



# Botley West Solar Farm

Applicant's Responses to comments on ExQ2 –  
Landscape and Visual Resources Clarification Note

September 2025

---

PINS Ref: EN010147

Document Ref: EN010147/APP/15.3

Revision Rev 0

APFP Regulation 5(2)(a); Planning Act 2008; and Infrastructure Planning (Applications:  
Prescribed Forms and Procedure) Regulations

## Approval for issue

Jonathan Alsop

5 September 2025

The report has been prepared for the exclusive use and benefit of the Applicant and solely for the purpose for which it is provided. Unless otherwise agreed in writing by RPS Group Plc, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

---

### Prepared by:

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

### Prepared for:

**Photovolt Development Partners GmbH,**  
**on behalf of SolarFive Ltd.**

---

## Contents

<b>1</b>	<b>Clarification Note to The Applicant's Response to the ExA's Second Written Questions [REP4-037]</b>	<b>1</b>
1.1	Part 1 – Agreement on Methodology	1
1.2	Part 2 – Application of Methodology	2
1.3	Part 3 – Clarification of the Applicant's Response to the ExA's Second Written Questions for Landscape and Visual Amenity	4
1.4	Part 4 – Deliverables (Deadline 5)	11
1.5	References	11

## Tables

Table 1.1:	Clarification of the Applicant's Response to the ExA's Second Written Questions, Q2.13 Landscape and Visual Amenity [REP4-037]	4
------------	--------------------------------------------------------------------------------------------------------------------------------	---

## Glossary

Term	Meaning
The Applicant	SolarFive Ltd
The Project	The Botley West Solar Farm
The Site or Order Limits	The area of land encompassing the Project development and shown on Location Plan [AS-024].

## Abbreviations

Abbreviation	Meaning
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
NGET	National Grid Electricity Transmission plc
OCC	Oxfordshire County Council
PA 2008	The Planning Act 2008
PINS	The Planning Inspectorate
PV	Photovoltaic
PVDP	Photovolt Development Partners GmbH
VWHDC	Vale of White Horse District Council
WODC	West Oxfordshire District Council

## Units

Unit	Description
ha	Hectares
km	Kilometres
m	Metres
MWe	Megawatt electrical

# 1 Clarification Note to The Applicant's Response to the ExA's Second Written Questions [REP4-037]

## 1.1 Part 1 – Agreement on Methodology

- 1.1.1 A meeting was held on the 10<sup>th</sup> June 2025, attended by landscape and planning officers from the majority of the Oxfordshire Host Authorities (OHAs) with RPS - Oxfordshire County Council, Cherwell District Council, Vale of White Horse District Council and South Oxfordshire District Council. The primary purpose of this meeting was to agree the principles of the methodology used for Chapter 8: Landscape and Visual Impact Assessment (LVIA, PDB-006).
- 1.1.2 Based on the methodology adopted for Chapter 8 [PDB-006], which was derived from best practice guidance detailed within GLVIA3, and subsequent guidance within LITGN 2024-01, Moderate effects can be significant or not significant depending on the particular circumstances of any given aspect of the Project, using professional judgement.
- 1.1.3 The Applicant's position was, and remains, that the LVIA methodology is based on industry standard best practice guidance as set out in the Guidelines for Landscape and Visual Impact Assessment – Third Edition (Landscape Institute and Institute of Environmental Impact Assessment, 2013) (GLVIA3), along with subsequent technical guidance notes, including Landscape Institute Technical Guidance Note 2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (LITGN-2024-01). None of the OHAs have advanced an alternative methodology.
- 1.1.4 The OHAs agreed to the principle of the LVIA methodology used by the Applicant and guidance but have not agreed to the *application* of the methodology and guidance, to date. Subsequent responses to written representations and / or ExAQs, including The Applicant's Responses to the Rule 17 Letter [REP2-029 and REP3-066] have sought to clarify these points further, regarding the methodology's application.
- 1.1.5 The Statement of Common Ground (SoCG) was updated at Deadline 3 (22<sup>nd</sup> July 2025), stating that the LVIA Methodology had been agreed. For example, at Table 4.4 of the Statement of Common Ground (SoCG) with the Vale of White Horse District Council (VoWHDC) [REP3-059], point 4.4.1 states that *"Other than where noted below, regarding specifics of the application of the LVIA methodology, the scope and methodology was agreed at a meeting with the OHAs dated 10th June 2025"*. With the "Status" noted as agreed. This position remains unchanged and to date there has been no direct responses from the OHA regarding this specific matter. Therefore, it is assumed that the principles of the LVIA methodology are agreed, in line with the agreed outcome of the meeting with the OHAs of the 10<sup>th</sup> June 2025.
- 1.1.6 An email to the OHAs was sent by the Applicant on 27<sup>th</sup> August 2025, in order to arrange a further meeting to discuss this and other matters arising from the Examination process to date. The timing of this email request was to try and avoid, so far as possible, the peak holiday season and to have allowed the OHA time to respond to the updated SoCG at Deadline 4. The Applicant sought to have this meeting prior to Deadline 5. An email response from the OHAs (OCC) was received on 2<sup>nd</sup> September 2025. The email from the OHAs requested further information from the Applicant, in the form of a *"document to the OHA clearly outlining how they have taken steps to address each of the concerns listed within section 7.3 of the joint LIR [REP1-072]"* before they would agree to another meeting at this time.
- 1.1.7 However, the Applicant notes that it addressed the OHAs' concerns listed in section 7.3 of the joint LIR [REP1-072] in The Applicant's Response to the Local Impact Reports [REP2-026] and further during its meeting with the OHAs on the 10<sup>th</sup> June 2025. Points agreed in that meeting are noted as such in the SoCG with the individual authorities. The Applicant also addressed further points within the ExA's Rule 17 Letter [PD-009] which repeated points in the Joint LIR in

