



Botley West Solar Farm

Applicant's Responses to other D5 Submissions

October 2025

PINS Ref: EN010147

Document Ref: EN010147/APP/17.5

Revision 0

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

Approval for issue

Jonathan Alsop

20 October 2025

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1 Introduction

1.1 Purpose of this Document

- 1.1.1 The purpose of this document is to provide the Applicant's response to submissions made by interested parties at Deadline 5 of the Examination.
- 1.1.2 The Development Consent Order (DCO) application for Botley West Solar Farm (the Application) was submitted on 14 November 2024 and accepted for Examination on 19 December 2024. Deadline 1 of the Examination was on 4 June 2025, Deadline 2 was on 1 July 2025, Deadline 3 was on 22 July 2025, Deadline 4 on 22 August 2025 and Deadline 5 on 12 September 2025.
- 1.1.3 The Applicant has not responded to questions posed to specific Interested Parties, apart from clarifications provided on some questions. However, the Applicant will continue to review further submissions at each Examination deadline.
- 1.1.4 The list of Interested Parties' that submitted representations at Deadline 5 are set out in **Table 1.1** below.
- 1.1.5 A total of 148 submissions were submitted to the Examination at Deadline 5. 50 of these were from the Applicant, with 98 being from Interested Parties.

1.2 Structure of this document

- 1.2.1 This document provides a response from the Applicant to Written Representations and Responses to ExQ2 submitted at Deadline 5 and is structured as follows:
- Table 2.1: Applicant's Responses to Representations submitted at Deadline 5 – Local Authorities and Statutory Consultees
 - Table 2.2: Applicant's Responses to Representations submitted at Deadline 5 – Non-Statutory Consultees
 - Table 2.3: Applicant's Responses to Representations submitted at Deadline 5 – Public/Landowner
- 1.2.2 Submissions received by Interested Parties are presented as verbatim text (unless it has been more appropriate to summarise) and are then responded to by setting out the Applicant's position on the matter at the time of writing.
- 1.2.3 To increase the conciseness of this document similar points have been grouped together and summarised. The reference number column in the tables below refers to the reference given to the submissions made by Interested Parties.
- 1.2.4 The documents submitted with the Application are also referenced in this document, using the reference number **[APP/x.y]**, where the last three numbers are the application document number, as set out in the Examination Library. All documents are also presented in numerical order in the Guide to the Application **[REP5-002]**.

Table 1.1: List of Interested Parties that submitted Representations at Deadline 5

| Examination Reference Number | Interested Party |
|------------------------------|--------------------------|
| REP5-051 | Alan and Beatrice Holdet |
| REP5-052 | Andrew John Gower |
| REP5-053 | Andrew McCallum |
| REP5-054 | Angelo Gilio |

| Examination Reference Number | Interested Party |
|------------------------------|--|
| REP5-055 | Barbara Anne Bradley |
| REP5-056 | Begbroke and Yarnton Green Belt Campaign (BYG) |
| REP5-057 | Begbroke and Yarnton Green Belt Campaign (BYG) |
| REP5-058 | Begbroke and Yarnton Green Belt Campaign (BYG) |
| REP5-059 | Begbroke and Yarnton Green Belt Campaign (BYG) |
| REP5-060 | Begbroke and Yarnton Green Belt Campaign (BYG) |
| REP5-061 | Blenheim Palace |
| REP5-062 | Blenheim Palace |
| REP5-063 | Blenheim Palace |
| REP5-064 | Bojan Ivanovic |
| REP5-065 | Bojan Ivanovic |
| REP5-066 | Brian Wood |
| REP5-067 | Bruce Windwood |
| REP5-068 | Cassington Parish Council |
| REP5-069 | Cassington Parish Council |
| REP5-070 | Cassington Parish Council |
| REP5-071 | Cassington Village Hall Management Committee |
| REP5-072 | Church Hanborough Residents |
| REP5-073 | Cllr Andrew Prosser |
| REP5-074 | Oxfordshire Community Foundation |
| REP5-075 | CPRE Oxfordshire |
| REP5-076 | Cumnor Parish Council |
| REP5-077 | Cumnor Parish Council |
| REP5-078 | David Foster |
| REP5-079 | Dr Alexander Lewis |
| REP5-080 | Dr Annie Haight |
| REP5-081 | Dr Elizabeth Jones |
| REP5-082 | Dr Michael Franklin |
| REP5-083 | Edward Shorter |
| REP5-084 | Elizabeth Owen |
| REP5-085 | Fay Julie Curtis |
| REP5-086 | Forever Fields Community Art Project |
| REP5-087 | Forever Fields Community Art Project |
| REP5-088 | Frances Anne Sunderland |
| REP5-089 | Frances Platt |

| Examination Reference Number | Interested Party |
|------------------------------|--------------------------------------|
| REP5-090 | Frances Stevenson |
| REP5-091 | Francisco Bustos Saavedra |
| REP5-092 | Gareth Hammond |
| REP5-093 | Hanborough Parish Council |
| REP5-094 | Harry St John |
| REP5-095 | Harry St John |
| REP5-096 | Herbert Hodson |
| REP5-097 | Hilary Owen |
| REP5-098 | Historic England |
| REP5-099 | James Hodson |
| REP5-100 | Jeannette Jenkins |
| REP5-101 | Jennifer Smith |
| REP5-102 | Julia Lucille Dorothea Gower |
| REP5-103 | Julian Morris |
| REP5-104 | June Hodson |
| REP5-105 | Katharine Southwell |
| REP5-106 | Kathryn Teal |
| REP5-107 | Kenneth John Clark |
| REP5-108 | Not in use |
| REP5-109 | Lesley Sims |
| REP5-110 | Lidia Arciszewska and David Sherratt |
| REP5-111 | Margaret Anne Lawrence |
| REP5-112 | Mark Selinger |
| REP5-113 | Martin Oldfield |
| REP5-114 | Mary Ann Canning |
| REP5-115 | Michael Brown |
| REP5-116 | Michael Field |
| REP5-117 | Michael John Gorick |
| REP5-118 | Miles Clissold Tuely |
| REP5-119 | Miles Clissold Tuely |
| REP5-120 | Mr Dermot Joseph Magee |
| REP5-121 | Mr Ian William Coy |
| REP5-122 | Mrs Josephine Christine Coy |
| REP5-123 | Nigel Roderick Pearce |
| REP5-124 | Oliver Boyd |
| REP5-125 | Oxfordshire Host Authorities |

| Examination Reference Number | Interested Party |
|------------------------------|---|
| REP5-126 | Patrick Lee Osborne |
| REP5-127 | Peter Derek Charles Harvey |
| REP5-128 | Peter Hewis |
| REP5-129 | Philippa Hodson |
| REP5-130 | Richard Francis Carlisle Ladenburg |
| REP5-131 | Richard Tyler |
| REP5-132 | Rosemary Lewis |
| REP5-133 | Rosemary Lewis |
| REP5-134 | Siemens Healthcare Limited |
| REP5-135 | St Peter's Church, Cassington, Parochial Church Council |
| REP5-136 | Stephen Brunel Hurst |
| REP5-137 | Steve Westaby |
| REP5-138 | Stewart Thompson |
| REP5-139 | Stop Botley West Limited |
| REP5-140 | Susanna Lewis |
| REP5-141 | Sustainable Woodstock |
| REP5-142 | Sylvia Hurst |
| REP5-143 | Terence John Cudbird |
| REP5-144 | The Hill End Outdoor Education Centre |
| REP5-145 | Tim Sumner |
| REP5-146 | Timothy Watson |
| REP5-147 | Tracy Jane Penny |
| REP5-148 | Wootton Parish Council |

2 Applicant's Responses to Representations provided at Deadline 5

2.1 Local Authorities and Statutory Consultees

Table 2.1: Applicant's Responses to Representations provided at Deadline 5 – Local Authorities and Statutory Consultees

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
|--------------------------|------------------|--|--|-----------------------------|
| REP5-098 | Historic England | <p>Trial trenching</p> <p>2.2. We are disappointed to see that, despite reassurances given at various points, the results of the archaeological field evaluation are still not forthcoming. This is stated to be due to an unresolved contractual issue (page 32 of the Applicant's Responses to other Deadline 3 Submissions (REP4-038)). We remain in a position where we are unable to advise on the suitability of the buffer which is currently proposed around the scheduled monument of Sansom's Platt.</p> <p>2.3. The applicant indicates that this information might not be available until post determination to inform the design details which would be submitted to local authorities as a requirement of the DCO, after this application has been determined.</p> <p>2.4. Rather than leave this key issue to so late a stage (when the issue may well remain unresolved), we suggest the following options might be considered:</p> <p>a. Provide Historic England (and Oxfordshire County Council) with just the results of the trenches that were excavated in the fields that currently include the buffer zone (fields 1.11 – 1.14 in the geophysical report included with the Environmental Statement APP134) in order that we can provide advice to help resolve this point before the determination of the DCO.</p> <p>If this cannot be done due to the contractual issue, then:</p> <p>b. Remove fields 1.12 and 1.13 entirely from the scheme and remove a greater proportion of field 1.11 and field 1.14. While it is (as we have previously stated) currently not possible to establish the boundaries of the Roman settlement, we believe that extending the buffer in this way is reasonably likely to reduce any harm to the potentially nationally important area to a minimum.</p> | <p>The Applicant can confirm that the draft reports on the results of the trial trenching are available, and have been included for submission at Deadline 6.</p> <p>This information has been passed to Historic England, along with a commitment that the reports will be made available to Historic England as soon as they have been received from the contractors. This will enable Historic England to further consider the issue of the proposed buffer zone around the Scheduled Monument at Sansom's Platt both in terms of the protection of the buried archaeological remains and the current setting of the designated heritage asset.</p> <p>In any event, the Applicant has agreed to add Historic England as a consultee for the purposes of discharging Requirement 5 (detailed design approval), amongst some other requirements. This revised wording adds Historic England as a consultee in respect of any parts of Work No. 5. This gives Historic England the opportunity to advise on the suitability of any archaeological protection zone including the one around Sansom's Platt Scheduled Monument. In other words, to the extent the proposed archaeological protection zone around Sansom's Platt Scheduled Monument remains undefined, Historic England will be involved in the discharge process to influence the final design of those proposed zones post-consent. This ensures that the delivery of relevant works is suitably controlled around the scheduled monument.</p> | Historic_Environment |
| REP5-098 | Historic England | <p>Development Consent Order</p> <p>2.5. In relation to the applicant's response to us (REP4-038) with regards to the DCO process, there are instances we feel Historic England should be a named consultee within certain Requirements in Schedule 2 of the DCO. We have identified to the applicant the Requirements where it would be beneficial for Historic England to be named as a consultee, in line with other named consultees. We hope these changes can be reflected in the next draft of the DCO.</p> | <p>This request has been discussed in meetings between the Applicant and Historic England. Amended text has been agreed and is included in the draft DCO submitted at Deadline 6.</p> | DCO_Process |
| REP5-098 | Historic England | <p>Clarification of Historic England's role and approach on points relevant to the Examination</p> <p>3.1. We do not wish to provide a commentary on other interested party responses, which were submitted and received at Deadline 4. However, there are some instances where some responses are factually incorrect. We therefore have provided the information below to assist the Examining Authority and other participants through the examination. Historic England's approach to assessing the impacts on designated heritage assets through changes to their setting</p> <p>3.2. When assessing the impact of change within the setting of a designated heritage asset on its significance, Historic England's assessment is guided by our Good Practice Advice in Planning Note 3 'The Setting of Heritage Assets'. We do not make a distinction between the immediate and wider setting as these terms are not regarded as having any particular formal meaning (GPA 3 page 5). Our advice therefore always refers to the setting of an asset as a whole.</p> <p>Historic England's role in advising the UK State Party to the World Heritage Convention</p> <p>3.3. The Department for Culture, Media and Sport (DCMS) represents the UK State Party to the UNESCO 1972 World Heritage Convention. Notifications regarding development proposals potentially affecting World Heritage properties are issued by DCMS, in this role, to the World Heritage Centre, the Secretariat for the World Heritage Committee. Historic England's role is to provide technical advice to DCMS on the implementation of the World Heritage Convention.</p> <p>3.4. Information submitted by the State Party may be shared with the World Heritage Committee's Advisory Bodies</p> | <p>The applicant notes this comment</p> | Historic_Environment |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
|--------------------------|------------------------------|---|---|-------------------------------------|
| | | (principally ICOMOS International for cultural heritage) for their review and advice. This process is known as Technical Review. Technical Review may be proactively requested by the State Party, or the World Heritage Centre may decide it is required. DCMS is ultimately responsible for deciding whether a case will be notified to the World Heritage Committee and whether a Technical Review will be requested from ICOMOS International, having sought advice from their technical advisers at Historic England. 3.5. Management of a cycle of technical advice usually takes a minimum of 12 weeks from the request being made by State Party to the receipt of advice from the Advisory Bodies. ICOMOS' latest Technical Review report was shared with the Examining Authority at Deadline 4. | | |
| REP5-125 | Oxfordshire Host Authorities | <p>REP4-026 – 7.6.2 Botley West Outline Operational Management Plan (Clean) (Rev 3) Paragraphs 2.2.3 and 2.4.1 - Maintenance and construction activities should only be carried out during reasonable hours to give neighbouring residents some peace and quiet outside these times, which OHA define as:</p> <ul style="list-style-type: none"> · 7.30am to 6pm from Monday to Friday · 8am to 1pm on Saturdays · No work on Sundays and Bank Holidays <p>OHA see no reason to widen site work beyond these hours. Paragraph 2.3.2- Please refer to the OHA's response to Q2.7.8 in [REP4-074]. The OHA clarified that a further CTMP would be required if 30% of panels were replaced within each of the three project areas individually (i.e. 30% of c.1/3 of the scheme). As such the applicant's modification of the oOMP [REP4-026] does not sufficiently address the OHA concerns on this issue. Table 3.1 - Noise impact. For clarity, the nearest Residential Receptors mentioned for assessment should be identified.</p> <p>Waste Whilst the OHA maintain the position that further detail regarding projected waste arisings, specifically in relation to waste types, anticipated timescales, and proposed management routes (particularly for the PV modules and piling) for construction, operation and decommissioning phases should be provided in advance of any decision, to enable a comprehensive assessment of the development's waste implications and to be able to plan for future waste requirements, we do acknowledge and support the newly proposed inclusions within the Operational Management Plan of the additional information on waste to be included within a future</p> <p>Waste Management Plan. In addition, we would welcome the inclusion of clear management routes alongside the measures identified for handling the waste within the Plan to be included. Furthermore, the proposed Waste Management Plan is expected to outline a programme detailing when waste will be generated during the operations and maintenance phase, we consider it essential that this programme explicitly identifies the types and volumes of waste, as well as the corresponding management routes, against a specified timeframe.</p> | <p>Waste The Applicant notes this comment, and confirms that the Operational Waste Management Plan will include a programme of when the wastes are likely to be generated, management routes, and volumes generated.</p> | Waste_and_resources |
| REP5-125 | Oxfordshire Host Authorities | <p>REP4-028 – 7.6.3 Botley West Outline Landscape and Ecology Management Plan (Clean) (Rev 3) OHA note the addition of a blanket-maintained height of new hedgerow of 3m. This does not account for the character of existing hedgerows or adjust to where there are views over the wider landscape. It is also noted at 8.7.4 that the addition of dense scrub areas adjacent to hedgerows for nightingale, could potentially impact on views and openness depending on location.</p> | <p>Please refer to the Applicant's response to REP4-041 in respect of hedgerow maintenance.</p> <p>It should be noted that the amended provision at Appendix C of the oLEMP now states:</p> <p><i>"Once grown hedgerows should be managed to a height of approximately 3m during operation, managed annually, accepting that hedgerows may be managed to a lower height (the locations and heights of which to be agreed in consultation with the Oxfordshire Host Authorities) in order to support important and/or more open views, provided such maintenance falls within the scope of the environmental assessment."</i></p> <p>5ha new woodland is proposed alongside creation of 26km new hedgerows. The existing agricultural fields will remain untouched by agricultural chemical input for several decades, see ISH2, 3c Ecology and Biodiversity [EN010147/APP/17.3]. The landscape will change, over time, as will views from PRowS. It should be noted that landscape is under constant change, due to changes in land use, patterns of planting and development. There are no designated key views identified in relation to the landscape surrounding the Northern and Centre sections of the Project.</p> | Landscape_and_Visual_Impacts |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
|--------------------------|------------------------------|---|---|--|
| REP5-125 | Oxfordshire Host Authorities | <p>REP4-030 – 7.6.4 Botley West Outline Decommissioning Plan (Clean) (Rev 1)</p> <p>Waste</p> <p>Whilst the OHA maintain the position that further detail regarding projected waste arisings, specifically in relation to waste types, anticipated timescales, and proposed management routes (particularly for the PV modules and piling) at the decommissioning phase should be provided in advance of any decision to enable a comprehensive assessment of the development's waste implications and to plan for future waste requirements, we do acknowledge the newly proposed inclusion within the Decommissioning Plan, to include a list of authorised processors and support this addition. We would be interested to know how adequate capacity assessment to manage the panels will be undertaken and whether the cumulative impacts of other solar farms will be included within this assessment.</p> | <p>The Applicant maintains its position that detailed waste information from the decommissioning phase cannot be provided at this stage, however the information will be included in the Decommissioning Waste Management Plan. The Applicant confirms that the Decommissioning Waste Management Plan will include a list of authorised waste processors and the capacity of their facilities. This Plan will be informed by an appropriate study of waste processors that will take into account other solar farms where necessary.</p> | Waste & resources |
| REP5-125 | Oxfordshire Host Authorities | <p>REP4-032 – 7.7 Outline Layout and Design Principles (Clean) (Rev 4)</p> <p>OHA consider this document needs further amendment to address OHA comments made at D3 [REP3-072]. It 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.</p> | <p>Noted. The Outline Layout and Design Principles Document (Rev 5) has been updated at Deadline 6 [EN010147/APP/7.7] to incorporate Table 6.4 of Chapter 6; Project Description, in order to include the details of fencing, lighting and CCTV.</p> | Project_description_and_Design_parameters |
| REP5-125 | Oxfordshire Host Authorities | <p>[REP4-037] Page reference 15</p> <p>The OHA re-affirm their position outlined on page 8 of [REP3-072] that a decommissioning bond is necessary to ensure that there are sufficient funds in place to allow the scheme to be decommissioned at the end of the operational lifespan of the scheme.</p> <p>The value of the assets on the site after the operational lifespan of the scheme will vary depending on the future markets which are impossible to predict with any certainty. A decommissioning bond provides a greater level of certainty that funds will be available for the decommissioning of the scheme. This is necessary as the applicant is relying on the temporary nature of the scheme to reduce the significance of several environmental impacts. Without the certainty of provided by a decommissioning bond, the OHA do not believe that the scheme can be considered temporary.</p> | <p>The Applicant's position on the need for a decommissioning bond is set out in part 5 of the Applicant's response to ExQ 1.1.16 [REP2-025] – specifically that, in the Oaklands Solar Farm decision, the Secretary of State noted that <i>'there is no policy requirement for a decommissioning fund to be imposed as paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments'</i>.</p> | Decommissioning |
| REP5-125 | Oxfordshire Host Authorities | <p>In addition, the table at 2.1.4 of the latest Cable Optionality Report dated August 2025 does not appear to include Arboriculture as a Topic and therefore it has not been demonstrated that trees and woodlands will be considered when designing the routes to avoid and reduce impacts.</p> <p>At 2.3.5 of the report, it states that 'This cable corridor follows the eastern perimeter of Bladon Heath, avoiding direct woodland intrusion but passing close to several ecological and arboricultural features, including mature trees, hedgerows, and a veteran tree protected under BS 5837 and the NPPF. To avoid trenching within the tree's root protection zone (RPZ), a Horizontal Directional Drilling (HDD) section may be required; the final decision on HDD use will be made in consultation with OCC'.</p> <p>However, without the detailed arboricultural survey and an updated detailed arboricultural impact assessment, an accurate assessment of the route of this cabling on the arboricultural features including a veteran tree cannot be made.</p> <p>The applicant is reminded of the following standing advice: 'For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area' (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-makingplanning-decisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort).</p> | <p>The northern and eastern edges of Bladon Heath Wood formed part of the extensive veteran tree survey [APP-164]. Alongside the results of the veteran tree survey, its designation as ancient semi-natural woodland has formed an integral part of the cable route option selection. A precautionary buffer which is >20m has been afforded to the cable route beside the woodland edge in these woodland edge locations. In parallel with the continuous 20m offset buffer, the cable route has been micro-designed in specific locations to avoid direct impacts upon specific veteran tree buffers (which have been calculated in accordance with the Natural England / Forestry England guidance). Note the curved arc shapes of cable route beside veteran trees ref: T47 (northeastern corner of Baldon Heath Wood), T50 & T51 (both on the eastern edge of the woodland).</p> | Trees_Plants_and_Flora |
| REP5-125 | Oxfordshire Host Authorities | <p>Cable Optionality Area 1 - Northern Site between the Oxfordshire Way, and B4027, south east of Wootton</p> <p>The area proposed by these two options were not assessed by the archaeological evaluations of the proposal. There are however located in an area of considerable archaeological interest with both options running alongside the Witney Ridgeway, recorded as Grundy's Road 3 and called Heh Street in the Shipton on Cherwell charted od AD 1005. Both options also cross the known line of Akeman Street, the Roman Road from Alchester to Cirencester. In addition, two parallel linear features have been recorded from aerial photographs from 1961 200m NE of these proposed cable routes. These features have been recorded as a possible Neolithic Cursus monument although a re-examination of the photographs does suggest they are likely to be a pre-medieval trackway, a continuation of which would cross the line of these proposed cable options.</p> <p>As such we cannot agree with the assessment in this document (EN010147) which states that no heritage assets would be affected. This area would need to be subject to further evaluation and mitigation, including preservation in situ of any significant remains as set out in the submitted overarching written scheme of investigation.</p> | <p>The Applicant has committed to the undertaking of a programme of archaeological evaluation along all cable routes prior to the commencement of construction. This evaluation would include trial trenching and possibly geophysical survey if this is possible. The commitment is set out in paragraph 1.6.3(3) of the Outline Written Scheme of Investigation (Rev 3) [CR2-053] and is therefore secured through Requirement 10 of the DCO (Rev 7) [CR2-009].</p> <p>The text of paragraph 1.6.3(3) of the Outline Written Scheme of Investigation (Rev 3) [CR2-053] explains that, where possible, impacts on archaeological remains would be avoided or reduced through the implementation of specific construction methodologies. Where this is not possible, detailed archaeological investigation would be undertaken ahead of construction.</p> | Cable_Routes |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| REP5-125 | Oxfordshire Host Authorities | <p>Cable Optionality Area 2 - Area between the Northern and Central Sites on land to the east of Woodstock and in the vicinity of the Bladon roundabout on the A44</p> <p>Option 1 – This area was not subject to the archaeological evaluation and as such the archaeological potential of the site is unknown. The proposed route is however located in an area of archaeological interest and an area of prehistoric settlement has been recorded adjacent to the southern part of this option (HER PRN 28571). This route option therefore has the potential to impact archaeological features related to this settlement and to impact previously unrecorded archaeological deposits along the route.</p> <p>Option 2 – this proposed route also has the potential to impact on the area of prehistoric settlement recorded adjacent to its southern end. The section along Shipton Road also runs immediately north of archaeological features (HER PRN 28750), identified from a geophysical survey and trenched evaluation undertaken as part of a housing application which form a continuation of the scheduled Blenheim Villa (SM 35545).</p> <p>As such we cannot agree with the assessment in this document (EN010147) which states that no heritage assets would be affected. This area would need to be subject to further evaluation and mitigation, including preservation in situ of any significant remains as set out in the submitted overarching written scheme of investigation.</p> <p>Whilst the applicant has set out how assumptions about use of habitats by bats have led to retention of ecological features, the information needed to identify key flight lines (and therefore areas which are likely to require additional buffering) have not yet been provided so have not been able to inform design. We maintain concerns that the lack of survey for riparian mammals has not been undertaken and therefore cannot inform design (for example wider buffering to avoid disturbance should an otter holt or resting place be present).</p> | <p>The Applicant has committed to the undertaking of a programme of archaeological evaluation along all cable routes prior to the commencement of construction. This evaluation would include trial trenching and possibly geophysical survey if this is possible. The commitment is set out in paragraph 1.6.3(3) of the Outline Written Scheme of Investigation (Rev 3) [CR2-053] and is therefore secured through Requirement 10 of the DCO (Rev 7) [CR2-009].</p> <p>The text of paragraph 1.6.3(3) of the Outline Written Scheme of Investigation (Rev 3) [CR2-053] explains that, where possible, impacts on archaeological remains would be avoided or reduced through the implementation of specific construction methodologies. Where this is not possible, detailed archaeological investigation would be undertaken ahead of construction.</p> <p>An updated ES Appendix 9.4 Bat Survey Report [EN010147_APP_6.5 Rev 2] and Bat Technical Note [EN010147_APP_15.6 Rev 2] have been submitted at Deadline 6. These incorporate additional work undertaken during 2025 to help provide IPs with further clarity with respect to buffer location and design.</p> <p>The Applicant has updated section 1.10.5 of the oCoCP [CR2-045] to incorporate specific reference to the completion of riparian mammal surveys, as necessary, pre construction.</p> | Historic_Environment |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.3.6 Page 22</p> <p>We continue to support the use of a wider buffer to ancient woodlands (at least 50m in line with best practice, as opposed the minimum 15m buffer). Please see comments also in relation to Q2.3.5 and lack of survey for riparian mammals.</p> | <p>As set out in section 8.1 of the oLEMP [CR2-051], all ancient woodlands will have extended 25m buffers. This is in excess of the government and Natural England recommended minimum of 15m (here). It should be noted that the OHA's own guidance references the same 15m (for example, VWH here) so the Applicant fails to understand the OHA's position.</p> <p>The Applicant has updated section 1.10.5 of the oCoCP [CR2-045] to incorporate specific reference to the completion of riparian mammal surveys, as necessary, pre construction.</p> | Local_Ecology_and_Nature |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.4.5 Page 26</p> <p>The answer to this question relates to the response to question 2.4.3 above. The applicant's response does not take into account any extreme value analysis, which would include a review of the likelihood of extreme situations such as 90mph winds or intense rainfall, rather than solely assuming a change in average weather conditions. The current level of climate vulnerability assessment is not sufficient to completely rule out the possibility of high winds and storm activity in excess of the manufacturer's specification of the panels.</p> | <p>The applicant notes this comment and has provided a response in the Applicant's Response to ExA's Rule 17 letter, as part of the Deadline 6 response [EN010147/APP/17.8].</p> | Climate_Change |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.4.7 Page 27</p> <p>The applicant's response does not directly address the point about whether these mitigations or manufacturing standards were used in the instances of damage to other solar farms raised by the ExA during ISH1. It is not clear whether the mitigations referenced in [REP1-019] are the same as, or in excess of, the mitigations taken on the solar farms referenced by the ExA.</p> | <p>The applicant notes this comment and has provided a response in the Applicant's Response to ExA's Rule 17, as part of the Deadline 6 response [EN010147/APP/17.8].</p> | Climate_Change |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.6.3 Page 37</p> <p>The OHA acknowledge the response of the applicant to the suggested project amendments made by ICOMOS UK.</p> <p>The applicant's response to the ExA's Second Written Questions states that the understanding of the contribution of the wider rural setting of the WHS to the identified Outstanding Universal Value OUV therefore requires consideration of the physical extent of the 'traditional English countryside and villages' within the setting of the WHS, i.e. at what point does the rural landscape cease to become a relevant or material part of the setting of the WHS?</p> <p>This is a point that the OHA have sought to emphasise through previous representations including the Local Impact Report. The OHA consider that the wider setting of heritage assets such as Blenheim Palace WHS includes the topography, natural and built environment, land use and visual relationships, social and cultural practices and more intangible dimensions such as perceptions and associations. Management of the wider setting is important in supporting the outstanding universal value of the World Heritage Site.</p> | <p>The Applicant would refer to its response to the second ICOMOS Technical Review [REP4-052] which is set out in the Applicant's Responses to other D4 submissions and comments on Interested Parties' Responses to ExA's Second Written Questions (ExQ2) submitted at D4 [REP5-005], and also to the updated Heritage Impact Assessment submitted in response to Change Request 2 (ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2-036]).</p> | Historic_Environment |

