



Botley West Solar Farm

Change Request 2: Change Report

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Approval for issue

Jonathan Alsop

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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 |
|--------------|---|
| CDC | Cherwell District Council |
| DCO | Development Consent Order |
| DESNZ | Department of Energy Security and Net Zero |
| EIA | Environmental Impact Assessment |
| ES | Environmental Statement |
| NETS | National Electricity Transmission System |
| NGET | National Grid Electricity Transmission plc |
| NSIP | Nationally Significant Infrastructure Project |
| NTS | Non-Technical Summary |
| OCC | Oxfordshire County Council |
| OHA | Oxfordshire Host Authorities |
| PA 2008 | The Planning Act 2008 |
| PINS | The Planning Inspectorate |
| PV | Photovoltaic |
| PVDP | Photovolt Development Partners GmbH |
| SPV | Special Purpose Vehicle |
| 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 Introduction

1.1 The Project

- 1.1.1 This document provides information to support a second Change Request application in connection with an Application for a Development Consent Order (DCO) for Botley West Solar Farm. The DCO Application is made by SolarFive Ltd (the Applicant) to the Secretary of State for Energy Security and Net Zero (the Secretary of State) under Section 37 of the Planning Act 2008 (PA 2008).
- 1.2.1 The Applicant is seeking development consent for Botley West Solar Farm (the ‘Project’), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic (‘PV’) solar farm and associated infrastructure with a total capacity exceeding 50 megawatts (‘MW’), in parts of west Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.
- 1.3.1 The Project is classed as a ‘nationally significant infrastructure project’ (‘NSIP’) for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a Development Consent Order (DCO). The Applicant submitted its application for a DCO for the Project on 15 November 2024 (the ‘DCO Application’). The DCO Application was accepted for examination by the Planning Inspectorate on 13 December 2024.

1.2 Purpose of this Report

- 1.2.1 Following the submission and acceptance of the DCO Application, the Applicant has continued to engage with affected landowners and key stakeholders (‘Interested Parties’). The changes proposed through this Change Application are predominantly as a result of proactive engagement by the Applicant with these Interested Parties in order to, amongst other things, alleviate any concerns in relation to potential environmental impacts and reduce land take where suitable alternative proposals are available. These changes demonstrate the continued application of the mitigation hierarchy by the Applicant in accordance with NPS EN-1, (e.g. at paragraph 4.1.15).
- 1.2.2 The changes that form part of this Change Request (the ‘Proposed Changes’) comprise the following:
1. Reduction in Order Limits boundary to reduce the solar installation area south west of Bladon, and removal of solar arrays on land east of Bladon and north of Heath Lane;
 2. Reduction in Order Limits boundary to reduce the solar installation area near to Oxford Airport;
 3. Refinement of Project layout and design to reposition the Main Project substation and secondary substation as shown on Sheet 13b of the Works Plans [AS-005];
 4. Reduction in Order Limits boundary to reduce the solar installation on land east of Lower Road;

5. Refinement of Project layout and design to remove solar installation areas overlapping with Flood Zones 2 and 3;
6. Refinement of Project layout and design to include an additional solar installation area within the Southern Site;
7. Reduction in Order Limits boundary to remove small parcels of land owned by Oxfordshire County Council (Estates);
8. Refinement of Project layout and design to reposition the Public Rights of Way proposed to be stopped up and diverted back to definitive alignment;
9. Reduction in Order Limits boundary to remove an area of land along Wharf Road;
10. Clarification of the role of the community educational facility; and
11. Refinement of Project layout and design to secure the latest design parameters for the new National Grid substation.

- 1.2.3 The Proposed Changes involve refinements of Project layout and design or reductions to the Order limits only. The Change Request does not involve any increase or extension of the Order limits, and therefore it does not necessitate any additional Compulsory Acquisition powers relating to new plots of land and/or interests.
- 1.2.4 Appendix A of the Change Report illustrate the location and nature of the Proposed Changes in relation to the current Order Limits.
- 1.2.5 Any change to environmental effects as reported in the Applicant's Environmental Statement are set out in detail in a separate Environmental Statement Addendum. To conclude, there would be no new significant effects as a result of the 11 proposed changes in the long term.
- 1.2.6 In accordance with Planning Inspectorate (PINS) guidance 'Changes to an application after it has been accepted for examination' (24 March 2025) (the "PINS Guidance"), the Applicant submitted a notification of its intention to formally submit this request for a change to the DCO Application on 1 July 2025 (the "Change Notification") [**REP2-045**]. A response was published by the Examining Authority (ExA) on 11 July 2025 [**PD-011**].
- 1.2.7 This report (and/or the supporting documents submitted as part of the Change Request) sets out the information required for change requests in accordance with the PINS Guidance. It also provides additional information requested in the ExA's response to the Change Notification, or otherwise explains where this information is provided in other relevant documents submitted as part of this Change Request and/or the DCO Application. It also details the engagement the Applicant has undertaken with relevant Affected Parties and Statutory Undertakers that informed the submission of the Change Request and provides an overview of the consultation undertaken in respect of the Change Request (with further details on consultation provided in the Consultation Report submitted alongside this Change Request).

1.3 Structure of this Report

- 1.3.1 The subsequent sections of this report are set out as follows:
- a. Section 2: Description of Changes and Rationale for the Change Request

- b. Section 3: Materiality, Legislative and Policy Context for the Change Request
- c. Section 4: Consultation
- d. Section 5: Schedule of Revised Application Documents
- e. Section 6: Conclusions

2 Description and Rationale of Changes

2.2 Introduction

- 2.2.1 The Proposed Changes are outlined below. The majority of the changes reflect those set out in the Change Request 2 Notification as submitted to the Planning Inspectorate on 1 July 2025 [REP2-045].
- 2.2.2 There are, however, two alterations to how the change was previously described:
1. **Change 4** – this change was previously described as being for the Applicant to “*reduce its powers of solar installation over a large part of the affected land*”. However, the Applicant is now removing all of the affected land from the Order Limits following continued engagement with the beneficiary of the restrictive covenant that was previously to be affected – see further detail in Change 4 below.
 2. **Change 8** – the Applicant proposes to remove its powers to permanently stop up and divert the Oxford greenbelt way (in addition to the three public footpaths – 416/24/10, 132/4/10, 152/8/10 – that are being reverted to definitive alignment), on the basis that the latest datasets that were accessed by the Applicant’s GIS team showed an alignment for the Greenbelt Way which does not align with the descriptions and mapping of Oxfordshire County Council.
 3. **Change 10** – on the basis that the community education facility was inconsistently referred to across the application, the Applicant intended to update certain documents to clarify that the proposed community education facility *is* intended to be delivered as part of the Project. However, having continued to engage with the OHA’s on this facility, the OHA’s preference is now not to support the provision of the education facility because of concerns about impact on Green Belt. The Applicant has therefore adjusted its proposals as part of this Change Application and decided to remove the education facility from its proposals and will instead use the affected land for BNG and other ecology mitigation measures.

2.3 Need and Rationale for Changes

- 2.3.1 The project is called Botley West Solar Farm (the Project), with the name derived from the location of the grid connection point. It is located in parts of the administrative areas of West Oxfordshire District Council (WODC), Cherwell District Council (CDC) and Vale of White Horse District Council (VWHDC) and is within the county of Oxfordshire. Its renewable electricity generation output will be critically important if the Government’s commitments are to succeed, significantly helping to deliver transition to net zero.
- 2.3.2 Photovolt Development Partners (PVDP), on behalf of SolarFive Ltd (the “Applicant”), submitted its application for a Development Consent Order (DCO) for the Botley West Solar Project (the “Project”) on 15 November 2024 (the “DCO Application”). The DCO Application was

accepted for examination by the Planning Inspectorate on 13 December 2024.

- 2.3.3 Following the submission and acceptance of the DCO Application, the Applicant has continued to engage with affected landowners and key stakeholders. The changes proposed through the Change Application are predominantly as a result of proactive engagement by the Applicant with these Interested Parties in order to, amongst other things, alleviate any concerns in relation to potential environmental impacts and reduce land take where suitable alternative proposals are available. These changes demonstrate the continued application of the mitigation hierarchy by the Applicant in accordance with NPS EN-1, (e.g. at paragraph 4.1.15).
- 2.3.4 The Applicant has also used this opportunity to further refine some minor extents of land falling within the Order Limits that, upon further design refinement in relation to the proposed layout of the Project, are no longer considered necessary. The Applicant is also proposing other scheme refinements that have become available as a result of the other refinements which are being sought in response to stakeholder feedback. These refinements are included in full as part of this Change Application.
- 2.3.5 In considering the scale and nature of the Change Application, the Applicant has had regard to 'Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination' (2024) (the "Guidance"), published by the Planning Inspectorate. The Applicant informally notified the Planning Inspectorate via email on 27th June 2025 that a change application was to be made. Its subsequent letter [REP2-045] formally notified the ExA that the Applicant is preparing a Change Application and provided an outline of the scope and nature of the proposed changes to inform the ExA's decision on procedural implications of the Change Application and the need, scale and nature of any consultation to be carried out in respect of the proposed changes. This report constitutes the Change Application and is accompanied by a Consultation Report in accordance with the ExA's advice, as well as an ES Addendum and other updated documents (see further Section 5 below).
- 2.3.6 In terms of the overall areas requiring to be updated, these may be summarised as follows:

| Project component | Parameter range - Old | Parameter range - New |
|---|-----------------------|-----------------------|
| Order limit | 1418 ha | Approx. 1328.13ha |
| Total Installation area for solar arrays – Northern Site Area (exc. 275kV corridor route) | Approx. 247.3 ha | Approx. 246.3 ha |

| | | |
|---|---|---|
| Total Installation area for solar array – Central Site Area (exc. 275kV corridor route) | Approx. 545.2 ha | Approx. 453.82 ha |
| Total Installation areas for solar array – Southern Site Area | Approx. 46 ha (with NGET substation) Approx. 50 ha (without NGET substation) | Approx. 48.6 ha (with NGET substation) Approx. 52.6 ha (without NGET substation) |

2.3.7 A description of the proposed changes to the Project is set out below with reference to plot numbers as referred to in the submitted Book of Reference (as updated alongside this Change Application) and work numbers from the Work Plans (also as updated alongside this Change Application).

2.4 Change 1

Reduction in Order Limits boundary to reduce the solar installation area south west of Bladon and removal of solar arrays on land east of Bladon and north of Heath Lane (see Appendix A attached to this Report)

2.4.1 This proposed change relates to two areas of land near Bladon, including:

- To the south west of Bladon it is proposed to reduce the Order Limits by approximately 31ha, involving the removal of the solar installation in this area of approximately 24.7ha, along with associated maintenance roads, PCS, fences and gates. The 275Kv cable corridor route option remains along the southern edge of this location. The remaining land is to be removed from the Order Limits and will continue in agricultural use by the landowner; and
- To the east of the main settlement at Bladon, east of Grove Road and north of Heath Lane, the Applicant proposes the removal of all of the solar installation in this area of approximately 17.6ha, along with associated maintenance roads, PCS, fences and gates. However, the Order Limits is not proposed to be amended in this area and the land will be retained within the Order Limits. The community food growing areas, together with the upgrade works to the Public Right of Way that crosses this area would remain as part of the Project.

2.4.2 Overall, there will be a total loss of approximately 42.3ha of solar installation in these areas.

2.4.3 The primary purpose of this proposed change is to protect the setting of the Blenheim Palace World Heritage Site, in response to feedback received from Interested Parties including Historic England.

2.4.4 In their Written Representation [REP1-086], Historic England advised that *‘further refinements could avoid much of the harm to the WHS,*

Blenheim Palace listed building and Registered Park and Garden, by removing solar panel development from the fields marked 2.1, 2.2, 2.5 and 2.20-2.26' (paragraph 5.56). These changes are being sought to address those concerns expressed by Historic England and comprise the full removal of all solar panels and associated infrastructure from those fields identified by Historic England in its Written Representation. In its response to the proposed changes in CR2, Historic England has acknowledged that this amendment has the potential to remove the previously identified harm to the Outstanding Universal Value of the WHS and the significance of the ensemble of the Registered Park and Garden and palace.

- 2.4.5 Change 1 will result in alterations to the Order Limits by reducing the area of land included within the Order Limits. The change will not result in any new land interests, as no new land is sought to be brought into the Order Limits.
- 2.4.6 In terms of resultant environmental effects, the Applicant's assessment is that there are no new or materially different significant effects that have been identified for most of the topics covered in the ES.
- 2.4.7 For some topics, a reduction in the likely impacts has been identified but this would not alter the conclusions reached in the ES. This includes ecology and nature conservation; hydrology and flood risk; noise and vibration; and air quality.
- 2.4.8 For the following topics, a reduction in effects has been identified:
 - historic environment; and
 - landscape and visual assessment.
- 2.4.9 For these topics, changes in the significance of effects reported in the ES would be an improvement compared to the effects assessed in the ES, such that there would be no effects greater than those reported in the ES.
- 2.4.10 From a planning perspective this change is expected to improve the openness of the Green Belt in this location.

2.5 Change 2

Reduction in Order Limits boundary to reduce the solar installation area near to Oxford Airport (see Appendix A attached to this Report)

- 2.5.1 As a result of discussions with Oxford Airport and in response to its concerns regarding the safe operation of their airfield with regard to take-off and landing of light aircraft, the Applicant has agreed to further revise its layout to accommodate their concerns by reducing the Order Limits in the safety area. The re-siting of the secondary substation and temporary construction compound are proposed to accommodate the revised layout and removal of land from the Order Limits.
- 2.5.2 This change will result in alterations to the Order Limits in the form of a reduction of approximately 46.55ha. The installation area would also be reduced by approximately 40.8ha. This change will also include the re-

siting of the existing secondary substation approximately 25-50m to the north, which itself will be reduced in height to approximately 5m, with associated lattice structure lightning rods being no higher than 10.5m. The existing temporary construction compound west of the A44 will also be moved through approximately 90 degrees from its current position.

- 2.5.3 The freed-up areas of land will continue to be used for agricultural purposes, managed by the landowner. The change will not result in any new land interests, as no new land is sought to be brought into the Order Limits. In terms of environmental effects, no new or materially different significant effects have been identified have been identified for most of the topics covered in the ES.
- 2.5.4 For some topics, a reduction in the likely impacts has been identified but this would not affect the conclusions reached in the ES. This includes ecology and nature conservation; hydrology and flood risk, noise and vibration; and air quality.
- 2.5.5 For the following topics, a reduction in effects has been identified:
 - historic environment; and
 - landscape and visual assessment.
- 2.5.6 For these topics, changes in the significance of effects reported in the ES would be an improvement compared to the effects assessed in the ES, such that there would be no effects greater than those reported in the ES.
- 2.5.7 From a planning perspective this change is anticipated to improve the openness of the Green Belt in this location and remove the concerns of Oxford Airport, the OHA's and other interested parties regarding safe operation of the airport, as well as removing any risk of coalescence between Begbroke and Kidlington.

2.6 Change 3

Refinement of Project layout and design to reposition the main Project substation and secondary substation as shown on Sheet 13b of the Works Plans [AS-005] (see Appendix A attached to this report)

- 2.6.1 Sheet 13a of the Works Plans [AS-005] identifies the existing layout of the Main Project substation alongside the New National Grid Substation, if the New National Grid Substation is to be delivered under the DCO. This is one of the layout options assessed within the Applicant's Environmental Statement (see APP-043). In Chapter 6 it is stated at paragraph 4.25 and 4.26 that:

Whilst, at the time of writing this ES, a final decision has yet to be taken by NGET, it is likely that the NGET substation will be located in one of two possible locations:

1. *On land within the Applicant's control, at its Southern Site, at the western most extremity, south of the Farmoor Reservoir.*
2. *On land near the Applicant's Southern Site, to the west of and adjoining that Site, south of the Farmoor Reservoir.*

For assessment purposes, the Applicant assumes that the NGET substation will be within the Applicant's Site, as described in Option 1 above, and powers will be taken to consent that substation as part of the Applicant's DCO. To cater for the eventuality that NGET decides not to locate their substation within the Applicant's Site, then the Applicant has additionally assessed:

- *an alternative location, assumed to be close to the Southern Site at its western end, on a cumulative basis, with NGET seeking any necessary consents and permissions; and*
- *the substitution of solar panels for the substation on the land referred to in Option 1 above.*

- 2.6.2 At Table 6.3 the ES also set out parameters that showed the effect of the total areas of installation with and without the NGET substation. They are stated as approximately 46ha with the NGET substation within the Order Limits and approximately 50ha if it moved west beyond the Order Limits.
- 2.6.3 Sheet 13b of the Works Plans identifies the layout of the Main Project substation and additional solar array, if the new National Grid substation is to be delivered by National Grid on adjacent land to the west beyond the Order Limits. As stated above, the original assessment assumed solar arrays directly in place of the land reserved for the new National Grid substation and the Project main substation remaining to the east of that land parcel. The Applicant now proposes a repositioning of the solar array installation area in the Southern Site.
- 2.6.4 Proposed Change 3 would alter the layout of the solar installation but would not change the overall area of solar installation proposed. This change would allow for a shorter, more efficient and more cost-effective cable connection to the National Grid substation. This was recognised by the ExA in the Issue Specific Hearing 1 (on DCO and Strategic Matters) and the Applicant is seeking this change partly in response to that suggestion.
- 2.6.5 The Main and secondary substation has also been sited to allow for a large landscape planting corridor to be accommodated along the northern edge of the facility as well as to avoid the existing hedgerow to the east and the proposed Greenway to the west. The landscape buffer on the northern boundary area will be planted with hedgerow and trees to allow for improved screening of the facility. The overall size of the facility will not change but there is a slight stagger in the footprint (for the secondary substation) to accommodate the landscape buffer to the north. The final slab level will be determined following detailed design but the plans assume a cut and fill balance i.e. no materials or so significant quantities of material taken off site during construction.
- 2.6.6 No new land interests would be engaged through this change. No additional land outside the current Order Limits is required. In terms of environmental effects, the Applicant's assessment is that there is no new or materially different significant environmental effects compared to those already reported.

2.7 Change 4

Reduction in Order Limits boundary to reduce the solar installation area on land east of Lower Road (see Appendix A attached to this Report)

- 2.7.1 The Applicant is aware of a restrictive covenant which prevents the construction of 'buildings' over Plots 6-18, 6-19, 8-06, 8-07, 8-13, 8-14, 8-15, 8-16, on which the Applicant proposed solar arrays and related infrastructure. Notwithstanding, the Applicant has continued to engage with the affected landowner to try and find a reasonable alternative proposal. To date, the IP has maintained his position that he does not want solar installation over the relevant land parcel. The Applicant is therefore proposing to reduce the Order Limits and remove its powers of solar installation over all of the affected land. This will result in a loss of approximately 6.26ha of installation area and the re-routing of part of the 33kV cable. The freed-up land would be removed from the Order Limits and remain in agricultural use. This change will result in alterations to the Order Limits in the form of a reduction of approximately 11.78 ha.
- 2.7.2 No new land interests would be engaged through this change. No additional land outside the current Order Limits is required.
- 2.7.3 In terms of environmental effects, no new or materially different significant effects have been identified for most of the topics covered in the ES.
- 2.7.4 For some topics, a reduction in the likely impacts has been identified but this would not affect the conclusions reached in the ES. This includes ecology and nature conservation; hydrology and flood risk, ground conditions; noise and vibration; and air quality.
- For the following topics, a reduction in effects has been identified:
 - historic environment; and
 - landscape and visual assessment.
- 2.7.5 For these topics, any changes in effects reported in the ES would be an improvement compared to the effects assessed in the ES, such that there would be no effects greater than those reported in the ES.