The Applicant's Response to the Rule 17 Letter **[REP2-029]** and The Applicant's Response to the OHAs' Response to the Rule 17 Letter **[REP3-066]**. The Applicant has undertaken a review of the LVIA following the Change Request 2 Notification **[PD-011]**. The revised Chapter 8 [currently **PDB-006**] will be submitted at Deadline 5. It will include the revisions to the assessments, in the Applicant's previous responses (detailed above).

- 1.1.8 The Applicant will continue to seek a meeting and agreement on other matters, subject to the OHAs' availability to deal with outstanding matters.

## 1.2 Part 2 – Application of Methodology

- 1.2.1 Following the ExA's Rule 17 Letter **[PD-009]**, the Applicant re-assessed the significance of effect in relation to the representative viewpoints where visual receptors were judged to experience Moderate and not significant effects during the construction and/ or operational phase (winter Year 1) in Tables 1.2 and 1.3 of The Applicant's Response to the Rule 17 Letter **[REP2-029]**. The Applicant also reviewed the significance of effects of additional viewpoints raised by the OHAs in the OHAs' Response to the ExA's Rule 17 Letter **[REP2-049]** in the Applicant's Response to the OHA's Response to the OHA's Response to the Rule 17 Letter **[REP3-066]**. A detailed explanation was provided as to why the Moderate was considered not significant or significant. The review concluded that several Moderate effects would be significant (representative viewpoints 5b, 5c, 23, 25, 32, 38, 48 and 50). This revised judgement was due in part to the amount of development in fields in close proximity to the visual receptor. In cases where the effect attributable to the proposed development, albeit in close proximity, was assessed as a Moderate effect, but not significant, this was primarily due to the limited angle of the Project in the view, together with the retention of the dominant skyline.
- 1.2.2 For the purposes of this note, the Applicant considers it helpful to note again the relationship between the reporting level of effects assessed in relation to the static representative viewpoints locations and the receptor related landscape and visual effects.
- 1.2.3 LVIA provides a summary of potential landscape and visual effects in Table 8.24 (PDP-006). The table also includes summaries of the Assessment for each of the 55 candidate representative viewpoints that were agreed with the LPAs prior to undertaking the assessment (we provide more context on this below). On reflection and to assist the Examining Authority and OHA officers, the results of the Representative Viewpoint Assessment have been presented in a separate appendix in the revised chapter (to be submitted at Deadline 5). To clarify, although the assessment of landscape and visual effects is supported by the representative viewpoints alongside the visualisations. The assessment of the effects at the representative viewpoints is based on the visual receptor's view at that representative viewpoint location. For that reason, the viewpoint assessment is only a representative 'snapshot' of a receptor's experience within the landscape. It should be noted that the direction of view chosen by the Applicant was that where the Project would be most visible. In that respect the viewpoints are conservative and represent the worst-case.
- 1.2.4 In relation to the effects provided in the summary Table 8.24, at Year 1, Moderate adverse visual effects were concluded for the Project Site and Public Rights of Way (PRoW) within or immediately adjacent to, the Project. Moderate landscape and visual effects can be considered as significant or not significant (LITGN-2024-01 question/issue 3(5)). However, all effects would be reduced through the landscape mitigation proposals which in themselves are ultimately reversible. GLVIA3 explains that Landscape and Visual Impact Assessment is primarily one of professional judgement unlike topics that deal with more quantifiable matters and there are often disagreements with judgements made, even among fully qualified professionals (GLVIA3, paragraph 2.25).
- 1.2.5 To assist the Examining Authority and OHAs, the revised LVIA (to be submitted at Deadline 5) will separate the Viewpoint Assessment as a supportive Appendix and assesses landscape

receptors (landscape character types) and visual receptors (residential properties, recreational routes, PRoWs) individually. This has not changed the Applicant's overall conclusions on the likely significant landscape and visual effects arising as a result of the Project.