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| | | <p>The setting of Blenheim Palace WHS is not clearly defined and it does not benefit from the protection that a buffer around the WHS would provide. A degree of policy protection for the setting of the WHS is provided by the Cotswold National Landscape, Conservation Areas and Green Belt, but cumulative developments within the setting of the WHS threaten the Outstanding Universal Value of the Blenheim Palace WHS. Planned developments in West Oxfordshire such as Salt Cross Garden Village which is referenced by the Applicant in their response to ExAQ2 are situated outside of the Oxford Green Belt,</p> <p>The OHA have previously drawn attention to an ICOMOS Technical Review (appended to the West Oxfordshire's Relevant Representation [RR-1102]) which highlights concerns about cumulative development within the setting of Blenheim Palace WHS and threats to the OUV in the absence of a buffer.</p> <p>The OHA wish to draw attention the updated Technical Review submitted by ICOMOS [REP4-052] which further explores the impacts of cumulative development on the OUV of Blenheim Palace WHS with specific reference to the Botley West Solar Farm proposed development.</p> <p>ICOMOS considers that the revised Heritage Impact Assessment continues to fall short of the standards set out in the 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context. While the Heritage Impact Assessment presents a structured analysis, it remains narrowly focused on visual impacts and does not demonstrate a sufficient understanding of how the wider setting of Blenheim Palace supports the Outstanding Universal Value of the property.</p> | | |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.6.9 Page 41 / Q2.6.10 Page 42</p> <p>The applicant indicates that the assessment of impacts and effects on the significance of a heritage asset as a result of change within its setting is largely subjective. In the case of the Church of St Peter and St Paul, Church Hanborough (Grade I), the setting makes a reasonable contribution to the heritage significance of the church, with the greatest contribution coming from the enclosing churchyard. The wider landscape which provides the longer views in which the church spire is visible is still considered to be part of the setting, but of reduced significance in comparison with the churchyard. Elements of the Project would be visible in the foreground and middle ground of such views and consequently the setting of the church as experienced in these views would change from the predominantly rural situation as at present.</p> <p>This change from a rural to an industrial setting would be the same as that as experienced at the Church of St Peter, Cassington (Grade I).</p> <p>The OHA acknowledge that the project would not impact the fabric of the Listed Building or affect the immediate setting but maintain that the heritage significance of the church would be harmed as a result of the change in longer views towards the church from the wider landscape.</p> <p>The OHA recognise that such harms are likely to be regarded as less than substantial in NPS terms and that impacts must be weighed against the public benefits of the proposal. In this regard, the OHA consider that similar harms to other heritage assets of the highest significance, e.g. Church of St Peter, Cassington (Grade I) should be weighed in the balance, particularly as the countryside landscape setting of these heritage assets also contribute to the setting of the Blenheim Palace World Heritage Site.</p> | <p>The Applicant's assessment of impacts and effects resulting from changes within the settings of heritage assets is set out in ES Appendix 7.5: Settings Assessment (Rev 3) [CR2-038].</p> <p>The Applicant welcomes the OHA's confirmation that any harm to the significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough and the Grade I listed Church of St Peter at Cassington would comprise 'less than substantial' harm in terms of national planning policy as set out in the National Policy Statements (NPSs) and the National Planning Policy Framework (NPPF).</p> <p>The relevant policy test is therefore the one set out in paragraph 5.9.32 of NPS EN-1 (the Overarching National Policy Statement for Energy): <i>Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.</i></p> <p>With regard to the public benefits of the proposed solar farm, paragraph 3.3.8 of NPS EN-3 (Renewable Energy Infrastructure) addresses the issue of National Designations in terms of factors influencing site selection and design:</p> <p><i>In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether it is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target.</i></p> | Historic_Environment |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.7.6 Page 60</p> <p>OCC appreciate that different approaches to highways agreements have been followed in different DCO applications and, in principle, would be content to enter into an agreement made under the Order itself provided it is based on OCC's template section 278 agreement. OCC officers are obviously familiar with the document and would not wish to depart too far from it for the purposes of one project only.</p> <p>Certain OCC officers had understood that a copy of this document had been shared with the Applicant and, since this appears not to be the case, a copy has now been provided. OCC would welcome discussions, as soon as possible, with the Applicant on the document and how they envisage it applying to the proposed highways works. In terms of securing a commitment to enter into a highways agreement, OCC consider it would be clearer if such a commitment were included in the Order itself. Such an approach is precededented in article 23(3) of the Sizewell C</p> | <p>The Applicant met with the OHAs, including OCC, on 14 October 2025. This included discussions on the approach to highways works and relevance of s278 agreements, amongst various other matters.</p> <p>In response to the OHA's concerns:</p> <ul style="list-style-type: none"> The Applicant updated the Construction Traffic Management Plan (CTMP) at earlier deadlines to add commitments for the Applicant to enter into a highways side agreement for certain works. At Deadline 6, the Applicant has expanded this commitment to include the need for the Applicant to enter into | DCO_Process |

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| | | (Nuclear Generating Station) Order 2022 (SI 2022/853) and is also being followed by the promoter of the Fenwick Solar Farm Order in article 16(3) of its draft DCO [REP5-006]. (The Fenwick examination has recently closed). | <p>a highways side agreement to deliver reinstatement works in the event that the Applicant must carry out cable works after OCC has completed its A40 improvement works.</p> <ul style="list-style-type: none"> Article 9(4) sets out that “<i>The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority</i>”. This, along with Article 14 (Agreements with Street Authorities), ensures that the preferred s278 template of OCC can form the basis of discussions for the highways side agreements to be entered pursuant to the CTMP obligations. It is not necessary or appropriate for the Applicant to include an obligation to enter into a highways side agreement on the face of the DCO as this would unnecessarily duplicate the obligation(s) which already exists in the CTMP. The obligation to enter highway side agreements is set out in the outline CTMP, which is included as part of the Code of Construction Practice under Requirement 11 of Schedule 2 of the draft DCO. This obligation is therefore secured and legally enforceable already. | |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.7.9 Page 65</p> <p>Whilst OCC is pleased with the applicant's amendment of the Conceptual Drainage Strategy to ensure that the LLFA is collaborated with in the development of a Surface Water Drainage Strategy, there is no provision within the DCO to ensure that the LLFA are adequately resourced for this collaboration. As was raised in at page 184 of the joint LIR [REP1-072] the DCO only make provision for a fee to discharge requirements (which the OHA has outlined is insufficient to cover the resourcing required to discharge the requirements). The councils also raised the issue that work not covered by the requirements is not covered by the fees proposed in schedule 16 at all. As such, for the LLFA to be able to collaborate with the applicant to develop a Surface Water Drainage Strategy, the DCO would need to make provision to cover the costs of this collaboration with the LLFA. The OHA have indicated how a PPA secured via Schedule 16 of the DCO would be the most appropriate means of ensuring the councils are adequately resourced to undertake this additional work at page 184 of the joint LIR [REP1-072].</p> | <p>In response to the OHA's general concern that the DCO does not adequately secure that the OHAs will be resourced in discharging requirements pursuant to Schedule 16, the Applicant has updated paragraph 5 of Schedule 16 of the draft DCO at Deadline 6 to include more substantial fee recovery provisions. Paragraph 5 now sets out the precise fees to be paid to relevant planning authorities in respect of different kinds of applications to discharge requirements. Including:</p> <ul style="list-style-type: none"> First application for the discharge of each of the requirements 5 (Detailed design approval), 6 (Landscape and ecology management plan), 7 (Biodiversity net gain), 9 (Surface and foul water drainage), 11 (Code of Construction Practice), 12 (Operational environmental management plan), and 14 (Decommissioning and restoration) – £2,535 Each subsequent application for the discharge of each of the requirements listed in Row 1 – £578 Any application under requirement 5 (Detailed design approval) in respect of the requirements listed in Row 1 – £578 Any application for the discharge of any other requirements not listed in Row 1 – £145 Any application under requirement 3 (Approved details and amendments to them) in respect of requirements not listed in not listed in Row 1 – £145 Any approval required by a document referred to by any requirement or a document approved pursuant to any requirement – £145 <p>Note, the definition of “discharge” in paragraph (1) of Schedule 1 confirms that these fee provisions relate to: (a) a requirement; (b) a document referred to by a requirement; or (c) a document that has been approved pursuant to a requirement.</p> | Hydrology_and_Flood_risk |

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| | | | <p>This wording aligns with precedent in the West Burton Solar Project Order 2025 and Tillbridge Solar Project Order 2025.</p> <p>In response to the OHA's specific request for fees to be recoverable for its role in collaboration with the Applicant in relation to the detailed surface water management strategy, the Applicant rejects this as it does not consider this to be reasonable or necessary. This is justified on the basis of the below:</p> <ol style="list-style-type: none"> (1) The protective provisions for the benefit of the drainage authority at Part 3 of Schedule 15 include provisions that require the undertaker to 'make reasonable compensation for costs, charges and expenses which the drainage authority may reasonably incur'; as well as to 'make reasonable compensation for liabilities, costs and losses which may be reasonably incurred or suffered', in relation to the specified work (as defined in those protective provisions). In other words, to the extent costs are incurred by the LLFA in its role as drainage authority, costs are already recoverable as appropriate under the protective provisions; (2) The LLFA does not benefit from the fees provisions of the Infrastructure Planning (Fees) Regulations 2010 (as amended by The Infrastructure Planning (Fees) (Amendment) Regulations 2024); (3) The updated fees provisions at paragraph 5 of Schedule 16 ensures that the LLFA (where OCC is the relevant planning authority) will be able to recover of fees incurred in discharging a requirement. This ensures fees incurred in discharging Requirement 9 (Surface and foul water drainage) are reasonably recoverable already. It's worth noting that Requirement 9 is listed in Row 1 and therefore £2,535 is recoverable for the first application for the discharge of Requirement 9; and (4) As a point of principle, the Applicant has included an obligation in the Conceptual Drainage Strategy to produce its detailed surface water management strategy in collaboration with the LLFA for the benefit of the LLFA. This has been added in response to a request from the LLFA to be involved in the process, therefore it is not reasonable for the Applicant to have to pay for those fees specifically if not already covered in the general fee provisions of Schedule 16 or otherwise caught under the protective provisions. | |
| REP5-125 | Oxfordshire e Host Authorities | <p>Q2.7.16 Page 71</p> <p>An Arboricultural Impact Assessment (AIA) should be provided for this to demonstrate accurately the impact of these works to the ancient woodland, considering recommendations on buffers. There appears to be space for the compound to be relocated to ensure greater buffer.</p> <p>From an arboricultural perspective, in relation to the HDD tunnelling, where possible, this should also avoid buffer zones. Therefore, it is advised that all options should be considered to relocate the route to avoid buffers to the ancient woodland. It is acknowledged that HDD tunnelling is a method to reduce arboricultural impacts and at a depth of around 9m and in this location where it appears to be under a road, it is unlikely to lead to root disturbance. However, further evidence in the form of an Arboricultural Impact Assessment and Arboricultural Method Statement would be required to demonstrate the method and impact accurately, including the precise locations of entrance and exit holes.</p> | <p>At detailed design, opportunities to micro-design the HDD compounds are present, once the precise engineering and layout details are procured, land surveyed and constraints assessed in greater detail. This will allow the avoidance of direct impacts upon trees and woodland buffers. Detailed tree surveys in this location will be tasked which will inform the detailed designs, and appropriate root protection areas and construction buffers will be assigned to the 'drive' & 'reception' HDD pits. Both locations lie within agricultural fields, which lie beyond the existing road (northern location) and far into the southern field, well beyond the woodland buffers.</p> <p>At this stage the submitted Strategic AIA provides a framework and tree protection guide for the protection of trees and woodlands in these types of instances.</p> | Trees_Plants_and_Flo ra |

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| REP5-125 | Oxfordshire Host Authorities | <p>Q 2.8.9 Page 77</p> <p>It is appreciated that the applicant has given further consideration to effectiveness of proposed mitigation for loss of skylark breeding habitat. However, we have some concerns with the assumptions made in the Skylark Technical note which used the following perimeters to determine where might support skylark:</p> <ul style="list-style-type: none"> Greater than 50m from hedgerow, tree, woodland and solar infrastructure (including fence lines) (i.e. area is away from any location where avian predators may perch); Grassland habitat; and >16m² in area. <p>However, Government guidance AB4: Skylark Plots [https://webarchive.nationalarchives.gov.uk/ukgwa/20250604003130/https://www.gov.uk/countryside-stewardship-grants/skylark-plots-ab4] indicates that fields supporting Skylark plots (and therefore it is assumed suitable to support breeding skylark) should be more than 5ha in size if they have an open aspect or >10ha if bounded by trees or woodland. A large proportion of the land parcels listed in Table 1.3 of annex 6 are less than 5ha in size – further detail is needed to understand if these areas are bounded by trees or woodland before it can be assumed they will be suitable to support skylark. It is also unclear whether these areas (particularly those in the Evenlode Corridor) currently support skylark and therefore to what extent their capacity to support skylark might be increased through habitat management.</p> <p>We also question the assumed density of skylark territories of 0.46/ha (equivalent to a spring sown crop) when it is reported that these areas will be managed as meadows (a type of natural grassland) which have a reported skylark territory density of 0.27/ha (see CIEEM In Practice issue 117 September 2022 pp47-51 available at https://webarchive.nationalarchives.gov.uk/ukgwa/20250604003130/https://www.gov.uk/countryside-stewardship-grants/skylark-plots-ab4) indicates that fields supporting Skylark plots (and therefore it is assumed suitable to support breeding skylark) should be more than 5ha in size if they have an open aspect or >10ha if bounded by trees or woodland. A large proportion of the land parcels listed in Table 1.3 of annex 6 are less than 5ha in size – further detail is needed to understand if these areas are bounded by trees or woodland before it can be assumed they will be suitable to support skylark. It is also unclear whether these areas (particularly those in the Evenlode Corridor) currently support skylark and therefore to what extent their capacity to support skylark might be increased through habitat management.</p> <p>Additionally, it noted that in calculating the potential number of breeding skylark that could be supported there is reliance on provision of the increased foraging opportunities within the solar farm boosting the carrying capacity of surrounding fields 3 fold, and an assumed existing number of territories in the surrounding fields (which has not been confirmed). As previously stated, skylark plots are designed to increase foraging within a winter sown crop, and it is unclear how effective they will be within a solar farm (with the height of the solar panels potentially a deterrent to access by skylarks).</p> <p>We consider that a requirement for a farmland bird strategy would allow more detailed consideration of suitable measures both on and off-site to maintain the skylark population during operation of the solar farm, we maintain our concern that many of the grassland areas (e.g. the archaeological areas) within the site are likely too small to support breeding skylark.</p> | <p>Although skylark do preferentially nest in open aspect fields, the AB4 guidance is for the provision of skylark plots and it is not an absolute that skylark will not nest in grasslands <5ha in size. All of the plots identified in the technical note are within grassland that is, by definition >100m across, 50m in all directions from any hedgerow/panel etc.</p> <p>The presence of an existing population of skylark within the Project site (including the Evenlode) has been considered during the assessment of territory numbers as it was included in the two years of surveys undertaken to support the Project baseline. Any territories present in these areas therefore fall within those to be mitigated.</p> <p>The density of skylark territories used (0.46/ha) is used as the grasslands will be managed to ensure that they are optimal for skylark, considering their ecology. Spring wheat supports high numbers of skylark not because it is spring wheat per se but because it has the right combination of vegetation structure and prey abundance that skylark require. The grasslands within the Project site to be managed for skylark will be similarly established and managed and, as such, the higher territory density is appropriate.</p> <p>Note that even this territory density does not account for the fact that the grassland within the Project site will be managed to allow skylark to raise multiple broods through the whole breeding season, something that spring wheat may not if a farmer harvests in July, for example.</p> <p>Notwithstanding the above, in order to provide additional clarity with respect to how the grasslands to support skylark will be managed, the oLEMP has been updated (sections 8 and 11 in particular) at Deadline 6. The AB4 guidance is for the provision of skylark plots, it is not</p> | Local_Ecology_and_Nature |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.9.5 Page 84</p> <p>The applicant states 'It is not the Applicant's intention to make wholesale changes to the LVIA methodology, as this has been produced based on best practice guidance, contained within GLVIA3 and clarified in LI TGN 2024 01, as agreed with the OHA.'</p> <p>Whilst the OHA agree that GLVIA3, as clarified in LI TGN 2024 01, is best practice guidance, this does not translate to agreement of the applicant's methodology. In paragraph 1.2.29 of the applicant's response to the OHA's response to the Rule 17 Letter [REP3-066] the applicant stated, 'The Applicant's Position – The use of the National Highways Standard significance of effects matrix (DMRB LA104, Table 3.8.1) adapted to reflect LVIA terminology (Table 8.12 of APP-045) is appropriate for the Botley West Solar Farm project.' The OHA remain concerned about the use of the Design 'Manual for Roads and Bridges (DMRB) LA104 for a solar development.</p> | <p>The Applicant response stated that the referred matrix was recently used and tested at the Mona Offshore Wind Farm (Mona) DCO Examination. This particular matrix and its ratings scale are widely used in the industry and do not deviate from generally used LVIA/ EIA matrices, where medium sensitivity combined with medium magnitude results in moderate significance. Ratings below are considered not significant and significant if above 'moderate'. The specificity concerning LVIA is that a moderate rating can be construed as significant or not significant based on professional judgment. This is in line with the LI TGN2/19. It should be noted that GLVIA3 explains that while matrices are effective in complementing the text of the LVIA, they should not be relied upon. 'Tables and matrices should be used to support and summarise descriptive text, not to replace it.' (GLVIA3, paragraph 3.36)</p> | Landscape_and_Visual_Impacts |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.10.2 Page 87</p> <p>As set out in our response to this question [REP4-074]:</p> <p>Flood modelling for the ordinary watercourses was reviewed by a consultant on behalf of the Host Authorities. This review was of the hydraulic modelling reports only and did not undertake model rerunning or development of its own modelling.</p> <p>Hydraulic models are a simplified representation of real-world processes, and therefore there are assumptions and limitations. This includes representations of features, landform and calculations to represent the different flood events. The modelling included sensitivity to downstream boundary and information on the operation of the sluices. The conclusions from the review were that the model for the existing flooding from the ordinary watercourses would require further, more detailed work:</p> | <p>The hydraulic modelling of the River Evenlode and its tributaries has been removed from the updated Flood Risk Assessment (Revision 1) [REP3-020]. Instead, all development has been conservatively steered to areas of Flood Zone 1. This approach was agreed with the Environment Agency as part of the core design objectives for the Project, and reflected in Annex 4 of the Applicant's note on design appended to responses to ExA Q2 [REP4-037].</p> | Hydrology_and_Flood_risk |