2.8 Change 5

Refinement of Project layout and design to remove solar installation areas overlapping with Flood Zones 2 and 3 (see Appendix A attached to this Report)

- 2.8.1 As a result of a base mapping error, the Applicant has identified minor anomalies where the solar installation slightly overlaps with Flood Zone 2 or 3 throughout the Project site. The Applicant is committed to not develop within Flood Zone 2 or 3 and so is proposing to correct this mapping anomaly. This has resulted in a small loss of installation area in several locations amounting to approximately 0.72 ha.
- 2.8.2 No new land interests would be engaged as a result of this change. No additional land outside the current Order Limits is required. Given the

minor nature of the proposed modification, no new or materially different likely significant environmental effects that would arise as a result of this change.

2.9 Change 6

Refinement of Project layout and design to include an additional solar installation area within the Southern Site (see Appendix A attached to this Report)

- 2.9.1 The Applicant has recently become aware of a change in the EA mapping of parts of Flood Zone 2. In particular, an area within the Order Limits was previously excluded from development because it was within Flood Zone 2. This is an area of approximately 2.41 ha, within the Southern Site. The Applicant now wishes to utilise this area for additional solar array as a result of the change in Flood Zone status.
- 2.9.2 No new land interests would be engaged through this change. No additional land outside the current Order Limits is required. A Technical Note is included at Appendix 3 of the ES Addendum to outline the surface water risk of this change.
- 2.9.3 In terms of environmental effects, no new or materially different significant effects have been identified.
- 2.9.4 For some topics, a slight change in the likely impacts has been identified but this would not affect the conclusions reached in the ES. This includes ecology and nature conservation and hydrology and flood risk.
- 2.9.5 For landscape and visual assessment, the ES identified that there would be temporary significant effects on a number of viewpoints in the winter of Year 1 and that these would not be significant by Year 15. Therefore, the overall conclusions of the ES in this regard remain the same. There are therefore no materially different significant effects for the Project as a whole.

2.10 Change 7

Reduction in Order Limits boundary to remove small parcels of land owned by Oxfordshire County Council (Estates) (see Appendix A attached to this Report)

- 2.10.1 This change is sought to refine the Order Limits so that these sections of the Order Limits only include the extent of the public highway (i.e. land of Oxfordshire County Council in its capacity as highway authority) and do not involve land owned by Oxfordshire County Council in its 'Estates' capacity. The amount of land proposed to be removed is approximately 0.005ha only.
- 2.10.2 This change will result in a reduction to the Order Limits but will not impact on the nature or extent of the works proposed to be carried out in these locations. No new land interests will be engaged through this change, as no additional land outside the current Order Limits is required. Given the minor nature of the proposed modification to the

Order Limits, this change will not result in any new or different likely significant environmental effects.

2.11 Change 8

Refinement of Project layout and design to reposition the Public Rights of Way proposed to be stopped up and diverted back to definitive alignment - (see Appendix A attached to this Report)

- 2.11.1 Prior to submission of the Applicant's DCO Application, the Applicant became aware that there was a difference between the aerial data showing the used footpath routes on the ground and the Oxfordshire County Council (OCC) definitive data set of their alignment. The data showed that the routes used by the public deviated from the definitive data set alignment. The Applicant therefore sought powers to alter the alignment of the PRow to reflect the 'desire lines' on the ground. However, following ongoing discussions with OCC, the Applicant is seeking to remove those powers to adopt the OCC definitive alignments which will result in a change to the submitted plans.
- 2.11.2 Upon further review of the changes and in light of ongoing consultation, the Applicant also proposes to delete the diversion of the Oxford greenbelt way in addition to the three public footpaths (416/24/10, 132/4/10, 152/8/10), on the basis that the latest datasets that were accessed by the Applicant's GIS team showed an alignment for the Greenbelt Way which does not align with the descriptions and mapping of Oxfordshire County Council. This change is to therefore align with that description/mapping. There is no consequential impact on the solar installation layout or Order Limits as a result of the withdrawal of this proposed permanent stopping up and diversion of the Oxford Greenbelt way.
- 2.11.3 The Applicant has submitted an updated version of the Streets Access and Rights of Way Plans to capture this change, which in total will add approximately 0.01ha of additional installation area.
- 2.11.4 No new land interests would be engaged through this change. No additional land outside the current Order Limits is required. Given the minor nature of the change it is considered that there are no new or materially different likely significant environmental effects that would arise as a result of this change.

2.12 Change 9

Reduction in Order Limits boundary to remove an area of along Wharf Road - (see Appendix A attached to this Report)

- 2.12.1 The Applicant is proposing to reduce the area required along Wharf Road following feedback from the landowner (Siemens Healthcare Limited). The area of Wharf Road to be removed (part of plot 11-29) falls within the landowner's gated area, which is secured and would require notice of entry each time access is required. Furthermore, removing the area would lessen the potential impact on the operations of the site, particularly in respect of vehicular access. It has been agreed

with the landowner that this area will not be taken under an Option Agreement as it is no longer needed to facilitate the development. The alternative route for the cable is facilitated through the Order Limits, by routing north before the gated area and running parallel in an adjacent parcel of land.

- 2.12.2 This change will result in alterations to the Order Limits and a reduction in the area of land included within the Order Limits of approximately 0.6ha. No new or different significant environmental effects are predicted as a result of this change.

2.13 Change 10

Clarification of the role of the proposed educational facility - (see Appendix A attached to this Report)

- 2.13.1 The proposed community education facility was included in the original application, as seen in Chapter 16 of the Environmental Statement and the outline Operational Management Plan (oOMP).
- 2.13.2 Whilst the facility was in the original project, its status was unclear. It was originally conceived following discussion with Oxfordshire County Council as education authority, and the Applicant had assumed there would be no objection to such a facility being provided in principle. However, ongoing engagement has revealed that the local authorities do have concerns. Having considered the details, the OHAs, including the County, now have concerns with this location including impact on the Green Belt, landscape impact and access. OCC Property have also stated that the County Council are not able to take on the maintenance responsibility of such a facility.
- 2.13.3 As such, whilst the OHAs are in favour of provisions being made within the scheme design to support outdoor education and recreation, they do not support the education facility as proposed by the Applicant.
- 2.13.4 In light of the above, the Applicant proposes to remove the education facility from the project and the use the land shown for that purpose (1.15ha) for BNG and other ecology mitigation measures. Chapter 16 and the oOMP have been updated to remove reference to this facility.
- 2.13.5 It is considered that whilst there would be a slight negative effect in terms of this loss of a new community education facility, this would be balanced against the beneficial effects in terms of a gain in BNG, and increase in the openness in this part of the Green Belt. Overall, the planning balance is unaffected by these changes and they will not result in any new or materially different likely significant environmental effects.

2.14 Change 11

Refinement of Project layout and design to secure the latest design parameters for the new National Grid substation (no plan required to show this change)

- 2.14.1 The area currently set aside for the NGET substation amounts to up to 3.8 ha. The parameters for that substation were 76m x 31m footprint of

the main building and 14m height of main building. The Guide to the Application, Statement in Respect of Statutory Nuisance and the Explanatory Memorandum were each updated at Deadline 2 to ensure any references to these parameters are consistent.

- 2.14.2 However, following its ongoing engagement with National Grid, amendments to those parameters are required to ensure that the secured design details adequately facilitate the delivery of the New National Grid Substation. This is secured in an updated version of the Outline Layout & Design Principles (REP4-032) and now assessed as part of change 11.
- 2.14.3 The new NGET substation parameters are defined as follows: the area set aside for the facility is an area of up to 3.8 hectares. Within this area the main Gas Insulated Substation (GIS) building will have a footprint of approximately 93m (93.020m) by 17m (16.725m) and a maximum height of approximately 15.0m (14.495m). Adjacent to the GIS building, there will be an additional building measuring approximately 105m (105.020m) by 10m with a height of approximately 4.8m to accommodate supporting functions such as offices, mess room, HVAC, battery room, and computer room. Surrounding these two buildings is a variety of other electrical infrastructure including transformers and connecting towers, which will be at varying heights but none greater than approximately 15m (excluding any cables connecting to the 400kV OHL).
- 2.14.4 No new land interests would be engaged through this change. No additional land outside the current Order Limits is required. Whilst the infrastructure is already captured in the original project, the updated parameters are included as part of the Change Application for absolute clarity that the newly proposed design of the new National Grid substation falls within the scope of the assessed parameters. Given the minor nature of the change no new or materially different likely significant environmental effects that would arise a result of this change.

3 Materiality

- 3.2.1 In respect of changes to DCO applications that are proposed during the course of examination, there is no statutory definition as to whether a proposed change is “non-material” or “material”. The Planning Act 2008 does not define what is a non-material or material change, and the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (the “Changes Regulations”) (which apply to proposed changes to made DCOs only) set out the process and procedure which needs to be followed in seeking a change.
- 3.2.2 The PINS Guidance provides that a proposed change may be so substantial that it constitutes a ‘materially different project’. However, within the PINS Guidance it also confirms that there is no statutory definition of what constitutes a “material” or “non-material” change to a DCO application.
- 3.2.3 Guidance on Changes to Development Consent Orders published by the Department for Communities and Local Government in 2015 (the “2015 Guidance”), whilst of some relevance, only relates to dealing with changes to DCOs made under the Changes Regulations (i.e. once a DCO has been granted). Paragraph 10 of this guidance does state that a decision around materiality “will depend on the circumstances of the specific case”.
- 3.2.4 The 2015 Guidance sets out circumstances where a change to a DCO could be a material change. These include where there may be a change in significant environmental effects, may invoke a need for a Habitats Regulation Assessment, would require the acquisition of additional land or result in new land interests, or impact on local people or businesses not previously identified. These are expressly referred to as a “starting point” only.
- 3.2.5 Noting that the 2015 Guidance does not apply directly to this Change Request, applying by analogy and having regard to the above, the matter of materiality is therefore a matter of judgement that needs to be applied on a case-by-case basis, depending on the extent of additional considerations (i.e. those not considered or assessed as part of the original DCO application) that may arise as a result of a proposed change.
- 3.2.6 In this case, Changes 1, 2, 4, 7 and 9 relate to the discrete removal of limited areas of land from the Project following engagement with interested parties or as a result of further design iteration. These changes involve reductions of the Order limits and would not impact on additional land interests not previously identified. The Change Request will not involve any material increase or extension of the Order limits and as such there is no ‘additional land’ included. Therefore, the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations) are not engaged.
- 3.2.7 Changes 3, 5, 6, 8 and 11 relate to minor changes to the proposed layout of the Project. The changes would also not impact on additional land interests not previously identified and do not involve any material

increase or extension of the Order Limits and does not require additional Compulsory Acquisition relating to new plots of land and/or interests.

- 3.2.8 In the preceding sections we have addressed each of the Proposed Changes in turn and expanded upon the features of each which contribute to our conclusion that the changes are non-material.
- 3.2.9 The Change Request is supported by an ES Addendum submitted alongside this Change Report. This confirms that the Proposed Changes will not result in any new or different significant effects compared to those reported within the ES [APP-036 to APP-224] submitted with the DCO Application.
- 3.2.10 In addition, the Change Request would not impact upon any consents or licences for the project with these remaining as set out in the Consents and Licenses Required Under Other Legislation [APP-035].
- 3.2.11 In view of the above, it is clear that the Proposed Changes are non-material, resulting in the Project being materially no different to that described and assessed in the DCO Application and accepted for examination, which would not give rise to any materially new or different effects or involve the inclusion of additional land.

3.3 Legislation and Policy Context

- 3.3.1 The following documents have been submitted as new or updated material, further to the Examining Authority's Notification of Applicant's Intention to Submit a Request for Proposed Changes to the DCO Application [PD-011].

3.4 The Planning Act 2008: Examination Stage for NSIP's (2004)

- 3.4.1 The guidance set out in the Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects, 2024 (the "Examination Guidance") includes matters which relate to the Change Request and has therefore been given due regard by the Applicant.
- 3.4.2 The Examination Guidance outlines an expectation that applications will be as well prepared as possible prior to submission, but notes that *"there are occasions when applicants may wish to make changes to an application after it has been accepted for examination"*.
- 3.4.3 It is stated within the Examination Guidance (at Paragraph 018 Reference ID-07-018-20240430) that the Examining Authority is required to consider a number of factors when deciding whether to accept an applicant's proposed changes, such as whether:
 - a. *"the changes would mean the project is effectively a different one from that contained in the application"*. The Proposed Changes are non-material in nature resulting in reductions of the Order limits and refinements to the proposed Project layout. In terms of the scope and extent of changes proposed, the effect of the proposed changes would not be so substantial as to constitute a materially different project to the Project as submitted with the DCO Application.

b. *“the application (as changed) is still of a sufficient standard for examination”*. As the Proposed Changes are non-material and will not result in a materially different proposal, the DCO Application is still of a sufficient standard for examination with the Change Request being supported by updated documents, where relevant, produced to a sufficient standard.

c. *“sufficient consultation on the changed application can be undertaken to allow for the examination to be completed within the statutory timetable”*. The Applicant has undertaken targeted consultation with identified relevant consultees – including statutory undertakers, host local authorities, host parish councils, land interests, Historic England and Oxford airport – to provide them with the opportunity to comment on the Change Request. These comments have been considered by the Applicant in preparing and submitting the final Change Request and as set out in the Consultation Report submitted with this Change Request.

d. *“the changes would breach the principles of fairness and reasonableness for parties participating in the examination”*. The Applicant has determined that the majority of previous consultees will not be impacted by the Proposed Changes, beyond the impacts already assessed and consulted on as part of the DCO Application.

On this basis, a more targeted approach to consultation in respect of the Change Request was carried out as described in paragraph c) above.

e. *“Any other procedural requirements can still be met”*. Due to the submission of the Change Request in line with the timings suggested by the Examining Authority [PD-011], there is sufficient time for any other procedural requirements to be met with no impact on statutory timescales for the examination of the DCO Application. The Change Request has been subject to consultation. Section 4 of this Change Request report provides a summary of the consultation responses received and how consideration has been given to these. A full copy of the Consultation Report is submitted with the Change Request. The Examination Guidance goes on to state *“It is expected that the applicants will discuss the implications of any changes they wish to make with the relevant statutory consultees and notify the Examining Authority at the earliest opportunity”*. The Applicant’s discussions with statutory undertakers and Affected Parties are ongoing. The Applicant informally notified the ExA of its intention to submit the Change Request on 27 June 2025, and the formal Change Request 2 Notification was submitted on 1 July 2025. In line with the Examination ExA’s proposed timetable in PD-011 the Applicant can confirm that submission of CR2 alongside D5 allows the changes to be considered sufficiently in advance of the hearings and within the remaining Examination timetable.

3.5 Nationally Significant Infrastructure Projects: Changes to an Application after it has been accepted for Examination (PINS,

24 March 2025)

- 3.5.1 In considering the scale and nature of the Change Request, the Applicant has had regard to the Government's Nationally Significant Infrastructure Projects: Advice pages, in particular, the advice page for 'Changes to an application after it has been accepted for examination' (referred to previously and hereafter as the "PINS Guidance").
- 3.5.2 The Applicant continues to engage with landowners and statutory undertakers in relation to the Project. The PINS Guidance recognises that the need for a change request may result from "*on-going negotiations between the applicant and other interested parties*", as has been the case in relation to the Proposed Changes.
- 3.5.3 The PINS Guidance sets out a number of steps required as part of the process for requesting a change to a DCO application. These are set out below, along with how the Applicant has complied with each of these steps.

Step 1 – the change notification

- 3.5.4 The PINS Guidance states that where an applicant decides to request a change to an application which has already been accepted for examination, they must inform the ExA in writing. The Project was accepted for examination on 15 November 2024 and the Applicant submitted a Change Notification to the ExA on 1 July 2025.
- 3.5.5 As part of the Change Notification, the Applicant complied with the PINS Guidance in terms of the information required to be included in a change notification. The Change Notification letter submitted on 1 July 2025 included:
 - a. A clear description of the Proposed Changes, including any new works, altered works and ancillary matters.
 - b. A statement setting out the reasons and need for making the Proposed Changes with reference to the government's guidance on the Examination stage, any relevant National Policy Statements, and any other important and relevant matters.
 - c. A statement establishing the Proposed Changes involve changes (being minor modifications and reductions) to the Order land.
 - d. A statement establishing that the Proposed Changes are not expected to result in any new or different likely significant environmental effects, including a summary description of those effects and any mitigation proposed.
 - e. Information to establish how the Applicant considers the Proposed Changes can be accommodated within the remaining statutory timescales.
 - f. The timescale for the Applicant's consultation about the Proposed Changes, and the Applicant's view on the scope of that consultation, including justification.
 - g. The expected submission date for the Change Request.

Step 2 – Advice from the Examining Authority

- 3.5.6 The PINS Guidance states that, after considering the change notification, the ExA will provide advice to the applicant about the procedural implications of the proposed change, including the need, scale, and nature of consultation that the applicant should undertake before formally submitting the change application.
- 3.5.7 The ExA published its response to the Change Notification on 11 July 2025, which provided the following advice to the Applicant:
- a. The ExA confirmed that the ‘further public consultation is welcomed’; and
 - b. The ExA requested that the Applicant’s proposed 30-day consultation period on the Proposed Changes was brought forward to effectively take place between Deadlines 3 and 4 in the Examination Timetable.
- 3.5.8 Following receipt of the above advice, the Applicant amended its consultation methodology to ensure that the timings and scope of the consultation aligned with the ExA’s requests. The Applicant held a 30-day period of targeted consultation on the Change Request between 23 July and 22 August 2025 and is submitting this request on 12 September 2025 as requested by the ExA. The full list of consultees who were consulted on the Change Request is set out in Section 3 of the Consultation Report submitted alongside this Change Request.

Step 3 – The applicant consults about the proposed changes

- 3.5.9 The PINS Guidance states that the applicant should carry out appropriate consultation about the proposed change, where the applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 who would be affected by the proposed change, giving a minimum of 28 days from receipt of the information about the proposed change for responses.
- 3.5.10 The PINS Guidance allows for a targeted approach to the identification of those affected by the proposed change to be adopted. Where this approach is taken, detailed justification should be provided about why the applicant considers it is not necessary to consult all the prescribed persons.
- 3.5.11 Section 4 of this Report outlines the approach to consultation taken in relation to the Change Request. A Consultation Report is submitted with this Change Request, which sets out the consultation undertaken in respect of the Proposed Changes in more detail.

Step 4 – The change application

- 3.5.12 The PINS Guidance sets out that a formal request must be made by the applicant to the ExA to change the application by providing the required information.
- 3.5.13 The PINS Guidance sets out the information that should be included within a change request. Table 3-1 below sets out the information

required, and where this can be found within this report and supporting documentation.