### Definitions of significance within the EIA Regulations and Guidance

- 1.2.6 The Applicant notes that Schedule 4 of the EIA Regulations requires an environmental statement to include: *"a description of the likely significant effects of the development on the environment"*. However, it does not advise how to derive significance or state what degree/level of effect is significant, including whether effects considered to be "moderate or above" are significant in the context of the EIA Regulations. Such a judgement on the level of significance in EIA terms has been made, having analysed and assessed impacts of a Project based on methodologies using LVIA guidance. This is what the Applicant did in its ES (PDB-006) at paragraph 8.5.22.
- 1.2.7 Whilst the Applicant strongly disagrees with the OHAs that all Moderate landscape and visual effects should be judged to be significant (as this would disregard the Landscape Institute's advice set out in LITGN-2024-01, question/issue 3(5) as stated above) the Applicant has considered whether, if the effects on landscape and visual receptors were to be judged significant, whether it would change the mitigation proposed or the overall conclusions of the LVIA? The Applicant has concluded that it would not.
- 1.2.8 The Applicant's firm view remains that its assessment is robust, through sensitive design and a comprehensive mitigation package proposed to manage effects. Should the Examining Authority take the view that the Applicant's conclusions on the significance of effects should be different, these conclusions must be considered in light of the highly enabling and directive policy of NPS EN-1 that recognises that renewable Nationally Significant Infrastructure, due to the scale and pace of its development, is anticipated to have some adverse effects.
- 1.2.9 In particular, National Policy Statement NPS EN-1 as set out in The Applicant's Response to the Rule 17 Letter [REP2-029] paragraphs 1.1.30 to 1.1.33.

NPS EN-1 paragraph 5.10.5 notes that:

- *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."*

Paragraph 5.10.13 goes on to explain that:

- *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."*

- 1.2.10 In making their decision, the Secretary of State must also consider paragraphs 5.10.35 and 5.10.36, which provide:
- *"The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project."*
  - *"In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable."*
- 1.2.11 In making its decision, the starting point for Critical National Priority infrastructure under paragraph 4.2.16 is that it meets any tests (such as that in 5.10.35) regarding the outweighing of harm.



## 1.3 Part 3 – Clarification of the Applicant’s Response to the ExA’s Second Written Questions for Landscape and Visual Amenity

**Table 1.1: Clarification of the Applicant’s Response to the ExA’s Second Written Questions, Q2.13 Landscape and Visual Amenity [REP4-037]**

ExQ2	Question to	Question	Applicant’s Response - Clarified
<b>Landscape Effects</b>			
<b>Q2.13.4</b>	Applicant	<p><b>Landscape effects – operation</b></p> <p>In their responses to EXQ1.14.11 [REP3-072] OHA consider that the impacts on landscape character are inadequately assessed and underestimated, and they state that your response does not address those concerns. In addition, Vale of White Horse District Council (VWHDC) disagrees with your assessment and state that 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. They also note that the National Grid Energy Transmission (NGET) substation would not be low-lying in nature.</p> <p>The ExA are minded to agree with the OHA and VWHDC assessments and so in order for the ExA to reconcile this issue, please provide a more robust and detailed response to the question of how the assessment of moderate/minor adverse effect is justified, particularly in relation to the change in character of the landscape from rural to industrial.</p>	<p>The Applicant has noted the concerns of the OHA and the Interested Parties.-</p> <p>The details of the NGET substation have not yet been submitted. Details, such as platform levels, land-modelling (e.g. cut and fill balance), and soft landscape mitigation are not known. The Applicant notes that the development of NGET substations should follow its own guidance set out in the Horlock Rules: Guidelines for the Design and Siting of Substations (National Grid, 2009) as set out in NPS EN-5: National Policy Statement for Electricity Networks Infrastructure, paragraph 2.9.19.</p> <p>The Applicant notes that the character of that part of the valley landscape in which the NGET and the Applicant’s primary and secondary substations would be located already contains large-scale infrastructure development, such as Farmoor Reservoir, the 400 kV overhead lines and pylons as well as the A420, as noted in the Applicant’s response to REP1-076 [REP2-027]. The South Oxfordshire and Vale of the White Horse Renewable Energy Study: Landscape Sensitivity Assessment (LUC for SoDC and VoWHDC, September 2024) notes that Farmoor Reservoir dominates the landscape. In places the reservoir is approximately 7 m above the adjoining valley floor.</p> <p>Nevertheless, the Applicant has reviewed the assessment of effects of both landscape and visual resources and receptors within Chapter 8 [PDB-006] in light of comments received during the Examination. The review is being undertaken as part of the wider review to assess the effects of the Applicant’s Change Request 2 Notification [REP2-045] and will be submitted at Deadline 5.</p> <p>The revised assessment considers the two guidance documents for renewable energy for the host authorities: Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire 2016, and South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment.</p>
<b>Q2.13.7</b>	Applicant	<p><b>Hedges adjacent to new and existing Public Rights of Way</b></p> <p>There have been several representations regarding the “tunnelling effect” of planting tall hedges on both sides of many of the Public Rights of Way (PROW).</p>	<p>A range of typical plans and sections across new paths is shown on figures 7.6.3.2 A to 7.6.3.2 M, of the outline Landscape and Ecology Management Plan (oLEMP) [REP3-034]. These plans and sections have been produced to illustrate proposed planting at Year 1, 5 and 15 (maturity).</p> <p>A typical planting schedule is included at Appendix B of the oLEMP, giving details of the proposed species mix.</p>