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| | | <ul style="list-style-type: none"> to cover the potential for validation/calibration from sourcing any known flood incidents and; further testing of the sluice operation and its impact on the flood risk and to understand a worst-case scenario. | | |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.10.3 Page 88</p> <p>It is good practice to have information on the ground conditions including infiltration tests during a pre-application stage when relying on this method to drain the site. This would include infiltration testing across different areas of the site boundary to identify any localised conditions. This information then supports the design at the preliminary stage and supports assumptions on the suitability of the proposed strategy. This was identified in out LIR [REP1-072] 001-76 para 7.5.15 with reference to OCC's Relevant Representation [RR-0793].</p> | The Applicant agrees to undertake targeted infiltration testing to support the preliminary design. | Hydrology_and_Flood_risk |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.11.12 Page 97</p> <p>The OHA do not consider that the response provided by the applicant adequately addresses our previous comments on the definition of openness. Openness has not been explicitly assessed in the LVIA. Whilst the OHA recognise that the Green Belt assessment touches on the issue of openness the LVIA does not assess the impact of the proposals on openness as an aspect of landscape.</p> | <p>The background evidence document to the adopted WODC Local Plan, prepared by LDA Design, 'Renewable Energy And Low Carbon Energy Assessment And Strategy For West Oxfordshire' (2016), advises for example that Battery facilities are inappropriate development in the green belt and as such very special circumstances will need to be demonstrated by developers, as inevitably some loss of openness will occur depending on the scale, height and density of the facility.</p> <p>With regard to the solar and wind farm development, the study provides susceptibility ratings for all LCTs within West Oxfordshire. Providing spatial guidance on the siting of renewables the assessment draws on the key characteristics and development sensitivities of the underlying LCTs. According to the assessment the Project areas fall within the LCTs less susceptible to solar farm development. See Section 2.12.2 of the LDA Report in particular, and the Summaries of Suitability and Susceptibility of Oxfordshire LCAs to Solar Farm Development.</p> <p>The definition of openness is Green Belt terminology. It should be noted that Green Belt is not a landscape designation.</p> | Landscape_and_Visual_Impacts |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.11.13 Page 98</p> <p>OHA continue to disagree with the applicant that the economic, education and sustainability benefits from the proposed development amount to Very Special Circumstances (VSC) to justify inappropriate development in the Oxford Green Belt. Such benefits can be achieved on land outside of the Green Belt and limited or no weight should be attributed to these VSC.</p> | A VSC should not be excluded just because it is capable of being delivered elsewhere. Any matter is capable of being a VSC, but the Applicant has included this as a VSC for the Project because of the unique nature and scale of the benefits that will flow from it. The Applicant and OHA's may disagree on the weight to be attached to this VSC, but it nevertheless cannot be disregarded. In the Applicant's view significant weight should be attached to this VSC as identified in the Green Belt Annex to the Planning Supporting Statement [REP1-012] and as updated at this Deadline 6, in Appendix 5 to the NPPF compliance table and other policy context note [EN010147/APP/17.9]. | Green_Belt |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.13.15 Page 112</p> <p>The Glint and Glare Study area considered dwellings that where within the one-kilometre assessment area and have a potential view of the panels. 699 dwellings have been assessed which is considerably different in scale to the 18 number listed in the response to Q2.13.15.</p> | The Glint and Glare Study identifies dwelling receptors at any locations where dwellings are present within 1km of the PV areas and south of the northmost PV areas. Whilst the process allows for areas to be excluded at this stage where it is clear that no views will be possible, in practice a cautious approach is taken and all dwellings within 1km of the PV areas were modelled in this assessment. Visibility of the site was then considered later in the process, in conjunction with consideration of the geometric modelling output. | Glint_and_Glare |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.16.6 Page 126</p> <p>OCC: It is acknowledged that the applicant would be responsible for maintaining the new permissive paths and cycleways, including associated landscaping and hedgerow planting within the Project site throughout the construction, operation and maintenance and decommissioning phases. The applicant however has not answered who is responsible for managing/maintaining diverted PRoW.</p> | The Applicant would be responsible for maintaining and reinstating the temporary diversions of PRoW during the construction phase of the Project. | Public_Right_of_Way |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| | | | <p>Specific protections are included within the DCO provisions, namely Article 11 (Temporary closure of streets or public rights of way) for example:</p> <ul style="list-style-type: none"> Sub-paragraph (2) – “<i>The undertaker must provide reasonable access for pedestrians going to or from premises abutting a street or public right of way affected by the temporary closure, prohibition, restriction, alteration or diversion of a street or public right of way under this article if there would otherwise be no such access.</i>” Sub-paragraph (4) – “<i>the undertaker must not temporarily close, prohibit the use of, authorise the use of, restrict the use of, alter or divert— (a) any street or public right of way specified in paragraph (3) without first consulting the street authority; and (b) any other street or public right of way without the consent of the street authority, and the street authority may attach reasonable conditions to any such consent.</i>” <p>No permanent diversions of PRoW are proposed following the submission of Change Request 2.</p> | |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.17.2 Page 129 Bill of Quantities</p> <p>We do acknowledge the content of the ES Chapter 18 [APP-055] and the changes to the Operational Management Plan and Decommissioning Plan to include greater detail and timeframes for waste arisings and management in the future, and we support the provision of this information. However, a clear bill of quantities remains the most suitable approach for establishing the quantities and types of waste management required over the duration of the project to be able to assess the developments impacts. For example, in Q2.7.8 of [REP4-037] the applicant states that no more than 30% of panels will be replaced in single year. If there are two million PVs on site, this could be 600,000 PVs being removed and requiring waste management each year over a 5-year period, which is a significant waste stream. This conflicts with the information within the ES Chapter 18 [APP-055] which sets out that estimates of 31,500 PVs to be recycled annually. A clear bill of quantities would address these types of conflicts and enable full assessment of the waste arisings and management of the development.</p> | <p>The Applicant confirms that the waste types and estimated quantities presented within the ES Chapter 18: Waste and Resources [APP-055] are correct. The Applicant's position regarding replacement of panels is set out in paragraph 2.3.2 of the Outline Operational Management Plan, which states that any large-scale replacement of panels will be phased over a minimum of five years and distributed spatially. The extent of replacements each year will depend on the level of works required. The Applicant has updated the Outline Operational Management Plan at Deadline 6 to include an annual replacement schedule.</p> | Waste_and_resources |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.17.3 Page 129 Future Waste Management</p> <p>As above, we do acknowledge the content of the ES Chapter 18 [APP-055] and the information within these sections. Waste arising types and quantity projections over the duration of the development, even if only estimates, alongside clearly defined management routes, rather than just recycling for example, should be set out ahead of any decision being made. It should also be established whether there is current and expected capacity to manage these arisings. If all PVs are to be replaced at least once in the next 38 years of the development, that is potentially 4, 000,000 PVs entering the waste stream over the proposed duration of this development. How this is to be managed should be considered and assessed. The applicant has responded that there are existing facilities within the UK to manage end of life PVs. It needs to be established if these have capacity to manage up to 4 million PVs and if not, how many new facilities are required. In addition, if the development is approved, as the panels are to be replaced throughout the development life, a list of processors and the management route for the waste arisings should be established and updated in the Operational Management Plan, not just the Decommissioning Plan.</p> | <p>The Applicants have committed to recycling replacement solar panels (see the Outline Operational Management Plan) and has provided the estimated waste quantities in ES Chapter 18: Waste and Resources [APP-055]. The Applicants notes that there is existing infrastructure in place within the UK to recycle end-of-life solar panels and that work is underway to support the number and capacity of such recycling facilities.</p> <p>The Applicant confirms that a list of authorised reproprocessors will be provided within the Operational Waste Management prior to operational phase of the Project and that the list of reproprocessors will be kept up to date during operation.</p> | Waste_and_resources |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.17.5 Page 130</p> <p>It is considered that the ES Chapter 18: Waste and Resources [APP-055] does not adequately explore existing waste management facilities to handle operational waste, in particular facilities to potential manage and recycle the 2million PV Solar Panels that are replaced during the operational phase.</p> | <p>The Applicant refers to its response to Oxfordshire Host Authorities' submission REP3-072 [REP4-038] regarding the capacity of existing waste management facilities to recycle solar panels.</p> | Waste_and_resources |
| REP5-125 | Oxfordshire Host Authorities | <p>Q2.17.8 Page 132</p> <p>In the latest response [REP4-037] the applicant has now only committed to full removal of all “above ground” infrastructure. Below ground infrastructure will only be removed “where feasible and appropriate” and that “where</p> | <p>The Applicant has confirmed, in line with the Decommissioning Plan Revision 2, submitted at this Deadline 6</p> | Waste_and_resources |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| | | <p>full removal is not practicable, these will be cut to 1m depth". They also only refer to cables within mineral safeguarding areas, not the impact of the piles.</p> <p>As the solar panels extend across the minerals safeguarding area—not just the cabling—the installation of support structures for the PV's necessitates extensive piling within the safeguarded minerals area. As previously set out in our response to the Examining Authorities First Written Questions [REP2-050] this could have significant impact on the mineral safeguarding area as it leaves potentially considerable quantities of 2m steel piles in the ground, as it is understood each panel requires 4 piles. This could significantly damage any future mineral resource viability, thereby potentially sterilising the resource.</p> <p>In their response the applicant has now also confirmed that they are also not intending to remove the HDD cabling where they fall on mineral safeguarding areas, following decommissioning. The implications of these cables would then need to be assessed by any future mineral operator prior to extraction in the area, which could reduce viability even further.</p> | <p>[EN010147/APP/7.6.4], that the intention is for all piles to be removed.</p> <p>The wording outlined within the previous response [REP4-037] referring to 'where feasible and appropriate', relates to the extremely unlikely case that a pile gets stuck during removal.</p> <p>As per previous Applicant response to Examining Authorities Second Written Question (ExQ2), the presence of the HDD cables are not considered to significantly impact any future extraction of the wider area, and are to be located for the purposes of protecting existing sensitive surface features and watercourses. Buffers associated with those sensitive features will already preclude mineral extraction in these buffer areas. Buffers also associated with areas prone to flooding in close proximity to main watercourses will also preclude mineral extraction in such areas, unless significant dewatering control measures were adopted. In some cases, the HDD cables may also run parallel with field boundaries and are therefore likely to fall within, or close to, structural integrity buffers that would need to be adopted around each excavation, to ensure suitable and safe excavation slopes and battering (if needed) can be established.</p> | |
| REP5-125 | Oxfordshire Host Authorities | <p>REP4-038 – 14.3 Applicant's Responses to other Deadline 3 Submissions</p> <p>The OHA make the following comments but please note that these are not exhaustive and in some cases the issues arising have been referred to in the table above.</p> <p>Page 6 – Waste - see our previous responses to the Applicant's Responses to ExA's Second Written Questions (ExQ2) (Rev 0) Part 1. Whilst we acknowledge that this development is not the only source of solar panels in Oxfordshire, currently this is the largest development with potentially the use of over 4 million solar panels, therefore producing the most amount of solar panel waste in Oxfordshire, if not the UK. To be able to plan successfully for these arisings the Waste Planning Authority require details on waste types, management route required and timings, even if only estimates. That has not been provided for Botley Solar Farm application.</p> | <p>The Applicant has provided waste types and estimates within ES Chapter 18: Waste and Resources [APP-055]. Detailed information on construction waste quantities and types will be confirmed during detailed design. The Applicant has committed to providing the operational and decommissioning waste including management of wastes within the Operational Waste Management Plan and Decommissioning Waste Management Plan.</p> | Waste_and_resources |
| REP5-125 | Oxfordshire Host Authorities | <p>REP4-038 – 14.3 Applicant's Responses to other Deadline 3 Submissions</p> <p>Page 7 - Minerals Safeguarding. OCC comments to deadline 3 submission relate to the use of secondary and recycled aggregate and the requirement for primary aggregate. The response provided by the applicant does not correlate to the points made by the Minerals Planning Authority. However it should be noted and from evidence within the MRA [APP-195], alongside evidence within BGS Brit Pits data, that Mineral resources can be found at varying depths across the proposed area located within the Minerals Safeguarding Area, and in addition there was an active working in close proximity to the proposed site, Therefore the comment that there are no reserves is considered incorrect.</p> | <p>Whilst it is noted from the listed available information that there is a potential mineral resource at the site, this does not automatically constitute an economically viable reserve, given that superficial deposits are generally highly variable in nature and thickness. In the case that a reserve was proven across the Mineral Safeguarding Areas that fall within the Proposed Development, the Proposed Development presents temporary not permanent sterilisation to any potential resource or reserve.</p> | Ground_Conditions |
| REP5-125 | Oxfordshire Host Authorities | <p>REP4-038 – 14.3 Applicant's Responses to other Deadline 3 Submissions</p> <p>Pages 7 and 19 - Quantity of Material & Decommissioning – The response from the applicant to these areas sets out in their response to OHA that all piles will be removed, however in their response [REP4-037] the applicant has now only committed to full removal of all "above ground" infrastructure. Below ground infrastructure will only be removed "where feasible and appropriate" and that "where full removal is not practicable, these will be cut to 1m depth".</p> <p>As the solar panels extend across the minerals safeguarding area, the installation of support structures for the PV's necessitates extensive piling within the safeguarded minerals area. As previously set out in our response to the Examining Authorities First Written Questions [REP2-050] this could have significant impact on the mineral safeguarding area as it leaves potentially considerable quantities of 2m steel piles in the ground, as it is understood each panel requires 4 piles. This could significantly damage any future mineral resource viability, thereby potentially sterilising the resource.</p> | <p>The Applicant has confirmed, in line with the Decommissioning Plan Revision 2 [Rev 2 of EN010147/APP/7.6.4], that the intention is for all piles to be removed.</p> <p>The wording outlined within the previous response [REP4-037] referring to 'where feasible and appropriate', relates to the extremely unlikely case that a pile gets stuck during removal.</p> | Ground_Conditions |
| REP5-125 | Oxfordshire Host Authorities | <p>REP4-038 – 14.3 Applicant's Responses to other Deadline 3 Submissions</p> <p>Page 21 – Minerals and Waste Resources and Page 29 – Compliance with NPS EN-1.</p> <p>In response to the applicant's response to these two questions, OCC maintain the view as set out within the Authority Local Impact Report [REP1-072]. The amount of sand and gravel that would be prevented from being</p> | <p>Please refer to the Applicant's written response set out in Q1.18.8 of the Examining Authorities First Written Questions (ExQ1) [REP2-025].</p> | Ground_Conditions |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| | | <p>worked is considered significant and would come at a time when central government are prioritising house building and growth which will need the adequate supply of sand and gravel to meet demand. In addition, whilst the applicant states that the planning permission would be temporary, and it would be removed at the end of forty years. It would be the case that the development would be in pace throughout the life of the next Minerals and Waste Local Plan, and most likely for the one following that.</p> <p>Also, as set out previously paragraph 168(c) of the NPPF states that when determining planning applications for end-of-life extensions to existing renewable sites, local planning authorities should give significant weight to the benefits of utilising an established site. This suggests that once the precedent of using the site for a solar farm, there would be planning policy support for continuing to do so once the temporary permission has expired. This principle could be applied to Botley Solar Farm in the future, and this would further prevent or hinder the future working of the mineral.</p> | | |

2.2 Non-Statutory Consultees

Table 2.2: Applicant's Responses to Representations provided at Deadline 5 – Non-Statutory Consultees

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| REP5-056 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>Deadline 5, BYG Comment on Responses to Examining Authority's ExQ2 re: ICOMOS's August 2025 Technical Review of BWSF and its wider setting. BYG welcomes the submission of the ICOMOS technical review ((REP4-052) and fully supports its conclusions. The Review provides necessary technical consideration of the importance of the wider setting to the OUV of the WHS.</p> <p>Our comment is on the Review's reference to the lack of a buffer zone and the resulting need for additional safeguards to be considered.</p> <p>1. It was the Blenheim Trustees who themselves argued against the need for a buffer zone in their Blenheim Palace WHS Management Plan 2017. Their arguments, set out in the attached letter dated 9 May 2016, were accepted. The Trustees believed strongly in the existing protection, as shown in this extract from page 3 of that letter.</p> <p>`The concept of a Buffer Zone and setting will be part of the WHS management plan review and the Estate will not pre-empt the recommendations and conclusions of that review. However, given the strong statutory and local plan protections for heritage assets, the Oxford Green Belt and natural environment features such as the Cotswold AONB coupled with the fact that the local authorities have recently produced, or are in the process of producing, new core strategies as part of the Local Development Framework, it would be our very firm view that Blenheim Palace and Park WHS is already provided with a very high degree of protection for the WHS Outstanding Universal Value and thus an additional level of designated protection is unnecessary.`</p> <p>2. However, the Blenheim Trustees now appear to be taking advantage of the planning process for NSIPs which can favour applications which might not otherwise succeed by circumventing purely local strategies such as those referred to in the letter. This is despite the Trustees clearly recognising at the time a) that the wider setting was of importance to the OUV of the WHS; and b) that their own Management Plan was an important source of guidance regarding the WHS's wider setting.</p> <p>3. The current Trustees are quite clearly ignoring the guidance given by Appendix 3 of their own Management Plan. They are also going back on their previous arguments to justify the omission of a buffer zone. The Trustees at the time gave particular importance to the protection provided to the WHS by the Green Belt. No buffer zone for the WHS was imposed, largely because of the protection assumed from the extent of Green Belt land surrounding the palace.</p> <p>4. We believe that considerable weight in the examination should be given to this assumption, and to the ongoing relevance and importance of Green Belt land for the protection of the World Heritage Site's Outstanding Universal Value.</p> | <p>The Applicant would refer to their response to the second ICOMOS Technical Review [REP4-052] which is set out in the Applicant's Responses to other D4 submissions and comments on Interested Parties' Responses to ExA's Second Written Questions (ExQ2) submitted at D4 [REP5-005], and also to the updated Heritage Impact Assessment submitted in response to Change Request 2 (ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2-036].</p> <p>The lack of a defined buffer zone for the Blenheim Palace WHS and the potential need for additional safeguards is not a matter for the Applicant to comment on.</p> | World_Heritage |
| REP5-057 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>Deadline 5, BYG: Site Selection and the Significance of the Proposed Industrialisation of Oxford Green Belt. Points already raised in direct reference to Green Belt by Begbroke & Yarnton Green Belt Campaign can be found in BYG's RR-0092 para 1.5 and following; REP3-083 para 3.3; REP3-085 para 3.8; and elsewhere in our submissions. 1. In previous submissions we also have highlighted the Applicant's inability a) to put forward any credible explanation as to why the Botley West site was considered acceptable for solar development; and b) to provide any meaningful review of possible alternatives. It was perfectly possible in many respects to choose a site which was less problematic, which demanded less of their dubious track record in solar farm development, and which did not run counter to so many designated national policies.</p> | <p>The Applicant has set out its site selection case in detail in its Planning Supporting Statement [REP1-012] (including Appendix 8) and elsewhere in its submissions, including ES Chapter 5: Alternatives Considered [APP-042].</p> | Site_selection_and_Cable_Route_Alternatives |

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| REP5-057 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>2. BYG has now reviewed all the NSIP solar projects listed on the PINS website. This analysis, shown on the next page, indicates that none of the NSIP solar projects approved to date by PINS utilises Green Belt land. Furthermore, the same is true of those NSIP solar projects currently under examination. This starkly underlines the centrality of the Green Belt component in any consideration of the acceptability of the BWSF Application.</p> <p>3. In this context, an overwhelmingly compelling case would have to be made to justify industrialising so much of Oxford's Green Belt. BYG believes the case has not been made and – for reasons already described in our submissions - cannot be made.</p> <p>4. Amongst the significant problems identified is the probability that the casual approach taken to decommissioning in the Application (D5, BYG 37521 re ExQ2.1.17) will render permanent a loss to Oxford's Green Belt of 75% of this huge site's area.</p> <p>5. BYG is driven to conclude that the selection of the site by the Applicant, despite its proposed – unprecedented - incursion into Green Belt, was opportunistic and a material error of judgement.</p> <p><i>[See response for Table provided]</i></p> | <p>There is no national policy that rules out solar farms in Green Belt locations, but there is national policy that directly supports it in respect of delivering UK Government energy transition targets where Very Special Circumstances are demonstrated. The Applicant has set out its site selection case in detail in its Planning Supporting Statement [REP1-012] (including Appendix 8 relating to the Green Belt) and elsewhere in its submissions, including ES Chapter 5: Alternatives Considered [APP-042].</p> | Green_Belt |
| REP5-058 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>Deadline 5 BYG, Comments on Other Information Received: financial statements for SolarFive Limited for the year ended 31 December 2024.</p> <p>The Applicant has just filed financial statements (attached) for SolarFive at Companies House. [For further information on the financial background to the BWSF Application, see BYG's RR-0092 Para 2 & following.]</p> <p>1. The statements were signed by SolarFive (and PVDP) company director Mr. Peter Gerstmann on 22 August. A copy could therefore have been submitted to ExA in time to meet the D4 deadline. Their omission from D4 submissions is unhelpful at best in the context of the interest shown during the Examination in financial information relating to the Applicant, its related companies and its shareholders.</p> <p>2. The statements themselves remain unaudited which ensures that the information provided by the Applicant is minimal. All that can be learnt is that, by the end of December 2024, a total of £15,484,000 has been provided by Cransseta Investment Limited, the company confirmed by the Applicant to be the source of the project funding.</p> <p>3. BYG's view remains that expressed in REP1-095; that nothing has yet been presented by the Applicant to demonstrate the financial credibility of the funding of the project.</p> | <p>As we have explained during the examination, funding for the construction of the project will be procured upon consent being granted. Several financial instruments are available to fund a scheme of that size. The Applicant is a special purpose company, and it would not/cannot be common place, or be expected, for such an entity to hold some £800 million on its balance sheet just in case. Please see Written Summary of Applicant's Oral Submissions at the Compulsory Acquisition Hearing 1 (CAH1) for further detail on the funding position of the Applicant.</p> | Funding_and_PPA |
| REP5-059 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>Deadline 5, BYG re: Comment on Applicant's Response to Examining Authority's ExQ2.5.1.</p> <p>In ExQ2.5.1, the Applicant was asked to provide details of the ownership structure of the various Blenheim entities.</p> <p>1. A specific request was made for information to support the claim that the Blenheim Palace WHS would benefit from £500,000 p.a. deriving from the Botley West Solar Farm project: `What is the legal method by which funds, and how much, will transfer directly to Blenheim Palace for the purposes of maintenance of the World Heritage Site (WHS), who will administer these funds and how is it secured? Explain how the Blenheim Maintenance Fund, a recipient of the lease monies, is related to these companies?`</p> <p>2. The Applicant has provided information in Annex 5 of REP4-036 but the information included there does not answer the question. As BYG pointed out in REP4-044 (1.5), it has been confirmed that all land outside the park is now leased to Vanbrugh Unit Trust (VUT). This includes any land owned by the Blenheim Palace 1984 Maintenance Fund.</p> <p>3. In the absence of any proof to the contrary forthcoming, it can therefore be assumed that it is VUT which will benefit from any revenue flowing from the solar project. It has been confirmed that VUT has no legal obligation to fund the WHS. [Only the 1984 Maintenance Fund has such a legal obligation.]</p> <p>4. Unless Blenheim provides the information requested, necessitating spelling out exactly how much land the 1984 Maintenance fund owns and what entitlement it has to the full benefit of increased rents (subject to any lease agreements in place), BYG contends that any statement made by the Blenheim Trustees about benefits to the WHS resulting from Botley West should be ignored.</p> <p>5. If the statements they have made could be upheld, it would have been a simple matter to provide the detailed information requested by the ExA</p> | <p>Response from Blenheim:</p> <p>We acknowledge REP5-059 from the Begbroke and Yarnton Green Belt Campaign (BYG) and would like to draw attention to REP5-062 from Withers, which addresses ExA questions concerning the flow of funds to the Heritage Property.</p> <p>REP5-062 addresses the misunderstandings within REP5-059 by BYG. It explains HMRC obligations and outlines the freehold and leasehold structures within the order limits. It specifies the proportion of underlying rents that flow from the project to the 1984 Maintenance Fund. The representation, which was covered by the ExA, included Blenheim's presence as part of the recent CA hearing.</p> | Land_Agreements |
| REP5-060 | Begbroke and Yarnton Green Belt Campaign (BYG) | <p>Deadline 5: BYG Comments on Applicant's Response to Examining Authority's ExQ2.1.17 on Decommissioning.</p> <p>In Q2.1.17 the Applicant was asked to `Provide evidence that at the end of the project life the asset value will be greater than, if not at least equal to the cost of decommissioning`.</p> <p>1. The Applicant's response to this important question stretches credulity. It merely consists of a random juxtaposition of seemingly disconnected numbers. A `longer lifeline of 40 years` has, without explanation, been</p> | <p>The above review and enclosed calculation table (response to [REP5-116], Annex 1) are verifying our initial supposition as the revenues from the sale of solar panels, cables and mounting equipment will exceed the expected decommissioning costs. The same can be said of the anticipated revenues and costs in 40 years' time.</p> | Decommissioning |

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| | | <p>assumed as 44 years; 12.6% drops in from nowhere; likewise an unexplained `108million GBP panel CAPEX`. This sterling capex in turn produces, again without explanation, a US dollar amount of \$0.02 which is then compared with the Nerdwallet site's \$0.05 estimated cost of panels for those currently in the US who want to place used panels on their roofs!</p> <p>2. The answer provided to the ExA is ill-considered at best. It fails to answer the question. More worrying is that it also shows that the Applicant has not included any analysis of this nature in their project planning. This can only mean that the Applicant believes it is not of their concern.</p> <p>3. This is a direct reminder of the muddle left behind when the Applicant sold Ukujima, their most significant project to date as detailed in our previous submission RR-0092 para 3.5.1. This will not confer confidence to the potential 'third party investors' that the Applicant is now relying on for funding construction and decommissioning.</p> <p>4. Even more important is that any analysis based simply on current facts, even if carried out correctly, is meaningless. It is inconceivable that there would be any serious market for two million panels that have a remaining useful life of just six years, even if already de-installed. Furthermore, in 40 years' time solar panels will have evolved considerably and those in this project would be obsolete. A great deal of research is already underway to produce panels with perovskite solar cells which, it is claimed, will be much more efficient. Undoubtedly other developments will also take place.</p> <p>5. BYG believes that the estimated cost of decommissioning should be realistic, and no allowance should be made for the sale of the installed panels. There should rather be an allowance for the cost of their removal and disposal.</p> <p>6. We continue to believe that the only way of securing certainty that the BWSF site will be restored to its current state as claimed by the Applicant is via a bond or sinking fund to ensure that the appropriate decommissioning funding is in place.</p> <p>7. Based on the answer that the Applicant has given to the ExA's question, which is discussed here, it is also apparent that an independent assessment of the expected costs of decommissioning would be required to ensure that such a bond would provide satisfactory funding.</p> <p>8. The reality is that the ExA has been given none of the evidence it seeks that the Applicant can securely fund the decommissioning of BWSF, which they now improbably claim will be achieved by selling obsolete, second-hand panels that are close to the expiry of their useful life.</p> | | |
| REP5-061 | Blenheim Palace | <p>In light of submissions to the Examination concerning both the World Heritage Site and the flow of rents from Botley West to the Heritage Property via the 1984 Blenheim Palace Maintenance Fund, we considered it helpful for the Examining Authority to receive further information on these matters.</p> <p>To that end, we commissioned notes from tor&co (on the World Heritage Site) and Withers LLP (on the flow of rents), each addressing what is a complex and distinctive set of circumstances. These notes have been prepared independently of the PVDP submissions and are submitted on behalf of Blenheim Estate. They are intended to provide background, reassurance, and context on how these matters relate to Blenheim. We hope these are helpful and both firms will also be available during the October Examination dates should the Examining Authority have any further questions.</p> | The applicant notes this comment. | acknowledgment response required |
| REP5-068 | Cassington Parish Council | <p>Flood Risk REP3-074 Cassington Parish Council - Hydrology and Flood Risk P36-37</p> <p>We note that the flood risk concerns were raised initially by Cassington Parish Council in the earliest stages of the Botley West planning process, notably the informal consultation prior to the formal Public Consultation. GWP were commissioned by Cassington Parish Council to further investigate the flood risk posed by the Botley West Utility-Scale Solar Power Station and flood mitigation proposed by PVDP and their consultants.</p> <p>We find the Applicants Response to REP-074 is effectively a repeat of previous responses. The Applicants have not undertaken further work on the modelling of surface water movement because of a failure to undertake water infiltration testing necessary to calibrate the model. They have also specifically failed to model their proposed flood risk mitigation measures. Cassington Parish Council note that the modelling undertaken to date estimates flow velocities of up to 1.0 m/s upstream of the village and up to 2.0 m/s downstream of the village, velocities that result in a very high flood hazard category (> 2.0) for the village. This is consistent with flood events in 2007 and 2024.</p> <p>Cassington Parish Council repeats that we find very little has changed from the PEIR and the submission of the ES. PVDP and their consultants have failed to respond to our submission for Deadline 1 or Deadline 3. This is even with the encouragement of the Examiners in their Second Questions to undertake the ground infiltration testing that will enable calibration of the models developed by PVDP's consultants and allow further work on effectiveness of the mitigation proposed. This lack of infiltration testing was also noted by the Oxfordshire Host Authorities in their Local Impact Report.</p> | <p>To clarify, no further modelling work is currently being undertaken, which is why the information provided repeats previous findings. This is because the identified flood risk is off-site, and the surface water model [APP-172] was developed specifically as an enhancement measure rather than a requirement in line with national or local planning policy, including the NPS and NPPF.</p> <p>Importantly, the approach is reasonable considering the proposed solar panel design, with no anticipated increase in flow rates or adverse flood risk impacts on Cassington. The planned mitigation is expected to provide a betterment to current conditions.</p> <p>The applicant has committed to undertaking detailed modelling in coordination with the relevant stakeholders and residents post-consent, and this is captured in the Operational Management Plan, section 2.7.2 [REF: REP4-026].</p> <p>While detailed design and refinement of mitigation measures will occur post-consent, this staged approach is standard practice and allows for technical and regulatory collaboration prior to</p> | Hydrology_and_Flood_risk |

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| | | Leaving detailed design of mitigation measures for prevention of increased flood risk to the Detailed Drainage Designs after consent is granted is not good enough. People's homes are at risk of flooding, or increased risk of flooding should this development increase the rate of water runoff from the site. Post consent, Cassington Parish Council and the residents of Cassington will have no power to influence the design or implementation of flood prevention measures. Attributing increased occurrence of flooding to the Solar Power Station will be statistically very difficult and would entail employment of further experts and no doubt legal expertise which would likely be out of reach financially of the Parish Council and residents. Furthermore, there are concerns regarding flood prevention measures such as balancing ponds as these require continual and ongoing maintenance, something Blenheim Estates have failed to do for a balancing pond located on the boundary of Cassington Village for two years despite numerous requests to do so by the Parish Council. Cassington Parish Council therefore urge that the precautionary principle is applied here, and areas of the development sited on the hills overlooking Cassington Village to the north and Worton Village to the north are removed as detailed in our letter to West Oxfordshire District Council, August 13th, 2024 (see appendices). This would have the additional benefits of reducing landscape and heritage impacts on the villages of Cassington and Worton as well as reducing impacts on Public Rights of Way (footpaths 152/6/10 and footpath 152/8/10) | construction. It also ensures mitigation measures are tailored and approved by relevant local planning authorities. | |
| REP5-068 | Cassington Parish Council | REP3-075 and REP3-076 Cassington Parish Council - Hydrology and Flood Risk P38 and P40 The fact that Cassington Village especially, and Worton have histories of flooding materially indicates that the design of Botley West Solar Power Station does not avoid areas of pluvial flood risk. Cassington Parish Council, on the basis of the evidence produced by GWP Consultants, do not believe that the Flood Risk Assessment or the Modelling undertaken to date demonstrate that the placement of solar arrays to the north of the village of Cassington and also Worton does not pose a risk of increased flooding. Instead, based on the evidence in the scientific literature and expert opinion of GWP we believe this scheme poses a significant increased risk of flooding outside of the boundary of the scheme to these villages and likely also to Jericho Barns. We note that regardless of whether PVDP believe they have discharged their duties in line with national and local policy their own modelling has demonstrated a high risk of flooding prior to the Solar Power Station being built. Our evidence demonstrates that likely the solar arrays will increase rates of runoff especially during extreme runoff events. As stated above, the Applicants are simply "kicking the ball into the long grass" of post consent. This is not acceptable and 3 based on the precautionary principle we urge the Examiners to reject the Botley West proposal unless the areas of the development sited on the hills overlooking Cassington Village to the north and Worton Village to the north are removed as detailed in our letter to West Oxfordshire District Council, August 13th, 2024 (see appendices) | <p>The FRA and Conceptual Drainage Strategy ensure that development is appropriately managed in line with national and local planning policy, including the NPS. Recent updates to the NPPF and the associated NPPG state the following;</p> <p><i>"Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied."</i></p> <p>The Project demonstrates how flood risk can be appropriately mitigated through its design, ensuring compliance with the NPPF and omitting the requirement for a sequential test in regard to surface water.</p> <p>A response was submitted regarding GWP Consultants evidence submitted at DL4 [REP3-074].</p> <p>Regarding concerns about deferring detailed mitigation design to post-consent stages, this approach follows established planning practice and allows for technical collaboration with the Lead Local Flood Authority and Environment Agency to ensure appropriate controls are implemented prior to construction.</p> | Hydrology_and_Flood_risk |
| REP5-068 | Cassington Parish Council | REP3-076 Q1.10.6 Cassington Parish Council - Hydrology and Flood Risk P41 The point raised here, and on several previous occasions, is the likely destruction of field drainage, installed because of the problems caused to cultivation of the fields to the north of Cassington by the underlying soil structure which results in water logging. The Applicant has chosen to refer to the Soil Management Plan and the restoration of soil profiles. In other words, they have failed to respond to the issue of damage or destruction of field drainage elevating the risk of flooding to Cassington, identified by an agricultural expert who actually managed this land for more than 20 years (Roderick Craig; see Appendix 2). Cassington Parish Council cannot see how this field drainage could be sensibly replaced following the insertion of support piles for solar arrays up to 3m deep, across these fields, post construction and for the duration of operation of the Solar Power Station. This is not a matter of soil management, it is a matter of flood prevention and one that the Applicant has consistently failed to address since the early days of the planning process. | <p>We note the comment regarding field drainage. In line with the comments, we have sought an update to the CoCP. This has been updated to reflect a commitment to reinstate drainage function where required post decommissioning. This has been included in paragraph 1.10.41 of the Updated CoCP (Revision 5) submitted at Deadline 6 [EN010147/APP/7.6.1].</p> <p><i>"Before commencement of construction, visual inspections will be undertaken of existing field drainage, with drainage plans also consulted (where available). If, for any reason of the construction of a specified work or the failure of any specified work impairs the efficiency of any land drainage and assets, the impairment or damage must be made good by the undertaker as soon as reasonably practicable to the reasonable satisfaction of the drainage authority."</i></p> | Hydrology_and_Flood_risk |

