references Sansoms Platt in 7.6.26 and 27 In answer to the above assertions by the developer : Further evidence of the extent of this Roman Town have been discovered and acknowledged by the developer.</p> <p>The increased extent makes Sansoms Platt a significant Roman Town since it is now proven to extend into field 1.11 towards Dornford Cottage (Oxfordshire County excavations for this enquiry) and, ground radar (Blenheim's own survey which I have previously presented to the Inspector) has proven the other side of the Drovers Road which is currently an Oxford Way leading to Woodstock has more Roman remains than are currently protected ! This field (originally referred to as 1.11) is absolutely adjacent to the protected monument and alongside Akeman Street (the Roman Road serving the Town.) It contains more of the protected Town so much so that I understand the developer has pulled back to further up the field and away from the monument area and has acknowledged more Roman remains at the top of the field a small area which, I believe, has been removed from development .</p> <p>So, this “possible small settlement” is now proven to extend to an area greater than is currently protected and having Akeman street – a major road and described by the Developer as “a key feature”, linking St Albans and Cirencester - running through the middle of it and being a days Legions march from Bicester Fort, Sansoms Platt was a major trading town .</p> <p>The increasing misunderstanding about the size of this area is compounded by the proposed new siting of solar panels which will be in full view of the monument and its surrounds since the field rises above the Roman Town area .</p> <p>However “ The Applicant considers the heritage significance of the Scheduled Monument would be barely affected” .</p> <p>I am further mystified that the applicant has taken out a small section of field 1.11 towards Dornford Cottage because of further archaeological discoveries of the town yet has surrounded it by solar panels making it inaccessible and</p> | <p>With regard to the nature of the archaeological site centred on the Sansom's Platt Scheduled Monument, the Applicant refers to their response to Relevant Representation RR1070 in the Applicant's Responses to Relevant Representations (Rev PO) [REP1-020]. The design of the proposed development has responded to the identified extent of the archaeological site through the establishment of a protected Area of Archaeological Interest around the Scheduled Monument; this is indicated on Figures 2.1b and 2.1c in ES Figures 2.1a-2.4c - Illustrative Masterplan (Rev 1) [AS-020].</p> <p>The IP also refers to ‘<i>more Roman remains at the top of the field</i>’ also being removed from development. The Applicant believes this to be a reference to a smaller protected Area of Archaeological Interest in the north-eastern part of Field 1.11 as indicated on Figure 2.1b in ES Figures 2.1a-2.4c - Illustrative Masterplan (Rev 1) [AS-020]. This has been established around a small enclosure likely to of later prehistoric date rather than Roman. The enclosure is clearly visible on the results of the programme of geophysical survey which is presented as ES Appendix 7.3: Geophysical Survey Report Part 2 of 8 [APP-134].</p> <p>Any adjustments to the protected Areas of Archaeological Interest will be set out in the layout presented in the detailed design which has to be approved by the relevant planning authorities in accordance with Requirement 5 of the draft Development Consent Order (Rev 4) [REP3-004]. This process ensures that the Oxfordshire County Archaeology Service can review the extent of the protected Areas of Archaeological</p> | Historic_Environment |

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| | | completely overlooked by panels, security fencing etc. This does not sit with the developers assertion “the magnitude of impact, therefore, being negligible.” | Interest in the light of all available information including the results of the trial trenching. | |
| REP3-121 | Tim Sumner | <p>Q1.6.42: I also note there is a proposed cable run to be dug into the Drover's Path from the Dornford Area downwards and alongside field 1.11 As it is now proven that either side of this path contains more of the Roman Town than is currently protected and the developer is acknowledging this area's Roman remains by pulling back from The Platt. It makes no sense to protect either side of this path yet allow this path to be dug up, since it runs, like Akeman Street, through the town.</p> <p>Neither should work be carried out on the section of Akeman Street running past Sansoms Cottage since, similarly, this pathway / Roman Road runs through the protected and unprotected area of the town. I reference the developers acknowledgement “Key features for the Roman period includes the important military road known as Akeman Street which crosses the Northern Site.” 7.6.26 I call for this cable route to be stopped.