ExQ2	Question to	Question	Applicant's Response - Clarified
		<ol style="list-style-type: none"> <li>Using a worst-case scenario, provide scaled plans that show a typical section across these paths, showing the minimum suggested width of path and suggested height of hedges on both sides at maturity during operation.</li> <li>Include details of the proposed species mix as outlined in the outline Landscape and Ecology Management Plan (OLEMP) [REP3-034].</li> <li>In Appendix C of the OLEMP, it is noted that hedgerows should be managed to a minimum height of 3m but no maximum is provided. On the plan and within the OLEMP include details of the proposed maximum height for these hedges during the operational phase of the proposed development to ensure they do not get overgrown. Include details of who holds responsibility for this maintenance.</li> </ol>	<p>The wording in Appendix C of the oLEMP has been revised and submitted as an updated document to clarify that 3 m would be the approximate height that hedgerows will be maintained at, unless there is a requirement from the LPAs to maintain them at a different height (e.g. to protect important views that they may wish to define). As hedgerows are managed on an annual basis, the growth over the course of a year, when established, will mean that the hedgerows will necessarily vary slightly from 3 m (or any other agreed height). Maintenance of new and retained hedgerows, including their height, is specified in section 11.3 of the oLEMP which is secured through Requirement 6 of the draft DCO and will be developed in more detail, in liaison with the LPAs, as part of detailed design and the discharge of the Requirements.</p> <p>The Applicant would have the responsibility of ensuring the hedgerows and other 'soft' landscape proposals are maintained. This responsibility is likely to pass onto a separate management company but working to any approved management plan.</p> <p>The LVIA [PDB-006] has been reviewed, and effects in relation to PROWs have been described in more detail for each route, in the revised Chapter 8 (to be submitted at Deadline 5).</p>
Q2.13.9	Applicant	<p><b>Environmental Statement and landscape effects</b></p> <p>In their response [REP2-029], to the Rule 17 letter [PD-009], the applicant acknowledges that mitigation would result in a change in view but states that the mitigation planting would 'balance' the effects attributable to the solar infrastructure and that the mitigation would be beneficial. The Environmental Statement (ES) Chapter 8 [PDB-006], paragraph 8.9.107 also states that operational effects are fully reversible suggesting the site would return to baseline conditions following decommissioning. However, the ExA notes that ES Chapter 8 table 8.11 determines the magnitude of impact is related to the change in view from baseline condition.</p> <p>The OHA identify a number of viewpoints [REP1-072], [REP2-050], [REP3-072] where they consider that despite mitigation, the view remains altered and therefore the magnitude of impact is not reduced or reduced to the extent the applicant reports.</p>	<p>As set out in GLVIA3, paragraph 2.21, landscape and visual effects are separate assessments, and both landscape and visual effects are interlinked. A clear distinction has been drawn between landscape and visual effects as described below:</p> <ol style="list-style-type: none"> <li>Landscape effects relate to the effects of the Proposed Development on physical and perceptual characteristics of the landscape and its resulting character and quality.</li> <li>Visual effects on views experienced by visual receptors (e.g. local residents, visitors, footpath users, road users etc) and on the change in views experienced by people.</li> </ol> <p><b>Landscape Mitigation Proposals</b></p> <p>The impacts of the project would be minimised by the comprehensive designed-in landscape mitigation scheme, as noted in paragraph 1.1.23, of The Applicant's Response to the Rule 17 Letter [REP2-029]. It also notes that post-decommissioning this landscape structure could be retained but need not be – this would be decided by the landowner/tenant at the time of decommissioning.</p> <p>The fact that there will be adverse landscape and visual impacts is considered in National Policy Statement NPS EN-1 as set out in The Applicant's Response to the Rule 17 Letter [REP2-029] paragraphs 1.1.30 to 1.1.33, and as set out in Part 2 of this Clarification Note.</p> <p><b>Landscape Effects</b></p> <p>The effects of the mitigation on landscape character and biodiversity would be beneficial or neutral, as reported and would complement the increase in recent woodland and other planting that has and is taking place on the Blenheim Estate.</p>