Table 3-1: Information required for a Change Request

| | |
|---|--|
| 1. Confirmed / Updated description of the changes | Section 2 of this Report |
| 2. Confirmed / Updated rationale for the changes | Section 2 of this Report |
| 3. Full schedule of application documents / revisions | Section 5 of this Report sets out the documents that will be updated as a consequence of this Change Request. The Guide to the Application contains the full list of updated documents, with those documents that have been updated as a result of the Change Request clearly shown. |
| 4. Statement identifying any impact the Proposed Changes would have on securing any consents or licences for the Project | Section 2 of this Report |
| 5. Clean and track changed versions of the draft DCO and Explanatory Memorandum | Clean and tracked changed versions of the draft DCO and Explanatory Memorandum have been submitted alongside the Change Request. |
| 6. Confirmation that Compulsory Acquisition Regulations are not engaged | Section 3.1.6 of this report outlines the non material nature of the Proposed Changes and confirms that the Compulsory Acquisition Regulations are not engaged. |
| 7. If there are any new or different likely significant environmental effects, provision of other environmental information and confirmation that, effects have been adequately addressed; and copies of any responses from consultation bodies who may have an interest in the proposed changes. | As the Proposed Changes would not result in any new or different significant environmental effects, this requirement is not engaged. An ES Addendum is submitted alongside the Change Request. More information on the consultation undertaken as a result of the Change Request is detailed in Section 4 of this Report. A Consultation Report is also submitted as part of the Change Request. |
| 8. Where consultation has been carried out (either voluntarily, at the direction of the ExA or pursuant to the requirements of the CA Regulations) a Consultation Report must be provided. The consultation report should: | Section 4 outlines the approach to consultation taken in relation to the Change Request. A Consultation Report is submitted with the Change Request, which complies with the PINS Guidance. |

3.6 Relevant Planning Policy

3.6.1 The Applicant has considered relevant planning policy and guidance alongside the Change Request and considers the Proposed Changes to be in line with:

- a. Overarching National Policy Statement for Energy (EN-1) ;
- b. National Policy Statement for Renewable Energy Infrastructure (EN-3); and
- c. National Policy Statement for Electricity Networks Infrastructure (EN 5).

Early Engagement

3.6.2 Paragraph 4.1.19 of NPS EN-1 acknowledges the importance of early engagement at the pre-application stage between the Applicant, key stakeholders, statutory consultees and others likely to have an interest in the application. While this refers to the pre-application stage of the DCO application, the Applicant considers it important and relevant to note that the rationale for the Change Request has arisen due to continued engagement largely with key stakeholders. This proactive approach to engagement is intended to support the examination process.

Obtaining Land by Negotiation

3.6.3 As set out in the CA Regulations the Applicant should only seek compulsory acquisition of land where it does not succeed in reaching a voluntary agreement through negotiations with landowners.

3.6.4 Changes 4, 7 and 9 have arisen from on-going discussions with Affected Parties and Statutory Undertakers and are the result of negotiations seeking to secure land through voluntary agreement. They are in line with paragraph 2.6.2 of NPS EN-5 (Ref 9), which states *“where the Applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work”*.

Flexibility in the Project Details

3.6.5 NPS EN-3 (Ref 8) recognises the importance of flexibility in proposals as *“not all aspects of the proposal may have been settled in precise detail at the point of application”*. The Change Request is the result of ongoing engagement with Affected Parties and Statutory Undertakers to continue to settle issues and make amendments to the Project that were not settled at the time of submission of the DCO Application. The Change Request does not change the approach to design flexibility in relation to the Project.

3.7 Compulsory Acquisition Regulations

3.7.1 For the avoidance of doubt, as the Proposed Changes relate to the removal of land and the reduction or modification of the Order limits, with no ‘additional land’ included, the CA Regulations are not engaged.

3.7.2 Since the Proposed Changes are either reductions of the Order limits or minor refinements of the Project layout, thereby not impacting on the

extent of the Order limits, there is no new Category 3 land as defined by section 57 of the PA 2008. Given this, there are no new claimants as a result of the Change Request and no new or different significant effects arising from the Proposed Changes to enable a relevant claim to be made.

3.8 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

- 3.8.1 The Applicant has submitted supporting environmental information in the form of an ES Addendum. This concludes there are no new or different likely significant effects associated with the Change Request, therefore the conclusions of the ES [APP-036 to APP-224] submitted with the DCO Application remain valid and unchanged.
- 3.8.2 While it is acknowledged that the ES Addendum would form supplementary environmental information, the Applicant notes there is no statutory requirement to consult on this, including in respect of the consultation requirements under Regulation 20 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations), as the ES Addendum does not constitute “further information” for the purposes of the EIA Regulations.
- 3.8.3 Further to this, the PINS Guidance) states: *“If the proposed change results in any new or different likely significant environmental effects, provision of other environmental information and confirmation that:*
 - a. *the effects have been adequately assessed and that the environmental information has been subject to publicity. Whilst not statutorily required, the publicity should reflect the requirements of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and applicants should also submit copies of any representations received in response to this publicity with the change request.*
 - b. *any consultation bodies who might have an interest in the proposed changes have been consulted (reflecting the requirements of the EIA Regulations). Applicants should submit copies of any responses received from consultation bodies with the Change Application. Applicants should identify those consultation bodies who were consulted on the proposed changes but not on the original application”.* The Applicant undertook proportionate targeted consultation with all potentially Affected Parties and Statutory Undertakers providing these parties with an opportunity to provide feedback on the Proposed Changes. The approach to consultation is outlined in Section 4 of this report, with further detail provided in the Consultation Report. Additionally, the Applicant has submitted the Change Request alongside Deadline 5 in line with the request from the ExA thereby allowing Interested Parties and others the opportunity to consider the implications of the Proposed Changes during the remainder of the Examination.
 - b. Consultation Full details of the consultation undertaken, including confirmation of who has been consulted, the methods of consultation used, and why they have been consulted alongside details of how the

Applicant has considered the content of the consultation responses received, are included in the Consultation Report. Copies of all consultation responses received, including how the Applicant has responded, are provided as appendices to the Consultation Report.

4 Consultation

4.2 Consultation methodology

- 4.2.1 In considering the scale and nature of the Change Request and the extent of any consultation undertaken, the Applicant had regard to the PINS Guidance.
- 4.2.2 As outlined in section 3 of this report, the Applicant considers that the reductions and modifications to the Order limits associated with the Proposed Changes are minor and would not result in a materially different DCO Application than that accepted for examination. Given the specific circumstances of this Change Request and the nature of the Proposed Changes, the Applicant therefore considered that it would not be proportionate to consult all prescribed consultees set out under Section 42(1)(a) to (d) of the Planning Act 2008 (PA 2008) that were previously consulted through the non-statutory, statutory and targeted consultations carried out during the Pre-Application phase of the Project.
- 4.2.3 This approach is in accordance with the PINS Guidance, which expressly allows for a targeted approach to the identification of those affected by the change application, provided there is adequate justification as to why it is deemed unnecessary to consult all prescribed persons. This justification is summarised in this report and set out in more detail in the Consultation Report.
- 4.2.4 In accordance with the PINS Guidance and the ExA's advice, the Applicant held a 30-day period of targeted consultation on the Change Request between 23 July and 22 August 2025.
- 4.2.5 The Applicant wrote to 51 consultees ahead of 23 July 2025 in relation to the proposed development. This list of consultees comprised:
- Relevant land interests specifically affected by and interested in the proposed changes;
 - Relevant Statutory Undertakers;
 - Host Local Authorities for the Project;
 - Historic England; and
 - Oxford Airport
- 4.2.6 The Applicant monitored the delivery of consultation notifications to consultees. The Applicant did not receive confirmation of delivery for two parties / land interests, and therefore reissued the consultation notifications to them on 04 August 2025. The requested deadline for comments from these parties was extended to 3 September 2025, to ensure they were provided with 30 days to respond.

4.3 Consultation Outcomes

4.3.1 Between 23 July and 22 August 2025, the Applicant received eight responses to the consultation on the Proposed Changes, from the following consultees:

- Bladon Parish Council
- Cumnor Parish Council
- Oxfordshire County Council
- Vale of White Horse District Council
- Cherwell District Council
- West Oxfordshire District Council
- Historic England
- Network Rail

4.3.2 In addition to the submission from Historic England, ICOMOS provided the Applicant with a Technical Review ahead of Deadline 4, which references the Change Request 2 consultation. The Applicant has considered the full submission by ICOMOS will respond as part of the ordinary course of the Examination.

4.3.3 The Applicant has had regard to the comments received and has provided clarification and responses to these comments in Appendix G of the Consultation Report.

4.3.4 The Applicant has welcomed multiple comments from consultees supporting various Proposed Changes and has sought to clarify and respond to any queries and feedback made on specific changes.

4.3.5 The consideration of the feedback received from both the public and technical consultees, and across both phases of consultation has informed the refinements of the Project and the proposals presented as part of the Change Request.

4.3.6 Features of the Proposed Changes that have developed in response to the Applicant's consideration of feedback has included the Applicant proposing to remove the education facility from the project and use the land shown for that purpose for Biodiversity Net Gain (BNG) and other ecological mitigation measures.

5 Updated Application Documents

5.2.1 The following documents have been submitted as new or updated material in response to the Examining Authority's requirements for Deadline 1 (as set out in the Guide to the Application accompanying this Change Report);

New deliverables

- Cover Letter
- Change Request Report (*this report*)
- Environmental Statement Addendum
- Change Request Consultation

Updated documents

- Guide to the Application
- Streets, Access and Rights of Way Plans
- Works Plans
- Land Plans
- Hedgerow Removal Plan
- Traffic Regulation measures Plans
- Draft Development Consent Order (dDCO)
- Explanatory Memorandum
- Land and Rights Negotiation Tracker
- Statement of Reasons
- Book of Reference
- ES Chapter 7 – Historic Environment
- ES Chapter 8 – Landscape and Visual Impact Assessment
- ES Figure 17.3 Surveyed ALC Grades
- ES Figure 17.4 Land Holdings
- ES Figure 17.5 PRoW and Other Promoted Routes
- ES Appendix 7.4 Heritage Impact Assessment for the Blenheim Palace World Heritage Site
- ES Appendix 7.5 Settings Assessment
- ES Appendix 9.13 Biodiversity Net Gain Assessment
- Operational Development Areas plan
- Landscape, Ecology and Amenities Plan

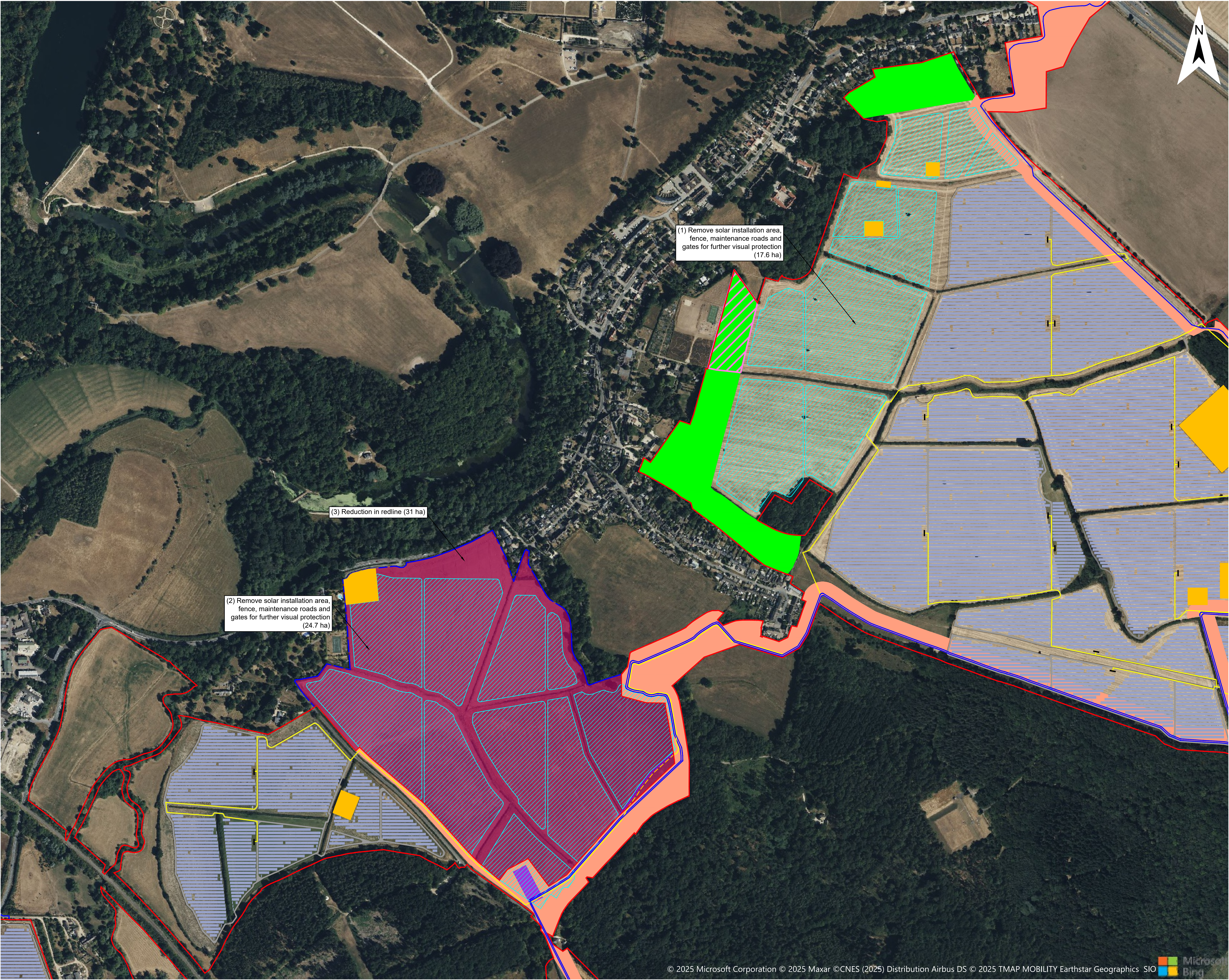
- Temporary Facilities Plan
- Outline Code of Construction Practice (CoCP) Part 1
- Outline CoCP Part 2
- Outline Landscape and Ecology Management Plan
- Outline Written Scheme of Investigation
- Outline Layout and Design Principles
- Location Plan
- Schedule of Changes to the draft DCO
- Schedule of Changes to the Book of Reference
- Compulsory Acquisition (CA) Schedule and Land Rights Tracker
- Additional Photomontages for Historic Environment Assessment
- Masterplans and Location Plan
- Hedgerow Removal Details Plans
- Chapter 16: Human Health
- Outline Operational Management Plan

6 Conclusions

- 6.2.1 The Proposed Changes are a result of the Applicant's proactive and continued engagement with Affected Parties and Statutory Undertakers and ongoing design refinement.
- 6.2.2 The Proposed Changes are all non-material, resulting in no new or different likely significant effects, as concluded in the ES Addendum submitted in support of this Change Request. The Applicant regards the changes as non-material reductions/refinements of the Order limits that are unsubstantial in nature. The Proposed Changes are not so substantial as to constitute a materially different Project to that submitted and accepted for examination. The Proposed Changes will not result in a DCO Application that is materially different in character to the one submitted and accepted for examination. The non-material changes to the proposed layout are positive design evolution arising from continued engagement with Affected Parties and Statutory Undertakers which are in accordance with relevant policy, legislation and guidance.
- 6.2.3 The Applicant considers the engagement undertaken in relation to the Change Request and scope of the consultation undertaken to be appropriate and proportionate to the nature of the Proposed Changes.
- 6.2.4 The Applicant has considered the appropriate approach to bringing forward the Change Request in the context of the requirements of the Examination Guidance and PINS Guidance. The Applicant considers that the changes can be adequately considered in full by the ExA, and

the Change Request decided, with sufficient time remaining in the Examination.

- 6.2.5 The documents listed in Section 5 are provided in support of this Change Request and the Applicant trusts that this report is useful to the ExA in providing an overview of the scope and nature of the Proposed Changes, and the consultation undertaken to support the Change Request. The Applicant welcomes confirmation from the ExA that the Change Request can be accepted.



Legend

Order Limits Rev.1, s51 Response

Order Limits Change Request 2

Proposed Infrastructure and Land Use Elements *

Areas for sensitive archaeological site protection and management

Solar Panels

Maintenance Road

Fence

Access Gate

PCS

Indicative 33kV Cable Route

Indicative 33kV Cable Route Affected

Indicative 275kV Cable Route

Indicative 275kV Cable Route Affected

Cable Corridor

Temporary HDD Compound

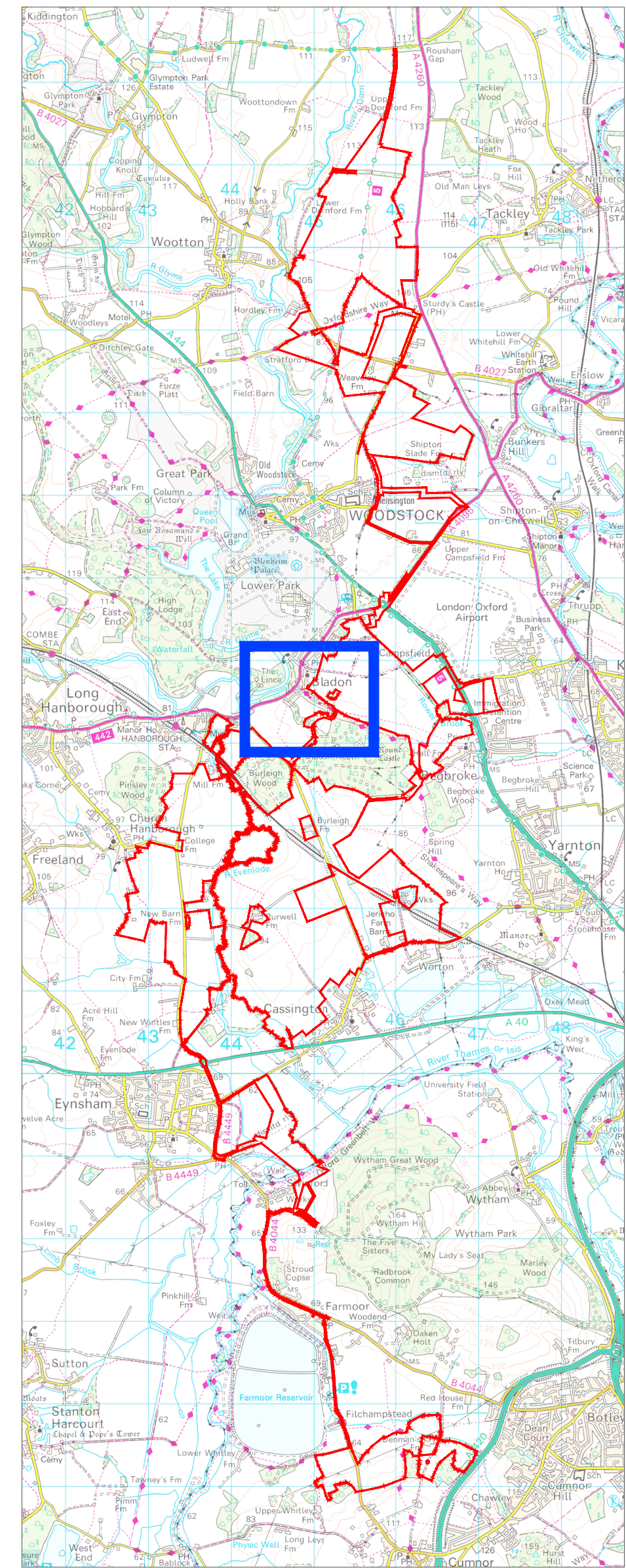
Educational Area

Land Available for Community Food Growing Area

Project Refinements

(1) (2) Replace solar installation area, fence, maintenance roads and gates for further visual protection (Total: 42.3ha)

(3) Reduction in redline (31 ha)



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| | | | | | |
|------------------------|---------|------------|--------------|------------|-----------------------|
| A: Change Request 2 | | | | | |
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | Date | Name |
| | | | | Edit | 12.09.2025 K. Lueken |
| | | | | Check | 12.09.2025 H.Trabelsi |
| | | | | Drawing No | Appendix A |
| A | Created | 12.09.2025 | K. Lueken | | |

