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**BOTLEY WEST SOLAR FARM**  
**OXFORDSHIRE HOST AUTHORITIES**  
**RESPONSE TO CHANGE REQUEST 2**  
**DEADLINE 6 | MONDAY 20 OCTOBER 2025**

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

Oxfordshire Host Authorities (“OHAs”)

Botley West Solar Farm (EN01014)

## **OXFORDSHIRE HOST AUTHORITIES**

### **RESPONSES FOR DEADLINE 6**

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

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

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

### **Purpose of this Submission**

The purpose of this submission is to provide written confirmation of OHA responses to Change Request 2 (**CR2**).

The written comments provided below do not prejudice the OHA’s ability to make further comments on these matters.

### **General observations on CR2**

Change Request 2 does not address concerns that the OHA have previously expressed in the LIR [**REP1-072**] and the Responses to Examining Authority’s Second Written Questions (ExQ2) [**REP4-074**], especially 2.13.11, and the associated Responses to Examining Authority’s Second Written Questions (ExQ2), Appendix 1 - Landscape and Heritage Omission Maps [**REP4-075**].

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The Change Request 2 does not address ExQ2 2.9.4 [**REP4-074**] which covers why the OHA considers that the scheme is not satisfactory, based on the limited information in the LVIA on approach to the design or mitigation.

The OHA would expect to see an appraisal of the relative landscape/visual/residential visual amenity sensitivities of the different parts of the site, and for this to inform the design. Panels should be removed from the more sensitive areas and focused across areas of lower sensitivity, where there are fewer open views across the landscape, where the landscape character is more ordinary, where key features would not be masked, key views blocked, or effects upon residential visual amenity considered overwhelming etc. Once the design is the very best that it can be (avoiding sensitive areas, being compact, logical, using areas that are naturally more screened etc), it is then important to apply further mitigation measures, such as proposed planting.

More fundamentally though, the design embedded mitigation, achieved through changes to the layout and positioning of panels, would have been very different, and a more sympathetic scheme could have been developed. This could still be a sizable project, but would be concentrated on the less sensitive areas, away from villages and individual hamlets or farms, and away from the visible steeper slopes and elevated land where the development would be far more widely seen, leading to a reduction in unacceptable levels of adverse effects.

There is also a considerable amount of inconsistency in the information provided in 6.3 LVIA [**CR2-022**]. Below are some of the examples where information is not consistent. Other examples are listed in the OHA Deadline 6 response. The number of inconsistencies within the LVIA makes it difficult to follow the assessment of the proposed development.

### **Appendix 8.7 Representative Viewpoint Assessment [REP5-038]**

OHA remain concerned about the assessment. In many places, the term **Low** is used to describe the Magnitude, but the OHA would be expect a least a **Medium** Magnitude, such as in the Southern Area Viewpoints 45, 46, 47, 48, 51, 52 and 53. Even where a **Medium** Magnitude is recorded with a **High** Sensitivity of receptor, using the Table 8.12 Assessment Matrix, it would be expected that a **Moderate to Major** level of effect would be recorded. However, in many places this is not the case, such as for Viewpoint 49; a **Moderate** adverse level of effect, that is not considered significant, is recorded. There are numerous examples in Appendix 8.7, under Operation and Maintenance Phase Effects, where a **Medium** Magnitude is reported, with a **High** Sensitivity of receptor,

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where a **Moderate** level of effect, which is not considered by the applicant to be significant, rather than a *Moderate to Major* level of effect is recorded (which would be considered significant). Other examples, in the Northern Site include Viewpoints 5b, 5c, 10, 11 and 13.

There are inconsistencies between the levels of effect set out in the new Appendix 8.7 and how they are recorded in Table 8.22: Summary of potential environmental effects, mitigation and monitoring.

For example, the assessment for Viewpoint 48 during Construction is recorded in Para 1.2.51 as **Medium** Magnitude of change resulting in a temporary **Moderate** adverse level of effect which is considered significant. During Occupation (para 1.3.98) Year 1 reports a **High** Magnitude, resulting in a **Major** adverse level of effect, which would be considered significant. At summer Year 15 (para 1.3.99), a **Medium-High** Magnitude of effect is reported, resulting in a **Moderate/Major** adverse level of effect, which is considered significant.

This however is recorded differently in Table 8.22: Summary of potential environmental effects. In the Table, Viewpoint 48 has a **Medium** Magnitude of effect for both Construction and a **Low** Magnitude of effect for Operation, giving a **Moderate** level of effect at Year 1 and a **Minor** level of effect at year 15 for both Construction and Operation.