</p> <p>In summary, I again call for all development in this area to be stopped</p> | <p>The Applicant can confirm that no work would be undertaken within any part of the public right of way known as the Drover's Path or Dornford Lane.</p> <p>An indicative 33kV cable route crosses the southern continuation of Dornford Lane at a location to the south of the B4027 road; this is indicated on Figure 2.1c in ES Figures 2.1a-2.4c - Illustrative Masterplan (Rev 1) [AS-020]. The Applicant has committed to this crossing being undertaken using Horizontal Directional Drilling (HDD – a form of trenchless technology) in order to avoid any physical impact on the existing vegetation and the two public rights of way (Sansom's Lane and the continuation of Dornford Lane). This is set out in ES Appendix 6.2: Cable Laying Methodology and Indicative HDD locations [APP-130], where the crossing is identified as HDD7 and the indicative locations of the HDD compounds are overlaid on an aerial image presented on page 7. Paragraph 1.6.3(2) in the Outline Written Scheme of Investigation (Rev 2) [REP2-021] establishes that further archaeological investigation may be required ahead of construction once the locations of the HDD compounds are confirmed as part of the detailed design of the proposed development.</p> <p>The Applicant can confirm that no work would be undertaken within any part of the Roman road known as Akeman Street, including the section adjacent to Sansom's Cottage. The indicative 275kV cable route crosses Akeman Street at a location just to the west of Sturdy's Castle; this is indicated on Figure 2.1b in ES Figures 2.1a-2.4c - Illustrative Masterplan (Rev 1) [AS-020]. The Applicant has committed to this crossing being undertaken using Horizontal Directional Drilling (HDD – a form of trenchless technology) in order to avoid any physical impact on the Roman road. This is set out in ES Appendix 6.2: Cable Laying Methodology and Indicative HDD locations [APP-130], where the crossing is identified as HDD1 and the indicative locations of the HDD compounds are overlaid on an aerial image presented on page 6. Paragraph 1.6.3(2) in the Outline Written Scheme of Investigation (Rev 2) [REP2-021] establishes that further archaeological investigation may be required ahead of construction once the locations of the HDD compounds are confirmed as part of the detailed design of the proposed development.</p> | Historic_Environment |
| REP3-122 | Tom Lewis | <p>Subject: Request for Access to Soil Sampling Plan Referenced in Blenheim's Submission Dear Planning Inspectorate, I am reviewing the document titled EN010147-001193 - Blenheim Palace – Responses to the Examining Authority's First Written Questions (ExQ1) as part of the ongoing examination of the Botley West Solar Farm proposal.</p> <p>I am writing to request access to the soil sampling plan referenced in Blenheim's response to the Examining Authority's first written questions. In their submission, Blenheim claims that they have attached a plan showing agricultural soil sampling results for the central section during 2024, which underpins their claim of degraded land with phosphorus indices of 1 or 2. However, this soil sampling plan is not included in the publicly available version of their submission. The extensive soil sampling results from over 450 sites throughout the project area and published in the PEIR (Volume 3 Appendices 11.11 to 19.1) would not support Dominic Hare's contention (Open Floor Hearing 13 May 2025) that this land produces “poor yields from poor soil”.</p> <p>Given the importance of these results in supporting Blenheim's argument that the land is agriculturally degraded and not Best and Most Versatile (BMV), it is crucial to review the actual data map to assess the credibility of their claim.</p> <p>Could you please ask Blenheim to provide these data and the methodology used to obtain it? Thank you for your assistance.</p> | <p>Agricultural soil sampling for parts of the central section was carried out in 2024 by qualified professionals in accordance with the standards required for the Sustainable Farming Incentive (SFI), on behalf of Blenheim, which farms the land. The results were provided in Blenheim's response to the Examining Authority as an example of management tools used by farmers to assess soil indices. The plan included in that response offers useful insight into comments regarding the viability of crop production, but it is not relied upon by the applicant as part of the case being made.</p> | Agricultural_Land_Use |