APFP Regulation: 5(2)(Q)

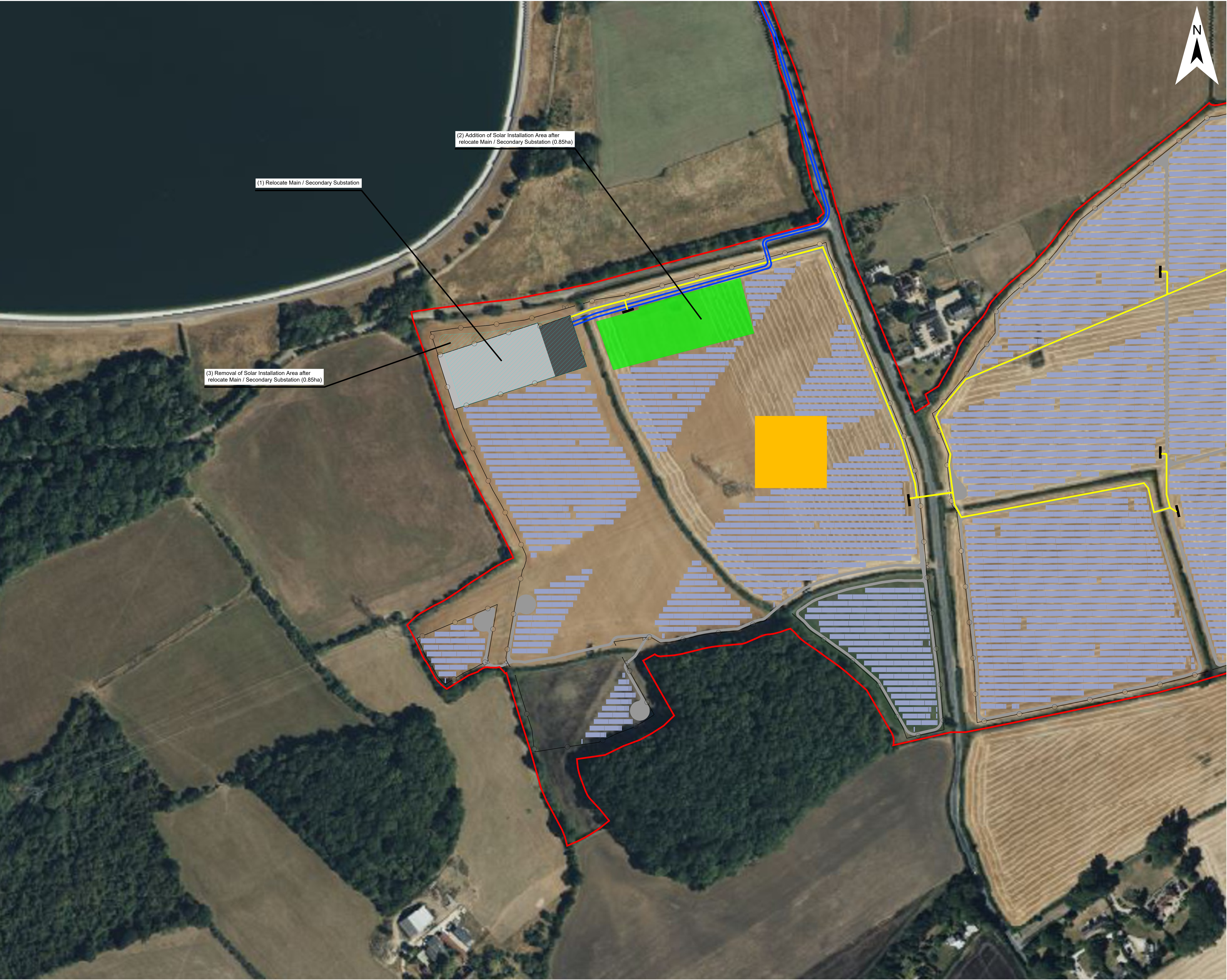
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Title Change Request 2 - Change 1

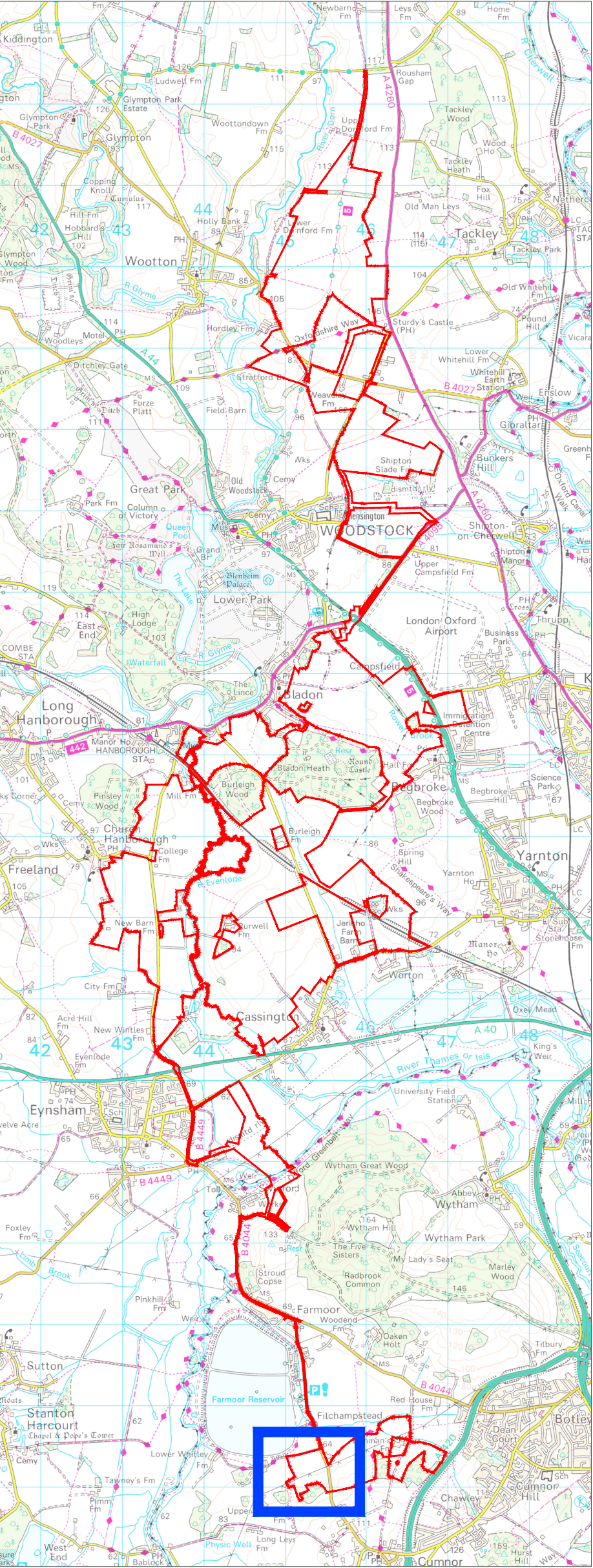
Photovoltaik Development Partners GmbH

Kurfürstendamm 52

10707 Berlin, Germany



- Legend
- Order Limits Rev.1, s51 Response
- Proposed Infrastructure and Land Use Elements *
- Areas for sensitive archaeological site protection and management
- Solar Panels
- Maintenance Road
- Fence
- Access Gate
- PCS
- Indicative 33kV Cable Route
- Indicative 275kV Cable Route
- Main Substation
- Secondary Substation
- Project Refinements
- (1) Relocate Main / Secondary Substation
- (2) Addition of Solar Installation Area after relocate Main / Secondary Substation (0.85ha)
- (3) Removal of Solar Installation Area after relocate Main / Secondary Substation (0.85ha)



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| A: Change Request 2 | | | | | |
|------------------------|---------|------------|--------------|------------|------------|
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | Date | Name |
| | | | Edit | 12.09.2025 | M.Thom |
| | | | Check | 12.09.2025 | H.Trabelsi |
| | | | Drawing No | Appendix A | |
| A | Created | 12.09.2025 | M.Thom | | |

APFP Regulation: 5(2)(Q)

Scale: 1:2500 at A0

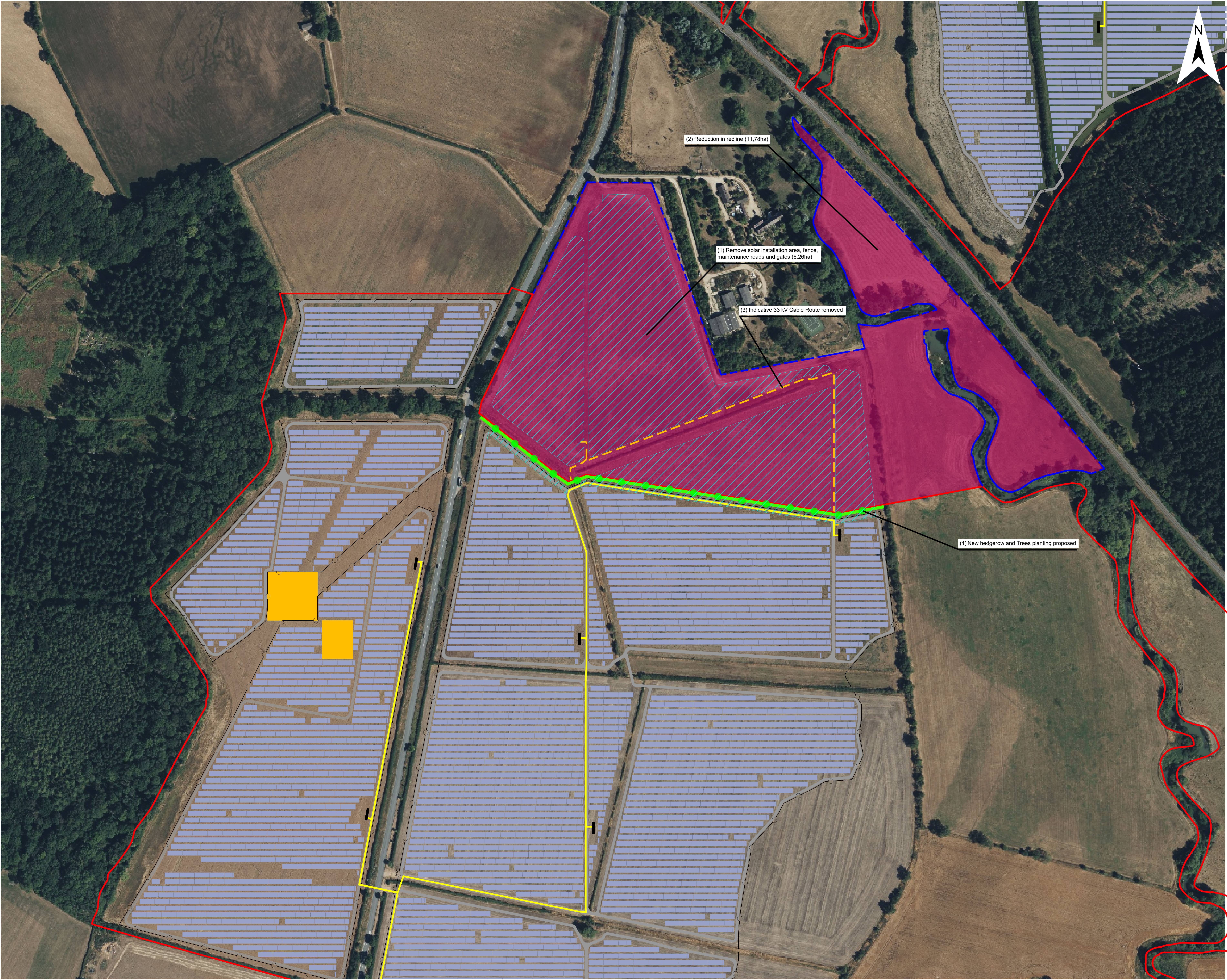
Title

Change Request 2 - Change 3

0 50 100 Meters



Photovoltaik Development Partners GmbH
Kurfürstendamm 52
10707 Berlin, Germany



Legend

Order Limit Rev. 1, s51 Response

Order Limits Rev. 2, Change Request

Proposed Infrastructure and Land Use Elements *

Areas for sensitive archaeological site protection and management

Solar Panels

Maintenance Road

Fence

Access Gate

PCS

Indicative 33kV Cable Route

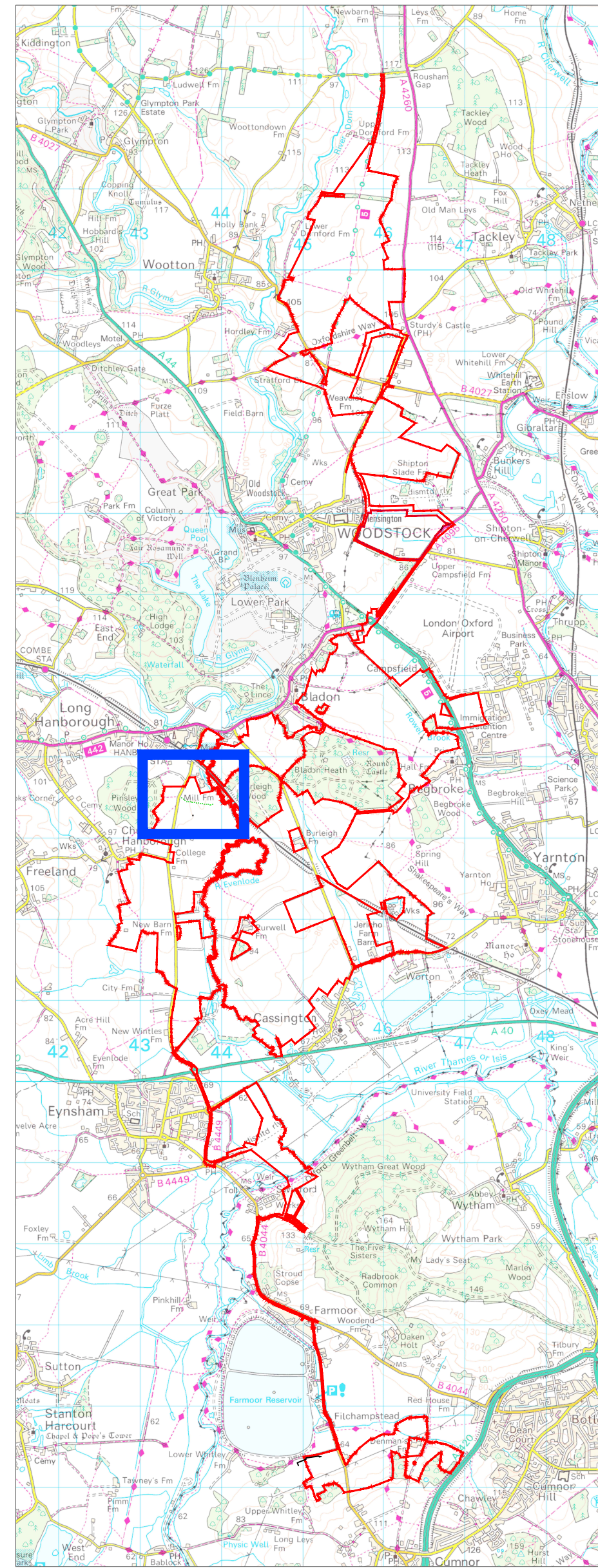
Project Refinements

(1) Remove solar installation area, fence, maintenance roads and gates (6.26ha)

(2) Reduction in redline (11.78ha)

(3) Indicative 33 kV Cable Route removed

(4) New hedgerow and Trees planting proposed



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| A: Change Request 2 | | | | | |
|------------------------|---------|------------|--------|--------------|------------|
| Project | | | | Status | |
| Botley West Solar Farm | | | | Illustrative | |
| Id. | Changes | Date | Name | | |
| | | | Edit | 12.09.2025 | M.Thom |
| | | | Check | 12.09.2025 | H.Trabelsi |
| | | | | Drawing No | Appendix A |
| A | Created | 12.09.2025 | M.Thom | | |

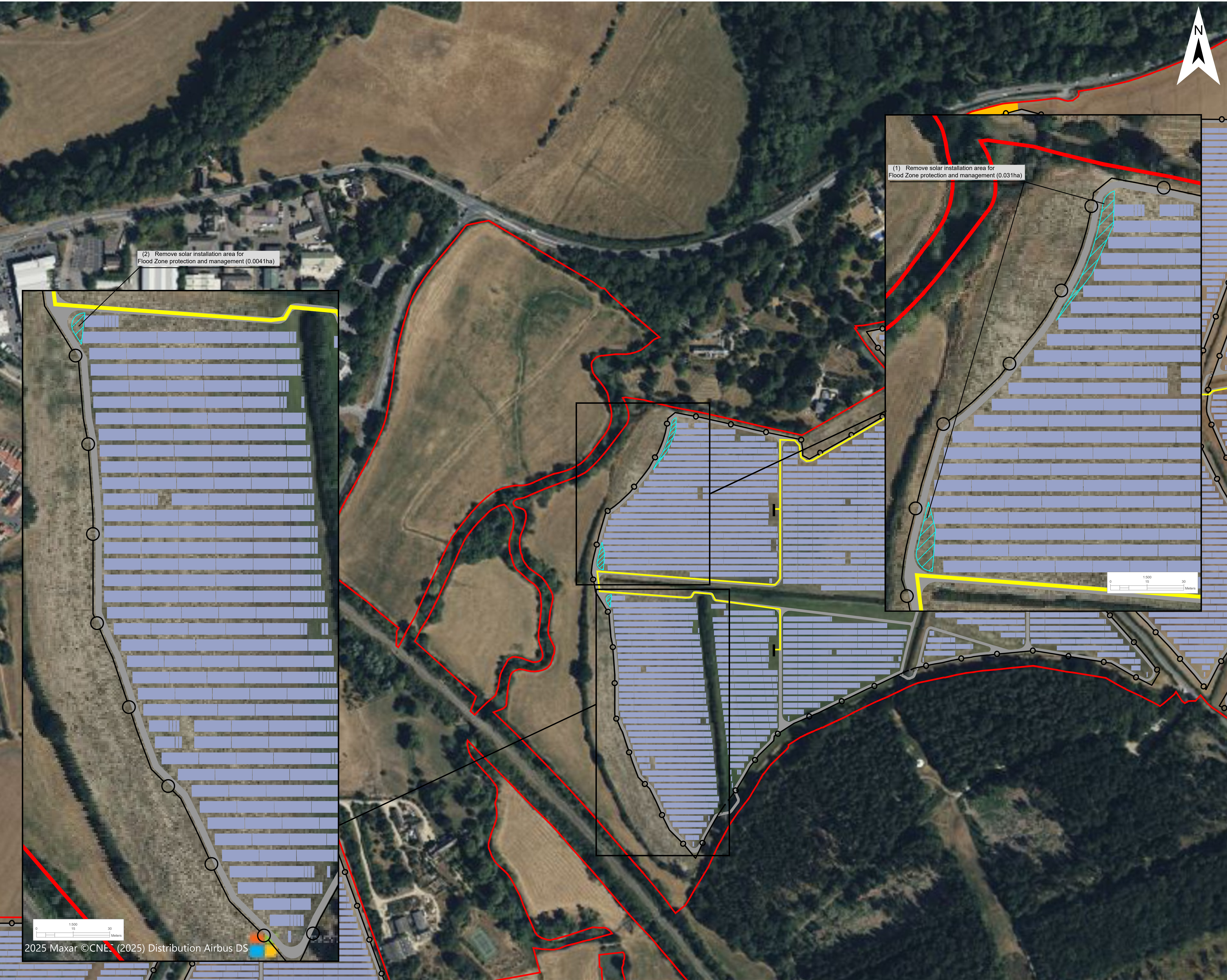
APFP Regulation: 5(2)(Q)

