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To the Applicant

Your Ref:

Our Ref: EN010147

Date: 14 October 2025

Dear Sir/ Madam,

**Planning Act 2008 (as amended) (PA2008) – and The Infrastructure Planning
(Examination Procedure) Rules 2010 (as amended) – Rule 17**

**Application by Photovolt Development Partners on behalf of Solar Five Limited (the
Applicant) for an order granting development consent for the Botley West Solar
Farm Project**

Request for further information

We are writing under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010 (as amended). Specifically, we request answers are provided to the following questions:

Socioeconomics

1. As discussed during Issue Specific Hearing 2 (ISH2), the Examining Authority (ExA) have concern that the list of Very Special Circumstances (VSC) in relation to the Green Belt appears to be flexible and subject to change. This results in a degree of uncertainty for the ExA at this stage of the Examination.

Please confirm whether the list of VSC is likely to be subject to further amendments. How much confidence should the ExA have in the VSC as currently listed?

2. The area identified for the location for the proposed education facility has not been removed from the Order limits. Is there an identified need for additional biodiversity net gain in this specific area?
3. Please confirm how the suggested location for the community food growing areas were selected. What formal consultation took place in relation to this matter?

4. The ExA notes that OxFarmtoFork supplies local Oxford colleges. Please provide a further explanation as to how this does not constitute a commercial enterprise and how local communities would benefit from the involvement of OxFarmtoFork.
5. The Cherwell Collective spoke at Open Floor Hearing 3 (OFH3) and promoted the food forests concept and explained their way of working. What is not clear is what relationship, if any, this organisation has with the general community in the surrounding villages or how the locals could get involved with it. Explain.
6. In response to ExQ2.15.6 [REP4-037], it was stated that if consent was granted, an implementation group would be formed in respect of the skills and employment programme. Please signpost to where this is detailed within the outline Skills, Supply Chain and Employment Plan. How would this be secured if it is not included within the plan?

Land use

7. At Deadline 4, it was confirmed that the proposed amount of Best and Most Versatile (BMV) land to be utilised had increased from 38% to 42%. Additionally, the response to ExQ2.11.4 [REP4-037] provided an explanation of which elements of the Proposed Development would be located on which grades of agricultural land.

Please expand on the answer provided to demonstrate compliance, or otherwise, with the requirements of NPS EN-3 which states that developers must justify why the use of BMV land is necessary and whether it is feasible to locate the scheme on lower grade agricultural land, considering other material planning considerations.

Landscape

8. The landscape clarification note [REP5-006] makes no mention of the Design Manual for Roads and Bridges (DMRB). In the Applicant's responses to D4 submissions [REP5-005], Table 2.1, pdf page 7 of 57 (in response to [REP4-041]), there is some commentary on the DMRB. It is stated that the DMRB matrix was used except for one difference: *"The main adaptation to the matrix in DMRB to the matrix used in the Botley West ES is the removal of the 'no change' magnitude of impact column. This is because if there is no change, then the impact is scoped out of the ES so this column is redundant."*
Chapters 7, 9, 10, 11, 12, 13 and others all have the no change column in the assessment matrix tables. By your own logic, if no change was a redundant column in an ES matrix, surely it should be omitted from all the assessments, but instead it is only omitted from LVIA. The ExA request justification as to why this is the case.
9. You stated in [REP5-005] that you have taken on board the concerns raised by HE, ICOMOS-UK and others regarding land to be omitted. You also stated that at this stage that you have no intention of reducing the proposed installation area any further and this assertion was repeated at Issue Specific Hearing 2 (ISH2).

Please can you explain why you were prepared to undertake the reductions in panel area that have been submitted at CR2 (in relation to the World Heritage Site (WHS)),

but are not prepared to give consideration to other areas that have been suggested by professional landscape architects and by the local authorities that have a deep understanding of their local area?

10. In EXQ2.9.5 we asked about residual effects. In your response at [REP4-037], you stated that where residual effects are perceived by others to be of a greater magnitude, then these are generally subjective opinions and do not materially affect the assessment of significant effects.

This comes across as being very dismissive of anyone's view but your own. Given that the view on residual effects is shared by the Host Authorities, Historic England and many of the Interested Parties (IP's). The ExA find it extraordinary that you have just repeated your approach and methodology, when this has been questioned on numerous occasions both in writing and in the previous hearings. Many of the IP's as well as the host authorities and Historic England have made valid professional judgements that should be considered as such. Please could you explain why you still consider your approach to be correct and everyone else's approach to simply be subjective opinions that would not materially affect your assessments?