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| REP5-068 | Cassington Parish Council | Track Record on Solar Farm Development REP3-075 Cassington Parish Council - Funding and PPA P38-39 Cassington Parish Council notes the information provided and has the following comments and requests for clarification: • Ukujima Solar Farm exemplifies the model of business undertaken by PVDP in terms of identifying solar opportunities, taking them through the planning process, including technical studies, and then selling the projects on as Cassington Parish Council have contended from the start of the Botley West planning process. • Onikobe Solar Farm: we thank the Applicant for the information on Onikobe. On investigating the web links provided we note that PurpleSol G.K. is an affiliated company of Thai Solar Energy Public Company Limited. The Applicant states that PurpleSol was established by PVDP, but the evidence identified on the web suggests PVDP no longer own it, as implied by their response. Can PVDP clarify what “affiliated” means in this context. Is this a joint venture between PVDP as PurpleSol G.K. and Thai Solar Energy Public Company Ltd., or do the latter now 4 own PurpleSol G.K.? The position would appear to be clarified later in PVDP's response to our submission (see next section). • We cannot find any records relating to Petasol Co. can you please provide evidence that this company is still owned by PVDP, notwithstanding whether PVDP established it? • Yamagata Solar Farm with a total capacity of 58 MW – no details provided. • Akita Solar Farm with a total capacity of 40 MW – no details provided. • Green Academy Solar Farm with a total capacity of 40 MW – no details provided. | PVDP is a project development company and there is nothing unusual about it's business model. We cannot see how specifics of when PVDP owned which special purpose company and when it exited the projects are relevant to this DCO application. PurpleSol G.K. is the SPV that owned all rights to construction and operation of the Onikobe Solar Farma and was sold to Thai Solar Energy. PurpleSol is no longer affiliated with PVDP. Yamagat Solar Farm was developed by PVDP and sold after construction being completed to a Japanese infrastructure fund. The Akita and Green Academy projects were sold by PVDP while under development to an affiliate company of Goldman Sachs (Japan). Further specifics fall under confidentiality clauses in respective agreements . | Funding_and_PPA |
| REP5-068 | Cassington Parish Council | REP3-076 Cassington Parish Council – Funding and PPA P49 Cassington Parish Council notes the information provided and has the following comments and requests for clarification: • The applicant seems to have misinterpreted Cassington Parish Council's question here. The prospect of a change in government in the next election may impact on subsidies currently enjoyed by the solar industry, specifically the fixing of generated electricity to the price of gas. We never implied that the costs of obtaining planning consent for Botley West were subsidised and that is very clear from our text. We specifically asked whether the potential removal of operational subsidies (i.e. the fixed price for solar generated electricity) was a threat to investment interest in Botley West? So, we ask the question again. • We note the comment that a solar farm project development company would not necessarily procure the entire cost of development. Examination of Solar Five's unaudited accounts indicates that the company has relatively little in the way of assets or funds although in our experience such accounts are often a poor guide to this and the complexity of the network of companies of which PVDP is a part means that funds may be available elsewhere. We note these accounts are unaudited because of the size of the company which means they are exempt. • We thank the Applicant for confirming the Ukujima Solar Farm was sold in 2018. As stated on the previous page this confirms our perception of the modus operandi of PVDP and Solar Five. • The Applicant denies that Dmitri Glukhov had any interest in Kamisol Ltd., however, on due diligence documents produced on behalf of Thai Solar Energy prior to acquiring Kamisol Ltd. Peter Gerstman and Dmitri Glukhov are named as ultimate shareholders, “based on a Declaration of Beneficial Ownership as of March 9, 2017” of this Belize-registered company. These documents, both the original Thai version and an English Translation are submitted to the Examiner alongside this document. We therefore ask: o Are the documents from Finnex to TSE incorrect as naming Dmitry Glukhov as having been a beneficial owner of Kamisol? 5 o Has Dmitry Glukhov's ownership position slipped the mind of the Applicant? • We thank the Applicant for clarification of the situation regarding the Onikobe Solar Farm. We note the investment in land acquisition and in the planning process but note this still fits the modus operandi of taking developments through the planning and land acquisition process and then selling them on. • We note the statement relating to the money invested in Botley West by PVDP and other companies owned by Peter Gerstmann as being traceable and passing financial checks. Since we are not party to any of these due-diligence activities we cannot comment on them. We hope the Examiners have the relevant information to confirm legitimacy of funding. However, we also note the Applicant's statement that the money for investment in the planning proposal for Botley West came from the projects in Japan. We would therefore hope that the Examiners have similarly satisfied themselves that money invested in the Japan projects was similarly traceable and has been scrutinised through financial checks. • The whole point of this line of enquiry is that PVDP have a history of developing solar projects to the point of “ready to build” and then sell them on. From Cassington Parish Council's point of view the concern here is that undertakings made during the planning process (e.g. for environmental monitoring and proactive and dynamic management of the project with respect to the environment) are not carried through by the ultimate owners of the project during construction, operation and decommissioning. The only way to ensure this happens is by the Examiner imposing planning conditions on every single aspect of the proposal where such promises are made | We do not consider a potential removal of operational subsidies a threat to the project, because the project does not intend to rely on any public subsidies for construction or operation. PVDP is a project development company and there is nothing unusual about its business model. The source of funds of Peter Gerstmann and Yulia Lezhen have been vigorously examined by banks that service both individuals, to which those banks are required under most stringent respective legislations. Any doubts about the source of funds would have prevented both individual to move funds of this magnitude and subsequently to finance development activities. In addition both individuals are subject to stringent KYC checks by all professional service providers. The extended interest and repeated representations of a limited number of IP's on that subject suggest an intend to harm our ability to continue financing project activities. With regard to the Onikobe transaction, the report prepared by Finnex Advisory in 2017 was commissioned by Thai Solar Energy plc in advance of the contemplated transaction. It was neither requested, reviewed, nor approved by us as Thai Solar plc potential contracting parties. We did not participate in its preparation nor were we given the opportunity to comment on its contents. On a mistaken basis, they erroneously represented my deceased husband as if he were already the beneficial owner of Kamisol Ltd. at the time of their report. This representation is factually and legally unfounded. Moreover, Finnex itself expressly limits the evidentiary value of its report. In the opening disclaimer, it states unequivocally that: “the Opinion Report has been prepared solely for the convenience of the foreign shareholders of Thai Solar Energy Public Company Ltd and should not be relied upon as a definitive and official document.” Accordingly, any assertion that Mr. Glukhov was the beneficial owner of Kamisol Ltd. is without legal merit, contradicted by the governing documents, and expressly disclaimed by the very report on which such a misrepresentation appears to be based. For the avoidance of doubt, the sole and continuous beneficial owner of Kamisol Ltd. since its incorporation has been Yulia Lezhen. Any contrary suggestion—whether in reports, media references, or third-party documentation — rests on a fundamental misreading of the governing instruments and is devoid of legal substance. The DCO application is made by the Applicant, that will remain the legal entity tasked with executing the project and adhering to all obligations. A change of ownership does not affect this. | Funding |

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| REP5-068 | Cassington Parish Council | <p>REP3-075 Cassington Parish Council – Socioeconomics and Land Agreements (P55) We note the Applicant's point that the values of individual properties are not a material planning consideration. We have asked for the impact on property values for all properties affected by the Botley West Solar Power Station. This is important because of the unique (to date) nature of Botley West where ~11,000 households lie within 1.5km of the scheme, in some cases, as in Cassington to within 25m of property boundaries. The very large potential socioeconomic impact on residents in such a densely populated, although still rural area is therefore a material consideration in terms of the local economy. Collectively, impacts on the value of so many households represents a huge potential financial loss for the region and so therefore should be examined as part of the ES. This is not a question of impacts on single households but on thousands. We note that the matter of impacts on house valuations was considered in APP-052 but was scoped out of the ES on the grounds that impacts on house valuations were likely to be negligible. The fact that this matter was considered demonstrates that the Applicant, or their consultants did consider the matter as of material concern to the socioeconomic studies related to Botley West. The decision to scope this matter out was based on a literature review, which included Jarvis (2021). We note, however, that the evidence cited in Table 15.9 includes mixed references regarding wind and solar energy (collectively renewables) with many referring only to wind energy. Wind energy needs a fraction of the land required for solar to generate the same energy output because it is a more efficient form of renewable energy. Also, because of the land take and the industrial nature of Solar Power Stations in presenting views of glass, metal framework and substations the impact of the two types of renewable energy on perception of the landscape and impacts on property value are likely to be different. Cassington Parish Council points out that Jarvis (2021) is not a peer-reviewed paper on the topic but an industry report and as such cannot be regarded as independent. Some of the other studies are up to 20 years old, written at a time when large-scale solar was not considered. The SolarQ study has identified a body of literature indicating a negative impact on property values associated with Solar Power Stations, much of it from the USA. To date there is one scientific analysis presented on the topic of the U.K., that of Maddison et al (2023) which identifies a significant reduction in property values within 750m of a small solar farm. In the face of this evidence, which overwhelmingly indicates that solar energy installations have a negative impact on property prices to a considerable distance we put forward the case that the Examiner should insist on a study of the potential economic impact of Botley West on property values in Cherwell, West Oxfordshire and Vale of the White Horse. The economic losses through this impact should be taken as part of the socioeconomic impact of the proposed scheme as a whole. It is ridiculous to point to all of the positive effects of this scheme without considering one of the major negative socioeconomic impacts, and one felt by the most people in the area. Further notes on the Socioeconomic Study Table 5.10 identifies that unemployment levels are low but jobs in Cherwell and Oxford fell in 2020 – 2021 showing a vulnerability in employment in the region. The Table fails to mention that this was the period of the Covid pandemic lockdowns when many jobs, particularly in the pubs, restaurants and other elements of the hospitality and tourism industries were especially impacted. Therefore, this perception of "vulnerability" is based on a period of extreme exceptional circumstances and as a result leads to an erroneous conclusion of Medium sensitivity. We note that this would move the receptor of employment from one that is "important to policy" to one which is "not a policy priority" because the receptor (employment in this case) is resilient (Table 5.13). This would also mean that the positive impact of the Botley West proposal during construction and decommissioning would be of low significance to the area in terms of employment. 7 15.9.17 ~1,300Ha of agricultural land equates to ~ 8 direct jobs. This has to be a minimal figure as it does not take into account the much wider number of businesses associated with agriculture in the region. These include contract labourers (e.g. tractor drivers etc.), supply-chain jobs, and jobs relating to the marketing of agricultural produce. We note this because it is on this basis that the figures for employment for the operation of the Botley West Solar Power Station are estimated (direct and supported jobs) as detailed in 5.9.26 and 5.9.27. The Applicant claims in EN010147/APP/14.3 that 424 direct FTE jobs will be created in the local travel study area across all phases. We note from the ES this is estimated at 199FTEs during construction, 18FTEs during operation, by far the longest time period associated with the project, and a similar number of FTEs during decommissioning as during construction. So, we view the Applicants statement in EN010147/APP/14.3 as misleading in so far as the number quoted mainly comprises of FTEs during construction and decommissioning, both of which are relatively short periods compared to the length of time of operation of the project which is 40 years or more. For much of this period the generated employment is of 18FTEs. This needs to be compared to agricultural labour lost (and we note the 18FTEs includes livestock managers) which as we have pointed out is a minimal figure based only on direct employment, not direct and indirect employment on which the figures for construction and decommissioning are based. We note that many of the assumptions on which conclusions related to impacts on the tourist industry are based have been challenged both by the Oxfordshire Host Authorities, various Interested Parties and ICOMOS, the body of experts within the U.K. on World Heritage Sites. In particular we draw attention to: 15.9.128 Where the Applicant states that that the construction, and decommissioning of the proposed Botley West Solar Farm would result in a minor negative impact on one of the defined attributes which contribute towards the Outstanding Universal Value of the WHS, namely the setting of the wider area of lands</p> | <p>The assertion about land take is incorrect: wind power requires more land area per unit of energy generated than solar. Current wind turbines are over 150 metres tall.</p> <p>The Applicant notes ICOMOS' s position, as set out by Cassington Parish Council, that "<i>Offsetting harm to the Outstanding Universal Value against potential benefits through the raising of funding for maintenance is not appropriate to World Heritage properties.</i>" However, this does not accord with the national planning policy position for England. The National Policy Statements and the National Planning Policy Framework include tests within which harm to the significance of designated heritage assets (where this harm is less than substantial) is weighed against the public benefits of the proposed development. Any benefits to the World Heritage Site in the form of increased revenue for maintenance would be a public benefit. In any case, the Applicant's position following the implementation of the changes set out in Change Request 2 is that the proposed development would not cause any harm to the significance of the WHS.</p> <p>With regard to the question asked by Cassington Parish Council on how much of the rental and other income for the proposed development will go to the maintenance and running of Blenheim Palace, The Applicant would refer the parish council to the Deadline 5 submission from Withers LLP on behalf of Blenheim Estates [REP5-062]. This sets out the position regarding the rents payable to the Maintenance Fund from the leases for the solar farm. The report concludes that the rents payable to the Maintenance Fund would rise from approximately £88,000 per annum (from farming tenancies) to approximately £440,000 per annum with the solar farm in place.</p> <p>The use of data from Covid affected years, although an exceptional time, does not change the conclusions as all regions would have been affected, therefore the fact that some regions were affected more emphasises their innate relative vulnerability. This remains true regardless of the reason e.g. high assumed hospitality sector and even so Oxfordshire's hospitality sector (I: Accommodation and Food Service Activities) is actually its 6th largest sector (with 6.9% of employees working in this sector) as outlined in the OSSCEP [EN010147/APP/6.5], which is not a high proportion therefore validating its moderate low significance.</p> <p>The methodology for calculating Agricultural Employment loss is outlined in detail in Chapter 15 (paragraphs 15.9.98 to 15.9.104) [EN010147/APP/6.3]. The calculation's output is direct FTE jobs which is directly comparable to output (direct FTE jobs) used for employment gain across construction, operation and decommissioning.</p> <p>The 424 direct FTE jobs, is circa 6 jobs less than the 416 (199 during construction before agricultural loss, 20 during operation and 199 during decommission) outlined in Chapter 15: Socio-Economics (section 'Reduced Unemployment Levels') [EN010147/APP/6.3]. The Socio-Economic assessment will take precedence of any Socio-Economic assessment and has correctly used the worst-case scenario as it references a lower number, which does not overstate socio-economic benefits.</p> | Socio_economics |

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| | | <p>belonging to Blenheim Estate. We note that the ICOMOS Technical Report (EN10147-001530-202508) concludes: "...landscape parks like that at Blenheim should not be seen in isolation but rather as inextricably linked to the rural vestiges of its wider setting. Despite being visually isolated from its immediate setting by the wall and plantations along its boundary, Blenheim and the experience of Blenheim is inextricably linked to the Oxfordshire cultural landscape." According to ICOMOS, the Blenheim Estate Park and its surrounding setting of the countryside formed by villages and estate farms are in fact inseparable in heritage terms. Botley West comes on top of developments around Woodstock that are already contributing to erosion of the heritage value of the World Heritage Site. Cassington 8 Parish Council agrees with these conclusions and believes that the socioeconomic reporting in the ES underplays the threat to tourism that Botley West poses largely because it relies on other aspects of the ES related to landscape and heritage impacts which have consistently underplayed the significance of impacts of the proposal. We will return to this matter later in this document.</p> <p>15.9.129 The applicant justifies the proposed Solar Power Station in that it will generate revenue to help maintain Blenheim Palace and its park. This is offsetting and ICOMOS categorically state in their Technical Report that: "Offsetting harm to the Outstanding Universal Value against potential benefits through the raising of funding for maintenance is not appropriate to World Heritage properties." We ask the Landowners at this point, how much of the rental and other income for the Botley West Solar Power Station will go to the maintenance and running of Blenheim Palace, the Park and wider estate lands? We note that the Blenheim Palace Heritage Foundation generates ~£16M per annum for its charitable activities which include: Restoring and preserving Blenheim for the public benefit.</p> | | |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Historic Environment The Applicant is deliberately conflating the issues of the setting of Blenheim Estate raised by ICOMOS in REP2-069 with specific comments made by Hal Moggridge OBE VMH PPLI FIHort RIBA AADip, a landscape expert commissioned by ICOMOS, with respect to the proximity of Botley West to villages. Whilst these comments form part of the overall discussion on the setting to Blenheim Estate they were made specifically because Mr Moggridge concluded the infrastructure associated with Botley West is far too close to villages including Cassington. This is specifically addressed by his comments: "ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee recommends omission of those areas which would be especially oppressive to local villages or particularly harmful to this attractive landscape." And "Solar arrays should be kept apart from all villages by a significant landscape breathing space and never be closer than a 3-minute leisurely walk (200m) from houses on the edges of villages - Shipton Slade, Bladon, Begbroke, Cassington, Church Hanborough." And "However, solar arrays are proposed far too close to Cassington village. There should be wide open fields between the NW edge of Cassington village with dense new hedges planted along the solar array boundary. The fields NW of Cassington village should be excluded from development to provide the village with breathing space." 9 Mr Moggridge makes it very clear that in his opinion areas of arrays should be removed where they are damaging to the landscape, which form part of the setting of Blenheim Estate but also where they are oppressively close to villages, including Cassington. Notwithstanding the relevance of the Blenheim Estate farms and their land, and associated villages to the setting of Blenheim Estate, proximity to Cassington in and of itself is an issue in the opinion of Mr Moggridge and the Local Authorities as outlined in our submission to Deadline 3.</p> | <p>There is no 'rule' as to what such a buffer should be; instead, it is ultimately a matter for professional judgement. It should be noted that large areas of solar panels have been removed specifically in relation to these villages.</p> <p>Please refer to the Applicants' response to REP5-068 below, in respect of panel removals.</p> <p>Please refer to the Applicants' response to REP5-097 below, in respect of buffer zones to residential receptors.</p> | Landscape and Visual |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Glint and Glare P41</p> <p>The Applicant's response fails to address the specific concerns that were raised by Cassington Parish Council in the submission to Deadline 3 with respect to Glint and Glare Impacts on properties along the northern margin of the village. These properties lie to the south of the Botley West Solar Power Station, and in some cases the project comes to within 25m of property boundaries. See comments below on the LVIA and RVAA.</p> <p>We note the Applicant's response to the Examiner's Second Questions detail for the first time that solar arrays will be formed of Low Reflectivity Glass. A number of questions arise:</p> <ul style="list-style-type: none"> • Will such surfaces decrease visibility of the solar arrays to our residents, given the close proximity of the arrays to properties in Cassington? • It is our understanding that non-reflective glass or non-reflective coatings to solar arrays involve a higher cost. Are these coatings going to apply to the whole of the Botley West Solar Power Station or will they only be applied to parts of it? • What is the additional cost for Botley West Solar farm of using non-reflective glass or non-reflective coatings? • The use of non-reflective surfaces or coatings potentially leads to higher absorption of solar radiation. Therefore will this increase thermal heating of the air over the solar arrays? • Have the Applicants considered the potential impacts on ecology of using nonreflective surfaces? <p>Evidence suggests that whilst non-reflective surfaces are less attractive to certain groups of insects, under overcast conditions they may be more attractive to aquatic insects, a situation known as an ecological trap (Száz et al., 2016). If our supposition is correct, that bats are attracted to solar arrays because of higher densities of insects, and this drives mortality in the former then the application of anti-reflective coatings or use of anti-reflective glass may increase impacts on the local bat communities. Aquatic insects are in</p> | <p>Whilst anti-reflective (AR) coating does not decrease the visibility of solar PVs, it will significantly reduce reflection loss from the panels from approximately 4-8% to approximately 1-2%. This will decrease the intensity of any glint and glare towards nearby dwellings, including those in Cassington.</p> <p>AR coating will be utilised across the site, and adds approximately 2% to the cost, compared to panels without AR coating.</p> <p>AR coating will lead to slightly higher absorption of solar radiation and therefore to greater heat within the modules (approximately 1-2W/m²), however this increase is very minimal relative to overall solar radiation of 1,000W/m². This will therefore not have a significant effect upon thermal heating of air over the solar arrays.</p> | Glint_and_Glare |

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abundance across much of the central are of the Botley West proposal because of the high number of water bodies (rivers, streams, ponds and water-filled gravel pits).

REP5-068

Cassington Parish Council

REP3-076 Cassington Parish Council -

The Applicant's response to our points relating to scale are rather puzzling. We think they are trying to make a legal point that means they do not have to consider the Greenbelt land around Cassington or other villages in the area of the proposal. We point out, that the Greenbelt, on which 70% of Botley West is sited, is Greenbelt around the city of Oxford, aimed to prevent urban sprawl encroaching on a landscape that is part of the heritage of the city and wider County of Oxfordshire. The Applicant's points are moot because there is no doubt that both through its nature, changing the landscape from a rural one to an industrial one and by virtue of its size, this project will have overwhelming impact on Cassington village and the entire area (our emphasis added) and as such it should be reduced. The Applicant's comments based on technicalities, are irrelevant.

The Applicant has assessed the Projects impact upon openness and on the Green Belt's five purposes, as set out in the Planning Supporting Statement Appendix 8 [REP1-012] and as updated at Deadline 6 [EN010147/APP/17.9].

The relationship of the Project to Cassington itself has not been individually analysed, but the Applicant has been cognisant of its relationship to the village. The Applicant in its analysis of the Project has accepted that there will be impacts upon the Green Belt.

A summary of the Applicant's current assessment as set out in Appendix 8 of the Planning Supporting Statement, paras 8.4.4 to 8.4.31 together with its latest assessment using the latest PPG is summarised in the table below – purposes A to D in particular are relevant to Cassington:

| Purpose | Current Assessment | Latest Assessment |
|---|--|--|
| Purpose A – to check the unrestricted sprawl of large built up areas | ...In that context, whilst the temporary period is long in duration, it is nonetheless, temporary in planning policy terms with limited harm to Green Belt purpose 1 | No material change. |
| Purpose B – to prevent neighbouring towns merging into one another | As the Project is temporary and reversible, the Project prevents other permanent built forms development which would otherwise cause the permanent merging of settlements in this part of the Green Belt. In the Applicants opinion, therefore, conflict with Green Belt purpose 2 is limited. | Conflict is less than previously assumed. In their analysis, the Applicant had incorrectly identified that the narrowest point of the Green Belt which the project affected, and which was therefore the area most vulnerable in terms of impacting the purposes of green belt, was between Bladon and Begbroke. Under the new guidance this analysis is redundant insofar as both |

Site_selection_and_Cable_Route_Alternatives

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| | | | these settlements are 'villages' and these are now excluded from assessment in the latest guidance. The nearest 'towns' now affected by the Project are Woodstock to the north, Witney to the west, Oxford to the east and Abingdon to the south. Given the much more significant areas of openness between these towns and the Project, the threat of merging is diluted even further. | |
| | | Purpose C - to assist in safeguarding the countryside from encroachment. | Despite the nature of ground mounted solar development, and the urgent need for it, conflict with purpose 3 of the Green Belt is in the Applicant view unavoidable, but temporary and reversible. | No change |
| | | Purpose D – to preserve the setting and special character of historic towns | The Applicant concludes therefore that despite the scale and location of the Project, there is no conflict with Green Belt purpose D. | No change |
| | | Purpose E – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. | The Applicant believes there is a conflict with Green Belt purpose E, but given the above, it considers the conflict is justified by these | No change |

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| | | | circumstances. | |
| | | | <p>The Applicant acknowledges and respects the Parishes' concerns. The Applicant has, in its opinion, sited its development sufficiently distant from the built up area, with additional landscaping measures to reduce its visual and spatial impact upon Cassington village.</p> <p>In addition, whilst in its view the following engineering measure was not necessary in flooding terms, the Applicant has identified and sought to address the <i>existing</i> flooding that Cassington already experiences (and will NOT be adversely affected by its own development). It has sought to provide a <i>betterment</i> to the village by creating a shallow depression (and other features) in the land which will be designed to help reduce the worst effects of that flooding from surface water run-off. This feature also creates additional areas of openness which helps with the Parish's Green Belt concern. A new permissive path around this feature has also been created which is an additional benefit, along with associated ecological benefits that go hand in hand with such a feature.</p> <p>Lastly, notwithstanding the Applicant's careful approach to siting and mitigation, national policy assumes, as a starting point, that the VSC test of developing in the Green Belt has been met by such infrastructure.</p> | |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council Acknowledgement Response P43-44</p> <p>We note the Applicant has failed to respond to our comments submitted to Deadline 3 that the buffer zone to Cassington Village has been set too low (25m) because:</p> <ul style="list-style-type: none"> (i) No independent landscape expert was employed to look at these aspects of the development. (ii) An RVAA was not carried out to assess impacts on the villages adjacent to the development despite many properties and other amenity assets in villages being within 25m of the planned Solar Power Station. (iii) Villages as visual receptors of the project were scoped out of the ES. (iv) The 25m buffer was applied without individual consideration of villages like Cassington. (v) Advice from experts from ICOMOS and WODC was simply ignored despite these being neutral parties and having presented good reasoning behind requests. We therefore take it that the Applicant cannot justify the narrow buffer distance between Cassington Village and Jericho Barns on the basis of evidence and therefore should reduce the scheme on the margins of these settlements as requested. | <p>Please refer to the Applicant's response to REP5-097, in respect of buffer distances.</p> <p>The Applicant has taken on board concerns raised by Historic England, ICOMOS and others in respect of land to be omitted from the proposed development. In recognition of this feedback, the Applicant has submitted Change Request 2 alongside Deadline 5 which includes the removal of large areas of land from the Project as well as further scheme refinements which reduce solar installation in other areas. It is recognised that the OHA does not consider these changes go far enough. The Applicant will consider the OHA Omissions Plan [REP4-075] in detail and provide a response at Deadline 6. To confirm, however, at this stage the Applicant has no intention of reducing its Order Limits or proposed installation area any further.</p> <p>The Applicant has carried out a Residential Visual Amenity Assessment, which is submitted at Deadline 6 [EN010147/APP/17.13].</p> | Landscape |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council - Site_selection_and_Cable_Route_Alternatives P44-45</p> <p>The Applicant's response here is to comments by Cassington Parish Council on the narrow buffer zone adopted by Botley West (25m) compared to other UK and 11 international projects and according to academic literature on the topic. The Applicant refers Cassington Parish Council to the LVIA (APP-045). However, the LVIA mainly deals with Cassington in so far as visual impacts related to footpaths and roads connected to the village. The 25m Buffer Zone remains unjustified, is amongst the lowest, or lowest for any UK large-scale solar project and certainly much lower than detailed in academic studies. This will result in an oppressive impact of the Botley</p> | <p>The Applicant has carried out a Residential Visual Amenity Assessment, which is submitted at Deadline 6 [EN010147/APP/17.13].</p> | Landscape |