ExQ2	Question to	Question	Applicant's Response - Clarified
		<p>The ExA notes that in the applicant's response to the Rule 17 request it states the mitigation will assist in integrating the proposed development into the landscape, provide biodiversity benefits and follow local management guidelines. However, it is unclear how ES Chapter 8 section 8.9 takes into account the change in the nature of the impact with reference to the supporting photomontages and instead considers all mitigation to have a beneficial effect.</p> <p>Can the applicant demonstrate how the change in nature of the impact has been taken into account in line with the methodology with appropriate consideration of, and reference to, the correlating photomontages. Where there is any change in the conclusions or justification for the conclusions of the assessment of likely significant effects, the ES should be updated accordingly.</p>	<p><b>Visual Effects</b></p> <p>The effect of the Project on views is adverse, as reported in Chapter 8 [PDB-006]. However, the magnitude of impact is to some degree mitigated by the landscape proposals. The LVIA has taken the stance of a person who would rather see the landscape mitigation than elements of the Project. The Applicant recognises that there is a balance to be had, between views of the Project and a change in the nature of the views due to the landscape mitigation. The Applicant acknowledges that the views will alter. There has been no attempt to screen all views from the PRoWs, for example. The Applicant has explained in paragraph 1.1.26 of The Applicant's Response to the Rule 17 Letter [REP2-029] and other responses that the constituent elements within the views, remains the same, and long views to landmarks are still available, in most cases. However, at some points along routes, views will be foreshortened before opening out again to afford wider views over the undulating landscape. Tree belts have also been used to screen particular elements from close views, where considered appropriate.</p> <p>It is also acknowledged that more elevated views in relation to the central section of the Project, as well as open aspect of views, would be changed due to the proposed landscape mitigation. Although the value of the existing views is clearly recognised by the Cumnor Parish Neighbourhood Plan Important Views Report (2021), there is no such guidance document provided in relation to West Oxfordshire. The loss of open aspect is discussed and described in more detail in the revised LVIA Chapter to be submitted at Deadline 5 [PDB-006].</p> <p><b>Landscape Mitigation - the tension between landscape and visual effects</b></p> <p>The effect of the landscape mitigation and the tension between the desirability for increased vegetation to enhance landscape character and biodiversity, and the effect on views is discussed in paragraphs 1.2.21 to 1.2.23, of The Applicant's Response to the OHA's Response to the ExA's Rule 17 Letter [REP3-066].</p> <p>As described above, the mitigation will have some beneficial and some adverse effects on the views enjoyed by visual receptors.</p> <p>As noted, (in part) of the Applicant's response to ExA's Q2.13.13 (REP4-037) the landscape would retain its expansive characteristic, with a dominant sky, views of focal features such as the church spire of Hanborough, and a skyline formed by the wooded landform of Burleigh Wood. The low-lying nature of the solar panels, themselves, would not affect the open character of the landscape. The proposed mitigation planting would slightly reinforce its semi-enclosed character with visual containment provided by hedgerows and woodland belts.</p> <p>Paragraph 1.1.26 of The Applicant's Response to the Rule 17 Letter [REP2-029] also acknowledges that this would result in a change in views available within the landscape. However, the undulating nature of the existing topography and suitable widths for PRoW corridors, would allow existing views of the wider landscape and key features, such as church spires, distinctive landforms (including Burleigh Wood) to remain open and available to visual receptors.</p>