Scale: 1:2500 at A0

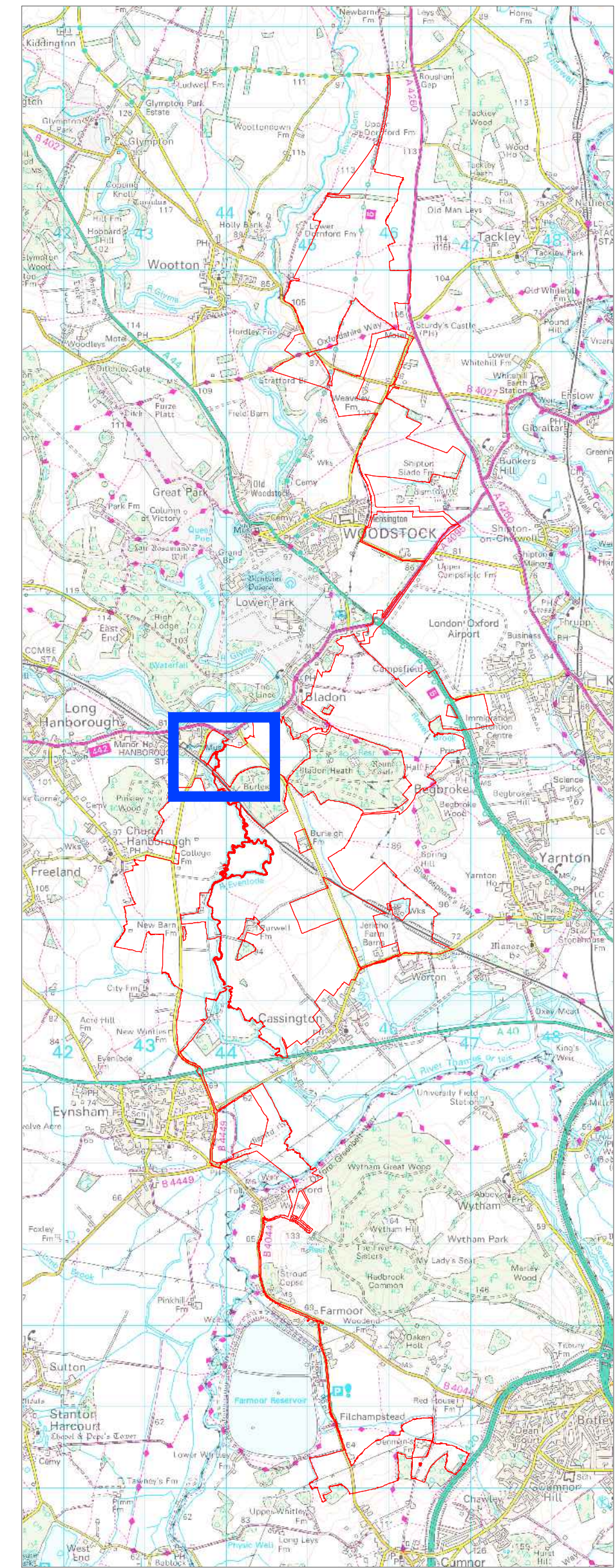
Title

Change Request 2 - Change 4

0 50 100 Meters



- Legend
- RLB of the S51 response
- Proposed Infrastructure and Land Use Elements *
- Solar Panels
- Maintenance Road
- Fence
- Access Gate
- PCS
- Indicative 33kV Cable Route
- Project Refinements
- (1) Remove solar installation area for further flood zone protection and management (0.031ha)
- (2) Remove solar installation area for further flood zone protection and management (0.0041ha)



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| | | | | | |
|------------------------|---------|------------|--------------|------------|------------|
| A: Change Request 2 | | | | | |
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | | Name |
| | | | | | |
| | | | Edit | 12.09.2025 | M.Thom |
| | | | Check | 12.09.2025 | H.Trabelsi |
| | | | | Drawing No | Appendix A |
| A | Created | 12.09.2025 | M.Thom | | |

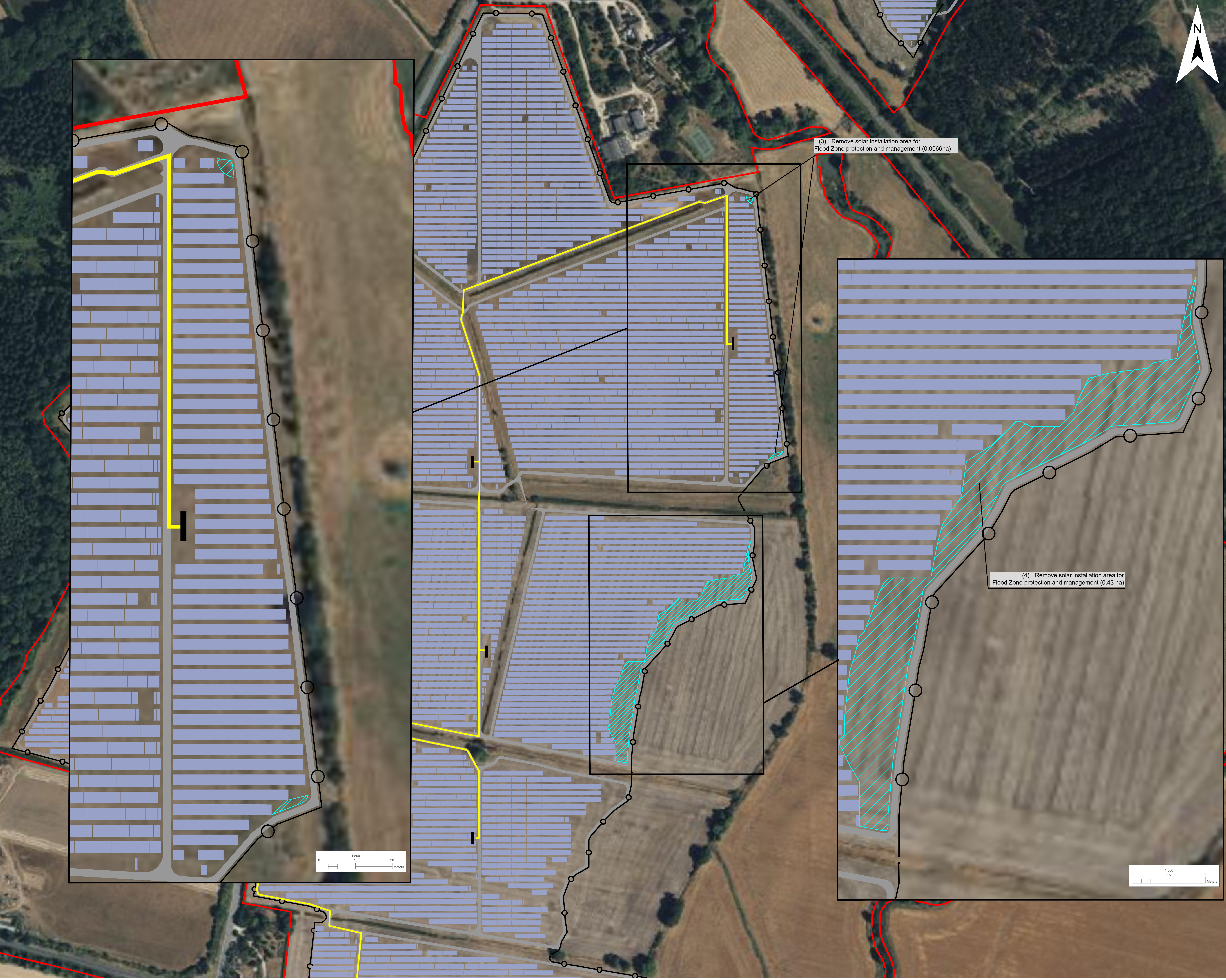
APFP Regulation: 5(2)(Q)

Scale: 1:2500 at A0


Title

Change Request 2 - Change 5


0 50 100 Meters




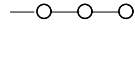
Legend


RLB of the S51 response 


Proposed Infrastructure and Land Use Elements *


Solar Panels 

Maintenance Road 


Fence 


Access Gate 


PCS 

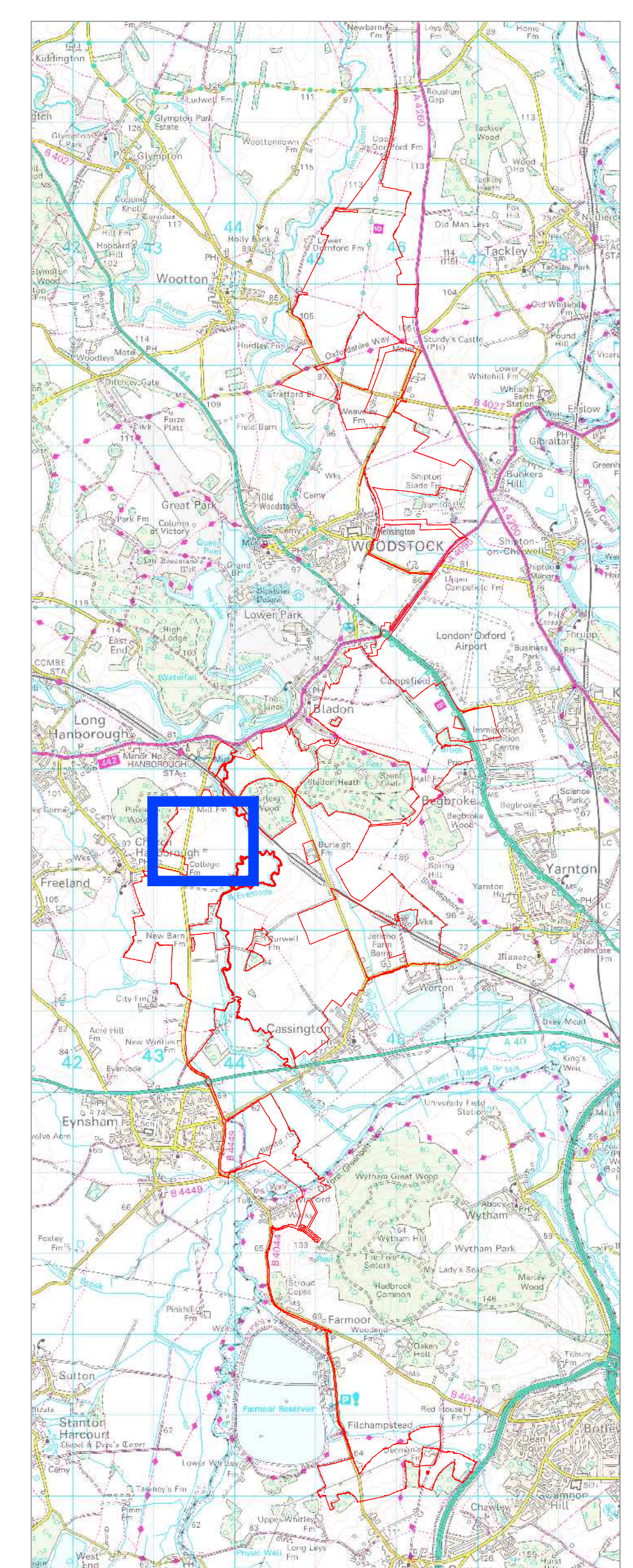
Indicative 33kV Cable Route 

Project Refinements

(3) Remove solar installation area for further flood zone protection and management (0.0066ha) 

(4) Remove solar installation area for further flood zone protection and management (0.43ha) 





* The location of the proposed infrastructure and land use elements are shown indicatively only.

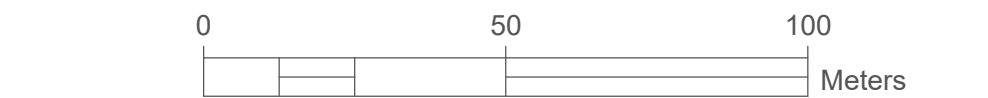
| | | | | | |
|------------------------|---------|------------|--------------|------|------------|
| A: Change Request 2 | | | | | |
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | Date | Name |
| | | | | | |
| | Edit | 12.09.2025 | M.Thom | | |
| | Check | 12.09.2025 | H.Trabelsi | | |
| | | | Drawing No | | |
| A | Created | 12.09.2025 | M.Thom | | Appendix A |

APFP Regulation: 5(2)(Q)

Scale: 1:2500 at A0

Title

Change Request 2 - Change 5

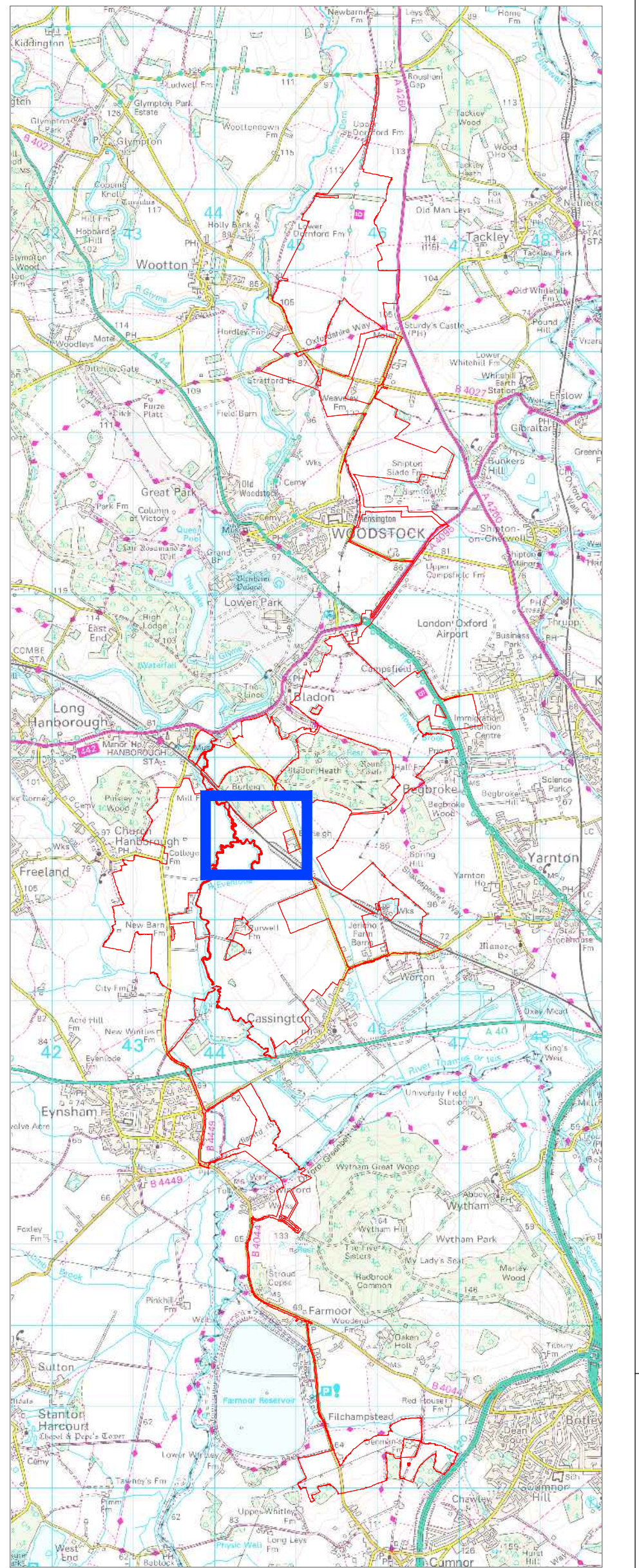




(5) Remove solar installation area for Flood Zone protection and management (0.0048ha)



- Legend
- RLB of the S51 response
- Proposed Infrastructure and Land Use Elements *
- Solar Panels
- Maintenance Road
- Fence
- Access Gate
- PCS
- Indicative 33kV Cable Route
- Project Refinements
- (5) Remove solar installation area for further flood zone protection and management (0.0048ha)



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| A: Change Request 2 | | | | | |
|------------------------|---------|------------|--------|--------------|-----------------------|
| Project | | | | Status | |
| Botley West Solar Farm | | | | Illustrative | |
| Id. | | Changes | Date | Name | |
| | | | | Edit | 12.09.2025 M.Thom |
| | | | | Check | 12.09.2025 H.Trabelsi |
| | | | | Drawing No | Appendix A |
| A | Created | 12.09.2025 | M.Thom | | |

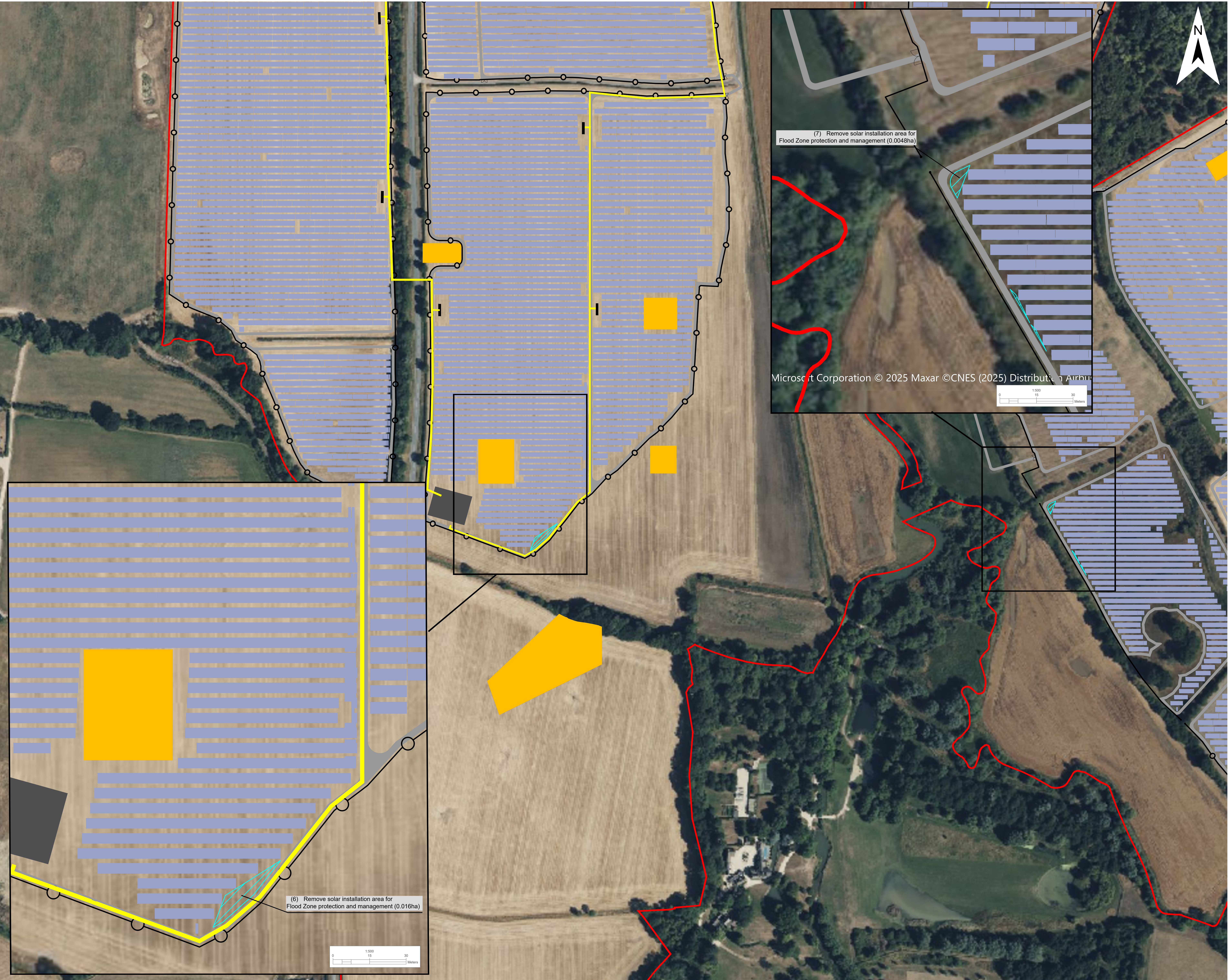
APFP Regulation: 5(2)(Q)