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| | | West Solar Power Station on Cassington, Jericho Barns and other villages in the area. See below of further comments on the LVIA and RVAA | | |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Human Health P45-47</p> <p>The Applicant responds to the comments of Cassington Parish Council by emphasising the effects of Botley West in the context of energy security. This was not clear from the Applicants original text “The assessment concludes that the Project’s renewable energy provides a positive contribution to reducing the health effects associated with climate change, locally, nationally and internationally.” As we stated, the influence of Botley West on global warming and its associated impacts, including on human health are likely insignificant in the face of rising CO2 levels driven by emissions from other States.</p> <p>However, the effects the Applicant describes in relation to energy security and health are mainly in the context of interrupted power supplies. The UK has not seen national or regional interruption of power supplies since strikes in the 1970s. The main reason for the focus of government on Energy Security is to avoid significant variability in the price of energy. Yes, this may impact on household finances, most especially those on limited incomes, but it does not lead to a loss of power supply. In such cases, individuals and families are usually supported by the state to some degree. We therefore reject the Applicant’s claims on the basis of health both on the basis of CO2 emission reductions and continuity of supply. In the latter case any effects on health are likely to be tenuous, indirect and compounded, minor or obscured by other issues impacting health.</p> | <p>The Applicant notes the concerns raised in REP5-068. We acknowledge that while the Project will contribute to renewable energy generation in the UK, and therefore indirectly contribute to the positive health effects of mitigating climate change, these effects are not likely to be significant. This is set out in detail within section 16.9 of Volume 1, Chapter 16: Human Health of the ES [APP-053], which concludes that minor beneficial (not significant) operational effects are anticipated as a result of the Project.</p> <p>We acknowledge concerns raised relating to energy security and interrupted power supplies. Energy security involves both continuous access to energy, as well as affordable access to it. It has been clear particularly over the last few years that not only climate change, but political conflicts around the world, can result in inflation of UK energy prices, which will affect vulnerable populations such as those with lower incomes, older people and those with existing illnesses, the most.</p> <p>This is reiterated by the British Energy Strategy (HM Government, 2022) and Powering Up Britain: Energy Security Plan (Department for Energy Security & Net Zero, 2023), both which aim to decarbonise and diversify our energy sources, and both of which acknowledge the rising issues faced by the public as a result of increasing energy prices. They also acknowledge current and future threats to UK energy security (including regarding supply) as a result of both climate change and geo-political conflict. The aim of this Project, and other renewable energy projects, is prepare for these increased threats to energy security, and future-proof the national grid.</p> <p>We maintain that the Project’s contribution to wider societal infrastructure (in this case, through helping to future-proof the national grid), will bring about significant public health benefits. This will be both through improvements to population mortality (e.g. reducing excess winter deaths), and morbidity of physical and mental health outcomes related to standard of living and access to health supporting infrastructure. Further detail on this is set out in detail within section 16.9 of Volume 1, Chapter 16: Human Health of the ES [APP-053].</p> | Human_Health |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Local Ecology and Nature P49-50</p> <p>Skylarks</p> <p>Cassington Parish Council welcomes the provision of land set aside for skylarks including the various small parcels of land allocated and also the area of 17.6ha of land near Bladon. We note that even if this land performs as expected it will carry approximately half of the breeding bird territories observed in the second year of surveys for the proposed project representing a significant decline in skylarks in the area. This is a negative impact of the scheme on a declining farmland bird. Also, the Applicant refers to the peak number of territories as 228. This is based on only two years of data and so may not represent the peak number of breeding birds the land can support, this is basic science. The Applicant reasonably concludes that the retained land may lead to more stable breeding numbers compensating for the lower number of territories to some extent. However, Cassington Parish Council points out that the retained territory outside of the 17.6ha near Bladon is highly fragmented and some parcels of land may be too small to hold skylark territories. Therefore, these mitigation measures must be monitored to identify how successful they are at maintaining a breeding population of skylarks and action taken for further mitigation if numbers are falling significantly below expected numbers.</p> <p>Bats</p> <p>REP3-076 Cassington Parish Council – Local Ecology and Nature P50</p> <p>We await the Technical Note to be submitted for Deadline 5 on bats and the appropriate measures to mitigate impacts on them. However, since the ultimate causation of decline of bats in solar installations is unknown it is difficult to imagine how mitigation could be designed other than by removal of panels from the most sensitive</p> | <p>As set out in the Skylark Technical Note accompanying the Applicant’s Response to ExQ2s [REP4-037], the assessment has accounted for land size to ensure that it is an accurate assessment of that available for skylark to breed post development.</p> <p>The Bat Technical Note was submitted at Deadline 5 [REP5-009] and updated at Deadline 6, Rev 1, [EN010147/APP/15.6] following further engagement with Natural England.</p> <p>Monitoring of the bat populations has been committed to within Section 12 of the oLEMP. Section 12 has been updated at Deadline 6 to provide clarity that monitoring reports will be provided to the relevant planning authorities/stakeholders and any remedial measures agreed as part of that reporting process. This provides a clear mechanism through which action must be taken to address monitoring results.</p> | Local_Ecology_and_Nature |

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| | | <p>areas in terms of bat activity.</p> <p>REP3-076 Cassington Parish Council – Local Ecology and Nature P50</p> <p>Bat monitoring</p> <p>Referring us to the OLEMP on bat monitoring does not address our concerns on whether monitoring will be acted upon. To be specific Cassington Parish Council would like to see a series of actions that would be taken if it was found that Botley West was having a negative impact on bat populations in the area. For example, would the developers remove panels from affected areas? Given that PVDP may have disposed of Botley West following granting of planning permission we would want to see such undertakings in the planning condition</p> | | |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Landscape and Visual Assessments P50 52, 53</p> <p>Cassington Parish Council has reviewed the LVIA(APP-045) and also the Applicants Response to the OHA's Response to the Rule 17 Letter (EN010147/APP/13.4). We note with respect to Paragraph 1.3.2 of the latter document that we do not recall ever being asked about representative points for visualisations or consulted at any time on this matter with respect to the village itself. We have responded to the Applicant's LVIA about missing footpaths, and it is PRoW which seem to form the bulk of the LVIA analysis.</p> <p>We also note the comment on P53 that residents were consulted on visual impacts with an example of Purwell Farm, a property belonging to Blenheim Estate. Can the Applicant provide evidence that properties along the northern margin of Cassington and in the settlement of Jericho Barns had similar consultations and were considered for reduction of Solar Arrays adjacent to the boundary of the Botley West Solar Power Station?</p> <p>We note that the Applicant should have been aware of the potential and oppressive impacts of the proximity of solar arrays to properties on the northern boundary of the village because WODC stated (recorded in the LVIA) that:</p> <p>"WODC also suggest that development be restricted from land to the north of Cassington. Although the masterplan indicates that development would be set back from the edge of the settlement in this location, land rises steeply to the north of the settlement making any development in this location prominent and visually exposed. This area is also within the Green Belt, which performs particularly well in this location in terms of protecting the historic character of settlements and safeguarding the countryside from encroachment."</p> <p>The applicant noted that this point was "Noted".</p> <p>The Applicant, later in this current response helpfully outlines where RVAA's are required.</p> <p>"...there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before. The Residential Visual Amenity Threshold (RVAT) has to be reached before an RVAA is required. Examples of where an RVAT is reached are where "one might use terms such as 'overwhelming/overbearing' for tall structures, or 'overly intrusive' for a development overlooking a garden or principal room" (LITGN-2/19.paragraph 2.2). Even with low profile schemes, such as road and residential projects (long-term and permanent) might only require RVAA assessments for properties 50-100 m from the development (LITGN2/19, paragraph4.7)."</p> <p>We note the Applicant states that the project is not a tall structure. We disagree, in a landscape predominantly formed by fields, where no such structures exist 'the solar arrays are tall, taller than a person, and because of their nature highly intrusive. We refer again to Hal Moggridge's evidence as an independent landscape expert where he refers to the proximity of Botley West to Cassington as "oppressive". Clearly, "oppressive" fits the definition above of where an RVAA should be undertaken, especially given that the boundary of the Solar Power Station comes to within 25m of the boundary of a number of our residential properties along the whole NW border of the village and also at Jericho Barns.</p> <p>We note the Applicant's claim that the LVIA was produced on the basis of best practice guidance. However, we dispute that the downgrading of "moderate impact" to "no significance" follows best practice and in reality was a fix to the best practice methodology to downgrade the significance of the impact of Botley West on the landscape by way of huge scale and its nature in converting a rural landscape to an industrial one.</p> | <p>Consultations with Cassington Parish Council</p> <p>Representative (Candidate) Viewpoints were included, illustrated with the Zone of Theoretical Visibility (ZTV), within the Applicant's Scoping report (Figure 7), dated June 2023. Details of correspondence with local authorities, regarding the inclusion of requested viewpoints, is given at Table 8.5 of the LVIA. Cassington Parish Council is not included in this table as no specific reference to viewpoints is given in their scoping consultation response, dated June 2023.</p> <p>The proximity of Botley West to Cassington as "oppressive".</p> <p><i>"Cassington's setting, in a relatively flat and expansive landscape setting - together with its containment - generally precludes long views from within the settlement out into the countryside beyond. However, such views are possible from the western edge of the Conservation area. Within Cassington itself the winding main street and the small greens together allow for a variety of attractive internal views."</i>(Conservation Area Character Appraisal, WODC)</p> <p>Although the views from the settlement are limited, it has been considered there are properties close to the solar panels at Barrow Court, Cassington. Solar panels would be at their closest to the rear gardens of the properties at a distance of 40m. The gardens' perimeters are lined by dense vegetation. Therefore, views would only be expected from first floor windows.</p> <p>A few properties, which are further offset from the Yarnton Road, are located at a distance of 30m from the solar panels. The houses are orientated towards the playing field and views of the solar panels are expected to be screened by the intervening vegetation.</p> <p>The rear gardens of the properties to the north of Eynsham Road are located at a distance of 80m from the solar panels. The intervening vegetation alongside the gardens' boundary and in addition trees which line the intervening field would provide screening and filtering effects in views.</p> <p>Overall, the impact upon Cassington settlement is considered limited not oppressive.</p> <p>Please also refer to the Applicants' response to REP5-097 below, in respect of buffer zones to residential receptors.</p> <p>Downgrading of "moderate impact" to "no significance".</p> <p>This is not downgrading but is the accepted approach in how professional judgement can be applied in line with the LI TGN2/19.</p> | Landscape_and_Visual_Impacts |

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| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Green Belt P51</p> <p>We note the Applicant's note of caution when looking at the current queue for solar. However, we point out that this queue, according to official statistics from NESO is 10x the requirement for solar overall, only 60% of which is due to come from ground-based solar projects. Even taking the Applicant's most precautionary figure of only 30% of these projects coming to fruition that is still 5x the target for 2050 by ground-based solar. So, we maintain our point that this means that despite the substantial weight in favour of solar NSIPs, the U.K. is in a position where targets will be met and exceeded with or without Botley West. This in our opinion lowers the weighting given to any single project and means that the most sustainable projects with respect to renewable energy generation, with the lowest impacts on people and nature can be selected.</p> <p>Cassington Parish Council completely disagrees with the statement: "The Applicant does not believe there will be any significant adverse effects on fauna or flora to set against the weight to be attached to BNG and VSC." As stated in many of our submissions to this enquiry BNG is based on an algorithm related to changes in habitat. It does not compensate for, or assess impacts on elements of fauna, especially, those that may be impacted by this project. For example, based on the Applicant's present document half the breeding skylark population for the central area of the Botley West Solar Power Station will be lost and we have already made the important case that an internationally important bat community in the central area is under threat of serious decline by this scheme. These are significant adverse effects at local / regional level (skylarks) and international level (bats) which are not compensated by BNG. The Applicant must realise that a positive change in a crude measure of change in habitat is not a mitigation or compensation for loss of nationally and internationally declining wildlife. The applicant may respectfully disagree with Cassington Parish Council's assessment of the impact upon the landscape and the weight to be attributed to VSC6 but the weight of opinion of residents and independent experts on the impacts of this scheme are overwhelming.</p> <p>"The eastern edge of the lovely Evenlode valley is a very unsatisfactory part of the Applicants' proposals. It is unacceptable to place solar panels on the steep west facing escarpment along the east side of the Evenlode valley, itself wisely excluded from proposed development. It is as if the topography of the landscape has not been analysed, as if no independent landscape mind has been involved. There should be no solar panels on any of the escarpment on the east side of the Evenlode Valley."</p> <p>"No attention has been paid to the conservation of the important north-easterly views identified on the Salt Cross Garden Village spatial framework as panoramic views. Salt Cross is a new village to be built beside the Oxford green belt west of Oxford. To conserve these panoramic views across the Evenlode valley to the escarpment on its north-eastern flank, all the fields near the north-east of Salt Cross should be excluded from consideration for solar farm development."</p> <p>"Church Hanborough's soaring limestone steeple can be seen across fields from every point of the compass (England's 1000 Best Churches by Simon Jenkins). To conserve most of these views and the setting of the village, in particular the rural scenery of the valley passing the western side of the village, no solar arrays should be placed on the sloping sides of the ridge to the south of Church Hanborough village."</p> <p>"ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee recommends omission of those areas which would be especially oppressive to local villages or particularly harmful to this attractive landscape. Solar arrays should be kept apart from all villages by a significant landscape breathing space and never be closer than a 3-minute leisurely walk (200m) from houses on the edges of villages - Shipton Slade, Bladon, Begbroke, Cassington, Church Hanborough."</p> <p>"Southern Solar Farm, SE of Farmoor Reservoir – Illustrative Masterplan Figure 2.3:(1.7km E-W; 0.7 km maximum width; substation with access to overhead power line which crosses this site.) At least half of this proposal is on exposed north facing arable slopes, which would be highly visible, almost certainly also being obvious from Farmoor Reservoir recreation area. All the area is in an important part of Oxford's Green Belt related to Oxford City and University, visible from footpaths above or below, useful to the population of the nearby city, being accessible by bus. This Southern site is a totally unsuitable place for a solar farm and should be omitted from the proposal."</p> <p>OHA "7.3.116 Adverse effects on residential areas and heritage areas and their setting are also of concern. As outlined in the LUC report in Appendix 1 there appears to be no consideration of local communities as a visual receptor despite the ZTV indicating theoretical visibility from the edge of settlements within the study area (e.g.</p> | <p>Matters relating to Green Belt have been addressed in the Applicants response above.</p> <p>The Applicant has nothing further to add from its previous submissions on need, including reference to 'queue for solar' (see for example, Applicants Response to other Deadline 3 Submissions – REP4-038, addressing the OHA's [REP3-072] and Cassington Parish Council [REP3-076] comments on need)</p> <p>The Salt Cross Garden Village Pre-submission draft The Area Action Plan (AAP) – August 2020 Figure 11.6 Salt Cross – Illustrative Spatial Framework Plan, indicates panoramic views along the north eastern edge of the proposed Salt Cross development, allocated for blue / green infrastructure network, net biodiversity gains & Country Park to ensure climate resilience Strategy.</p> <p>The proposed site of the Garden Village is located to the north of the village of Eynsham and covers an area of approximately 185 hectares, consisting predominantly of farmland. The site is bordered by the A40 to the south, by Lower Road to the east, and by farm tracks and field boundaries to the west.</p> <p>The centre section of the Project abuts the consented Garden Village next to Lower Road, with areas allocated for Food Growing and landscape enhancement. The proposed Project Substation and solar panels would be located at a distance of 160 m from the sports fields on the north eastern boundary of the consented housing development. Due to the existing intervening vegetation and proposed vegetation as shown on the Illustrative Masterplan of the Garden Village (application 20/01734/OUT), there would not be any intervisibility between the developments (see Viewpoints 25, 27, 29, 30, 31).</p> <p>With regard to the recreational area of Farmoor Reservoir, the Project would be too far in the distance to be seen clearly being 1.5 km at its closest (Viewpoint 45). The location of the substations is backed by mature vegetation to the north west, which provides screening in views across the Farmoor Reservoir.</p> <p>With regard to the potential visibility from villages and residential receptors, the Applicant has carried out a Residential Visual Amenity Assessment, which is submitted at Deadline 6 [EN010147/APP/17.13].</p> <p>The Applicant recognises that BNG has no relation to impacts/effects on ecology receptors per se. It is, however, the Government's method for determining the ecological gain that a development may deliver, as set out in section 4.6 of EN-1.</p> <p>The Applicant provided an updated version of ES Appendix 7.5: Settings Assessment following the acceptance of the changes set out in our Change Request 2 notification [REP2-045]. The updated version (Rev 3) [CR2-038] provides an assessment of the impacts and effects arising from changes within the settings off heritage</p> | Green_Belt, Landscape & Ecology |

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| | | <p>Wootton, Woodstock, Kidlington, Long Hanborough, Cassington, Freeland, Eynsham, Bladon, Farmoor and Cumnor). EN-3 states in paragraph 3.10.88 that applicants should carry out landscape and visual assessment and that visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas of viewpoints. The LVIA does not state why these have been scoped out and, given the scale of the Proposed Development and the number of settlements surrounding the Site, the exclusion of local communities is an erroneous omission.”</p> <p>These are just a few examples from the many IPs that have objected to this proposal on the grounds of impact to Greenbelt and the landscape proposed as a recipient for this project.</p> | <p>assets. The assessment includes reference to visualisations where appropriate.</p> <p>The Applicant has taken on board concerns raised by Historic England, ICOMOS and others in respect of land to be omitted from the proposed development. In recognition of this feedback, the Applicant has submitted Change Request 2 alongside Deadline 5 which includes the removal of large areas of land from the Project as well as further scheme refinements which reduce the solar installation in other areas. It is recognised that the OHA does not consider these changes go far enough. The Applicant will consider the OHA Omissions Plan [REP4-075] in detail and provide a response at Deadline 6. To confirm, however, at this stage the Applicant has no intention of reducing its Order Limits or proposed installation area any further.</p> <p>The Applicant has carried out a Residential Visual Amenity Assessment, which is submitted at Deadline 6 [EN010147/APP/17.13].</p> <p>Matters relating to Green Belt have been addressed in the Applicant's response to points raised by Cassington PC further above in this document.</p> | |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Landscape and Visual Impacts P51</p> <p>Cassington Parish Council would like to note that whilst the Applicant believes that people undertaking sports and recreation activities have a low sensitivity to the presence of the solar arrays it proposes the area is used for more than these activities.</p> <p>The Sports and Social Club, of which the recreation ground is part of, is used for social events and wedding celebrations. These include both an inside and outside element of activities and have a greater level of sensitivity to the change in landscape that the proposed scheme will present</p> | <p>The Applicant notes the concern raised within REP5-068.</p> <p>Following field work it has been noted that the playing fields at Cassington are well contained by existing vegetation to all sides, which would limit available views to the Project.</p> <p>It should also be noted that the Landscape, Ecology and Amenities Plan [CR2-043] includes additional tree planting to the perimeter of the playing fields.</p> <p>The Landscape, Ecology and Amenities Plan [CR2-043] also indicates buffer strips / bunds to the northernmost boundary of the playing fields and to the northeast. These bunds are to be planted up, which will further screen available views.</p> <p>Please note that planting is shown indicatively and would be subject to detailed design.</p> | Landscape and Visual Impacts |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Climate Change P51</p> <p>The Applicant confirms our view that studies on this topic are very scarce and that evidence suggests that temperatures may be elevated above solar arrays especially during heat wave conditions. We point out that for the most recent decade in the UK, compared to 1961–1990, while exceedances of 20°C have increased by 39% and of 25°C by 62%, exceedances of 28°C have more than doubled and of 30°C and 32°C more than trebled (Kendon et al., 2025). In other words, it is the occurrence of the most extreme temperatures that are increasing in frequency the fastest.</p> <p>Therefore, even a small effect on temperature of the very large area of solar arrays, in close proximity to Cassington village, is a concern to human health. This is confirmed by the Applicant's own response to our query related to health benefits of the Botley West Power Station. The Applicant states very clearly that interruption of power supply can lead to health impacts from exposure to high environmental temperatures. Applying the precautionary principle, we believe that on this basis there is further justification for pulling the boundary to the north of Cassington back from 25m to 300m</p> | <p>The Applicant notes the concerns raised within REP5-068, and agrees with the first statement regarding the sparse nature of the evidence related to heat island effects of solar arrays. We also acknowledge and agree that general ambient temperatures in the UK are rising and extreme temperature events are becoming more frequent.</p> <p>It should be noted that as established by the scientific literature available on this matter, any increase in temperature caused by the presence of solar arrays is likely to be relatively small and geographically limited in the contexts relevant to this project (Fthenakis and Yu 2013). Fthenakis and Yu found that thermal energy generated by the centre of a photovoltaic field (in North America) dissipated rapidly with distance from the solar farm, and arrays cooled completely at night, therefore not giving rise to health island effects. The studies that tend to identify potential for solar heat island effects tend to be from arid or desert contexts (Barron-Gafford et al 2016), with the greatest temperature variations being at night and within the array areas. Recent studies show solar farms may even have a cooling effect (Xu et al., 2024). The role of vegetation, including the proposed development's planting of trees</p> | Health and Efficiency |

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| | | | <p>and hedgerows is likely to contribute to cooling and shade for those passing through array areas. There is not considered to be the potential for a likely significant population health effect on this issue and as such it has not been scoped into the Environmental Statement.</p> <p>Regarding the concerns raised around interruption of power supply and adverse health outcomes, it should be noted our original response (and assessment within Volume 1, Chapter 16: Human Health of the ES [CR2-023]) is to do with the public health <i>benefits</i> of the proposed development, and renewable energy developments in general. Renewable energy projects help towards maintaining energy security (both in terms of continuous access to energy and it being affordable), which in turn has public health benefits. The proposed development will help towards <i>preventing</i> potential future interruptions to UK power supply (as a result of climate change and/or political instability), not cause any.</p> <p>We acknowledge concerns regarding the proposed buffer zone. This has been responded to in detail within the Applicants' response to REP5-097. In summary, this issue has been a thoroughly discussed and tested, whereby the landscape team have concluded that properties within the 50-250m zone will not need further assessment for residential amenity. Furthermore in terms of impacts to health from heat island effects, as detailed above, the proposed development is not anticipated to result in heat island effects for Cassington village or other similar residential receptors, so it is our professional opinion that a change to the buffer zone is not necessary.</p> | |
| REP5-068 | Cassington Parish Council | <p>REP3-076 Cassington Parish Council – Noise and Vibration</p> <p>It is abundantly clear from our statement “the noise clearly audible from pile driving at Blenheim Estates Weaveley Solar Farm 1km away from pile driving (recording in the SBW Community Impact Report - EN010147-001254).” Where pile driving noise was emanating from and that this was in the construction of Blenheim Estate’s own small scale Solar Power Installation, presumably using similar methods to Botley West. We note with concern that the Applicant considers “there is no requirement for construction phase noise to be inaudible at residential dwellings”. Some noise is tolerable but given the very large number of arrays to be installed in close proximity to Cassington village over a very wide area this is a serious concern. Such noise would be intolerable for our residents given it would likely go on for months.</p> <p>We also note the noise emanating from PCS units during operation of up to 47Db, above ambient noise. Given the close proximity of Botley West to Cassington residences (25m) this is also a concern. Apart from background traffic noise, the land around Cassington is generally peaceful.</p> | <p>We note the concern about noise from the construction works at Cassington Village. As has been stated previously, the noise from construction works will be controlled at receptors using the management procedures which are set-out in the Outline Code of Construction Practice [APP-232]. This document includes the commitment to implement good practice construction methods.</p> <p>It is incorrect to state that sound from the PCS units is 47dB above the ambient sound level. As is detailed in ES Chapter 13 - Noise and Vibration [APP-050], noise from the PCS units has been compared against the lower Background Sound level, not the ambient sound level. This approach ensures a robust assessment, and one which is in accordance with <i>British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound</i>. The assessment shows that noise from the PCS units will be less than 5dB above the background sound level at all receptors. In most cases, noise from the PCS units is below the existing background sound level.</p> | Noise_and_Vibration_Impact |
| REP5-068 | Cassington Parish Council | <p>[See page 17 of the response]</p> <p>In summary: "...On the basis of the ICOMOS Technical Review Cassington Parish Council agrees with ICOMOS that both the increasing housing development around Woodstock and elsewhere within the setting of Blenheim Estate WHS has already eroded the value of the site. Further development, including both housing and the huge Botley West Solar Power Station not only erodes the value of the WHS but in fact is a threat to it. This concurs with the view put forward in the Blenheim Estate Management Report of 2017....."</p> | <p>The Applicant has made changes to the design of the proposed development following consultation with Historic England, who advise the department for Culture, Media and Sport (the State Party) in respect of World Heritage Site matters. Our conclusion following these changes is that the proposed development does not result in any harm to the significance of the WHS. Any cumulative effects would therefore arise from the other developments considered within any cumulative effects assessment and not from the proposed development. The Applicant disagrees with any suggestion that the proposed development represents a threat to the WHS.</p> | Cumulative_Impacts |