| REP3-122 | Tom Lewis | <p>1. The Applicant states it was decided to place the areas close to settlements to reduce vehicle movements and to make access easy for villagers but if these areas are not being utilised by these villagers, then this supposed benefit is lost.</p> | <p>Cherwell Collective supports 8,000 clients in food poverty across Oxfordshire and Northamptonshire and has them in all of the villages adjacent to the proposed development. Chris Goodall will</p> | Community_Food_growing_Location |

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| | | <p>2. The Applicant's response seemingly involves their discussions with what might be described as fringe organisations with worthy aims but with little experience or knowledge of managing quite large areas of land set up so-called 'Food Forests' to supply food banks.</p> <p>3. One of the organisations that the Applicant has been in discussion with appears to be a purely a commercial enterprise supplying food to Oxford Colleges. It would seem unlikely to succeed in operating what would be a market garden enterprise on this land, which after all the Applicant describes on many occasions as being of 'poor quality' and so would be difficult to guarantee success in being able to deliver a constant and predictable supply of food of quality.</p> <p>4. If rent is to be charged for the use of the land used for Community Food Growing then will the Community benefit from the income? The outcome of these proposals is likely to be that the land given over to 'Community Food Growing' will quickly become overgrown and abandoned with the unintended consequence of adding to biodiversity. All of which poses the question of how the Community affected by this development will benefit? - One of the Community Food Growing areas is in Hanborough Parish which is in a Conservation Area. (Field No 2.116 11.96Ha) (App-131 Appendix 7.1 Historic Environment desk based assessment Figures 2a-c) (marked bright green on map and the Key indicates that this field (2.116) is for Community Food Growing and also for an area of "new planting for enhancement")! - Ref: WODC Information Map of the Church Hanborough Conservation Area.</p> <p>(Key: purple dots indicate the 20 Listed Buildings in Church Hanborough)</p> | <p>be growing food to supply a number of local food banks, including Cutteslowe Larder.</p> <p>OxFarmToFork is a social enterprise designed to encourage small food growers to grow food using agroecological and regenerative farming methods. It provides a market for the growers and grants to help them get started. It reduces food miles, encourages recovery of intensively farmed land and increases food security.</p> <p>The field at Church Hanborough is set aside for enhancement, which may include organic food growing. Access to the field is via a gate on Lower Road so no vehicles or tractors will need to enter Church Hanborough.</p> <p>The growers will not be charged rent.</p> | |
| REP3-122 | Tom Lewis | <p>Conservation Area Implications Field 2.116 lies within a designated Conservation Area so that: - Any proposed development must preserve or enhance the area's character. - Compulsory purchase would require robust justification, especially under the Planning (Listed Buildings and Conservation Areas) Act 1990. This field is now owned by Vanburgh Trustees with absolute freehold title (Land Registry Title No ON 160997) Land Plan Reference 8-28 is field 2.116 (124,161m²) and it would appear to be subject to a Compulsory Purchase Order BWSF Land Plan Reference 8-28 (i.e. field 2.116). The Church Hanborough Community (CHC) have not been consulted on the meaning of Community Food Growing and are concerned that:- 1. Why does this field have to be Compulsorily purchased? 2. What say will CHC have in its ownership and organisation? 3. What will be the benefit to CHC? 4. The operators of enterprises in this Conservation Area must be made aware that they will need to obtain planning permission to erect buildings in which to store equipment, packaging and produce.</p> <p>In 1.16.9 the Examiners posed the question to the Applicant will you draft agricultural license agreements with interested food growing companies prior to close of examination? If not why? The Applicant replies that they have signed Memoranda of Understanding with Cherwell Collective, Chris Goodall and Good Food Oxfordshire to operate in the areas set aside for food growing.</p> <p>Do these organisations have any rights to the land in the event of the BWSF scheme failing? To whom will their tenancy be assigned? The Applicant's claim that Community Food Growing Areas have "moderate positive weight" because of "the number of lives it will touch" (1.16.8). How comforting! Unlike the negative effect of over 2,000,000 solar panels on a destroyed landscape.</p> <p>Tom Lewis Church Hanborough</p> | <p>There is no intention to compulsorily acquire this land; it is covered by the option agreement with Blenheim Estate and would be leased should the DCO be granted. The Statement of Reasons [APP-021] explains why the DCO contains CA powers as insurance in case of non-performance of land agreements.</p> <p>Licences to occupy land will be signed with growers should the DCO be granted. The licences will be with SolarFive Ltd, who will be the leaseholder of the land.</p> | Community_Food_growing_Location |