Scale: 1:2500 at A0

Title

Change Request 2 - Change 5

0 50 100 Meters



Legend

RLB of the S51 response

Proposed Infrastructure and Land Use Elements *

Solar Panels

Maintenance Road

Fence

Access Gate

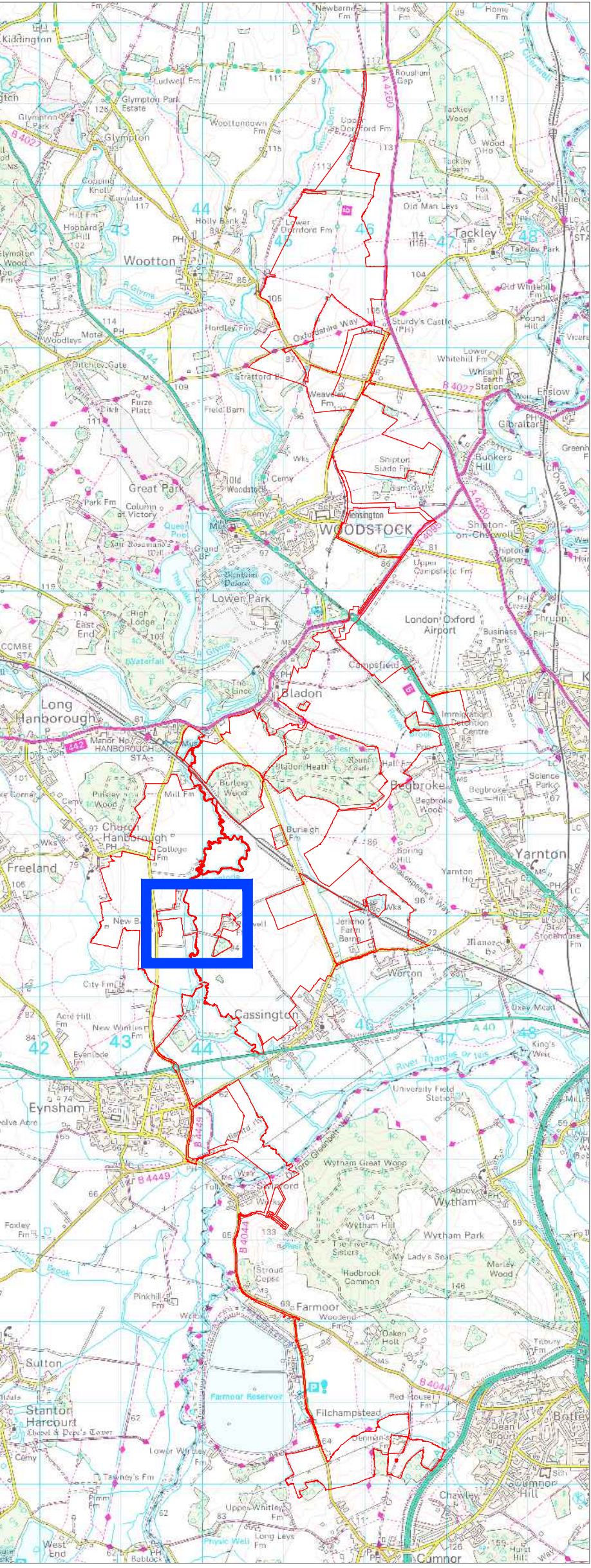
PCS

Indicative 33kV Cable Route

Project Refinements

(6) Remove solar installation area for further flood zone protection and management (0.016ha)

(7) Remove solar installation area for further flood zone protection and management (0.0048ha)



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| | | | | | |
|------------------------|---------|------------|--------------|------------|------------|
| A: Change Request 2 | | | | | |
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | Date | Name |
| | | | Edit | 12.09.2025 | M.Thom |
| | | | Check | 12.09.2025 | H.Trabelsi |
| | | | Drawing No | Appendix A | |
| A | Created | 12.09.2025 | M.Thom | | |

Change Request 2 - Change 5

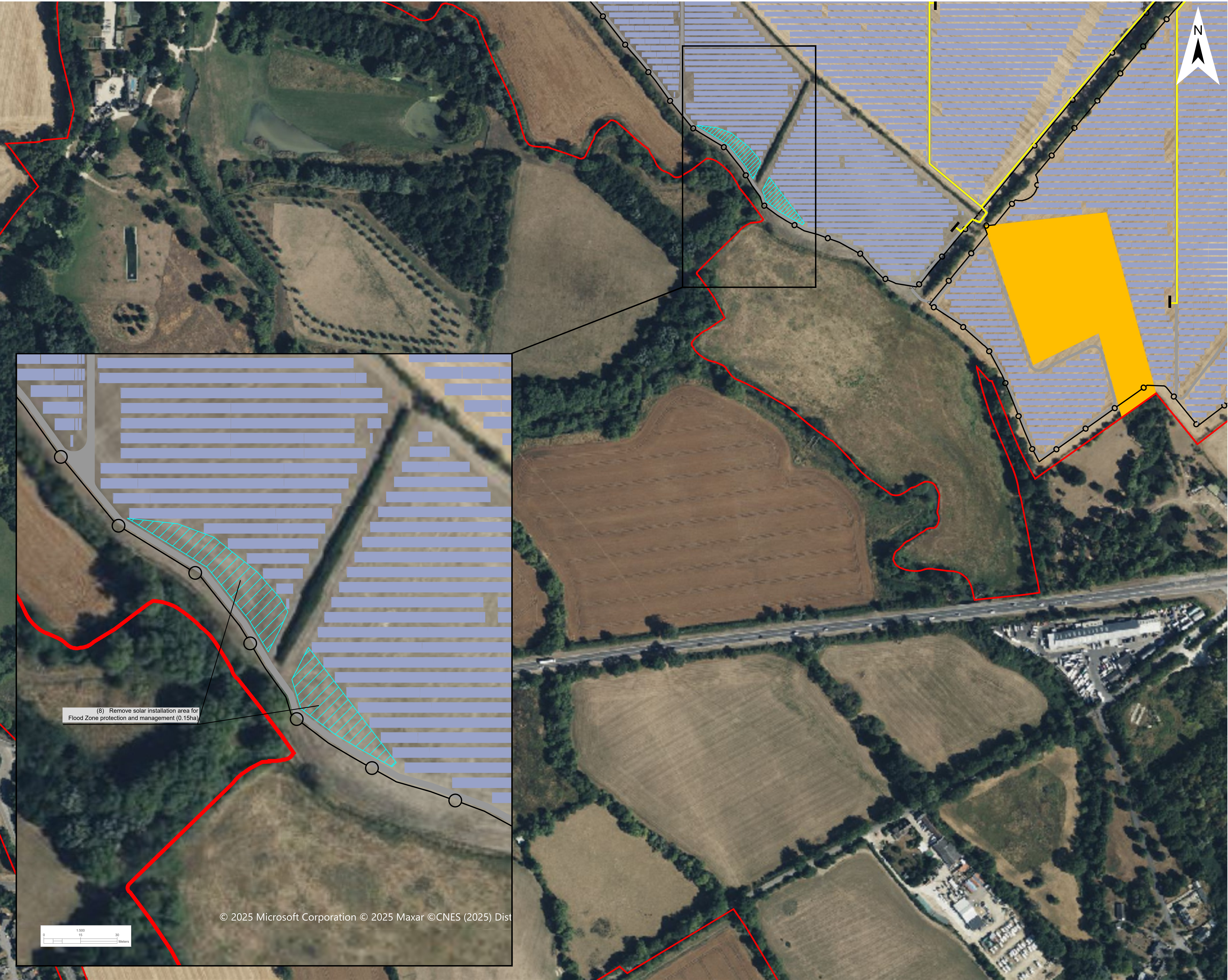
APFP Regulation: 5(2)(Q)

Scale: 1:2500 at A0

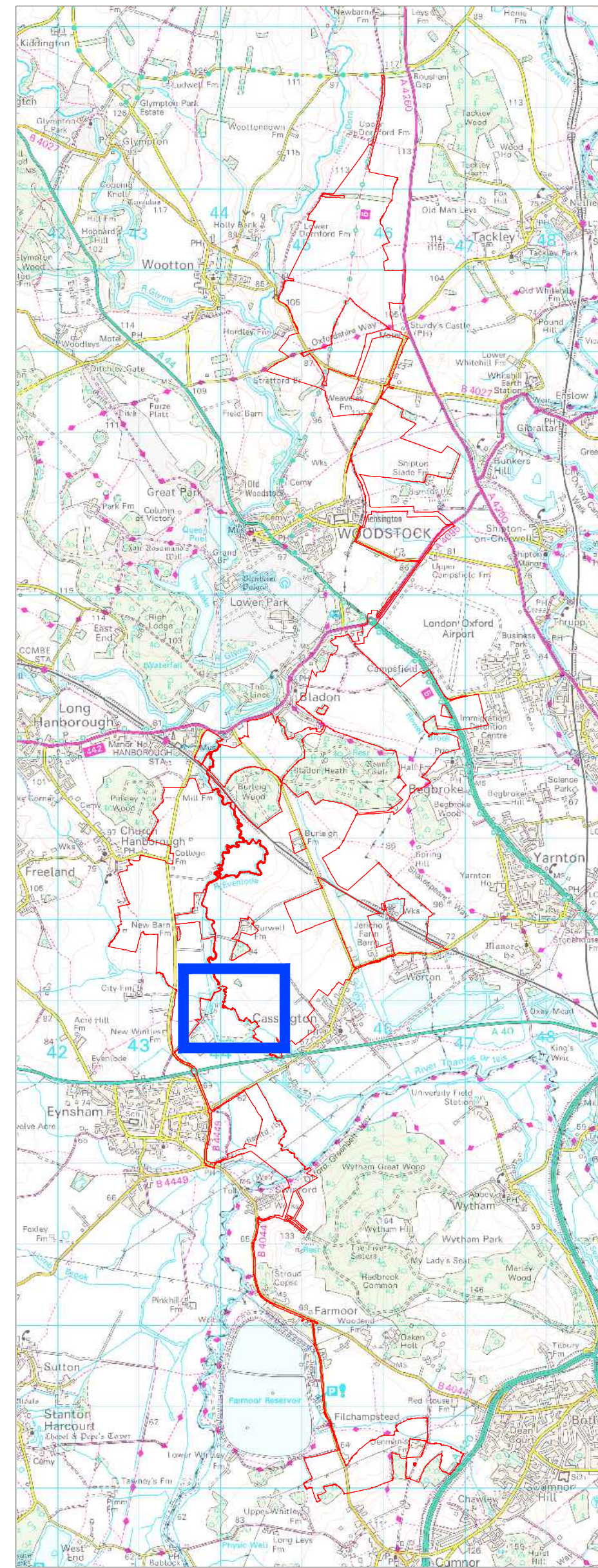
Title

0 50 100 Meters

Photovoltaik Development Partners GmbH
Kurfürstendamm 52
10707 Berlin, Germany



- Legend
- RLB of the S51 response
- Proposed Infrastructure and Land Use Elements *
- Solar Panels
- Maintenance Road
- Fence
- Access Gate
- PCS
- Indicative 33kV Cable Route
- Project Refinements
- (8) Remove solar installation area for further flood zone protection and management (0.15ha)



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| | | | | | |
|------------------------|---------|------------|--------------|------------|-----------------------|
| A: Change Request 2 | | | | | |
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | | Changes | Date | Name | |
| | | | | Edit | 12.09.2025 M.Thom |
| | | | | Check | 12.09.2025 H.Trabelsi |
| | | | | Drawing No | Appendix A |
| A | Created | 12.09.2025 | M.Thom | | |

APFP Regulation: 5(2)(Q)

Scale: 1:2500 at A0

Title

Change Request 2 - Change 5

0 50 100 Meters



Legend

RLB of the S51 response

Proposed Infrastructure and Land Use Elements *

Solar Panels

Maintenance Road

Fence

Access Gate

PCS

Indicative 33kV Cable Route

Project Refinements

(9) Remove solar installation area for flood zone protection and management (0.064ha)



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| A: Change Request 2 | | | | | |
|------------------------|---------|------|--------------|------------|------------|
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | Date | Name |
| | | | Edit | 12.09.2025 | M.Thom |
| | | | Check | 12.09.2025 | H.Trabelsi |
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| A | | | Appendix A | | |
| Created | | | 12.09.2025 | | |
| M.Thom | | | | | |

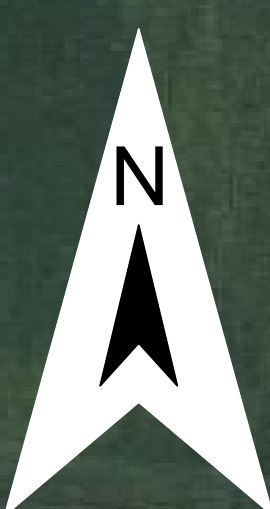
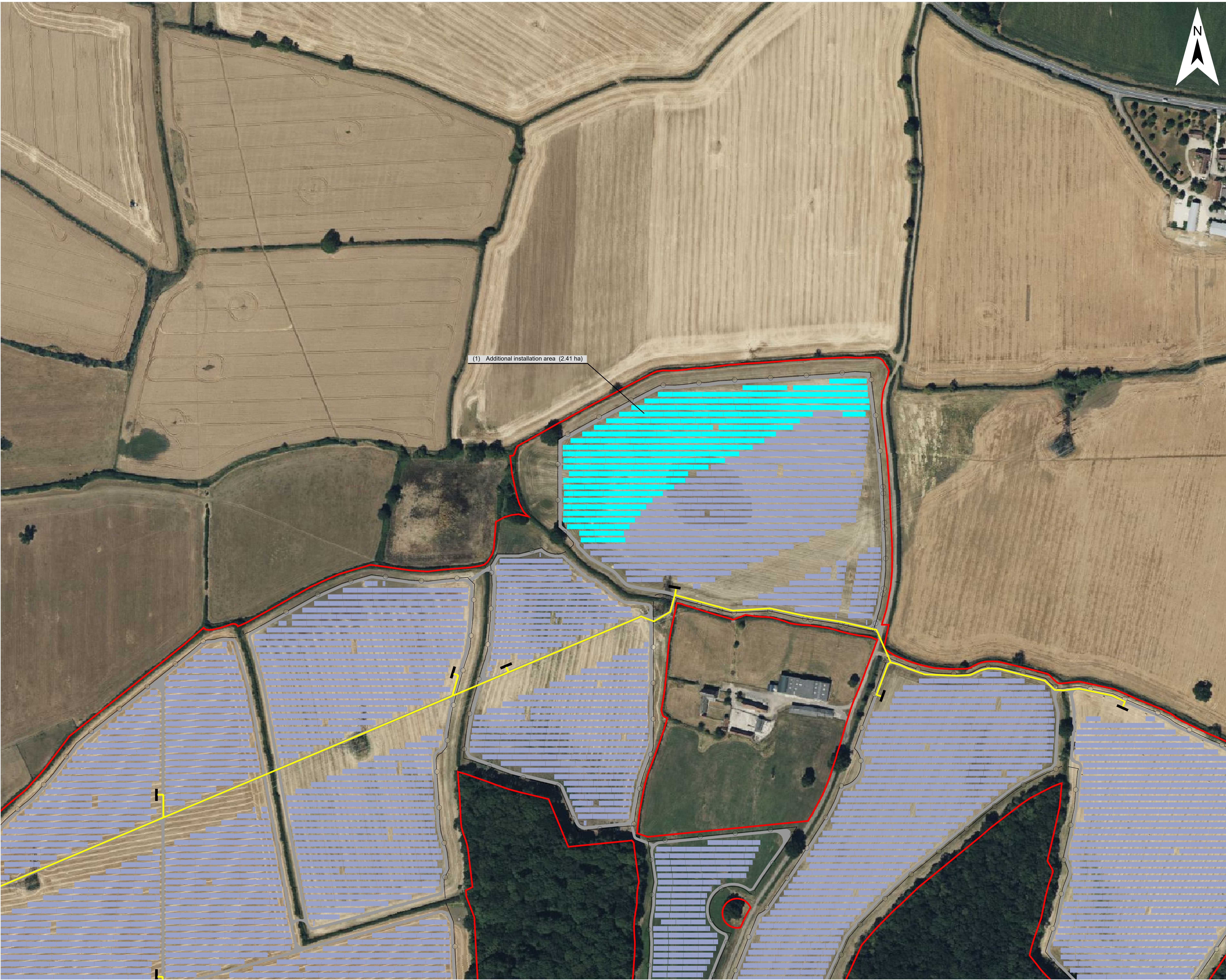
APFP Regulation: 5(2)(Q)




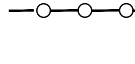



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Title

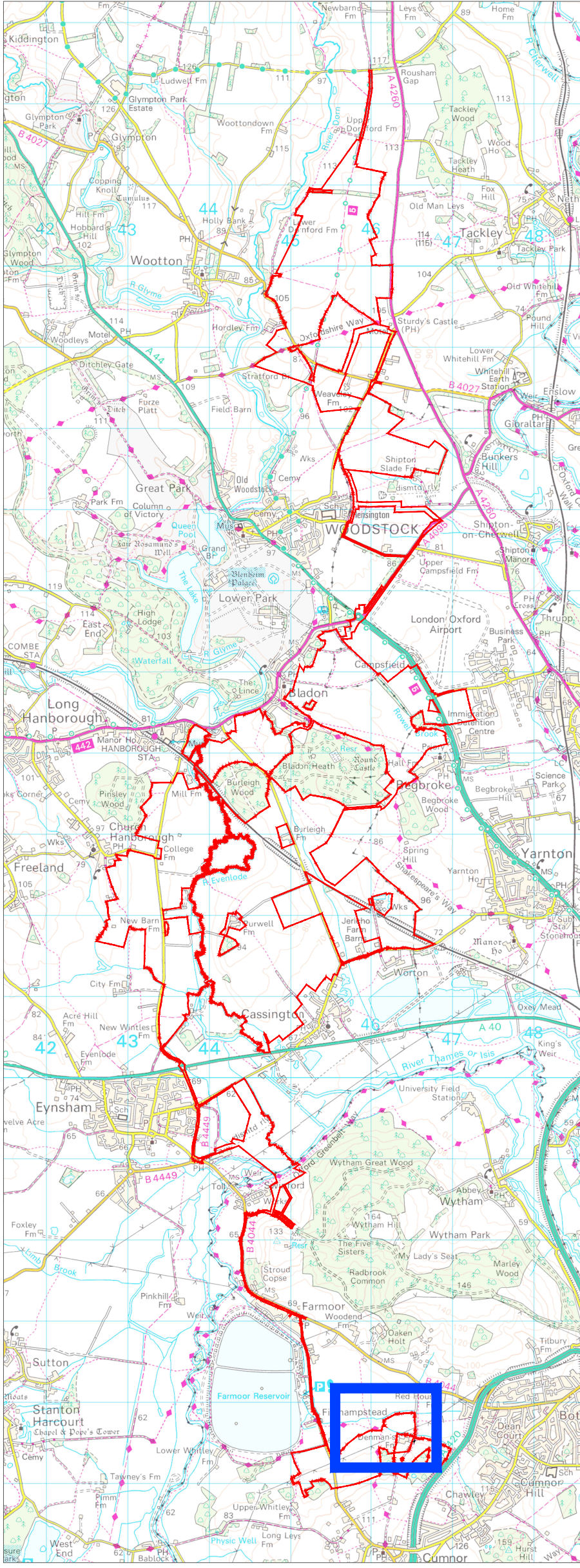
Change Request 2 - Change 5

0 50 100 Meters



- Legend
- RLB of the S51 response 
- Proposed Infrastructure and Land Use Elements *
- Solar Panels 
- Maintenance Road 
- Fence 
- Access Gate 
- PCS 
- Indicative 33kV Cable Route 

- Project Refinements
- (1) Additional installation area (2.41 ha) 

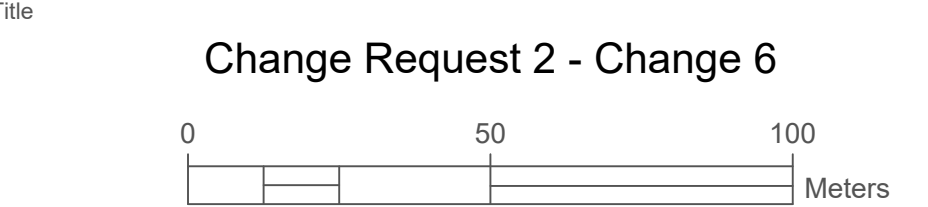


* The location of the proposed infrastructure and land use elements are shown indicatively only.