ExQ2	Question to	Question	Applicant's Response - Clarified
			<p>The agreed representative viewpoints are just that – representative of a view at a certain point, However, visual receptors are not static and neither are views, they change as a visual receptor moves (e.g. along a PRow).</p> <p>Table 1.1 of the Applicant's Response to the Rule 17 Letter <b>[REP2-029]</b> provides a detailed breakdown of the impacts experienced by visual receptors at the representative viewpoints raised by the ExA and the OHAs. Table 1.2 provides additional information/context for the judgements made on combining receptor sensitivity with magnitude of impact.</p> <p>Tables 1.1 to 1.3 of the Applicant's Response to the OHA's Response to the Rule 17 Letter <b>[REP3-066]</b> reviewed the magnitude of impact from additional representative viewpoints raised by the OHAs, in their response to the Rule 17 Letter. In a similar manner to Table 1.1 of REP2-029, it provides more in-depth information/context of the judgements made.</p> <p><b>Future baseline</b></p> <p>Landscapes are dynamic, they are not preserved in aspic. Landscapes change due to societal needs and, in rural areas, farming practices and will also change due to climate change, as noted in the Applicant's response to REP3-077 <b>[REP4-037]</b>.</p> <p>The landscape character will also change due to landowner wishes, explained in paragraph 1.1.28 of the Applicant's Response to the Rule 17 Letter <b>[REP2-029]</b>. The future baseline in and around much of the Project will change at 15 years due to the planting that has taken and is taking place elsewhere on the Blenheim Estate, introducing woodlands into what were and are arable fields, enclosing the landscape and views. This has been taken into account when considering the effects during the first 15 years.</p> <p>The landscape in and around the Project will have changed further at decommissioning, as built development is proposed and any woodland will have matured., changing the nature of views still further. It is at that point in time, that a decommissioning plan can be finalised, taking into account this future landscape context.</p> <p><b>Review of the Landscape and Visual Resources Chapter [PDB-006]</b></p> <p>The updated chapter will be issued at Deadline 5.</p> <p>Revised photomontages illustrating the Change Request 2 Notification changes will form part of the submission. They also illustrate the change in the hedgerow height (from 3.5 m to 3 m). Concerns on accuracy of the photomontages raised by other parties have been investigated and either dismissed (as unfounded) or addressed. The updated chapter will refer to the updated photomontages where changes have been made.</p>
<b>Q2.13.10</b>	Applicant	<p><b>Definition of temporary</b></p> <p>In your response to the Rule 17 letter <b>[REP2-029]</b>, you have stated that 'temporary' relates to the completion of the construction period and therefore the magnitude of effects at construction is the same</p>	<p>Construction effects are short-term in nature and temporary, relating to the construction works themselves, e.g. the movement of plant required for the construction of the Project. The end of the construction phase is marked by the completion of the development of the solar farm.</p> <p>The overall construction period is five years. However, the period of the construction works will vary throughout the Project, according to the complexity of the build/installation in each location,</p>

ExQ2	Question to	Question	Applicant's Response - Clarified
		as the initial year of operation. However, this is not always the case in ES Chapter 8 <b>[PDB-006]</b> section 8.9; examples include but are not limited to viewpoints 22 and 36. Explain the discrepancies or otherwise seek to amend any errors in the ES.	<p>with some areas within the project boundary being completed before others, i.e. some areas will have a shorter construction period than others. The short-term and temporary nature of the works is a factor in determining magnitude as set out in GLVIA3 paragraph 5.51 (where an example of short-term is given as 0-5 years) and as noted in paragraphs 1.1.16 to 1.1.19 of The Applicant's Response to the Rule 17 Letter <b>[REP2-029]</b>.-</p> <p>The magnitude of impact within Chapter 8 <b>[PDB-006]</b> has been considered using the criteria in GLVIA3, paragraphs 5.48 to 5.52 (landscape impacts) and paragraphs 6.38 to 6.41 (visual impacts). The guidance requires that duration and reversibility are part of the assessment of magnitude of impact. The magnitude of impact during the construction phase reported in Chapter 8 <b>[PDB-006]</b> followed this guidance.</p> <p>The Applicant additionally notes the definition of temporary as set out in NPS EN-3 at paragraphs 1.1.18 of The Applicant's response to the Rule 17 Letter <b>[REP2-029]</b>. Temporary is defined in NPS EN-3 paragraph 2.10.65 as <i>"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."</i></p> <p>Table 1.1 of The Applicant's Response to the Rule 17 Letter <b>[REP2-029]</b> considers the magnitude of impact of visual receptors raised by the ExA in its Point 5, which includes duration and reversibility. Tables 1.1 to 1.3 of The Applicant's Response to the OHA's Response to the Rule 17 Letter <b>[REP3-066]</b> also set out how the Applicant has assessed the magnitude of impact on views experienced by visual receptors, including duration and reversibility.</p> <p>The operation and maintenance phase starts once the Project is operational. For the purposes of LVIA, the start of this phase is after the landscape mitigation has been implemented, which would be the first planting season (October to March) after the construction of the built elements has been completed. Hence photomontages are produced for winter Year 1. The ExA is correct in that there may be a period between the construction finishing and the landscape proposals being implemented, for example if the construction of part of the Project has been completed in March, there would likely be a period of seven months before any planting could take place, to minimise losses of plant material. However, at winter Year 1 (of the operational phase) the landscape mitigation across the whole project would be in place – noting that some areas may have been planted before this date, as the construction of the development in certain locations will be completed before others.</p> <p>At Landscape Institute Technical Guidance Note 2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) (LITGN-2024-01), issue/question 3(5) Significance: How to assess significance, where to set thresholds and how to achieve consistency, the GLVIA Advisory Panel supports the Applicant's approach <i>"Statements of significance should be reported post primary (designed-in) mitigation, and this includes considering effects during the growth of mitigation planting as set out at paragraph 4.31 of GLVIA3."</i></p>