| REP3-123 | Professor and Mrs Anne Banning | <p>Highway and pedestrian safety. i) The submitted proposals .</p> <p>The only vehicular and pedestrian access to the site, as shown on the site layout plan forming part of the application is along School Lane from the A4095 (Grove Road) .</p> <p>There are no adjacent parking or turning facilities within the site .</p> <p>ii) The School Lane access .</p> <p>School Lane is a very narrow, single track carriageway, approximately 3m in width, which rises up from the A4095 between the side and rear gardens of Nos. 2 and 4 Grove Road, from which it is separated by 1.8m high close boarded fencing. The narrow, enclosed nature of the lane and its sinuous alignment mean that visibility along its length is very restricted, resulting in vehicles only seeing oncoming vehicles at the last minute. This results in vehicles having to reverse backwards uphill with limited visibility or reverse back onto the main A4095- this is clearly extremely hazardous. School Lane is on Blenheim Estate but its surface receives no maintenance and its condition is the responsibility of the users. Increased usage will inevitably cause further deterioration in the surface. Recent emergency vehicle access up the lane has been declared impossible this makes development of additional resource a known additional public health hazard.</p> | <p>The proposed education facility forms part of Change Request 2 for which the Applicant will submit further assessment at Deadline 5.</p> | Traffic_Transport_and_Access |
| REP3-123 | Professor and Mrs Anne Banning | <p>iii) Visibility onto the A4095 (Grove Road) .</p> <p>The access from School Lane onto the A4095 is very narrow with high walls and hedgerows restricting visibility in either direction. The access itself is very difficult to spot and is dangerously positioned directly adjacent to a pelican crossing across the main road. This area is already a documented accident blackspot with a fixed traffic camera nearby. Cars waiting to turn into the lane obstruct traffic on the main road and block the vision of the pedestrian lights. This lane is used by small children and their parents for pedestrian access to school twice a day. These children ride bicycles and have limited control particularly coming downhill towards the main road, Crucially it is not possible for cyclists to see the cars and vica versa until both are within the high fenced area. School Lane is also used by up to 500 pedestrian visitors a day to Winston Churchills grave. These visitors disembark from coaches on</p> | <p>The proposed education facility forms part of Change Request 2 for which the Applicant will submit further assessment at Deadline 5.</p> | Traffic_Transport_and_Access |

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| | | <p>the A4095 and they are usually elderly with limited mobility. It is not possible to have both a pedestrian and a moving vehicle safely side by side in the lane .</p> <p>iv) Absence of local parking facilities .</p> <p>Not only is School Lane totally sub-standard in terms of highway criteria, but there are also no opportunities for safe and convenient on-street parking in the vicinity of the lane. Due to double yellow lines along the A4095, the nearest on-street parking is hundreds of yards from the proposed visitor centre.</p> | | |
| REP3-124 | Gerard Mullan | <p>In the section: 'Change 11: Refinement of Project layout and design to secure the latest design parameters for the new National Grid substation', in addressing 'Scope and extent of proposed changes', the applicant states: "The combined effect of the changes, due to them largely being reductions in the extent of the Order Limits and/or involving no additions to the Order Limits, will not result in materially new or different effects to those assessed in the Environmental Statement [APP-036 to APP-224] (as may have been updated during Examination)." It is expressly noted by The Examining Authority's First Written Questions and Requests for Information (ExQ1) that the full extent of environmental and ecological change associated with this project have not been sufficient to address multiple articles of Q1.8. Ecology and Biodiversity .