There are similar issues with lack of consistency of judgements for the Northern Site. The viewpoints above are used as examples of the issues that are apparent with regard to Appendix 8.7 and Table 8.22.

The OHA welcome the reduction in Order Limits and removal of solar arrays (in part of heritage and in part for the airport), but the changes do not go in any way far enough to reflect the areas suggested for removal by ICOMOS and the OHA, for landscape, visual, residential visual amenity, and heritage reasons. It is the OHA's position that taking on board these changes, to remove panels from areas of highest landscape, visual and residential visual amenity sensitivity, is fundamental mitigation for the project.

## Changes to the Project (16.1 Cover Letter)

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*1. Reduction in Order Limits boundary to reduce the solar installation area southwest of Bladon, and removal of solar arrays on land east of Bladon and north of Heath Lane.*

The OHA welcome the removal. Although the proposed reduction in solar panel installation would go some way to mitigating the impact of development on sensitive receptors to the south of Bladon and north of Heath Lane, the OHA consider that there will still be residual effects arising from the proposed development where panels and associated infrastructure remain in the Central Area, particularly in proximity to Ancient Woodland and Public Rights of Way. The setting of Blenheim Palace WHS is not clearly defined. Please see the OHA's Written Summary of Oral Submission for ISH2 for the OHA's latest position on the setting and the Outstanding Universal Value of the World Heritage Site

*2. Reduction in Order Limits boundary to reduce the solar installation area near to Oxford Airport.*

CDC welcomes the removal of panels from the parcels to the south of London-Oxford Airport.

The removal of panels from these areas overcomes our objection regarding the coalescence of Kidlington and Begbroke and the loss of some areas of Grade 2 BMV agricultural land. CDC observes that the removal of panels from areas within the Oxford Green Belt is an additional improvement which will ensure that the areas omitted will continue to serve the purposes of the Green Belt. This is particularly beneficial for the parcel to the east of the A44 where the loss of GB would be more harmful due to the role this area plays in preventing the sprawl of Kidlington and the coalescence of settlements and in preserving the setting of the GB. Our concerns in this regard were set out in Cherwell's individual LIR [REP01-052] with reference to the Cherwell Green Belt Study: Additional Green Belt Site Assessments 2023 which was attached to the individual LIR as Appendix 2.

Change 2 also appears to CDC to be significantly beneficial to public safety by retaining a larger safeguarded zone immediately south of London-Oxford Airport which would allow safer crash landings in the event of engine failure after take-off. Whether the extent of panels removed in this location is adequate will need to be confirmed by the airport operator, but CDC consider this to be a substantial improvement.

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Furthermore, CDC supports the removal of panels from the areas to the north and west of Begbroke village which would substantially reduce harmful visual impacts for residents and would better preserve the settings of Begbroke Conservation Area and its listed buildings.

Re-siting of Secondary Substation:

CDC has no objection to the re-positioning of the secondary substation adjacent to the A44 from the southern side of the field boundary to the northern side of the boundary or to the reduction in its height from up to 6m to a maximum of 5m. It is noted that the secondary substation would otherwise remain the same as originally proposed. The re-siting would bring the structure into closer proximity with an existing range of farm buildings next the road and therefore make it a less isolated feature than in the previous position. This is considered to be a moderate improvement. Again, subject to confirmation from the airport operator, the new location would appear to be an enhancement in terms of public safety. Proposals for its screening with landscape planting should be clarified and require approval prior to implementation.

Position of Temporary Construction Compound:

CDC has no objection to the re-orientation of the temporary construction compound (by rotating it roughly 90 degrees) and, subject to confirmation from the airport operator, it appears that this will improve public safety by retaining a safe zone to the south of the airport runway. It is assumed that the access to this compound would remain largely the same as for the original compound and that the DCO would continue to require the decommissioning/removal of the compound along with any screening and landscaping enhancements deemed necessary.

*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].*

VWHDC consider the revised location of the main substation and additional solar panels will have a detrimental impact on the landscape.

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It is noted that limited space has been allowed to mitigate the substation buildings and associated plant. There needs to be a minimum 5m offset between boundary fencing and adjacent vegetation, so space to provide mitigation planting would be limited. Mitigation planting areas need to be illustrated on the Works Plan, as do other easement routes which could prevent mitigation planting.