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| | | | The Applicant would refer to their response to the second ICOMOS Technical Review [REP4-052] which is set out in the Applicant's Responses to other D4 submissions and comments on Interested Parties' Responses to ExA's Second Written Questions (ExQ2) submitted at D4 [REP5-005], and also to the updated Heritage Impact Assessment submitted in response to Change Request 2 (ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2-036]. | |
| REP5-068 | Cassington Parish Council | <p>We further note that finally we have figures for the amount of Best and Most Versatile Land (BMV) included in the 834.81ha of land fenced off for Botley West. This is detailed in the Applicant's Response to the Examiners Second Questions Annex 8 (Rep 4-037). Based on BMV covering 353ha (Grade 1,2, and 3a) we estimate that this is 42.3%.</p> <p>Natural England advise that if a development would take more than 20 hectares of land and over 40% of that is BMV, it should normally be regarded as causing "significant loss" of BMV land. This is contrary to continuous statements from both the Applicant and Landowner that the land is of poor quality, statements that have also been repeated at meetings of Cassington Parish Council by a representative of Blenheim Estates, a view we categorically denied at the time. In our view this has been a dishonest representation of the impact that the Botley West Solar Power Station will have on agricultural land and productivity in West Oxfordshire.</p> | <p>The reference to the loss of more than 20ha of land refers to the permanent loss of the best and most versatile land, not to the total area of best and most versatile land within the Project. Natural England agree in the Statement of Common Ground [REP3-054] that the permanent loss of best and most versatile land would be less than 20ha and that the implementation of a Soil Management Plan, substantially in accordance with the outline Soil Management Plan [CR2-047] would ensure that areas of soils that are disturbed during the construction phase of the Project can be suitably reinstated.</p> | Agricultural_Land_Use |
| REP5-076 | Cumnor Parish Council | <p>Cumnor Parish Council's comments</p> <p>3. 14.3 Applicant's Responses to other Deadline 3 Submissions (REP4-038)</p> <p>Having regard to the limited time and resources available to CPC, and the quantum required to construct a line-by-line rebuttal of many of the applicant's responses in REP4-038, Council has reluctantly concluded that it is not a responsible use of its limited resources so to do, as the applicant would likely not engage meaningfully with such a submission.</p> <p>Why?</p> <p>Because REP4-038 in responding to the Host Authorities REP3-072 and Cumnor Parish Council's REP3-077 and REP3-078 seems to follow a modus operandi that CPC has previously drawn attention to (para 7 of REP4-046); namely</p> <ul style="list-style-type: none"> • Repetition of previous answers when challenged (e.g. in respect of the NGET substation, viewpoints, etc.) • Inaccurate information and unrelated unevidenced assertions (e.g. 'substantial areas of newly planted woodland' and 'landscape within the Parish is not a [sic] preserved in aspic', • 'noting' points made and questions asked but not providing answers(e.g. movement of construction vehicles over Swinford bridge on the B4044;Cumnor Neighbourhood Plan Flood Risk Policy RNE2; impacts on school children/Hill End Outdoor Education Facility; and the response to CPC's comments on the applicant's response to ExA Q1.3.1, which doesn't answer the questions posed, but instead extolls the virtue of sheep grazing under panels with a lower lip height of 0.8m – interesting as a Google search elicits 'An average UK sheep is approximately 80 to 120 cm (31.5 to 47.2 inches) tall at the shoulder'. Are we to witness Hobbit like sheep in Cumnor? CPC assesses that all of the above is consistent (as raised in para 2 of REP3-078) with the applicant's 2nd July public position that 'it's a big change, but people will get used to it' <p>4. End</p> <p>[APPENDICES LISTED OF DOCUMENTS SUPPLIED AS EMAIL ATTACHMENTS TO PINS]</p> | <p>The applicant notes this comment. Since Deadline 3 further responses have been provided at Deadline 4 including responses to ExA's Second Written Questions (ExQ2) [REP4-037, REP4-038] and Deadline 5 [REP5-005].</p> <p>The Applicant also wishes to provide additional clarify the following points raised by the IP:</p> <ul style="list-style-type: none"> - There will be no construction vehicles passing over Swinford Bridge. This is confirmed within the access strategy set out in section 12.7 of ES Volume 1, Chapter 12 [REP5-016] and Appendix 12.6 Construction Vehicle Trip Generation Assumptions [APP-204]. This access strategy is set out as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [CR2-045] and is secured at Schedule 13 of the Development Consent Order [CR2-009]. - Policy RNE2 is addressed in REP3-012 - The Applicant in its Environmental Statement Chapter on Traffic and Transportation [REP5-016] includes transport assessment which is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport. See section 12.6 and the Travel plan measures included within an oCTMP secured as part of the Code of Construction Practice (CoCP) (CR2-045 and 047) requirement within the draft DCO. <p>An assessment of the impact of construction traffic upon traffic and transport receptors, which includes pedestrians and schools, is set out in section 12.10 of ES Volume 1, Chapter 12 [REP5-016]. It assesses the impact of construction traffic upon, amongst other things, non-motorised user delay, non-motorised user amenity, severance and road safety, all of which incorporate pedestrians and schools. It concludes that the construction traffic would not create any significant effects upon traffic and transport receptors. No adverse impact is</p> | acknowledgment response required |

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| | | | <p>predicted on school children nor the continued use of the Hill End Outdoor Education Facility.</p> <p>Advice on the practicality of sheep grazing under panels was given by Savills and through speaking to Blenheim Palace Farm managers.</p> | |
| REP5-077 | Cumnor Parish Council | <p>Responses to the Examining Authority's ExQ2 from the applicant (REP4-037)</p> <p>Q2.1.6 The applicant cites 'deer fencing' in its reply to the ExA question about 'the potential for theft or damage of solar infrastructure'.</p> <p>Aside from the obvious point that 'deer fencing' is presumably there to keep deer out of the power station, not humans, this reply again ignores the evidence from Thames Valley Police presented by CPC at D1 (REP1-064). Therefore, CPC repeats its D4 request (REP4-046 para 8, page 3-4) that the applicant be requested by the ExA to engage with Thames Valley Police Designing Out Crime team so that so that there is an expert opinion on the 100+km of fencing, CCTV etc. that the applicant is proposing to install across rural Oxfordshire?</p> <p>That expert opinion – for example on the need for considerably more robust fencing than is currently being proposed - can then be fed into a new LVIA, as the nature and extent of the proposed fencing is central to the visual impact of the proposed power station.</p> | <p>The applicant has answered previously, in particular in the comments set out in REP3-065, under Q. 1.5.8., and confirms that security has been embedded into the design of the Proposed Development from the outset, consistent with the principles of "security by design" and the requirements of NPS EN-5.</p> <p>Measures secured through the DCO include perimeter deer fencing to restrict unauthorised access, CCTV with motion detection limited to the access points, secure access points, and the provision of a security service. These features are controlled through Requirements in the DCO and further detailed in the Outline Layout and Design Principles document [EN010147/APP/7.7 Rev 4], and Outline Construction Code of Practice [REP3-030], and the Outline Landscape and Ecology Management Plan [REP3-034]. The final security layout will be subject to consultation with the relevant authorities and will ensure the infrastructure is safe, resilient, and compliant with national standards without compromising landscape or amenity considerations.</p> | acknowledgment response required |
| REP5-077 | Cumnor Parish Council | <p>Responses to the Examining Authority's ExQ2 from the applicant (REP4-037)</p> <p>Q2.1.8 CPC has a very low degree of confidence in the applicant's answer given that the proposed location of its substation in the Parish is immediately adjacent to three PRoW and would be visible from a number of made Cumnor Neighbourhood Plan Important Views.</p> <p>CPC assesses that in its consideration of the Horlock Rules, the applicant has placed considerably more weight on its efforts to 'minimise cable lengths and losses, and ensure operational efficiency' than it has on 'visual impact' and 'noise considerations', and so has not followed these Rules.</p> | <p>The siting and design of the main and secondary substations follow the Horlock Rules, as set out in NPS EN-5, paragraphs 2.9.18–2.9.19. Locations were chosen to balance visual impact, minimise cable lengths and losses, and ensure operational efficiency. Noise considerations were also factored in, with substation locations selected to reduce impact on sensitive receptors, in the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) REP1-019 Chapter 3 Proposed Development Description PINS Action Point No. 6.</p> <p>The environmental effects are also considered in the Change Request 2: ES Addendum [CR2-071].</p> | acknowledgment response required |
| REP5-077 | Cumnor Parish Council | <p>Q2.3.7 CPC notes that the applicant does not answer this question, as it fails to provide the ExA's requested 'comparison of the two options'</p> <p>Q2.6.3 The applicant asserts that it 'does not agree that any of the land identified by ICOMOS-UK as a concern within the Southern Site could reasonably be considered to form part of the setting of WHS that could contribute to its OUV'</p> <p>That assertion is unfounded and inaccurate because that is not what ICOMOS-UK stated (REP2-074). Instead, ICOMOS-UK identified areas to be removed on the Southern site on the grounds of 'areas specially oppressive to local villages' and 'areas specially harmful to this rural landscape'</p> | <p>As noted in the Applicant's response to Q2.3.7 in its response to Second Written Questions [REP4-037], no BESS is proposed for Project, either in terms of remote battery storage or otherwise so this clarification was provided to the ExA, making the comparison exercise irrelevant.</p> <p>In response to question 2.6.3, the Applicant has reviewed the request from ICOMOS-UK but has not found any justification for the further removal of land in the Southern site..</p> | acknowledgment response required |
| REP5-077 | Cumnor Parish Council | <p>Q2.6.14 The ExA's attention is drawn to the fact that the applicant's admission that its 'revised assessment' of the setting of Upper Whitley Farm will only 'be prepared following the consultation on the change request' further amplifies CPC's previously expressed concerns (see REP4-045) about the inadequate nature of the '30-day' consultation process.</p> <p>Q2.7.7 CPC notes that the applicant again fails to provide draft wording for a Grampian requirement as requested by the ExA. Instead, the applicant chooses to focus on NGET's submission for the 1st July Deadline 2 (REP2-076) and 'oral discussions' rather than the later (July 22nd) statement of PVDP's common ground with NGET (REP3-053) with its admission that the connection date is not agreed but is 'in discussion'</p> <p>Given the above, CPC assesses it continues to have a very low degree of confidence in the various explanations offered by the applicant, with varying descriptions and connection dates out to 2029, and</p> | <p>The Applicant provided a revised assessment of the likely impact on the heritage significance of the Grade II listed Upper Whitley Farm at Deadline 5. This is set out in paragraphs 1.9.140 - 1.9.143 of ES Appendix 7.5: Settings Assessment (Rev 2) [REP5-035].</p> <p>The assessment was revised again following the ExAs acceptance of the changes set out in the Applicant's Change Request 2 Notification [REP2-052]. This is set out in paragraphs 1.9.139 - 1.9.142 of ES Appendix 7.5: Settings Assessment (Rev 3) [CR2-038].</p> | acknowledgment response required |

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| | | encourages the ExA to continue its questioning on this crucial matter, including establishing wording for a Grampian requirement | The Applicant will not be providing draft wording for a <i>Grampian</i> requirement for the reasons already provided in response to ExQ2.7.7 [REP4-037]. There is no policy basis for such a requirement and it is both unnecessary and unreasonable. | |
| REP5-077 | Cumnor Parish Council | <p>Q2.7.13 The applicant states that 'widening works will be undertaken on the B4017 Cumnor Road through Filchampstead to accommodate AILs and also provide betterment for HVs'. Page 49 of REP3-004 confirms the widening is to be between points ASP-22 and ASP-23 (see below left) This assertion requires some heroic assumptions by the applicant since in that area (see below right) the narrowest part of road is sandwiched by properties – unsurprising given the medieval origin of the road.</p> <p>Can the ExA ask the applicant to explain how such widening would be possible –especially to accommodate AILs (Abnormal Indivisible Loads), which the gov.uk website describes as having a minimum of 5 axles and a load capacity of between 46000-150,000kg, viz between 46 and 150 tons?</p> <p>Also, could the ExA require the applicant to explain how such widening would not adversely impact the safety of users of the Oxford Green Belt PRow and PRow 184/50/10 that cross the B4017 at that point. Similarly, could the ExA ask the applicant to explain how 'alteration of layout including modifications to road markings on the carriageway to B4017 Cumnor Road and B4044 Eynsham Road' (P53 of REP3-004) can be achieved at the exiting 'mini' roundabout sufficient for it to cope with AILs without detriment to the immediately adjacent businesses, dwellings and the users of Farmoor Village Hall & Farmoor Stores (see below)?</p> <p>Given that the ExA will be in the Parish for its ASI on 7th October, CPC requests that ExA members see these locations for themselves. This can be easily achieved within the existing visit without impacting the route or the timings. The ASP 22 to ASP 23 section of the B4017 would be visible if ExA approaches the Farmoor Reservoir car park meeting point by travelling north from Cumnor village on the B4017.</p> <p>The mini roundabout at the junction of the B4017/B4044 is on the route from the Farmoor Reservoir car park to the Hill End Outdoor Educational Centre</p> | <p>ES Appendix 12.8 Accesses and Highway Drawings Part 4 of 4 [APP-209] sets out indicative widening along the B4017 Cumnor Road through Filchampstead together with the Order Limits and the extent of the adopted highway boundary.</p> <p>The indicative widening along the B4017 Cumnor Road [APP-209] is wholly deliverable within the Order Limits and within the extent of the adopted highway boundary and will comprise some localised widening of the carriageway onto the verge. As a result, no properties or any adjacent third party land would be affected by the widening works.</p> <p>The Oxford Green Belt PRow (184/22/10) terminates at the eastern side of the B4017 Cumnor Road and routes along a track marked as 'Green Belt Way' at ES Appendix 12.8 Accesses and Highway Drawings Part 4 of 4 [APP-209]. PRow 184/50/10 terminates at the western side of the B4017 Cumnor Road and routes along the track alongside Appletree Cottage as shown at ES Appendix 12.8 Accesses and Highway Drawings Part 4 of 4 [APP-209].</p> <p>The indicative widening along the B4017 Cumnor Road that is shown at ES Appendix 12.8 Accesses and Highway Drawings Part 4 of 4 [APP-209] does not propose any carriageway alterations at the points where these two PRow terminate. There is no proposed widening in these locations because widening is not required in these locations. Therefore, the proposed widening along the B4017 Cumnor Road [APP-209] would have no effect upon the safety of users of the Oxford Green Belt PRow (184/22/10) or PRow 184/50/10.</p> <p>If users of these two PRow wish to travel from one to the other, they are required to walk along the B4017 Cumnor Road. The B4017 Cumnor Road has no footways in this location and pedestrians are required to walk within the carriageway and share the carriageway with all vehicles. The B4017 Cumnor Road is not designated as a PRow and pedestrians walk along its carriageway at their own risk. The widening of the B4017 Cumnor Road [APP-209] would provide a wider carriageway and would provide additional space for vehicles to pass any pedestrians they may encounter. This would have the effect of increasing separation distances between vehicles and pedestrians and improve the amenity for pedestrians. Thus, the widening of the B4017 Cumnor Road [APP-209] would provide benefit to users of the Oxford Green Belt PRow (184/22/10) and PRow 184/50/10 in this regard.</p> <p>ES Appendix 12.8 Accesses and Highway Drawings Part 4 of 4 [APP-209] sets out the proposed modifications to the B4017 Cumnor Road / B4044 Eynsham Road mini roundabout, which consists of minor widening on its south eastern side.</p> <p>There would be no change to its northern side or to its south western side, therefore the businesses, dwellings, Farmoor Village Hall and Farmoor Stores would be unaffected in this regard.</p> <p>The widening on its south eastern side would result in the temporary loss of some hardstanding between the car sales area and the carriageway. The Applicant has been in full liaison with the owners of the car sales area throughout the design process prior to the submission of the application for Development Consent and</p> | Traffic_Transport_and_Access |

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| | | | throughout the Examination and they are satisfied with the proposed works to the mini roundabout. | |
| REP5-077 | Cumnor Parish Council | <p>Q2.9.2 CPC thanks the ExA for asking this question on cumulative assessment, but notes that the applicant has still only (on 22nd August 2025) 'proposed' to submit one 'at Deadline 5' (12th September 2025). This for a planning application registered on 12th December 2024 and of which the applicant has been informed on numerous occasions by VWHDC and CPC before, during and after the oral hearings in May 2025</p> | <p>An updated ES Chapter 20: Cumulative Effects and Inter-relationships [REP5-022] was submitted at Deadline 5.</p> <p>This Chapter has been updated in line with the Applicant's commitment to do so at Deadline 5. It reflects changes in the status of surrounding developments considered previously including the resubmission of the previously withdrawn application for development of up to 500 residential dwellings on Land South of Perdiswell Farm (25/01510/OUT), and similarly for the resubmission of a solar farm application proposed on Land to the West of Red House Farm (P24/V2489/FUL).</p> <p>Furthermore, the Chapter considers cumulative effects for new applications as well.</p> | acknowledgment response required |
| REP5-077 | Cumnor Parish Council | <p>Q2.14.1 CPC thanks the ExA for raising questions about the cumulative noise in PROW. However, CPC notes that the applicant has chosen in the case of the southern site to only consider noise envelopes caused by Power Converter Stations, so underestimating harm because of the omission of the noise envelopes associated with either its proposed 'substation' and/or the NGET substation where, for example (see para 11 of REP4-045) a 95 dB(A) sound power level is quoted in the applicant's July 2025 Explanatory Note for the Change Request3 . CPC asks the ExA to request the applicant to re-present its answer to Q2.14.1 to include the impact of all noise envelopes from installed equipment in the southern site on PROW.</p> | <p>As has been acknowledged previously that noise from some of the infrastructure associated with the solar farm (PCS units, and substations) will be audible on some parts of the PROW network. It is not uncommon for industrial noise to be audible on the PROW network. This was discussed at Deadline 4 (Applicant's Responses to ExA's Second Written Questions (ExQ2) Rev 0).</p> <p>Furthermore, users of the PROWs are permitted access to the PROW to enable travel between point A and point B, therefore user of the PROWs are transient receptors.</p> <p>This transient nature of the receptor ensures a limited exposure to any operational phase noise. This short time period reduces the adverse effect from operational phase noise so that a significant adverse effect is avoided. This was discussed at Deadline 4 (Applicant's Responses to ExA's Second Written Questions (ExQ2) Rev 0).</p> | acknowledgment response required |
| REP5-077 | Cumnor Parish Council | <p>Responses to the Examining Authority's ExQ2 from the host authorities (REP4-074 and REP4-075) CPC supports and endorses the responses of the host authorities in REP4-074 and REP4- 075, especially the omissions map for the southern site in the latter document. 5. Responses to the Examining Authority's ExQ2 from Stop Botley West (SBW) (REP4-093 to REP4-096 inclusive) CPC supports and endorses the responses of Stop Botley West in REP4-093 to REP4-096 inclusive. CPC draws the ExA's attention to the fact that as the applicant has failed to respond to your request to provide a layered map showing all the requests for panel removal, SBW has done so itself at its own expense. CPC thanks SBW for doing so, especially for the detail shown in REP4-096 covering the proposed power station's southern site</p> | <p>The Applicant has provided a full response in respect of additional areas of proposed solar panel removal as part of its Rule 17 Response submitted at Deadline 6. This includes comments on and a response to the proposals in REP4-074 and REP4-075</p> | acknowledgment response required |
| REP5-086 | Forever Fields Community Art Project | <p>Reference : REP3-093/14.3 Applicants Responses to other D3 submissions/Page 82</p> <p>The response is inaccurate and does not reflect the behaviour of the applicant at the Forever Fields Exhibition on November 26th 2023. Mr Owen Lloyd is the only PVDP representative who attended. He hardly spoke to anyone present other than Mr Thompson and during the 60 - 90 minutes he was present, focused almost entirely on contributing to an interview with Meridian TV.</p> <p>We are not aware of any attendees being asked whether they saw climate change as being a threat to the landscape depicted in the exhibition as PVDP suggest in their REP3-093 response. We respectfully request that Mr Owen Lloyd takes some time to actually read the Forever Fields Book which is now available online via the PINS website D1 published submissions: "Forever Fields book - Any post-hearing submissions requested by the ExA - 9th June 2025" (PDF, 35MB).</p> <p>We repeat the assertion that PVDP have not taken the Forever Fields Community Art Project seriously. Questions raised in the Forever Fields book have not been answered, and a credible plan for reinstating the fields in 42 years time does not exist. Without a credible plan the proposal cannot reasonably be described as 'temporary' and as such, should not be recommended for approval.</p> | <p>The Applicant spoke to a number of attendees at the Exhibition as well as artists present. The Applicant has read the Forever Fields book submitted at D1. The DCO consent applied for is time limited, not permanent, which makes it temporary in accordance with National Policy NPS EN-3. The position has been confirmed in a number of made Solar DCO decisions by the Secretary of State, including most recently the 60 year consent for the Tillbridge Solar Project. The decommissioning plan can be found at [APP-236] which secures re-instatement.</p> | Community_Benefits_and_Impacts |
| REP5-087 | Forever Fields | <p>The Forever Fields Community Art Project Team appreciates that the Planning Inspector has taken the points we made in the first Open Floor Hearing very seriously. However, after several months of examination, and despite thousands of pages of additional paperwork from the applicant and landowner, Forever Fields still</p> | <p>We acknowledge the concerns raised and recognise that they are based on the assumption that there will be a shortfall in funds in 2068, which could be resolved by a fund and escrow. We do not</p> | Decommissioning |

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| | Community Art Project | <p>considers the application flawed. It should not be recommended for approval.</p> <p>We are however, mindful of the complexity of the issues being discussed and can understand the challenges facing the Inspector in reaching a decision to recommend approval or not.</p> <p>With this in mind, our submission for Deadline 5 is solely focused on decommissioning and re instatement in the event of a recommendation to approve. This is because Forever Fields is about protecting the landscape for future generations and about how the landscape plays a vital role in our culture and sense of health and wellbeing. If approval is to be justified partly on the basis that it is 'temporary' there must be a clearer understanding of what decommissioning and re-instatement means and how it is to be funded. This is because without an agreed plan for what happens in 42 years' time to restore the fields, the word 'temporary' is not suitable to describe what is being examined, and re-instatement will not be taken seriously by the applicant or the landowner. In respect of PVDP and The Blenheim Estate, how seriously the definition of 'temporary' is taken will be measured in the context of investment and financial return. Neither party is proposing this scheme with civic priorities as their main ambition. If they are not held directly financially accountable for delivering a 'temporary' scheme it will be uncertain in 42 years' time what will happen and there is the potential that green fields lost will be green fields lost forever.</p> <p>To achieve certainty that the application is for 'temporary' use of the land, the applicant and the landowner must be held financially accountable for decommissioning and reinstatement, whether or not they are directly involved for the entire 42 year period.</p> <p>Compulsory purchase of the land may otherwise remove any future commitment from the landowner. Equally, based on previous experience of the applicant's business model, the likely sale of the planning approval and CPO for the solar farm land prior to the build out, means that PVDP are also potentially absolved from any future commitment. It is reasonable in this circumstance to make approval conditional on the creation of an escrow account for decommissioning and re-instatement with funds held independently. This fund could be added to as Botley West becomes operational, by insisting that ongoing contributions to the escrow account in the form of a percentage of profit are made annually to satisfy future cost liabilities.</p> | <p>share these concerns because for the reasons outlined in the above (response to Rep 5-116) , BTW will generate sufficient funds from the recycling of raw materials, meaning there is no need to set up a fund and escrow. In addition, the British legislator also does not share these concerns and has therefore not created an obligation to set aside funds.</p> <p>The Applicant provided a detailed position on the nature of 'temporary', the lifespan typically associated with large-scale solar farms, and the overall commitments towards decommissioning and reinstatement at the end of that lifespan, in the responses to Relevant Representations at Section 11 [REP1-020] , in the written summary of oral submissions to ISH1 [REP1-019] and in responses to ExQ 1.1.16 [REP2-025].</p> <p>As referred to above, the position has been confirmed in a number of made Solar DCO decisions by the Secretary of State, including most recently the 60 year consent for the Tillbridge Solar Project.</p> <p>The Applicant's position on the need for a decommissioning bond is set out in part 5 of the Applicant's response to ExQ 1.1.16 [REP2-025] – specifically that, in the Oaklands Solar Farm decision, the Secretary of State noted that <i>'there is no policy requirement for a decommissioning fund to be imposed as paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments'</i>.</p> <p>In terms of the concerns raised about PVDP being absolved of future commitment regarding the DCO, Article 34 of the draft DCO [CR2-009] has transfer mechanisms that would mean that, should transfer to another entity take place at a later stage, that entity would be legally bound to comply with the requirements of the DCO, including on decommissioning.</p> | |
| REP5-087 | Forever Fields Community Art Project | <p>It is difficult to estimate how much it will cost to decommission and re-instate the fields to their current condition if approval is given. However, there are various sources online that suggest decommissioning may cost between £40 - £50,000 per MW. This would suggest that Botley West may cost: £45k X 840MW = £37.8m to decommission</p> <p>If one considers the impact of inflation over the last 42 years - based on Bank of England calculators, one would need to apply a factor of 3.4 if similar inflation occurs over the next 42 years: £37.8m x 3.4 = £128.5m.</p> <p>It is reasonable to assume that restoration of this quality and scale of Greenbelt/Farmland adjacent to such rich heritage and landscape assets could cost even more: At least £150m - £175m cost in 42 years' time seems realistic. It is reasonable to request at least half of this sum is paid into escrow at the point of approval. Based on a minimum £150m being required in 42 years' time, and discounting that sum by the factor of 3.4 this would require: £44.1m to be deposited into an independent escrow account on approval of the scheme. (This also has the benefit of part 'insuring' against any 'half built' scheme in the event of default or financial over-run which leads to the developer being unable to complete the build out.) A proportion of the balance of funds needed could then be paid annually based on actuarial valuations each year. We acknowledge that these numbers are our estimates based on information available online that is general rather than specific to the Botley West proposal. The applicant and the landowner will be able to resource the access of better quality information, and provide guidance to the Inspector as to the estimated cost of decommissioning and re-instatement in the case of Botley West.</p> <p>The Forever Fields Team therefore request the Inspector asks the applicant and the landowner to provide guidance on this issue prior to making any recommendation for approval. In addition, we request that using their cost estimates the applicant provides a detailed, fully funded plan to satisfy the Inspector that any recommendation for approval to the Secretary of State is based on a comprehensive plan for a 'temporary' scheme that holds as a condition, funding for decommissioning and re-instatement.</p> <p>This would ensure that the application and approval can genuinely be described as 'temporary' and that the land will be FOREVER FIELDS.</p> | <p>We acknowledge the concerns raised and recognise that they are based on the assumption that there will be a shortfall in funds in 2068, which could be resolved by a fund and escrow. We do not share these concerns because for the reasons outlined in the above (response to REP5-116) , BTW will generate sufficient funds from the recycling of raw materials, meaning there is no need to set up a fund and escrow. In addition, the British legislator also does not share these concerns and has therefore not created an obligation to set aside funds. It should be noted that under Japanese law, the responsibility for securing funds for decommissioning lies with solar plant operators, and not with developers. It applies only ten years prior to the end of the project period.</p> <p>The Applicant's position on the need for a decommissioning bond is set out in part 5 of the Applicant's response to ExQ 1.1.16 [REP2-025] – specifically that, in the Oaklands Solar Farm decision, the Secretary of State noted that <i>'there is no policy requirement for a decommissioning fund to be imposed as paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments'</i>.</p> | Decommissioning |