</p> <p>As a resident of the Eynsham area who frequents many of the fields, walkways, and bridleways mentioned by the Refinements, I am especially concerned that Environmental Impact is undertaken correctly, in a manner that does not confuse the size and scope of the project with license to neglect the minutia of localised impact. In any instance where cables are rerouted or moved, both immediate changes brought about by construction and the long-term effects involved must be considered. I am not confident at this time that the applicant has regarded the environmental impact of the project with due seriousness, given the project's proximity to the greenbelt countryside renewable energy is designed to preserve .</p> <p>Without thorough assessment, moving ahead with the project and seeing what happens as it develops may cause irreparable harm to the environment's current balances</p> | <p>The Applicant notes the IP's concerns. However, a professional judgement has been made and correctly assessed the proposed changes (as part of Change Request no.2 (to be submitted with an ES Addendum) .</p> <p>The IP should also note that design and layout matters are controlled via:</p> <ol style="list-style-type: none"> 1. Works Plans 2. The Layout and Design Principles Document and related Management Plans and Appendices, and 3. The relevant Management Plans that have to be submitted to and approved by the relevant planning authorities via Requirement (notably nos. 5 and 6) in the Development Consent Order. | Site Selection and cable routes alternatives |
| REP3-125 | Marina Sparks | <p>To the Planning Team, I am writing to express my deep anger and firm opposition to the Botley West solar farm proposal. This project is a completely unacceptable assault on our countryside and local communities .</p> <p>It is outrageous that vast swathes of productive, beautiful farmland are set to be ripped up and industrialized in the name of "green energy." Covering this land with solar panels will not only destroy its agricultural value but also inflict lasting damage on the local environment and rural character. This isn't sustainability — it's vandalism masquerading as virtue. Visually, the impact will be appalling. Instead of open countryside and green fields, we'll be forced to live with an industrial-scale eyesore on our doorstep. The sheer scale of this project shows a complete disregard for the people who actually live here .</p> <p>Let's also not ignore the economic consequences. The presence of such a development will drag down local house prices and make the area less desirable for families, businesses, and tourists alike. People didn't choose to live in the Oxfordshire countryside to wake up surrounded by miles of metal and fencing .</p> <p>This solar farm will ruin what makes our community special — its rural charm, open space, and connection to the land. I urge you to reject this destructive proposal before irreversible damage is done .</p> <p>Sincerely,</p> | This comment is noted | Community_Benefits_and_Impacts |
| REP3-126 | Professor George Leeson | <p>PVDP detailed as Community Food Growing Areas Responses to ExQ1 document is REP2-025 With reference to Food Growing in ExQ1. These were the questions. 1.13.4 Lack of information on location and how it would function 1.16.8 Area of 30ha - how was scale decided? How is delivery secured? We were assured that Filed 2.116 would be preserved as a community eco-system amenity. This is essential given how much destruction to the wildlife habitats you are proposing. We now learn that this is to be a commercial food growing area Under whose decision was this taken? Please see the terrible potential impact the Solar Panels will have on the environment around Church Hanborough – and particularly to Field 2.116 Why have you not published ANY photographs from Church Hanborough looking over Field 2.116? All the ones we saw at all your exhibitions were deliberately dreary and presented our beautiful country side as a waste land .</p> <p>See the following Photos of Field 2.116 (through different seasons and uses) and those beyond from the village of Church Hanborough – and the beautiful eco system and agricultural land you are threatening to destroy. Note the frequent mists and fog... .</p> <p>Field 2.116 Church Hanborough Responses to ExQ1 document is REP2-025 With reference to Food Growing in ExQ1. These were the questions. 1.13.4 Lack of information on location and how it would function 1.16.8 Area of 30ha - how was scale decided? How is delivery secured</p> | <p>The community food growing areas are part of the biodiversity net gain plan. This is contained in the Outline Landscape and Ecology Management Plan [APP-235]. Field 2.116 had all panels removed after feedback at Phase One consultation. It has been offered to a grower from OxFarmToFork for organic food production. Access to this field is via a gate on Lower Road, not via the village.</p> | Community_Food_growing_Location |