Furthermore, the Works Plan [CR2-005] does not indicate access routes to the substation sites.

*4. Reduction in Order Limits boundary to reduce the solar installation on land east of Lower Road.*

The OHA welcome the removal.

*5. Refinement of Project layout and design to remove solar installation areas overlapping with Flood Zones 2 and 3.*

As established through discussion at the Issues Specific Hearing 2, held 8 October, further clarification is required for those additional panels proposed for the southern site area, as it appears from figure 1.1 Appendix 2: Hydrology and Flood Risk Technical Note 2 [CR2-071] these additional panels will be located within flood zone 2.

*6. Refinement of Project layout and design to include an additional solar installation area within the Southern Site.*

VWHDC consider additional solar panels in this location will have a detrimental impact on the landscape. The addition of more panels runs counter to repeated requests for a reduction in scale of this proposed development. It also does not allow for improved mitigation (planting to help provide a landscape framework).

*7. Reduction in Order Limits boundary to remove small parcels of land owned by Oxfordshire County Council (Estates).*

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CDC has no objections to the minor reductions to the red line site area to the north-east of Perdiswell Farm and west of Upper Campsfield Road.

OCC welcomes the reduction of the Order Limits to remove OCC Estate’s land.

*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.*

The OHA note that there has not been a wider review and sense check of the development areas to minimise impacts, as previously raised such as small areas of solar panels adjacent to footpaths routes. This is covered in the OHA Joint Local Impact Report [**REP1-072**] including paragraphs 7.3.81 to 7.3.86.

CDC have no objections to the proposals to reinstate the line of the footpath along the definitive right of way between Begbroke and Bladon.

In principle OCC support the use of the definitive map for plotting Rights of Way within the order limits and recognise that the applicant is attempting to alleviate OCCs concerns around doglegs within the PRow network.

However, OCC is concerned that unrecorded public rights may subsist on the non-definitive (walked) lines that are in use on the ground if they have been used ‘as of right’ by the public for 20 years or more without challenge. This may result in a situation whereby the walked route on the ground is added to the Definitive Map following a successful claim for public rights, resulting in two routes running parallel to each other, the legal line and the walked route.

This may cause the applicant to unintentionally put panels across routes in use on the ground on which currently unrecorded public rights exist. If these are subsequently claimed as PRow and added to the Definitive Map, the legal line would then be obstructed. OCC would oppose any development obstructing the PRow.



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OCC believes that the simplest solution is as outlined in response to question 1.17.20 at ExQ1 [**REP2-049**] in so far as the applicant should divert sections of the legal line that do not align with the walked route as originally proposed but expand the order limits to prevent dog legs in the PRow.

*9. Reduction in Order Limits boundary to remove an area of land along Wharf Road.*

WODC support this change.

*10. Clarification of the role of the community educational facility.*

OHA welcome the clarification on this element of the proposed development.

*11. Refinement of Project layout and design to secure the latest design parameters for the new National Grid substation.*

The location of the NGET substation will have a detrimental impact on the landscape and views, and VWHDC is disappointed heights are increasing again, beyond that assessed in the Environmental Statement.

It is noted the changes to the size and height of the proposed NGET substation are not recorded in a change to the description of the scheme between the original LVIA [**APP-045**] and the Change 2 LVIA [**CR2-022**].

VWHDC has consistently been concerned that the actual design of the NGET substation is not informed by an assessment of its impacts and the size and parameters set aside for it are only getting bigger. VWHDC therefore repeats its request for a rerun of the ZTV and visualisation work to reflect the change in dimensions and locations, taking account additional viewpoints previously requested. It is not clear in the LVIA, the size of the built form that has been used in the ZTV and LVIA assessment, as there are no dimensions except height in Table 8.17 Maximum design scenario considered for the assessment of potential impacts. There are no revised ZTVs submitted to support the application to test the changes, due to the increased height and changes in width and

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length of the NG substation buildings. The ZTV work is based on the NGET substation height of 12.5m, not 15m as now proposed, and this is just for the built elements; it does not include associated plant and the connection to the pylon.

## **Other CR2 Documents**

**CR2-002** – 1.3 Guide to the Application (Clean) (Rev 9)

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

**CR2-005** – 2.3 Works Plans (Rev 2)

It is noted the plan does not indicate access routes to substation sites.