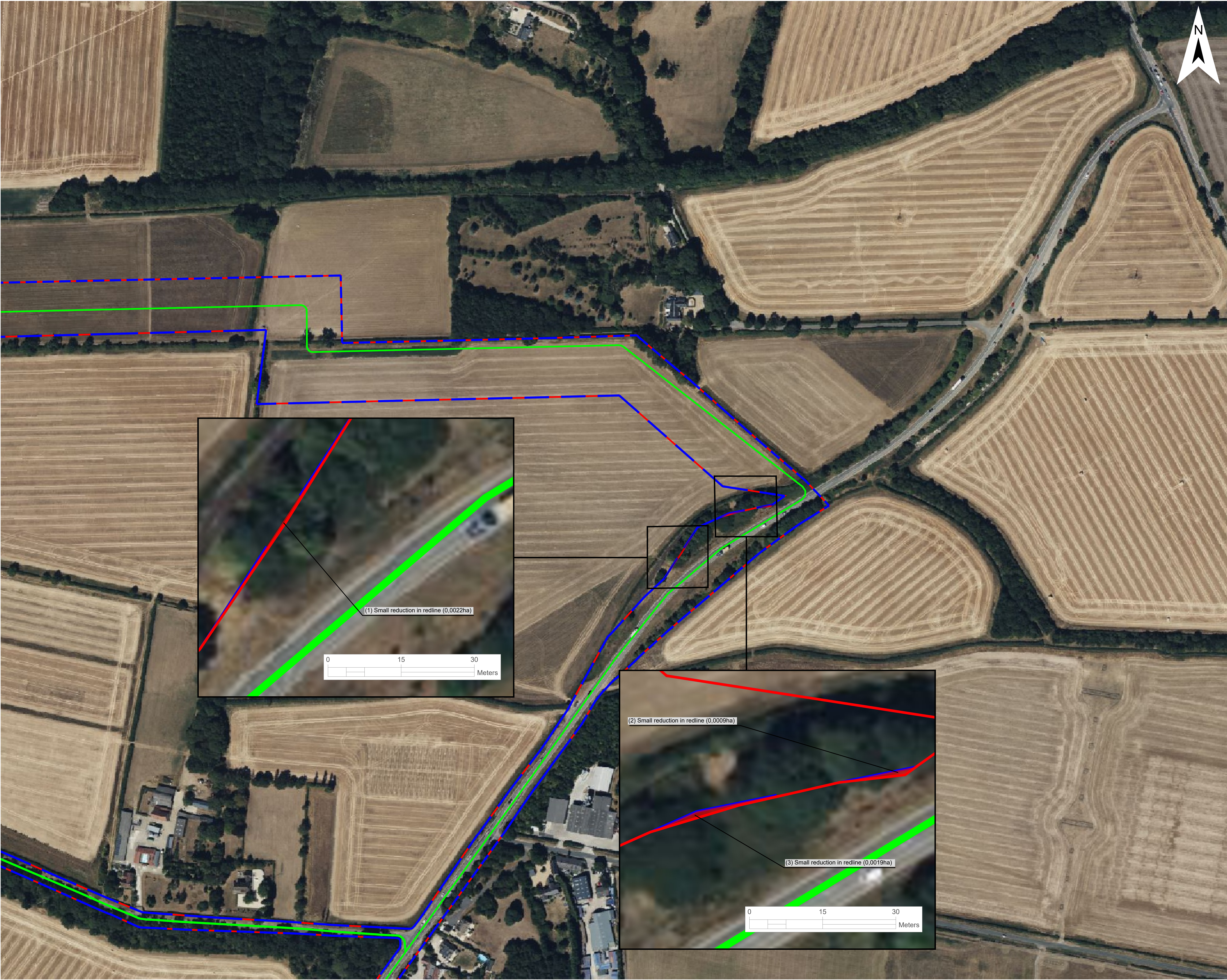
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|------------------------|---------|------------|--------------|------------|------------|
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | Date | Name |
| | | | Edit | 12.09.2025 | M.Thom |
| | | | Check | 12.09.2025 | H.Trabelsi |
| | | | Drawing No | Appendix A | |
| A | Created | 12.09.2025 | M.Thom | | |

APFP Regulation: 5(2)(Q)

Scale: 1:2500 at A0



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Legend

Order Limit Rev. 1, s51 Response

Order Limit Rev. 2, Change request

Proposed Infrastructure and Land Use Elements *

Indicative 275kV Cable Route

Project Refinements

(1), (2) and (3) Refinement of Redline

* The location of the proposed infrastructure and land use elements are shown indicatively only.

A: Change Request 2

Project

Status

Botley West Solar Farm

Illustrative

Id.

Changes

Date

Name

Date

Name

Edit

12.09.2025

M.Thom

Check

12.09.2025

H.Trabelsi

Drawing No

Appendix A

A

Created

12.09.2025

M.Thom

APFP Regulation: 5(2)(Q)

Scale:

1:2500

at A0

Title

Change Request 2 - Change 7

0

50

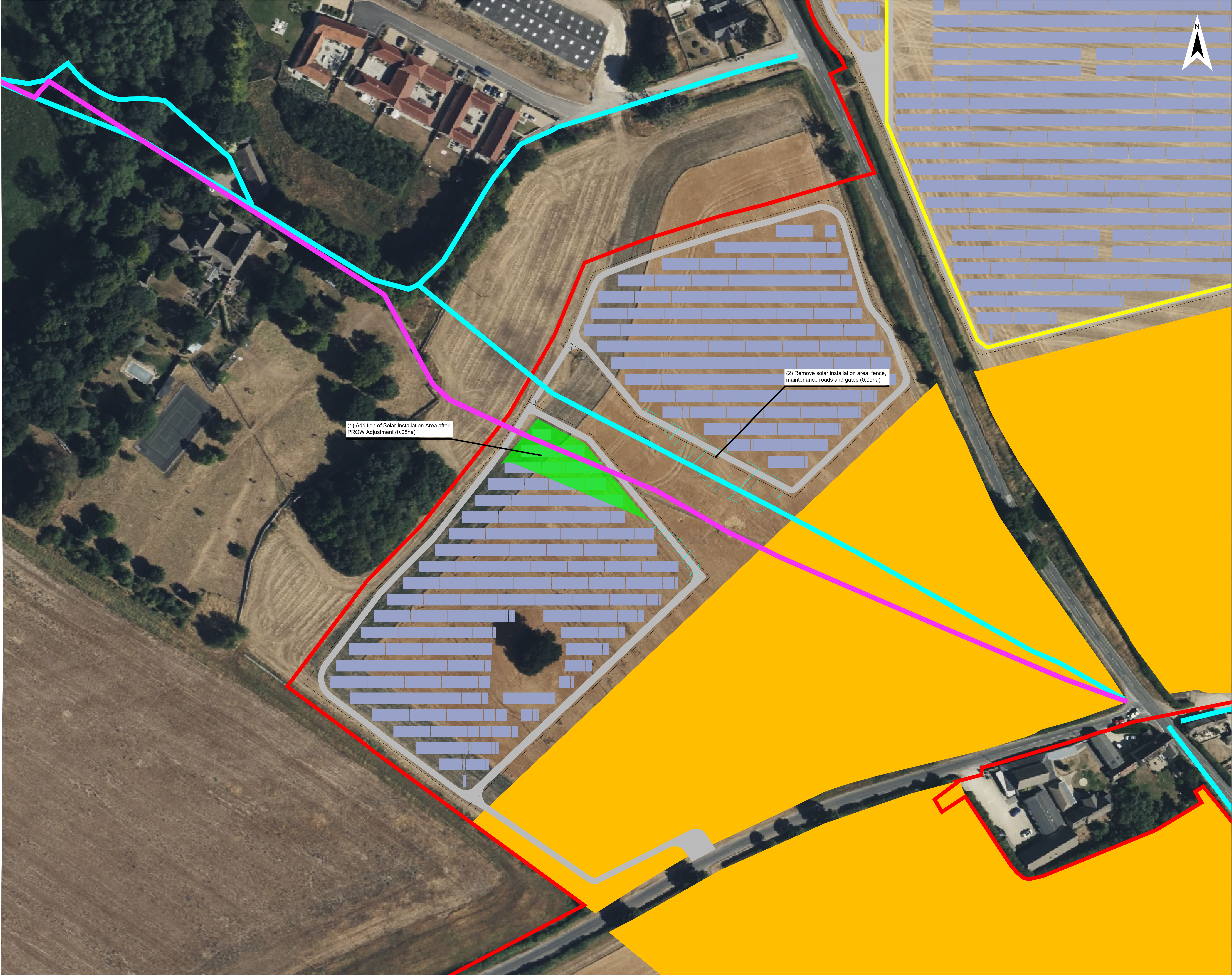
100

Meters

Photovoltaik Development Partners GmbH

Kurfürstendamm 52

10707 Berlin, Germany



Legend

Order Limits Rev.1, s51 Response

Proposed Infrastructure and Land Use Elements *

Areas for sensitive archaeological site protection and management

Solar Panels

Maintenance Road

Fence

Access Gate

Indicative 33kV Cable Route

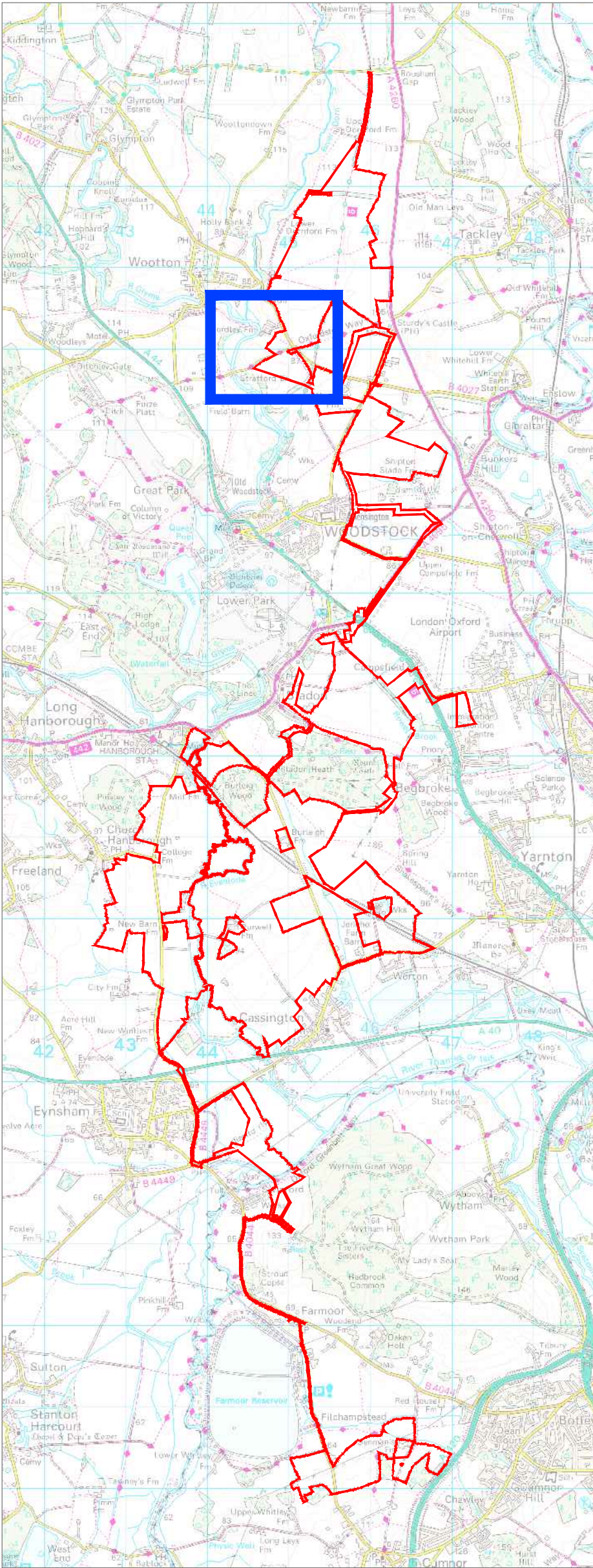
Previous PROW Route

Updated PROW Route

Project Refinements

(1) Addition of Solar Installation Area after PROW Adjustment (0.08ha)

(2) Removal of solar installation area, fence, maintenance roads and gates for PROW adjustment (0.09ha).



* The location of the proposed infrastructure and land use elements are shown indicatively only.

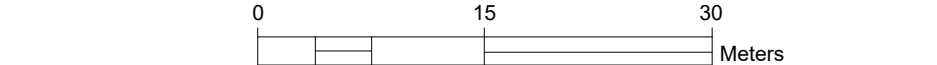
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|------------------------|---------|------------|--------------|------------|-----------------------|
| A: Change Request 2 | | | | | |
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | | |
| | | | | Edit | 12.09.2025 M.Thom |
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| | | | | Drawing No | Appendix A |
| A | Created | 12.09.2025 | M.Thom | | |

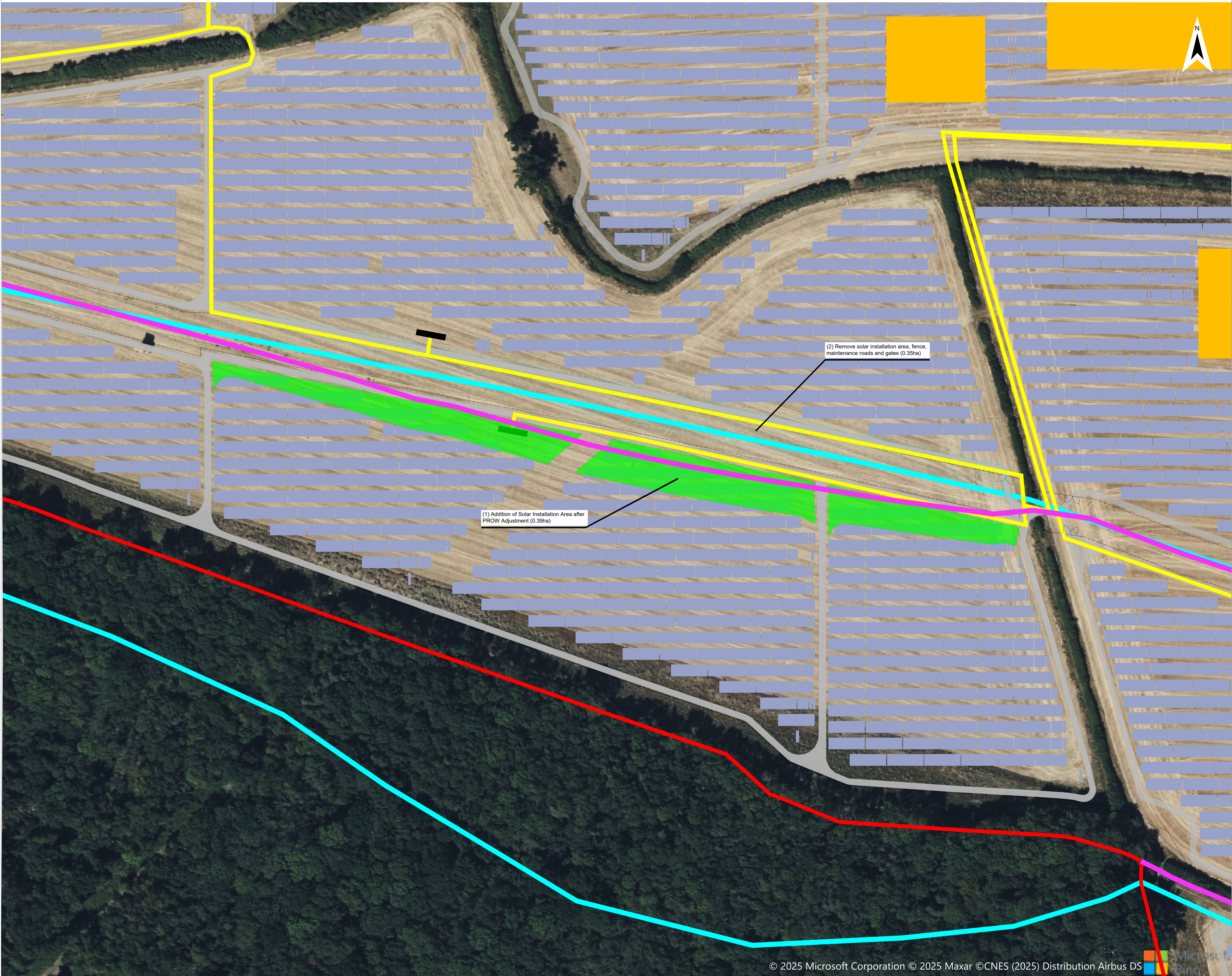
APFP Regulation: 5(2)(Q)

Scale: 1:1250 at A0

Title

Change Request 2 - Change 8





Legend

Order Limits Rev.1, s51 Response

Proposed Infrastructure and Land Use Elements *

Areas for sensitive archaeological site protection and management

Solar Panels

Maintenance Road

Fence

Access Gate

PCS

Indicative 33kV Cable Route

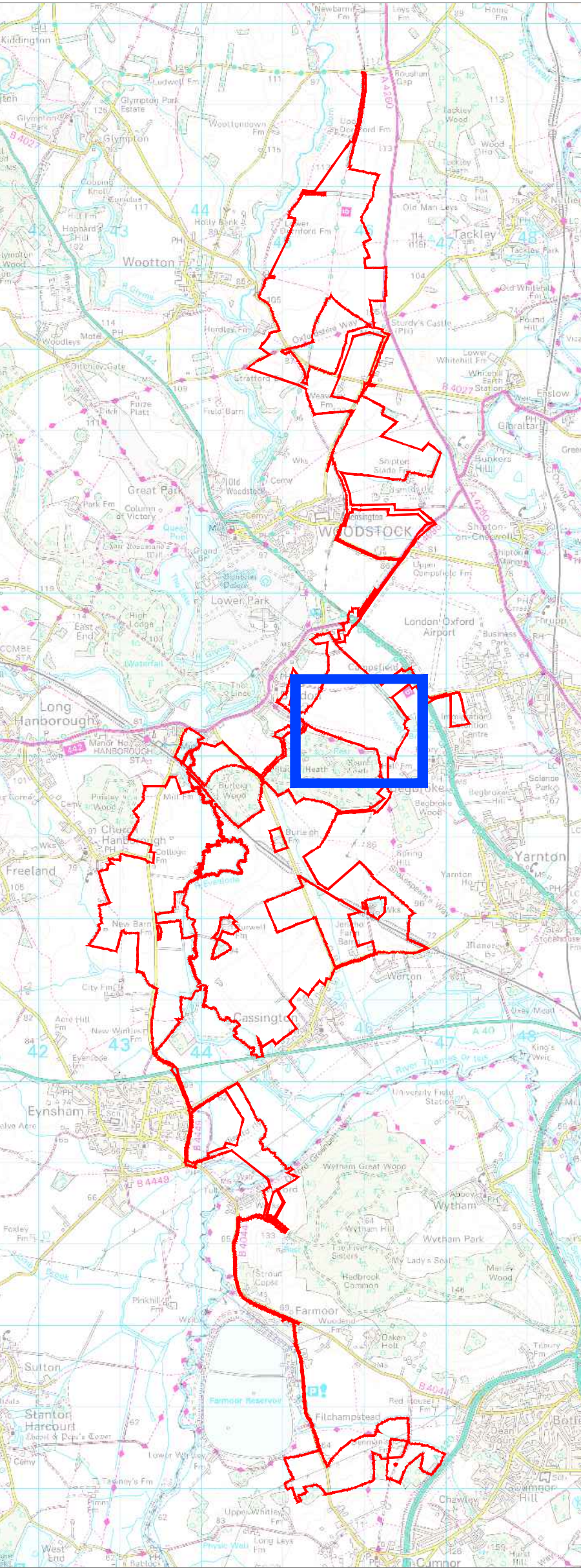
Previous PROW Route

Updated PROW Route

Project Refinements

(1) Addition of Solar Installation Area after PROW Adjustment (0.39ha)

(2) Removal of solar installation area, fence, maintenance roads and gates for PROW adjustment (0.35ha).