| REP3-127 | Steve and Lesley Chipper | <p>Q 1.16.21 - We are writing this letter to express our deep concerns over the recently submitted planning application for the development at the above site: specifically, the planned provision of a visitor education centre adjacent to the recreation centre in Bladon.</p> <p>This extract has been taken from your Applicant's Response to the ExA's First Written Questions July 2025 Q1.16.21 Applicant Education facility building Please confirm how the possible location for the education facility was selected? What level of consultation was undertaken with local stakeholders in respect of the possible location? The Outline Operational Management Plan [APP-234] confirms that further detail in respect of the education facility is to be set out in the detailed Operational Management Plan. Please confirm why such detail is to be confirmed post-consent,</p> | <p>Provision of the educational facility was requested by OCC. The location is the subject of the targeted consultation running until 22nd August.</p> | Impact_on_School_Sites |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| | | <p>rather than during the Examination. The Project Mitigation Measures and Commitments Schedule [APP-129] states that the provision of such an education facility to be additional mitigation. Given that limited information has been provided in respect of this facility, please confirm what weight should be given to this by the ExA.</p> <p>Through discussions with the OCC team, an Education Facility was identified as an opportunity.</p> <p>Chapter 16 [APP-053] paragraph 16.9.133 includes the statement.</p> <p>"Provide open and covered space in the solar farm for use by school field trips. An educational area could provide local schools with the basic facilities – benches and a covered area to undertake their own learning activities. Potential to walk to the educational site and potential for guided access to array areas would support both physical activity and learning outcomes for population health. Indicative layout (as set out with Outline Operational Management Plan [EN010147/APP/7.6.2]) includes toilet (compost) and minibus parking (either provided or existing). Secured as a requirement of the DCO - via oOMP [EN010147/APP/7.6.2]. Location, size and scale will be finalised during detailed design phase and included within the detailed Operational Management Plan. The educational area is illustratively shown in Figure 16.2: Illustrative 3D Views of Educational Facility [EN010147/APP/6.4]. The expectation is that there will be post consent community involvement in the refinement of design and selection of an appropriate location." A potential location was identified to the east of Bladon, on land adjoining existing community facilities (land next to a playground, MUGA, and Botley West Solar Farm Applicant's Response to the ExA's First Written Questions [EN010147/APP/12.2] Rev P0 July 2025 Page 174 ExQ1 Question to Question Applicant's Response allotments) and where there is a suitable vehicular and pedestrian access, which also serves the Bladon Primary School and the Parish church.</p> <p>If you have visited this site, you will have noticed that the vehicle access from A4095 Grove Road, is restricted to one vehicle only with very poor visibility along its length, resulting in vehicles only seeing oncoming vehicles at the last minute. This results in vehicles having to reverse backwards uphill with limited visibility or reverse back onto the main A4095- this is clearly extremely hazardous and against the highway code.</p> <p>This narrow lane is used by small children and their parents for pedestrian access to school twice a day. These children ride bicycles and have limited control particularly coming downhill towards the main road. Also, we have coach visitors to Winston Churchills grave, so during the day this lane becomes very busy with pedestrians.</p> <p>There is NO parking within school lane and no vehicles beyond the church car park, due to resident's properties. Where you have stated "there is suitable vehicular access and minibus parking" needs to be questioned.</p> <p>Conclusion.</p> <p>Due to restricted visibility onto the A4095 (Grove Road) School Lane is entirely unsuitable to take the traffic that would be associated with the proposed development. Why an education site has been earmarked in Bladon needs questioning. There can be no guarantee of safe emergency vehicle access to the facility and the local Ambulance staff have advised the school an Ambulance cannot get to the school due to this lane's width in providing limited access. Having this education centre with more school children will be tempting fate.</p> | | |