11. At ExQ2, we asked question EXQ2.13.8 of all IP's as to their reaction if proposed landscape mitigation were to be omitted from the proposals, in particular hedgerows adjacent to public rights of way. This would result in un-mitigated visual effects during the lifetime of the project, but a more recognisable landscape that afforded the existing open countryside views when the project is decommissioned.

The overwhelming response was that neither solar panels nor 3m hedges were considered to be appropriate in the views from the footpaths and that proper mitigation would involve greater buffers that would then not require such tall hedges to be planted. From our accompanied and unaccompanied site visits, we have experienced the sweeping open landscape views that the IP's have referred to and comes back again to the matter of the proper application of mitigation hierarchy and whether this was correctly carried out during design development. It also links back to the question we have asked before as to why, in the Landscape and Visual Assessment only, you have chosen to treat Moderate impacts as not significant.

Please could you comment on this issue and try to help us resolve it?

12. In their relevant representation [RR-0793], Oxford County Council stated that any planting proposed around public rights of way should have a clear corridor of 15m between hedges, and this is repeated in their response to EXQ2.13.7 [REP4-074]. Furthermore, in their response to EXQ2.13.8 they have suggested that a more nuanced approach to the design, allowing for hedges that are not necessarily in straight lines along either side of a pathway, would provide for some more open spaces that feel less oppressive, and gaps in the hedges that could allow for views over the countryside. They also suggest that if greater buffer zones were applied to the layout, then the hedges could be lower in places, allowing views over the top.

Taking all these points together would provide a more naturalistic and appropriate response to the issue of planting hedges along footpaths in order to screen the development. However, your response to this is that public rights of way flanked by

hedgerows is a characteristic feature of the existing landscape and that you propose a minimum of a 5m corridor within which the paths would run.

In the latest revision of the Outline Landscape and Ecology Management Plan (OLEMP) [CR2-051], you have provided indicative footpath plans, showing a footpath width of 3m between hedges, with footpath/cycleways at 9m wide. Please explain the discrepancy between your stated footpath widths (5m) and the indicated widths in the OLEMP. Also, please explain why have you not responded to OCC's suggestions but instead continued to state that narrow greenways are characteristic in the area where it has been indicated by several IP's, and confirmed through the ExA's own site visits, that these instances are the exception and not the rule?

13. In your revised ES Chapter 8 [CR2-021], paragraphs 8.8.9 and 8.8.10 have a number of mitigation measures and principles listed. Please could you signpost the ExA as to where we will find these commitments secured?
14. At ExQ2.9.3 [PD-012] the ExA asked for more detail regarding four important and relevant cumulative effect projects. In response you stated more detail would be forthcoming in the updated Cumulative Effects Assessment (CEA) at Deadline 5 [REP5-022]. Taking the example of Salt Cross Village, which comprises 2,200 houses and 40ha employment land, this is only five mentions in the CEA and no detailed assessment. In relation to landscape, there is a tabulated conclusion stating: "No significant effects" but that relates to Salt Cross grouped with 9 other projects, including a 500-dwelling scheme at Perdiswell Farm. Can you justify how you reached that conclusion and can you provide the detail requested in ExQ2.9.3?
15. A minor point on the revision numbers for the OLEMP. The latest revision at [CR2-051] is Revision 5; but most of the document still has Revision 4 on the footnote and Appendix C still states Revision 1 on the footnote. Please can this be tidied up for the next revision so that it is clear as to which version of the document is being referred to.

Climate change resilience

16. In Action point 24 of ISH 1 [EV5-010], you were asked how the lessons learned from the solar farm incidents at Porth Wen, Cirencester and Verwood, would be incorporated in your design. The ExA felt you didn't answer this question adequately, so in our second written questions ExQ 2.4.7 [PD-012] we asked for further clarity.

In your response at D1, Appendix 2 [REP1-019], with specific reference to high wind resilience, you have referred to the development being built to relevant design standards and modules being no taller than 2.2m at a low angle. The ExA still feel you haven't answered the question with sufficient detail to alleviate concerns that your proposed development will be resilient to these extreme weather incidents. Presumably the solar farms at Porth Wen, Cirencester and Verwood, would have been built to similar manufacturing standards to the ones you have proposed and that they would have done their research and found wind speeds have historically been below 90 mph, yet the solar farms still suffered severe damage.

So the question is why should the ask ExA consider the risk of storm damage to your proposed development is lower than the solar farms at Porth Wen, Cirencester and Verwood. What's different about your solar farm, or what will you be doing differently so the farms is not subjected to the same damage in the event of such extreme weather.

All of the above material should be submitted by Deadline 6 (20 October 2025).

Should you have any questions about the contents of this letter, please do not hesitate to contact the case team.

Yours faithfully

David Wallis

David Wallis
Lead member of the panel of Examining Inspectors

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