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| REP5-139 | Stop Botley West Limited | <p>Historic Environment</p> <p>2.2. SBW welcome the findings of the Technical Review provided by ICOMOS which concludes that the proposed development individually and cumulatively presents a significant adverse impact on the Outstanding Universal Value (OUV) of the World Heritage Site (WHS) at Blenheim Palace.</p> <p>2.3. ICOMOS's concerns regarding the lack of adequate protection of the WHS's setting provided by the Management Plan, especially given the absence of a buffer zone, reflect points previously and consistently raised by SBW in previous submissions. In particular, SBW have, from the outset, raised concerns with the absence of the assessment of aspects of setting other than visual from the Applicant's heritage reports and the contribution these make to then heritage assets at Blenheim Palace. ICOMOS have raised similar concerns, stating that setting should be understood more broadly incorporating 'perceptual, cultural and experiential dimensions'. SBW welcome the opportunity to review the Applicant's forthcoming updated assessments.</p> <p>2.4. In addition, it is also noted that ICOMOS state that the removal of the areas proposed by the Applicant would be sufficient to reduce the 'substantial harm' that the project would have on the OUV. It is understood that this relates to the areas proposed by Historic England to be removed and which are anticipated as part of Change Request 2 rather than others previously proposed by the joint authorities and ICOMOS-UK. SBW welcome the opportunity to review the proposed changes and updated heritage reports, and note ICOMOS's reference to 'substantial harm' to the WHS.</p> <p>2.5. The Applicant notes at Q1.6.16 that they welcome Historic England's assessment that the impact on the WHS would be less than substantial. We would like to reiterate that less than substantial harm remains a high bar, particularly where highly graded heritage assets of international significance could be affected. Additionally, it is noted that the Applicant does not attempt to reconcile this within their current assessment of negligible adverse impact as identified in the current ES.</p> <p>2.6. The Applicant also states at REP3-089 that the driver for changes to the scheme is the WHS due to its international significance. However, SBW would like to highlight that other highly graded heritage assets in particular should still be taken into consideration and mitigation measures applied in respect of one asset may not be appropriate to another. SBW is therefore concerned that the Applicant is overlooking other impact on highly graded assets that require mitigation by focusing areas of change on the WHS.</p> <p>2.7. SBW notes the delay with the archaeological investigations and the subsequent reporting. Notwithstanding the Applicant's view that the geophysical survey has been reliable to do, we look forward to the opportunity to review and comment on these when available as we share Historic England's view that any remains will be of intrinsic interest and require individual review.</p> | <p>The Applicant would refer to their response to the second ICOMOS Technical Review [REP4-052] which is set out in the Applicant's Responses to other D4 submissions and comments on Interested Parties' Responses to ExA's Second Written Questions (ExQ2) submitted at D4 [REP5-005], and also to the updated Heritage Impact Assessment submitted in response to Change Request 2 (ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2-036].</p> <p>The Applicant's updated assessment, following the acceptance of the changes set out in Change Request 2, is that the proposed development would not result in any harm to the significance of the Blenheim Palace World Heritage Site.</p> <p>The Applicant would point out that the WHS is considered to be of international significance, therefore it is reasonable to make every effort to avoid harm to its heritage significance. For all other designated heritage assets any harm falls to be considered in line with the tests set out in national planning policy.</p> <p>The Applicant can confirm that the draft reports on the results of the trial trenching are being provided for submission at Deadline 6.</p> | Historic_Environment |
| REP5-139 | Stop Botley West Limited | <p>Landscape</p> <p>2.8. We understand that a revised LVIA will be submitted at Deadline 5 which will respond to some of the comments raised by the ExA. Within this, we would expect there to be a reconsideration of the following:</p> <ul style="list-style-type: none"> • The assessment threshold for significance which is currently at odds with the rest of the supporting reports. The applicant has made reference to this being reviewed in the resubmitted LVIA. • There remains outstanding issues with the judgement on the impact of the proposed mitigation. It is quoted as that it "serves its purpose and works as a positive enhancement measure" and that there will be "no loss of existing landscape elements attributable to the proposed development. In terms of visual effects, the screening by the proposed mitigation planting would change views from several footpaths/PRoWs, however the overall quality of the available views would not be affected". It is our view that there will be an impact on views which contribute to the landscape character and the experience of the wider landscape and the quality of the views. • We expect the updated LVIA to consider the change in views as a result of the introduction of the mitigation measures, particularly the hedgerows along the publicly accessible routes. • No RVAA has been submitted yet and there remains questions over the extent to which buffers will be increased and the evidence to support the judgements on the impacts of residential receptors. • The selected photomontage locations to be justified. • Addressing the comments from ICOMOS and Historic England on the relationship between the wider setting of the WHS and its OUV baseline in order to understand the contribution of the landscape character makes to the property and its assets and to support judgements on the effects of the proposals on the landscape character. The HIA and the LVIA are contradictory in their judgement of the sensitivity of the landscape surrounding the WHS and this needs to be reviewed with the benefit of a clear evidence base. | <p>The assessment threshold for significance at odds with the rest of the supporting reports.</p> <p>In its Response to the Rule 17 Letter (17th June 2025) [REP2-029] paragraphs 1.1.2 to 1.1.13 and again at paragraph 1.2.6 of the Applicant's response to the OHA's response to the Rule 17 Letter [REP3-066] where EIA guidance (The state of environmental impact assessment in the UK, IEMA 2011) states that "<i>there is no regulatory requirement to apply the same methodological approach to significance evaluation across an EIA</i>". In summary, there is no impediment to the LVIA if it uses a tailored approach, to ensure it follows GLVIA3 guidelines and Landscape Institute technical guidance notes (LI TGN). GLVIA3 and the LI TGNs were agreed as the relevant guidance to follow, with the OHAs at a meeting with the Applicant on the 10th June 2025 and as agreed in the draft Statement of Common Grounds with the OHAs</p> <p>Impact on views which contribute to the landscape character</p> <p>Appendix C of the oLEMP now states:</p> <p><i>"Once grown hedgerows should be managed to a height of approximately 3m during operation, managed annually, accepting that hedgerows may be managed to a lower height (the locations and heights of which to be agreed in consultation with the Oxfordshire Host Authorities) in order to support important and/or</i></p> | Landscape_and_Visual_Impacts |

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| | | | <p><i>more open views, provided such maintenance falls within the scope of the environmental assessment."</i></p> <p>Viewpoint 38 is one example of where this may need to be considered further, at detailed design, through consultation with the OHAs. However, it should be noted that hedgerows at 3m, as currently show, would not prevent the characteristic views across the valley towards Church Hanborough from this location. With the spire of the Church of St. Peter & St. Paul remaining in view.</p> <p>RVAA</p> <p>The Applicant has carried out a Residential Visual Amenity Assessment, which is submitted at Deadline 6 [EN010147/APP/17.13].</p> <p>The selected photomontage locations to be justified</p> <p>A ZTV and Representative Viewpoints figure(s) was included at scoping. Details of correspondence with local authorities, regarding the inclusion of requested viewpoints, is given at Table 8.5 of the LVIA. Any authority not included within this table, is due to there being no specific mention / requests within their respective scoping consultation response in 2023. 31 out of 54 viewpoints have been illustrated through photomontages. Several viewpoints are close to each other, and this was considered sufficient representation for assessment proposes.</p> <p>The HIA and the LVIA are contradictory in their judgement of the sensitivity of the landscape surrounding the WHS</p> <p>The Applicant has provided an updated HIA following acceptance of the changes set out in our Change Request 2 notification [REP2-045]. This addresses the potential impact on the World Heritage Site as a result of the change within its setting. The updated HIA (ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site (Rev 1) [CR2-036]) includes a figure in which a sensitivity judgement is applied to the land owned by Blenheim Estate. This sensitivity is in relation to the significance of the WHS, i.e. how any area of land has the potential to contribute to this significance. The LVIA assesses impacts on other receptor groups and therefore the levels of sensitivity applied to any area of land will not necessarily accord with the HIA.</p> | |

2.3 Public / Landowner

Table 2.3: Applicant's Responses to Representations provided at Deadline 5 – Public / Landowner

| Examination Library Ref. | Name | Comment | Applicant's Response | Issues |
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| REP5-064 | Bojan Ivanovic | <p>Dear Inspector,</p> <p>I write once again as a local resident and Interested Party to raise formal objection to the suggestion that the proposed Botley West Solar Farm — a scheme on a land area comparable to Heathrow Airport, and unprecedented in the Oxford Green Belt — can be lawfully or credibly described as “temporary” development.</p> <p>It is perhaps unsurprising that the developer clings to this convenient fiction: their “very special circumstances” case — the only legal basis on which inappropriate development may proceed in the Green Belt — is high-level, generic, and wholly unsubstantiated. It relies on vague appeals to renewable energy policy while ignoring the specific legal tests applicable to this location. In short, it is greenwash masquerading as planning justification.</p> <p>1. A 40-Year Scheme Is Not Temporary</p> <p>A development of this scale and duration will dominate the landscape for two generations, excluding it from agricultural, ecological, and public use. With roads, substations, fencing, and solar arrays in situ for 40 years, the effect is indistinguishable from permanent industrialisation of open countryside.</p> <p>2. Case Law – Dillon v Secretary of State [2010]</p> <p>The High Court has already made clear in Dillon v Secretary of State for Communities and Local Government [2010] EWHC 1085 (Admin) that the label “temporary” does not obviate the requirement to assess full Green Belt harm. Openness and landscape character must be examined in reality, not brushed aside by time-limited promises.</p> <p>3. Planning Statute – Town and Country Planning Act 1990 The Act demonstrates the absurdity of this position. Under s.171B, a development becomes immune from enforcement after four years — whether from substantial completion of building works or unauthorised residential use. In law, four years may suffice for permanence. The idea that forty years is anything less is incoherent.</p> <p>4. De Facto Rezoning</p> <p>The practical outcome is not a “temporary” project, but a de facto rezoning of productive Green Belt into an industrial energy zone, with the uplift in land value accruing to its private sponsors (principally the Blenheim Estate). That uplift depends upon the Secretary of State exercising powers to override local planning protections. This is not essential infrastructure but speculative development — an archetypal case of the Green Belt being transformed into a “grey belt” by administrative sleight of hand.</p> <p>5. Request for Disclosure of Legal Advice Given the centrality of classification, I request that:</p> <p>a) The Government and the Inspectorate confirm whether legal advice has been sought on whether a 40-year solar scheme can lawfully be treated as “temporary”;</p> <p>b) That such advice, or at least a summary, be published;</p> <p>c) That the developer and Blenheim Estate disclose any advice relied upon to justify their position.</p> <p>This is not a procedural quibble. It is determinative of the appropriate policy framework and whether the NSIP regime can be legitimately engaged.</p> <p>6. Conclusion</p> <p>The Botley West proposal would be one of the largest Green Belt developments ever consented. Its 40-year footprint renders it permanent in all but name. To classify it otherwise is to subvert statute, ignore case law, and erode public confidence in the planning system. Brownfield land and commercial rooftops — closer to major energy users, with lower transmission losses and no Green Belt conflict — are clearly available and superior alternatives. Their wholesale dismissal exposes the present scheme for what it is: not necessary, but opportunistic. Once such an industrial use is established in the Green Belt, the precedent is set, and the land is functionally reclassified for future intensification. It is not merely a breach but an irreversible transformation, undermining the permanence that is supposed to define Green Belt</p> | <p>The Applicant has nothing further to add from its previous submissions on need, including reference to ‘queue for solar’ - see for example, Applicants Response to other Deadline 3 Submissions – [REP4-038], addressing the OHA's [REP3-072] and Cassington Parish Council [REP3-076] comments on need.</p> <p>The Applicant also has nothing further to add in respect of the temporary nature of the development. The Applicant's position on this was set out in the Applicant's responses to Relevant Representations [REP1-020], Section 11.</p> | <p>acknowledgment response required</p> |

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| | | policy. I urge the Inspectorate to apply the NPPF and case law rigorously and to resist the mischaracterisation of this project as “temporary.” Yours faithfully, Bo Ivanovic | | |
| REP5-065 | Bojan Ivanovic | <p>[Please see link for full response]</p> <p>Summary:</p> <p>Jurisdictional Concern Over NSIP Status -The project appears to have artificially aggregated non-contiguous land parcels solely to meet the Nationally Significant Infrastructure Project (NSIP) size threshold, risking procedural unlawfulness and undermining legal compliance. NSIP designation should reflect genuinely integrated projects.</p> <p>Procedural Inertia and Avoidance of Engagement -The Inspectorate's approach of merely publishing representations without substantive engagement delays addressing critical legal issues, effectively avoiding timely scrutiny and risking a predetermined outcome.</p> <p>Misleading Use of Statutory Timetables -The statutory timetable is treated as a fixed deadline rather than a maximum limit, allowing the process to slow-walk substantive examination and prolong uncertainty for affected parties.</p> <p>Lack of Departmental Involvement and Oversight -Key departments like DEFRA, responsible for Green Belt and farmland protection, have not been formally engaged, undermining expert and local oversight and allowing controversial issues to be deferred to the Secretary of State.</p> <p>Unchallenged Developer Claims and “Green” Narrative -The developer's assertions about benefits such as lowering electricity bills and preserving agricultural land remain untested and unsubstantiated, risking decisions based on marketing rather than evidence.</p> <p>-Significant evidence shows solar farms and related infrastructure can reduce nearby property values by 5% to 10%. The Examining Authority must rigorously assess these impacts and conflicts of interest, which have been inadequately addressed to date.</p> <p>Appearance of Undue Influence and Call for Independent Scrutiny -The process gives an impression of corporate overreach and political influence, with procedural delays shielding DESNZ and DEFRA from scrutiny. The Examining Authority is urged to compel legal and policy responses or commission independent advice before final recommendations.</p> | <p>The Applicant responds as follows to the IP's concerns:</p> <p><u>Jurisdictional Concern Over NSIP Status:</u> The Applicant has previously addressed this in Section 21 of the Applicant's responses to Relevant Representations [REP1-020] and its position has not changed. Under section 31 of the Planning Act 2008, Nationally Significant Infrastructure Projects are required to be consented through a DCO. For Utility Scale Solar projects, such as the Proposed Development, if more than 50 Megawatts capacity is being generated it is captured as a Nationally Significant Infrastructure Project. On that basis, it would not be possible for the Applicant to seek consent for the Project through any other consenting process. ES Chapter 5 - Alternatives Considered [APP-042] explains the size, location and extent of land parcels considered, and why the land identified was considered most appropriate for the Project. While larger sites of contiguous ownership were preferred, these were not available in all cases and taking into account other site constraints.</p> <p><u>Procedural Inertia and Avoidance of Engagement:</u> This appears to be a criticism of PINs and its process. The Applicant does not subscribe to the IP's criticism; the process has followed a well-established protocols and procedures. The PINs examination of the draft DCO has been thorough.</p> <p><u>Misleading Use of Statutory Timetables</u> Again, this appears to be criticism of process. The Applicant does not agree with the UIP's assertions.</p> <p><u>Lack of Departmental Involvement and Oversight</u> This appears to be another criticism of process, but not one subscribed to by the Applicant. For the avoidance of doubt, the Applicant would also state that it is beyond their gift to 'force' consultees to participate in the process. The IP may also be interested to know that some statutory Consultees now demand fees (under Reg 12A of The Infrastructure Planning (Fees) Regulations 2010 (as amended by The Infrastructure Planning (Fees) (Amendment) Regulations 2024 (the “Regulations”)), payable by the Applicant, in order to participate in the process. The Applicant has also agreed to pay the majority of the host authorities costs on order for them to properly engage in this consenting process, via a Planning Performance Agreement.</p> <p><u>Unchallenged Developer Claims and “Green” Narrative</u> For the avoidance of doubt, the Applicant is no longer offering a facility whereby they can subsidise electricity costs. Notwithstanding, in the Applicants view, the ExA have thoroughly tested the Applicants proposals. The Applicants use of land and its ability to preserve for agricultural purposes is secured as part of the Decommissioning Plan [REP4-030]. Paragraph 2.1.1 confirms that “<i>The land within the Project Site Boundary will be returned to the respective landowners and to its original use after decommissioning</i>”.</p> <p><u>Reduction in Property Values caused by solar</u> This is not a planning matter that, even if it were true, the Applicant nor the ExA and Secretary of State, would not ordinarily consider in the planning balance.</p> | acknowledgment response required |

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| | | | <p>The IP may be interested to know that despite one IP's concerns and accusations of the developer's proposals detrimentally affected his house price, saying that the proposals had substantially reduced his house value, nevertheless sold his property recently for its asking price.</p> <p><u>Appearance of Undue Influence and Call for Independent Scrutiny</u></p> <p>This appears to be another criticism of process. The Applicant does not subscribe to the IP's concerns.</p> <p>The Applicant would respectively remind the IP that the decision making process and how decisions are made were set out clearly by the ExA in the Preliminary Meeting (PD-006). The process must accord with the Planning Act 2008 and related Regulations, advice and guidance. At Appendix B to the PM letter, the ExA made it clear that it will consider the Proposed Development in accordance with the relevant NPSs and any other applicable policy or considerations the ExA deem to be important and relevant. The PA2008 makes it clear that, in making a decision, the relevant Secretary of State (SoS) "must decide the application in accordance with any relevant NPS" (s104(3)), subject to certain provisos. Essentially, the provisos are that the application must not breach legal or treaty obligations, and that any adverse impact of the Proposed Development would not outweigh its benefits.</p> <p>The SoS is entitled to disregard any representations that relate to the merits of the designated National Policy Statements (NPS). In practice, this means that the ExA will not spend time examining representations that challenge policy set out in NPSs, or the validity of NPSs themselves. The focus will be on the merits or disadvantages of the Proposed Development, tested to the appropriate extent using the tests set out in relevant designated NPSs that are in force. Other important and relevant planning policies that the ExA may consider include policies in the relevant local authorities' development plans. However, if these conflict with policy in a NPS, then the NPS will take precedence.</p> | |
| REP5-071 | Cassington Village Hall Management Committee | <p>Response to PVDP reply to our concerns</p> <p>Please see below the comments from Cassington Village Hall committee in response to the applicant's reply to our previous concerns raised.</p> <p>Overall change to the rural nature of the village</p> <p>The committee previously expressed concern regarding the overbearing size and the location of the potential development so close to the village of Cassington and the impact on the community as a whole. Although close to Oxford, residents often choose to live here because of the rural nature of the village community with easy access to the beautiful countryside around.</p> <p>The applicant's answers did not appear to address the detrimental environmental impact the development would have on the overall nature of the village and the wellbeing of the inhabitants.</p> | <p>The Applicant acknowledges the concerns of the IP. While the solar panels represent a change in the use and appearance of the fields, the Applicant believes that the benefits to Cassington in terms of flood mitigation, addressing climate change and meeting Oxfordshire's net-zero commitments outweigh the perceived harm. Residents will benefit from access to the scheme's Community Benefit Fund, set at £441,000 annually, for grants for community initiatives and energy-use reduction measures.</p> | acknowledgment response required |
| REP5-071 | Cassington Village Hall Management Committee | <p>Traffic and Noise</p> <p>The committee previously expressed concern that the additional traffic and noise during construction and decommissioning would detrimentally impact the activities for all ages which take place in the village hall. The response points to a document which highlights the increased traffic locally but dismisses significant overall effects to traffic and noise. However, it does not appear to address the specific impact on traffic through Cassington village which may increase due to surrounding roads having heavier construction traffic.</p> | <p>Section 12.7 of ES Volume 1, Chapter 12 [REP5-016] and Appendix 12.6 Construction Vehicle Trip Generation Assumptions [APP-204] sets out an access strategy for construction vehicles. As part of this access strategy, construction vehicles will not travel through Cassington.</p> <p>This access strategy is set out as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [CR2-045] and is secured at Schedule 13 of the Development Consent Order [CR2-009].</p> <p>An assessment of the impact of construction traffic upon traffic and transport receptors is set out in section 12.10 of ES Volume 1, Chapter 12 [REP5-016], which has been prepared in accordance with industry standard guidance and good practice and aligns with the approach adopted for similar infrastructure projects. It assesses the impact of construction traffic upon driver delay (congestion, including the impact upon driver delay from installing cables within roads), non-motorised user delay, non-motorised user amenity, severance, public transport delay, road safety and the impact of Abnormal Indivisible Loads on the safety of users of the road network. It concludes that the construction traffic would not create any significant effects upon traffic and</p> | Traffic_Transport_and_Access |

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| | | | <p>transport receptors. The methodology and conclusions of ES Volume 1, Chapter 12 [REP5-016] is agreed with Oxfordshire County Council, as the Local Highway Authority, as set out in the Oxfordshire Host Authorities Responses to Examining Authority's First Written Question 1.17.10 [REP2-050].</p> <p>There is no evidence to suggest that there would be increased delay to vehicles on the highway network as a result of the Project that is so severe that it would result in other vehicles diverting away from their normal route and through Cassington.</p> <p>If there was any potential for severe delay to other vehicles to occur such that other vehicles may divert away from their route and through Cassington then (a) that would have been identified within section 12.10 of ES Volume 1, Chapter 12 [REP5-016] and (b) Oxfordshire County Council, as the Local Highway Authority, would have raised this as a concern. As above, Section 12.10 of ES Volume 1, Chapter 12 [REP5-016] does not make any such conclusions and Oxfordshire County Council agrees with the methodology and conclusions of ES Volume 1, Chapter 12 [REP5-016].</p> | |
| REP5-071 | Cassington Village Hall Management Committee | <p>Consultation</p> <p>The local consultation events which took place in the Village Hall did not provide an opportunity for the local community to have a discussion directly with the developers and their experts about their concerns and to hear their neighbours' questions and PVDP answers</p> | <p>To support engagement with the consultation process, the Applicant held a series of in-person and online information events where the proposals could be discussed with members of the Applicant's Project Team. If a member of the Project team was unable, or unavailable to answer a question put to them at an event, the consultee was invited to submit their question to the Applicant who would then subsequently respond. The Applicant's range of free-to-use contact details were operated throughout the consultation period. This has been evidenced in the Consultation Report [APP-024]</p> <p>The Applicant undertook its consultation in compliance with commitments made in its published Statement of Community Consultation, which in turn was informed through consultation with relevant local authorities. This is described in Section 6 (Preparation for Statutory Consultation) of the Consultation Report [APP-024]. This report was submitted to the Planning Inspectorate and accepted for examination (See Notification of Decision to Accept Application [PD-002]).</p> | Consultation_Process |
| REP5-072 | Church Hanborough Residents | <p>Church Hanborough Residents' response to the Applicant's answer to ExQ2.5.5</p> <p>1. The land subject to this proposal is inaccurately described by the Applicant. The ExA correctly identifies the land as field 2.116 and the northern part of field 2.115. The Applicant incorrectly states it as fields 2.116 and 2.117; however, there is no field 2.117 according to APP-131 Appendix 7.1 Historic Environment Desk Based Assessment Figure 2b (page 70).</p> | <p>There was a Field 2.117 in the original mapping, but it was not subsequently included within the Order Limits at the time that the application was submitted, following removal of land from the Order Limits after pre-application consultation. The Applicant provided a response on this point in ExQ2.2.5 [REP4-037].</p> | Acknowledgement required |
| REP5-072 | Church Hanborough Residents | <p>2. The Applicant's claim that "Panels were removed from these two fields after the Phase One consultation in November 2022 as a result of feedback from residents of Church Hanborough" is incorrect. The Phase One Consultation booklet (Nov 2022, pages 12-13) clearly labels the area of field 2.116 as "Protection of Conservation Area with opportunities for landscape enhancement." There were never any panels planned for field 2.116 due to its status within a conservation area.</p> | <p>Field 2.116 was never proposed to contain panels, precisely because it was within the Conservation Area. Panels were, however, removed from the field to the south of Church Hanborough, labelled initially as 2.117 in the informal consultation stage in 2022/3, following feedback from that Phase One consultation.</p> | Project_description_and_Design_parameters |
| REP5-072 | Church Hanborough Residents | <p>3. The Applicant has failed to justify their assertion that "Given the organic methods that a potential food grower will use, involving no chemicals and fewer tractor movements, putting the fields to this use is a better use of the land than intensive commercial agriculture as is the current use." There is no guarantee that commercial food growers will adhere to these organic methods. Furthermore, the Applicant provides no evidence that current methods employed on field 2.116 are "intensive." This is refuted by the current farmer working the land, who confirms the contrary.</p> | <p>The Agricultural Land Use and Public Rights of Way Chapter 17 [APP-054] states at Paragraph 17.9.23 that "whilst not relied upon for the assessment of permanent effects, the conversion of land from arable to grassland use managed through conservation sheep grazing, in accordance with the Outline Landscape and Ecology Management Plan can also provide benefits during the operational period to soil health.</p> <p>The greatest benefits in terms of increase in soil organic matter (SOM), and hence soil organic carbon (SOC), can be realised through land use change from intensive arable to grasslands. Likewise, SOM and SOC are increased when cultivation of the land for crops (tillage) is stopped and the land is uncultivated (zero tillage)".</p> <p>Following decommissioning of the Project, the Applicant will be required to return the land to its original owner. It will be open to the original owner at that time to determine how they want to use the land. The Applicant has no control over future land use following decommissioning.</p> | Agricultural_Land_Use |

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| REP5-072 | Church Hanborough Residents | <p>4. In response to Examiner's first written questions (ExA1.16.8), the Applicant stated: "It was decided to place the [food growing] areas close to settlements to reduce vehicle movements and to make access easy for villagers." However, if the proposal no longer considers true local "community agriculture" (i.e., allotments for villagers), this rationale is invalid. Local access is unnecessary, and the commercial scheme would likely increase vehicle movements instead.</p> <p>5. The Applicant also states in their answer to ExQ1.16.8 that they "will fill all 30 hectares with food producers and expect this to have a significant effect on the volume of food the OxFarmtoFork system is able to deliver," suggesting this initiative warrants "moderate positive weight." We contend that since this initiative is unrelated to the BWSF project, it should not be given any positive weight in the assessment. Moreover, even if the Applicant reverted to offering all 30 hectares for local community agriculture (allotments), this would equate to approximately 1,200 full-size allotments (traditionally 10 poles each), far exceeding the needs of the entire BWSF site.</p> <p>Consultation The Applicant admits that the only group consulted about food growing were those interested in using the land for commercial use - OxFarmToFork. Hanborough Parish Council have confirmed that they have not been consulted on food growing areas (commercial or community), that the parish already has allotments and that, although there is a waiting list, more allotments are already planned elsewhere in the Parish.</p> | <p>The intention is that the users of the community growing areas will be drawn from nearby settlements - certainly in the case of allotments and of Cherwell Collective's food forests. If a field is being used by a single grower then the traffic will be less than currently generated by commercial farming.</p> <p>OxFarmToFork is a market for growers' produce. The Applicant will source occupants of the community growing areas and is open to applications from those seeking allotments as well those who wish to grow food on a larger scale. The concept of community food growing was consulted on at the PEIR stage, during the Phase Two consultation which ran from 30th November 2023 to 8th February 2024. The display boards at the events and the consultation leaflet showed areas available for food growing, together with the words: "<i>We are exploring areas for community food growing across three sites, and we are seeking feedback on where the community would like the areas to be located</i>".</p> <p>Furthermore, the Applicant included an outlined section on page 6 of the Phase Two Feedback Form requesting feedback specifically on where members of the community would prefer food growing to be. All Phase Two consultation materials, including the consultation leaflet, event display boards, and feedback form, can be found in the examination library [APP-029] and the Parish Council was consulted on the Phase Two materials.</p> | Community_Food_growing_Location |
| REP5-072 | Church Hanborough Residents | <p>The Applicant's change in their description of the use and purpose of the fields for retention</p> <p>1. At the time of the Statutory Consultation (Dec 2023) there was no indication that the area around field 2.116 was to be used for food growing of any sort. It was only after the DCO application was submitted in Dec 2024 that this changed - too late for the Statutory Consultation.</p> <p>1.1. In the PEIR, the key on the master plan described the "area shown in bright green" as "Meadow Grassland/Opportunities for enhancement"</p> <p>1.2. In the ES 2024 the masterplan key changed to "available for community food growing area"</p> <p>2. From the BWSF Community Consultation Leaflet Nov 2023.</p> <p>2.1. "We are exploring areas for community food growing across the three sites, and we are seeking feedback on where the community would like these areas to be sited". This text was in the corner of the map for the Northern site only.</p> <p>2.2. PVDP's consultation report mentions receiving "some feedback" but no numbers or locations of responders were given.</p> <p>3. The plan to use the land for a commercial enterprise (Farm2Fork initiative) has never been mentioned publicly until raised in the Examiners' questions. So never consulted on.</p> | <p>The concept of community food growing was consulted on at the PEIR stage, during the Phase Two consultation which ran from 30th November 2023 to 8th February 2024. The display boards at the events and the consultation leaflet showed areas available for food growing, together with the words: "We are exploring areas for community food growing across three sites, and we are seeking feedback on where the community would like the areas to be located".</p> | Community_Food_growing_Location |
| REP5-072 | Church Hanborough Residents | <p>In the absence of any consultation with the local Community, the village of Church Hanborough conducted their own survey. The village contains an adult population of around 124 in 72 properties. An e-mail survey was carried out to 106 adults in 60 properties (others don't use email or the property is empty). Around 50% of those consulted responded. 53 responses from 30 properties.</p> <p>The Applicant's plans for the land under discussion and Examiner's question 2.5.5 were explained. The questions asked and answers given were [see full response for table provided].</p> | <p>The Applicant acknowledges the survey conducted by the village of Church Hanborough but would like to reaffirm that community food growing was consulted on during the Phase Two consultation which ran from 30th November 2023 to 8th February 2024. The display boards at the events and the consultation leaflet showed areas available for food growing, stating: "<i>We are exploring areas for community food growing across three sites, and we are seeking feedback on where the community would like the areas to be located</i>".</p> <p>The Applicant included an outlined section on page 6 of the Phase Two Feedback Form requesting feedback specifically on where members of the community would prefer food growing to be. All Phase Two consultation materials, including the consultation leaflet, event display boards, and feedback form, can be found in the examination library ([APP-029])</p> | acknowledgment response required |