**CR2-009** – 3.1 Draft Development Consent Order (Clean) (Rev 7)

OHA is concerned with the wording of Part 6, Article 38 of the DCO which allows hedges and trees to be removed. The OHA raised concerns around the powers of Article 38 in the Local Impact Report **[REP1-072]** that have yet to be satisfactorily addressed. Given the applicants proposed bat mitigation strategy, the wording of this section will need to be revised to ensure that those hedgerows/trees that are part of the bat corridor mitigation are retained/protected. The best way to ensure this, is to ensure that Local Authority consent is required for the removal, cutting back or lopping of any hedge or tree not covered within Schedule 12 of the dDCO.

OHA consider the Design Principles Document **[REP1-014]** does not adequately reference all design parameters set out in ES Chapter 6 Project Description **[APP-043]**. Other Infrastructure Parameters (Fence heights, CCTV and lighting) specified in table 6.4 of Chapter 6 are not referenced and these are required in relation to Requirements 5 and 8.

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**CR2-011** – 3.3 Explanatory Memorandum (Clean) (Rev 7)

OHA remain concerned about the lack of fixed detail with regards to proposed Mitigation. Para 1.5.12 states *Any illustrative development layouts have been submitted to provide illustrative examples of the different design layouts that have been considered for the Project that could be built out within the "consent envelope"*. This is a very open statement with regards to the amount of Design to be finalised after the DCO is granted.

**CR2-013** – 3.6 Land and Rights Negotiation Tracker (Clean) (Rev 7)

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

**CR2-015** – 4.1 Statement of Reasons (Clean) (Rev 2)

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

**CR2-017** – 4.3 Book of Reference (Clean)

OHA have no comments to make on this document.

**CR2-019** – 6.3 Environmental Statement Chapter 7 - Historic Environment (Clean) (Rev 3)

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

**CR2-021** – 6.3 - Environmental Statement Chapter 8 - Landscape and Visual Impact Assessment (CR2) (Clean) (Rev 3)

Please see OHA comments in response to Rev 2 [**REP5-026**].

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**CR2-023** – 6.3 Environmental Statement Chapter 16 - Human Health (Clean) (Rev 1)

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

**CR2-032** – 6.4 Environmental Statement Figure 8.248 to 8.371 Photomontages (Winter and Summer) (Rev 2)

This document does not indicate that there has been any change in the Photomontages to reflect the changes in the height and massing of the NGET Substation.

**CR2-036** – 6.5 Appendix 7.4 Heritage Impact Assessment (Clean) (Rev 1)

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

**CR2-038** – 6.5 Environmental Statement - Appendix 7.5 Settings Assessment (Clean) (Rev 3)

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

**CR2-040** – 6.5 Environmental Statement Appendix 9.13 Biodiversity Net Gain Statement (Clean) (Rev 1)

There is a new hedgerow proposed on the Nget In - Post Development Habitats Plan Fig 1.7 Rev 01 running through the solar arrays north of Deadmans Farm which is not on the Illustrative Masterplan Figure 2.3 Plan [**CR2-025**] or space allowed for this hedgerow on the Works Plans Sheet 13b of 13 [**CR2-005**]. This hedgerow is also not present on the 7.3.3 Landscape, Ecology and Amenities Plan Rev 3 plan [**CR2-043**].

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**CR2-042** – 7.3.2 - Operational Development Areas Plan (Rev 2)

Sheet 13 of 13 Rev 2 does not key where the Project Main Substation is on the plan.

**CR2-043** – 7.3.3 - Landscape, Ecology and Amenities Plan (Rev 3)

It is noted there are areas proposed where footpaths do not have any mitigation treatment, such as either side of the Oxford Green Belt Way 184/15/30.

**CR2-044** – 7.3.4 - Temporary Facilities Plan (Rev 2)

There is no indication of how the level change will be incorporated into the Southern Site compound, much of which is greater than a 1 in 10 slope.

**CR2-045** – 7.6.1 Botley West Outline Code of Construction Practice (Clean) Part 1 (Rev 4)

OHA maintain that construction hours should be limited to 07.30H-18.00H Monday to Friday, 07.30H-12.30H on Saturdays and no time on Sundays, Bank and Public Holidays. As detailed in our response to ISH2 Action Point 21, a longer quiet period at the weekend would be preferred to a slightly shorter construction period due to many residents benefitting more from peacefulness during this time than during the working week.

OHA welcome confirmation to engage with Thames Water for construction and excavation works within 200m of the Farmoor Reservoir embankments.