ExQ2	Question to	Question	Applicant's Response - Clarified
			The assessment of magnitude throughout Chapter 8 <b>[PDB-006]</b> has been reviewed and any necessary changes made in the revised LVIA Chapter, which will be submitted at Deadline 5.
<b>Q2.13.12</b>	Applicant	<p><b>LVIA methodology and assessment of effects.</b></p> <p>At Issue Specific Hearing 1(ISH1) and EXQ1.14.10 <b>[PD-008]</b> the ExA asked the applicant to explain why effects with a significance level of Moderate or less were considered not to be significant.</p> <p>Whilst the applicant provided a response at <b>[REP2-025]</b> and <b>[REP2-029]</b>, the ExA is minded to agree with other representations on this matter, including the LIR <b>[REP1-072]</b>, OHA <b>[REP3-072]</b> and Stop Botley West <b>[REP3-120]</b> and still consider this matter unresolved.</p> <p>In light of these representations (and the alternative approach taken in other ES chapters) and in order for the ExA to reconcile this issue, please comment on the representations made at DL3 and provide a more detailed and robust reasoning for your position.</p>	<p>The Applicant has provided evidence as to the ability of different topics to use different methodologies e.g. paragraphs 1.1.2 to 1.1.14 of The Applicant's Response to the Rule 17 Letter <b>[REP2-029]</b> and paragraphs 1.2.5 to 1.2.8 of The Applicant's Response to the OHAs' Response to the Rule 17 Letter <b>[REP3-066]</b>.</p> <p>The LVIA has been undertaken by Chartered Landscape Architects using the guidance set out in GLVIA3 (Landscape Institute and IEMA, 2013) and in subsequent technical guidance notes published by the Landscape Institute, including Technical Guidance Note 2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) (LITGN-2024-01). At issue/question 3(5) Significance: How to assess significance, where to set thresholds and how to achieve consistency, the GLVIA Advisory Panel notes that <i>"it is not necessary to establish thresholds for levels of significance, provided it is made clear whether effects are or are not significant. However, typically, effects falling below the middle of the range of overall effects are assessed as not significant. For example, 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 will be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not"</i> (Applicant's emphasis).</p> <p>LITGN-2024-01 Issue/question 3(6) Use of matrices, goes further and notes that <i>"Diagrams or matrices can be useful as a means of illustrating to the reader how judgements are combined and can support or summarise narrative descriptive text (GLVIA3, paragraph 8.10), but they should not dictate judgements. LVIA is a means of documenting professional judgement, rather than a formulaic process. All judgements need to be supported by clear description"</i> (Applicant's emphasis).</p> <p>The Applicant has previously provided this evidence for the assessment of the representative viewpoints raised by the ExA and the OHAs in Table 1.1 of The Applicant's Response to the Rule 17 Letter <b>[REP2-029]</b> which considers the magnitude of impact of visual receptors raised by the ExA in its Point 5 and includes duration and reversibility. The same exercise was undertaken for additional representative viewpoints raised by the OHAs and is presented in Tables 1.1 to 1.3 of The Applicant's Response to the OHA's Response to the Rule 17 Letter <b>[REP3-066]</b>.</p>
<b>Q2.13.14</b>	Applicant	<p><b>Viewpoints</b></p> <p>There have been representations from OHA <b>[REP1-072]</b>, <b>[REP2-050]</b>, <b>[REP3-072]</b> as well as IP's, including but not limited to <b>[REP1-148]</b>, <b>[REP1-154]</b>, <b>[REP2-081]</b>, <b>[REP3-108]</b> regarding</p>	<p>A record of email correspondences, with the statutory consultees (LPAs in which the Project is located) 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 <b>[PDB-006]</b>, including a number of</p>