* The location of the proposed infrastructure and land use elements are shown indicatively only.

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|------------------------|---------|------------|--------------|------------|-----------------------|
| A: Change Request 2 | | | | | |
| Project | | | Status | | |
| Botley West Solar Farm | | | Illustrative | | |
| Id. | Changes | Date | Name | | |
| | | | | Edit | 12.09.2025 M.Thom |
| | | | | Check | 12.09.2025 H.Trabelsi |
| | | | | Drawing No | Appendix A |
| A | Created | 12.09.2025 | M.Thom | | |

APFP Regulation: 5(2)(Q)

Scale: 1:1250 at A0

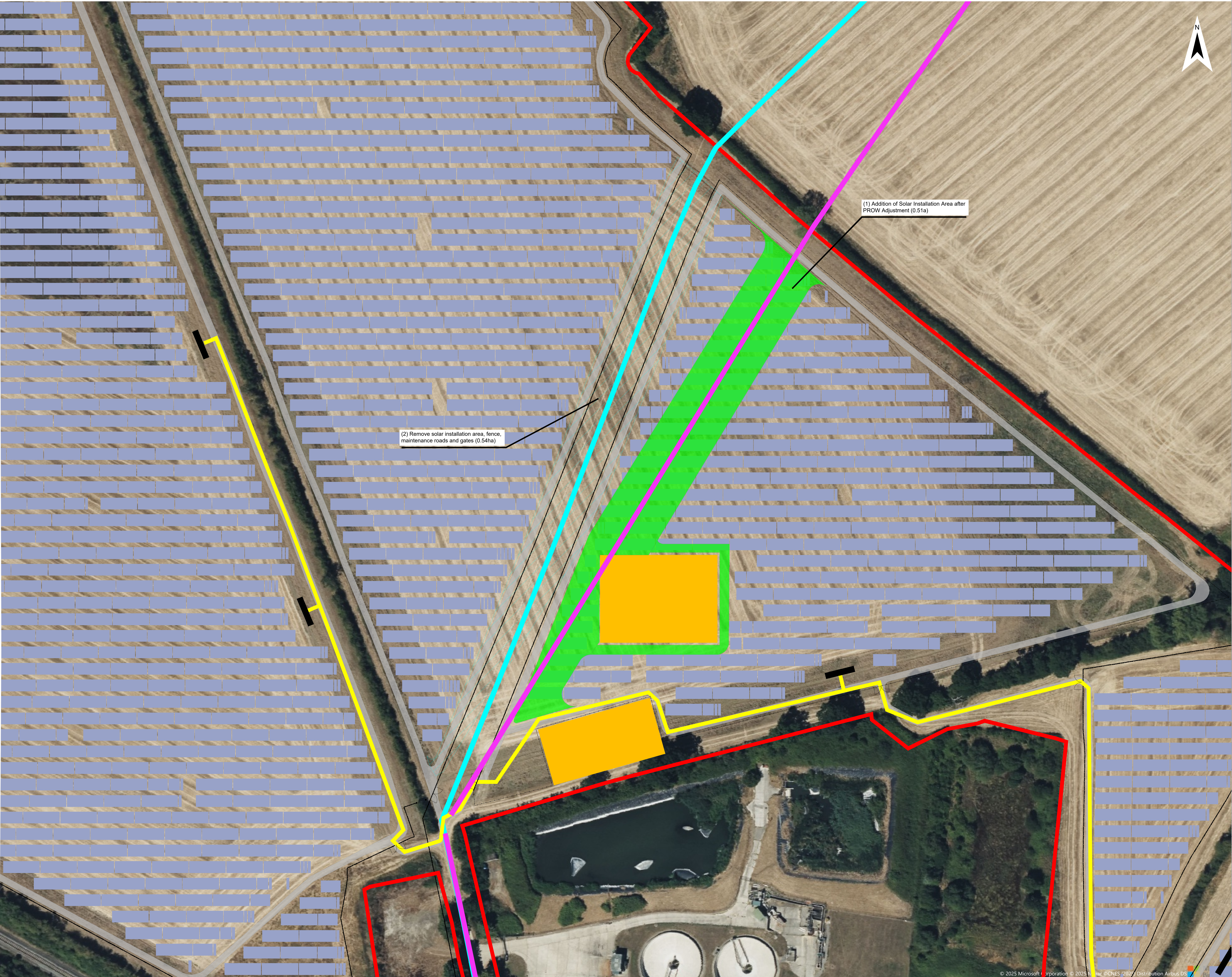
Title

Change Request 2 - Change 8

0 15 30

Meters

Photovoltaik Development Partners GmbH
Kurfürstendamm 52
10707 Berlin, Germany



Legend

Order Limits Rev.1, s51 Response

Proposed Infrastructure and Land Use Elements *

Areas for sensitive archaeological site protection and management

Solar Panels

Maintenance Road

Fence

Access Gate

PCS

Indicative 33kV Cable Route

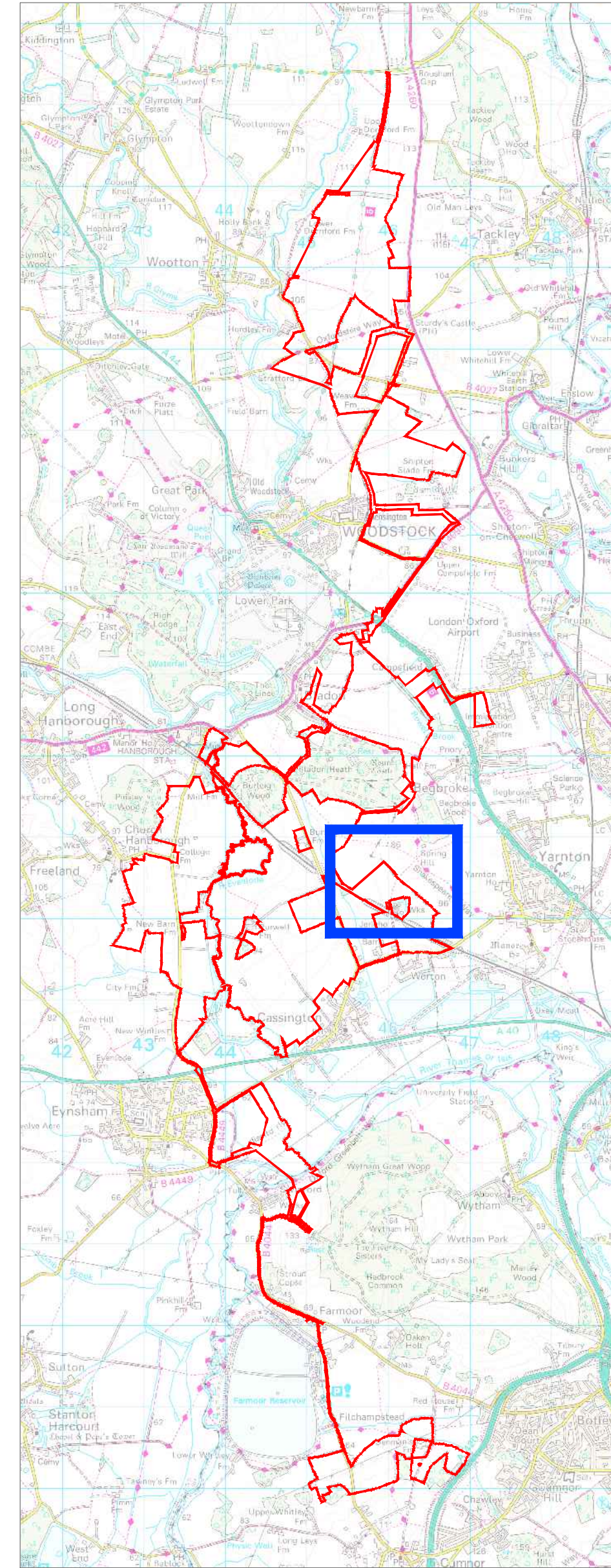
Previous PROW Route

Updated PROW Route

Project Refinements

(1) Addition of Solar Installation Area after PROW Adjustment (0.51ha)

(2) Removal of solar installation area, fence, maintenance roads and gates for PROW adjustment (0.54ha).



* The location of the proposed infrastructure and land use elements are shown indicatively only.

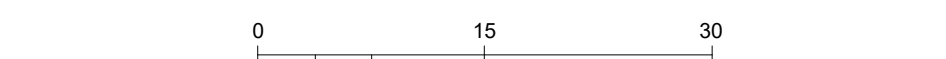
| A: Change Request 2 | | | | | | | | |
|------------------------|---------|------|------|--------------|------------|------------|------------|--|
| Project | | | | Status | | | | |
| Botley West Solar Farm | | | | Illustrative | | | | |
| Id. | Changes | Date | Name | | Date | Name | | |
| | | | | Edit | 12.09.2025 | M.Thorn | | |
| | | | | Check | 12.09.2025 | H.Trabelsi | | |
| | | | | Drawing No | | | Appendix A | |
| | | | | A | Created | 12.09.2025 | M.Thorn | |

APFP Regulation: 5(2)(Q)

Scale: 1:1250 at A0

Title

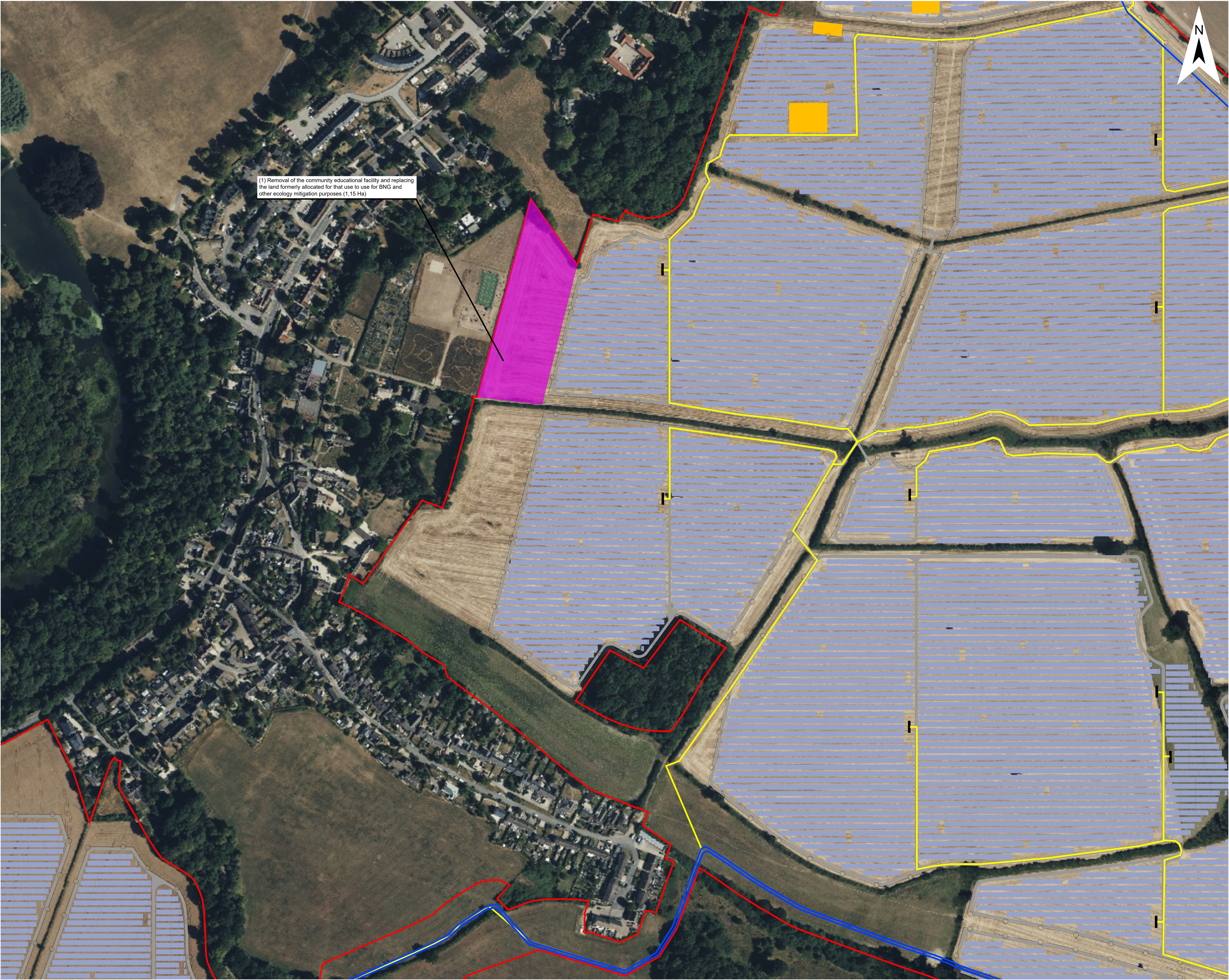
Change Request 2 - Change 8













Photovoltaic Development Partners GmbH


Kurfürstendamm 52

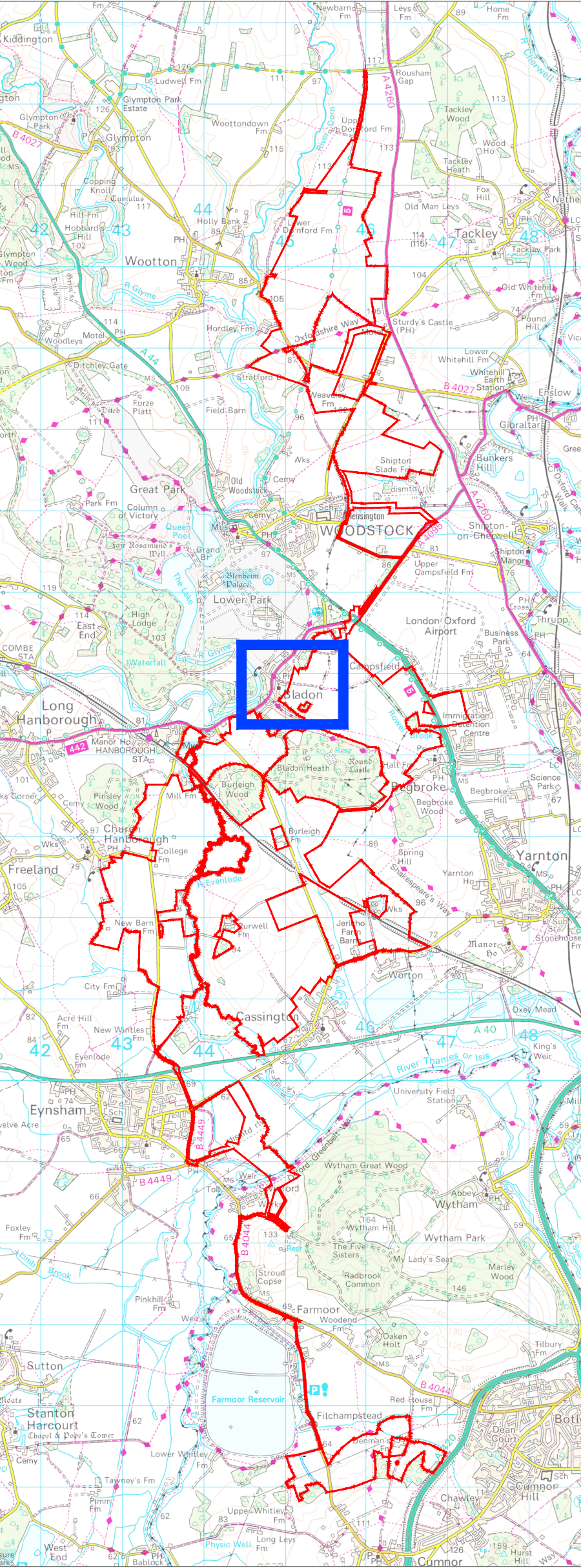
10707 Berlin, Germany



(1) Removal of the community educational facility and replacing the land formerly allocated for that use to use for BNG and other ecology mitigation purposes (1,15 Ha)

- Legend
- Order Limits Rev.1, s51 Response 
- Proposed Infrastructure and Land Use Elements *
- Areas for sensitive archaeological site protection and management 
- Solar Panels 
- Maintenance Road 
- Fence 
- Access Gate 
- PCS 
- Indicative 33kV Cable Route 
- Indicative 275kV Cable Route 
- Land Available for Educational Area 

- Project Refinements
- (1) Removal of the community educational facility and replacing the land formerly allocated for that use to use for BNG and other ecology mitigation purposes (1,15 Ha) 



* The location of the proposed infrastructure and land use elements are shown indicatively only.

| | | | | | | |
|------------------------|---------|------------|--------|--------------|------------|------------|
| A: Change Request 2 | | | | Status | | |
| Project | | | | | | |
| Botley West Solar Farm | | | | Illustrative | | |
| Id. | Changes | Date | Name | | Date | Name |
| | | | | Edit | 12.09.2025 | M.Thom |
| | | | | Check | 12.09.2025 | H.Trabelsi |
| | | | | Drawing No | Appendix A | |
| A | Created | 12.09.2025 | M.Thom | | | |

APFP Regulation: 5(2)(Q)

Scale: 1:1250 at A0

Title

Change Request 2 - Change 10

0 50 100 Meters



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10707 Berlin, Germany