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**CR2-047** – 7.6.1 Botley West Outline Code of Construction Practice (Clean) Part 2 (Rev 4)

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

**CR2-049** – 7.6.2 Botley West Outline Operational Management Plan (Clean) (Rev 4)

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

**CR2-051** – 7.6.3 Botley West Outline Landscape and Ecology Management Plan Rev 5 (Clean)

The OHA note that there are no significant changes to the oLEMP between D5 and the Change Request. Please refer to the OHA's comments on the oLEMP submitted at D5 [**REP5-045**]

**CR2-053** – 7.6.5 Outline Written Scheme of Investigation (Clean) (Rev 3)

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

**CR2-056** – 8.3 Schedule of Changes to the draft DCO (Rev 6)

OHA have no comments to make on this document.

**CR2-057** – 8.4 Schedule of Changes to the Book of Reference

OHA have no comments to make on this document.

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**CR2-058** – 11.5 Compulsory Acquisition (CA) Schedule and Land Rights Tracker (Clean) (Rev 6)

OHA have no comments to make on this document.

**CR2-071** – 16.3 Environmental Statement Addendum

OHA have no comments to make on this document.

**CR2-072** – 16.4 Change Request Consultation Report (Rev 1)

OHA have no comments to make on this document currently.

**CR2-073** – Change Request Report Sept 2025

OHA have no comments to make on this document.

## **Amended Plans**

OHA make no observations on the following plans:

**CR2-004** – 2.2 Streets, Access and Rights of Way Plans (Rev 2)

**CR2-006** – 2.4 Land Plans

**CR2-007** – 2.10 Hedgerow Removal Plans (Rev 2)

**CR2-008** – 2.11 Traffic Regulation Measures Plans (Rev 2)

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**CR2-025** – 6.4 Environmental Statement - Figure 1.2 Illustrative Masterplan Overview (Rev 2)

**CR2-026** – 6.4 Environmental Statement - Figures 2.1a - 2.4c - Illustrative Masterplan (Rev 2)

**CR2-027** – 6.4 Environmental Statement - Figures 5.1 - Illustrative Masterplan Cable Corridor Plan (Rev 1)

**CR2-028** – 6.4 Environmental Statement - Figures 5.2 - Illustrative Masterplan Cable Corridor Plan (Rev 1)

**CR2-029** – 6.4 Environmental Statement - Figures 5.3 - Illustrative Masterplan Cable Corridor Plan (Rev 1)

**CR2-030** – 6.4 Environmental Statement - Figures 5.4 - Illustrative Masterplan Cable Corridor Plan (Rev 1)

**CR2-031** – 6.4 Environmental Statement - Figures 5.5 - Illustrative Masterplan Cable Corridor Plan (Rev 1)

**CR2-033** – 6.4 Figure 17.3 (Rev 1)

**CR2-034** – 6.4 Figure 17.4 (Rev 1)

**CR2-035** – 6.4 Figure 17.5 (Rev 1)

**CR2-055** – 8.2 - Location Plan (Rev 1)

**CR2-059** – 12.7 Additional Photomontages for Historic Environment Assessment (Rev 1)

**CR2-060** – 12.8.1 Hedgerow Removal Plans - Sheet 02 Details Plans (Rev 1)

**CR2-061** – 12.8.2 Hedgerow Removal Plans - Sheet 03 Details Plans (Rev 1)

**CR2-062** – 12.8.3 Hedgerow Removal Plans - Sheet 04 Details Plans (Rev 1)

**CR2-063** – 12.8.4 Hedgerow Removal Plans - Sheet 05 Details Plans (Rev 1)

**CR2-064** – 12.8.5 Hedgerow Removal Plans - Sheet 06 Details Plans (Rev 1)



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**CR2-065** – 12.8.6 Hedgerow Removal Plans - Sheet 07 Details Plans (Rev 1)

**CR2-066** – 12.8.7 Hedgerow Removal Plans - Sheet 08 Details Plans (Rev 1)

**CR2-067** – 12.8.8 Hedgerow Removal Plans - Sheet 09 Details Plans (Rev 1)

**CR2-068** – 12.8.9 Hedgerow Removal Plans - Sheet 10 Details Plans (Rev 1)

**CR2-069** – 12.8.10 Hedgerow Removal Plans - Sheet 11 Details Plans (Rev 1)

**CR2-070** – 12.8.11 Hedgerow Removal Plans - Sheet 13 Details Plans (Rev 1)