ExQ2	Question to	Question	Applicant's Response - Clarified
		<p>the lack of consultation on viewpoints, suggestions for additional viewpoints, noting the poor positioning of existing viewpoints and, given the scale of the project, the lack of photomontages.</p> <p>From the Unaccompanied Site Inspections (USI) undertaken, the ExA is minded to agree with these various representations and the applicant is therefore asked to explore this further, providing evidence to demonstrate the robustness of their approach in order for the ExA to reconcile this matter.</p>	<p>additional viewpoints (46 and 47) included as a direct response to comments from the VoWHDC.</p> <p>The Applicant has taken additional photography from the Cotswolds National Landscape (CNL) at the specific (additional) request of the ExA and the OHA's in its Response to the ExA Q2.1.4 – Annex 3: Explanatory Note Looking at the Special Qualities of the Cotswolds National Landscape [Annex 3 of <b>REP4-037</b>] despite the CNL Board stating:</p> <p><i><u>"Having reviewed the applicant's DCO submission and visited the site and surrounding area, the Board concluded in our response dated 24 February 2025 that the proposed solar farm would have, at worst, a temporary negligible to minor adverse significance of effect at all stages of the project (i.e. construction, operation and decommissioning) on the landscape character and special qualities of the CNL and a temporary negligible adverse effect on views to and from the CNL."</u></i> [REP2-068] (Applicant's emphasis).</p> <p>The Applicant agreed to the ExA's request as if there were any views, these would have been experienced by high sensitivity visual receptors (people using PRoW) within a nationally designated landscape. However, as reported in Annex 3 of REP4-037, no views were available.</p> <p>It should be noted that in the same document [REP2-068] the CNL Board stated that</p> <p><i><u>"The Board also considers that the 'new planting/areas for enhancement' on 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 purpose of CNL designation and should be secured as part of the Development Consent Order should, without prejudice, the Secretary of State be minded to grant such an order. As such the Board considers that the impacts of the proposal would not represent an impediment in respect of relevant authorities' adequate discharge of the s.85 CROW Act duty"</u></i> (Applicant's emphasis).</p> <p>The CNL Board's consideration that the duties under s.85 of the CROW Act had been adequately discharged was not reported in the Applicant's Response to the ExA Q2.1.4 – Annex 3: Explanatory Note Looking at the Special Qualities of the Cotswolds National Landscape [Annex 3 of <b>REP4-037</b>]. The Applicant would like to take this opportunity to direct the ExA to the CNL Board's position and add this point to Annex 3 of REP4-037.</p>

## 1.4 Part 4 – Deliverables (Deadline 5)

- 1.4.1 At Deadline 2 (1<sup>st</sup> July 2025) the Applicant provided a response to the ExA's Rule 17 Letter (17th June 2025) on Environmental Statement Landscape and Visual Impact Assessment Chapter 8 **[REP2-029]**. These responses focused on the ExA concerns raised by the OHA regarding the Application of the LVIA methodology. A review of the LVIA assessment / conclusions was completed at this stage and further clarification was given in the Applicant's response, including changes to a number of the significance of effect conclusions that were considered significant.
- 1.4.2 In light of the responses to the Applicant's response to the Rule 17 letter, further concerns raised in a number of subsequent written representations and the ExA's Second Written Questions **[PD-012]** at Deadline 3 and 4, a more thorough review of the LVIA has been carried out. This has sought to further clarify and change, where required, elements of the original LVIA submission **[APP-045]**, with primary focus on the assessment of magnitude of impact and significance of effect. It has not altered the LVIA methodology, which has already been agreed by the OHA.
- 1.4.3 The Applicant's Change Request 2 Notification **[REP2-045]** submitted at Deadline 2 has resulted in a further review of the LVIA and associated documents.
- 1.4.4 It is the Applicant's intention to submit the revised Chapter 8: Landscape and Visual Impact Assessment, taking account of changes as a result of the Applicant's Response to the Rule 17 letter, the Change Request 2 Notification and other written representations. This revised LVIA Chapter is to be submitted at Deadline 5 (12<sup>th</sup> September 2025).

## 1.5 References

- Department for Energy Security and Net-Zero (January 2024) NPS EN-1: Overarching National Policy Statement for Energy.
- Department for Energy Security and Net-Zero (January 2024) NPS EN-3: National Policy Statement for Renewable Energy Infrastructure.
- Department for Energy Security and Net-Zero (January 2024) NPS EN-5: Electricity Networks Infrastructure.
- Landscape Design Associates (for West Oxfordshire District Council) (2016) Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire.
- Landscape Institute and the Institute of Environmental Impact Assessment (May 2013) Guidelines for Landscape and Visual Impact Assessment: Third Edition.
- Landscape Institute (August 2024) Technical Guidance Note 2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment: Third edition (GLVIA3).
- Land Use Consultants (for South Oxfordshire District Council and The Vale of the White Horse District Council) (September 2024) The South Oxfordshire and Vale of the White Horse Renewable Energy Study: Landscape Sensitivity Assessment.