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| | | | <p>The responses given by the Applicant to feedback received on community food growing during the Phase Two Consultation, can be found in Table 5 of the Phase Two Section 47 Applicant Response Table [APP-033].</p> <p>The Applicant undertook its consultation in compliance with commitments made in its published Statement of Community Consultation, which in turn was informed through consultation with relevant local authorities. This is described in Section 6 (Preparation for Statutory Consultation) of the Consultation Report [APP-024]. This report was submitted to the Planning Inspectorate and accepted for examination (See Notification of Decision to Accept Application [PD-002]).</p> | |
| REP5-072 | Church Hanborough Residents | <p>A selection of comments received</p> <ol style="list-style-type: none"> 1. This field is within a conservation area. It provides a setting for Church Hanborough, the village located at the top of the hill and St Peter's and St Paul Church Spire, which is one of the most beautiful church Spires in Oxfordshire. The field should stay as it is. 2. This field is totally unsuitable for commercial or community food growing. Both need polytunnels, sheds for machinery and tools for produce packaging and distribution. They need to be fenced, and they need access. All these are incompatible with the landscape that needs to 'frame' the conservation area village. As field 2.116 is within the conservation area, any buildings or structures would need special planning permission. 3. The proposal to retain Field 2.116 within the Botley West Solar Farm boundary for "community food growing" is neither necessary nor supported by the community. The concept appears to be a late-stage addition that was not raised during earlier consultations, which raises serious concerns about transparency in the engagement process. It is difficult to see this as anything other than an attempt to offset strong local opposition with a tokenised "benefit" that is unwanted and unviable. The proposal is misaligned with local need – Our community has no shortage of nearby allotments or opportunities to grow food. What we do need is to preserve existing high-quality farmland, open green space, and vital wildlife habitat. 5. Loss of productive and biodiverse land – The field is not only agricultural but also an attractive, open landscape that supports local wildlife, including birds, insects, and small mammals. Its natural character contributes to the setting of the village and the rural approach along Church Road 6. Undermines trust – The absence of any mention of food growing in earlier stages of consultation suggests this is a reactive measure, not a planned benefit, which undermines confidence in the developer's stated intentions. 7. Scale and permanence – Even as a so-called "temporary" project, a 40-year lease represents a generational change to the landscape and land use. Once altered and industrialised, reversion to its current state — both agriculturally and ecologically — is far from guaranteed. 8. Field 2.116 is not just farmland — it is part of the village's rural character, a visually open and attractive green space that supports wildlife and biodiversity. Rebranding it as "community food growing" is a superficial repackaging of an unnecessary land grab. The proposal delivers no genuine local benefit, was never part of the initial consultation, and risks permanently damaging both the beauty and the ecology of this area. The only credible and supported outcome is for this field to be excluded entirely from the Botley West scheme. | <p>The concept of community food growing was consulted on at the PEIR stage, during the Phase Two consultation which ran from 30th November 2023 to 8th February 2024. The display boards at the events and the consultation leaflet showed areas available for food growing, together with the words: "We are exploring areas for community food growing across three sites, and we are seeking feedback on where the community would like the areas to be located".</p> <p>The field, 2.116, is currently used for food production. There is no intention to construct any structure in the field. The Applicant plans a new permissive path across the field in order to increase public access.</p> | Community_Food_growing_Location |
| REP5-072 | Church Hanborough Residents | <p>ExA Question 2.5.5 addressed to WODC</p> <p>"Do you feel that community food growing would be an appropriate use of this land having regard to heritage objectives"</p> <p>Church Hanborough residents fully endorse and support the answer provided by WODC in their response within OHA's Responses to ExQ2 (REP4-074) regarding the detrimental impact on the conservation area in particular and their statement that: "food growing spaces are often characterised by different sized plots with storage sheds, water butts, polytunnels and paraphernalia associated with cultivation and growing of food. Such structures in the context of the Church Hanborough Conservation Area would likely be regarded as uncharacteristic and would likely</p> | <p>The Applicant had several conversations at consultation events with residents of Bladon who expressed an interest in allotments near the village given current waiting lists. The Applicant is exploring the idea of a subscription plot model in order to attract potential growers, with onsite tuition and one set of shared tools to avoid multiple sheds and stores. The aim is to attract a new user who might not think about joining an allotment waiting list, offering a community and the opportunity of acquiring new skills.</p> | Community_Food_growing_Location |

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| | | <p>conflict with heritage objectives of the Conservation Area”</p> <p>Land retention in other areas</p> <p>1. Long Hanborough. Not mentioned in Examiners’ questions, not consulted on and seemingly overlooked by everyone, PVDP are also proposing “community food growing” in field 2.34, also within the Parish of Hanborough, at the junction of Lower Rd (East side) with A4095. This field is also unsuitable as it floods regularly (so not suitable for panels either) and access would be a problem - even dangerous - near this congested junction. The same questions regarding need arise as for the Church Hanborough site.</p> <p>2. Bladon (subject of question 2.5.4). According to PVDP in their answer to ExQ1 1.16.8 “the village of Bladon expressed interest in establishing an area for allotments, given current high demand and limited availability in the village’.</p> <p>In her response (REP3-095) as a Bladon resident, Frances Stevenson (also a member of SBW Steering Group) wrote: “It is unclear who the Applicant is referring to as ‘the village of Bladon’. Existing groups that might represent the village on this subject are Bladon Parish Council, Bladon Gardens Society and Bladon Allotments Association. I have spoken to each of these groups and all confirm that they have not been approached or consulted by or on behalf of the Applicant for their opinion on the community food growing proposal. The Chair of Bladon Allotments Association, which is responsible for managing the existing allotments site in Bladon, also explained that the provision of allotments in Bladon is roughly in balance with demand. Occasionally there may be a waiting list of one or two people but usually for less than a year. The facts do not support the Applicant’s claim that there is high unmet demand for allotments in Bladon.”</p> | | |
| REP5-072 | Church Hanborough Residents | <p>Conclusion</p> <p>The conclusion has to be that the idea was dreamed up by PVDP as a means of showing “added benefits” to the proposal, not consulted on, not providing any community benefit locally and imposed on villages who universally reject the idea. In the cases of Church Hanborough and Bladon, also impacting the setting of heritage assets. ALL these areas should be removed from the Order Limits.</p> <p>[see images provided in full response]</p> | <p>Community food growing was consulted on during the Phase Two consultation which ran from 30th November 2023 to 8th February 2024. The display boards at the events and the consultation leaflet showed areas available for food growing, stating: “<i>We are exploring areas for community food growing across three sites, and we are seeking feedback on where the community would like the areas to be located</i>”.</p> <p>The Applicant included an outlined section on page 6 of the Phase Two Feedback Form requesting feedback specifically on where members of the community would prefer food growing to be. All Phase Two consultation materials, including the consultation leaflet, event display boards, and feedback form, can be found in the examination library (APP-029)</p> <p>The Applicant will source occupants of the community growing areas and is open to applications from those seeking allotments as well those who wish to grow food on a larger scale.</p> | Community_Benefits_and_I mpacts |
| REP5-075 | CPRE Oxfordshire | <p>1. Response to Q2.11.4 – Best and Most Versatile (BMV) Land</p> <p>We welcome the clarification provided on the extent of BMV land that would be taken out of agricultural production if the proposed solar farm proceeds. However, we note with concern that the figure has increased from the original application. The applicant now acknowledges that 42.26% of the land to be used is BMV, a significant increase from the 38% stated in the original application. Despite this updated figure, the applicant has still not adequately demonstrated compliance with the requirements of NPS EN3, 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.”</p> <p>We urge the Examining Authority to request a clearer explanation from the applicant on these specific requirements, in line with policy.</p> <p>We also draw attention to increasing ministerial concern about the loss of BMV land to solar developments and the associated threat to food security. In July 2025, a joint letter from 30 Ministers and Lords was sent to the Prime Minister calling for a clear ban on large-scale solar installations on BMV land (ALC Grades 1, 2, and 3a). This aligns with CPRE Oxfordshire’s position, that solar development should not occur on Grades 1 or 2 land, or on Grade 3a where it negatively affects landscape value. We enclose a copy of the Ministerial letter for your consideration.</p> | <p>The areas of agricultural land within the Annex to the ExQ2 answer to Q2.11.4 indicate that there is approximately 800ha of Subgrade 3b land (62%) compared to approximately 488ha of Subgrades 1, 2 and 3a (38%) land. The land would not be taken permanently out of agricultural use, with conservation grazing proposed across the majority of the site in accordance with the outline Landscape and Ecological Management Plan (CR2-051).</p> | Agricultural_Land_Use |

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| REP5-075 | CPRE Oxfordshire | <p>2. Response to Q2.11.14 – Soil Sampling Data</p> <p>While the applicant has responded to Q2.11.14, they defer provision of soil data to Blenheim Palace. We request confirmation that Blenheim Palace will supply the full soil sampling plan as previously requested.</p> <p>Specifically, we ask for the following details:</p> <ul style="list-style-type: none"> - pH levels - Phosphorus, potassium, and magnesium levels (in parts per million, not index values) - Organic matter content - Soil sampling data for the northern site <p>The applicant's reference to a Soil Management Plan, which includes taking samples to assess nutrient levels and determine fertiliser/lime application, directly contradicts their earlier assertion that the land is too degraded to support crop growth. If nutrient application is now proposed to establish grassland, this undermines the previous justification for removing the land from agricultural use.</p> | <p>The data being requested here is not a dataset compiled in relation to the ES assessment of effects on soils or bmv and is not referenced as part of the Environmental Statement. The Applicant has liaised with Blehneim regarding the CPRE request and can confirm that the available information was shared with CPRE on the 17th October. The sampling referenced in the outline Soil Management Plan would be used to inform the aftercare of the land through the operational period.</p> | Agricultural_Land_Use |
| REP5-075 | CPRE Oxfordshire | <p>3. Responses to Q2.13.3 and Q2.13.15 – Landscape and Visual Impact Assessment (LVIA) & Residential Visual Amenity Assessment (RVAA)</p> <p>CPRE maintains that the applicant has not sufficiently addressed the need for an RVAA. The current LVIA contains several deficiencies, and there remains no clear justification for omitting a proper Residential Visual Amenity Assessment. We request that this issue be given further scrutiny, especially given the potential for significant visual impact on residential properties in the area.</p> | <p>The Applicant notes the concerns raised by CPRE Oxfordshire in REP5-075. Which were also raised at ISH2 dated 09.10.2025 and further scrutinised by the ExA.</p> <p>The Applicant has carried out a Residential Visual Amenity Assessment. This has been submitted at Deadline 6 [EN010147/APP/17.13].</p> <p>The RVAA [EN010147/APP/17.13] identifies potential effects attributed to the Proposed Development on residential visual amenity through the completion of Steps 1 to 3 of the Residential Visual Amenity Assessment (RVAA). The assessment aims to identify properties with the greatest magnitude of change, to determine whether any properties require further assessment and are to be taken forward to Step 4 of the RVAA.</p> <p>The purpose of the Residential Visual Amenity Assessment (RVAA) is to identify potential effects of the Development on residential visual amenity of such nature and / or magnitude that it potentially affects “living conditions” or residential visual amenity. This is referred as the residential visual amenity threshold. RVAA requires assessors to reach a conclusion on whether the effect of the development on visual amenity and / or views from the property reaches the threshold.</p> <p>Residential amenity is a planning matter that involves a wide number of effects (such as noise) and benefits, of which residential visual amenity is just one component. The RVAA is limited to the consideration of visual effects on residential amenity and the methodology accords with the advice in GLVIA3 and the Landscape Institute's Technical Guidance Note (TGN) 02/19: Residential Visual Amenity Assessment.</p> <p>Planning law contains a widely understood principle that the outlook or view from a private property is a private interest and not therefore protected by the UK planning system. However, the planning system also recognises situations where the effects on residential visual amenity are considered as a matter of public interest. This matter has been examined at a number of public inquiries in Wales (as well as in Scotland and England) where the key determining issue was not the identification of significant effects on views, but whether the proposed turbines would have an overbearing effect and/or result in unsatisfactory living conditions, leading to a property being regarded, objectively, as an unattractive (as opposed to a less attractive) place in which to live.</p> <p>“The planning system is designed to protect the public rather than private interests, but both interests may coincide where, for example, visual intrusion is of such magnitude as to render a property an unattractive place in which to live. This is because it is not in the public interest to create such living conditions where they did not exist before. Thus I do not consider that simply being able to see a turbine or turbines from a particular window or part of the garden of a house is sufficient reason to find the visual impact unacceptable (even though a particular occupier might find it objectionable).” (TGN 2/19 paragraph A1.14).</p> | Landscape_and_Visual_Impacts |

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| | | | <p>The RVAA consequently provides a detailed assessment of the most affected residential properties by the Project. This allows the assessor and the determining authority to make a judgement as to whether the residents at these properties and communities would be likely to sustain unsatisfactory living conditions which it would not be in the public interest to create. Reviews of decisions demonstrate that significant visual effects or changes to the views available from residential properties and their curtilage are not the decisive consideration, rather it is the residential amenity and, with regard to the Landscape and Visual Impact Assessment (LVIA), visual amenity that is determinate. In any event RVAA can be considered supplementary to LVIA following on from, and informed by, the latter's findings and conclusions. It is, however, important to note that the assessment of residential visual amenity is separate and distinct from the LVIA. RVAA focuses on private visual amenity at individual properties whilst LVIA focusses on public amenity and views. TGN2/19 makes it clear that 'combined effects on a number of residents', by means of 'aggregating properties within a settlement' is a matter of LVIA and not of RVAA.</p> | |
| REP5-075 | CPRE Oxfordshire | <p>4. ICOMOS Technical Review – August 2025</p> <p>We also draw attention to the latest technical review by ICOMOS (August 2025). It concludes that the proposed development, in its current form and cumulatively with other schemes, would have a significant adverse impact on the Outstanding Universal Value (OUV) of Blenheim Palace. ICOMOS makes four key recommendations which we fully support:</p> <ul style="list-style-type: none"> - Commission a Landscape Character Assessment focused specifically on the way in which the wider setting supports the Outstanding Universal Value of Blenheim Palace; - Require a revised and enhanced Heritage Impact Assessment for the Botley West Solar Farm that independently defines attributes of the Outstanding Universal Value, addresses the full range of experiential and cultural dimensions of setting, and integrates the findings of the Landscape Character Assessment; - Undertake a cumulative impact assessment that considers the Botley West Solar Farm alongside other approved or proposed developments in the setting, including recent and planned urban expansions; - Assess the current planning and management system for the property's setting, including the adequacy of policy protections in the absence of a buffer zone, and consider introducing additional safeguards <p>We strongly urge the Examining Authority to ensure that these recommendations are followed.</p> | <p>The Applicant would refer to their response to the second ICOMOS Technical Review [REP4-052] which is set out in the Applicant's Responses to other D4 submissions and comments on Interested Parties' Responses to ExA's Second Written Questions (ExQ2) submitted at D4 [REP5-005], and also to the updated Heritage Impact Assessment submitted in response to Change Request 2 (ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2-036]).</p> <p>The four key recommendations set out in the ICOMOS Technical Review are aimed at the State Party, i.e. the Department for Culture, Media and Sport (DCMS). The Applicant has complied as far as possible with the second recommendation in providing a revised and enhanced Heritage Impact Assessment (Rev 1) [CR2-036]). However, this does not integrate the findings of a Landscape Character Assessment as per the recommendation, as the State Party has not commissioned any such report.</p> | <p>acknowledgment response required</p> |
| REP5-075 | CPRE Oxfordshire | <p>5. Response to Q2.11.13 – Green Belt and Very Special Circumstances (VSC)</p> <p>- Economic Benefits</p> <p>The applicant's economic claims rely heavily on assumptions and the phrase "in the opinion of the Applicant". There is no quantitative evidence provided to support claims of local economic benefit during the construction or operation of the solar farm. While it is conceivable that some local employment might be created, Oxfordshire's unemployment rate is significantly lower than the national average, which limits the local labour pool. It is far more likely that construction would be subcontracted to external specialist firms. As such, the economic benefits claimed are speculative and unsubstantiated, and should be given minimal weight in any assessment of Very Special Circumstances.</p> <p>- Educational Benefits</p> <p>The proposed visitor centre is presented as an educational asset. However, any major renewable project could incorporate such a facility, regardless of location. Moreover, Oxford already has an outstanding international reputation for education, and it is unlikely that a visitor centre at a solar farm would meaningfully enhance this. In addition, the Hill End Outdoor Education Centre near Cumnor already serves this purpose exceptionally well. Therefore, the claimed educational benefits do not constitute a valid justification for development in the Green Belt.</p> <p>- Sustainability</p> | <p>The economic benefits of the Project are set out clearly in its Chapter 15, REP3-018. The scale of this renewable energy project, which is desperately needed, and the economic benefits that consequently flow from it are, in the Applicants view, sufficient to include it as a VSC.</p> <p>The education facility has now been removed from the Project, but the project has other opportunities for education, incorporating as it does information boards and fun trails that can be linked to understanding nature and renewable energy for example. Again the scale and unique opportunity to provide these facilities should not be underestimated.</p> <p>In terms of the matters relating to site selection process and the case for developing part of the Project in the Oxfordshire Green Belt has been previously set out – see for example the Planning Supporting Statement, Appendix 8, APP-225, and Chapter 5, Alternatives Considered, APP-042.</p> | <p>Green_Belt</p> |

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| | | <p>The applicant has still not provided a clear explanation as to why this site in Oxfordshire is appropriate for a solar development of this scale, particularly when it entails significant loss of BMV land, and loss of Oxford's Green Belt. Both of these are strong and valid reasons to question the site's suitability and to conclude that Very Special Circumstances do not exist in this case. CPRE Oxfordshire maintains serious concerns regarding the proposed development at Botley West and believes the applicant has not sufficiently demonstrated compliance with national policy, nor provided the necessary evidence to justify development on high-value agricultural land and within the Green Belt.</p> <p>We respectfully ask the Examining Authority to give full weight to the above points and ensure all outstanding questions are answered in full</p> <p>[letter to Prime Minister attached to response]</p> | | |
| REP5-082 | Dr Michael Franklin | <p>1) The residents of Hanborough have not been consulted on this matter by the developer, PVDP. Also, in a recent survey carried out in Church Hanborough, all but one person answered that they had heard nothing about these plans at the time of the Statutory consultation.</p> <p>2) The residents of Church Hanborough have objected almost unanimously to the field being used for the said purpose following a local survey on the matter.</p> <p>3) The field is within the Church Hanborough Conservation Area and such use would be detrimental to this status. There would be a huge negative impact on the conservation area of CH and the setting of heritage assets within it (especially St Peter & St Paul Church) which would arise from filling the conservation field with storage sheds, polytunnels, machinery and other paraphernalia associated with food growing - especially on a commercial scale on more than 12 hectares.</p> <p>4) There is no gain for the residents of Church Hanborough or the parish of Hanborough as a whole from this proposal.</p> <p>5) West Oxfordshire District Council have already raised concerns about the use of the land for such use to the examiners.</p> <p>6) PVDP have already been in contact with OxFarmtoFork initiative who sell their produce directly to the Oxford Colleges. They evidently consider these growers a better bet because they will operate on a larger scale than Cherwell Collective and Chris Goodall who they also mention.</p> <p>7) I additionally object to the area of land being retained for a similar purpose in Long Hanborough. This is sited on the corner of Lower Rd at the junction with A4095 (field 2.34). This field is unsuitable because it floods regularly and has a dangerous access point on Lower Rd.</p> <p>To conclude and in summary: I object to the land to the southeast of Church Hanborough, Field 2.116 and the northern section of Field 2.115 (according to the landscape, ecology and amenity plan [AS-022]) being made available for community food growing. This area cannot be used for panels (being a conservation area) and is unsuitable for community food growing. There is no reason for it to be included in the DCO application and these fields should be retained for agricultural use and be removed from the red-line boundary.</p> | <p>OxFarmToFork is a market for growers' produce. The Applicant will source occupants of the community growing areas and is open to applications from those seeking allotments as well those who wish to grow food on a larger scale. The concept of community food growing was consulted on at the PEIR stage, during the Phase Two consultation which ran from 30th November 2023 to 8th February 2024. The display boards at the events and the consultation leaflet showed areas available for food growing, together with the words: "We are exploring areas for community food growing across three sites, and we are seeking feedback on where the community would like the areas to be located".</p> <p>The field is currently used for food production. There is no intention to any structure in the field. The Applicant plans a new permissive path across the field in order to increase public access.</p> | Community_Benefits_and_Impacts |
| REP5-097 | Hilary Owen | <p>ExQ2.13.8 Landscape Mitigation and Decommissioning Hedges and Footpaths</p> <p>Hedges 3 m high on each side of footpaths will convert them into 'green lanes' which do occur in this area but are much less common than the open-aspect footpaths more normally found. The few existing green lanes have evolved over centuries and make an interesting but occasional variation in the landscape. The BWSF as planned would provide a network of artificial green lanes with enclosed metal fences through an industrialised landscape instead of the open-aspect footpaths in a rural landscape which we have at present. No mention is given of the time it will take for these hedges to grow, of the maintenance involved or of the effect on wildlife. From the recent experience of growing field hedges around Bladon it takes 5 years to grow a hedge 1m high during which time the solar panels would therefore be in full view from a path. Moreover, the treatment of these hedges after decommissioning has not been properly</p> | <p>No mention is given of the time it will take for these hedges to grow, of the maintenance involved or of the effect on wildlife.</p> <p>It is recognised that hedgerows and other mitigation measures would take time to establish, as would be the case in any proposal.</p> <p>Appendix C of the oLEMP now states:</p> <p><i>"Once grown hedgerows should be managed to a height of approximately 3m during operation, managed annually, accepting that hedgerows may be managed to a lower height (the locations and heights of which to be agreed in consultation with the Oxfordshire Host Authorities) in order to support important and/or more open views, provided such maintenance falls within the scope of the environmental assessment."</i></p> | Landscape_and_Visual_Impacts |

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| | | dealt with and no information is given as to the fate of hedges planted by villagers in the last few years to aid biodiversity. | <p>Treatment of these hedges after decommissioning</p> <p>The Applicant would have responsibility for the management of proposed hedgerows for the lifetime of the Project. Post decommissioning this responsibility for management would return to the landowner.</p> <p>It should be noted that after 30 years under Section 4 (a) of the Hedgerow Regulations 1997 hedgerows are deemed to be 'Important Hedgerows'. However, this does not mean that they cannot be reduced in height (as noted by the OHAs and regulated by the Management of Hedgerows (England) Regulations 2024). It does not prohibit the removal of hedgerows but requires landowners to justify the need for their removal. Section 6.1 (a) to (j) of the Hedgerow Regulations details circumstances under which the removal of any hedgerows under the Regulations may be permitted if it is required.</p> | |
| REP5-097 | | <p>ExQA2.15.4 & 5 and 2.16.3</p> <p>Education Facility</p> <p>As a resident of Bladon I have only very recently become aware of this project. There does not appear to have been any consultation with local people and the need/desirability for such a project is doubtful, to say the least. The money available could be put to much better use to improve existing facilities.</p> <p>The only access to what I presume to be the site of this proposed facility (School Lane) is totally unsuitable for motor vehicles. It is the pedestrian access route to the primary school, the primary school playing fields, the village recreation ground, the allotments, the church and the cemetery. Vehicular access is strictly limited.</p> | <p>The Education Facility - Change Request 2 and supporting documents were submitted on 12 September 2025. It was also agreed that Change 10. Education Facility has been removed from the DCO application.</p> | Community_Benefits_and_Impacts |
| REP5-097 | Hilary Owen | <p>ExQ 2.5.4 and 2.5.5</p> <p>Land retention for food growing There does not appear to have been any consultation with residents about the introduction of a commercial growing facility. If the land is now not in the plans for solar panels it should maintain its present use (presumably it is farmed) or be used for biodiversity.</p> | <p>The Applicant will source occupants of the community growing areas and is open to applications from those seeking allotments as well those who wish to grow food on a larger scale. The concept of community food growing was consulted on at the PEIR stage, during the Phase Two consultation which ran from 30th November 2023 to 8th February 2024. The display boards at the events and the consultation leaflet showed areas available for food growing, together with the words: "We are exploring areas for community food growing across three sites, and we are seeking feedback on where the community would like the areas to be located".</p> | Community_Benefits_and_Impacts |
| REP5-097 | Hilary Owen | <p>ExQ2.13.5</p> <p>Landscape and Visual Amenity</p> <p>A buffer zone of 25 m for residential buildings is totally inadequate from the point of view of an overbearing visual outlook, potential noise disturbance (e.g. in heavy rain or high winds) and security precautions (obtrusive lighting at night) - not to mention possible danger if panels are damaged in storms - which are now more frequent. Moreover, the size of the buffer zone should take into account the noise and disruption during the construction phase as well as during the operation period. The proposed buffer zone should be increased at least 10-fold, if not more.</p> <p>No information has been given (although requested many months ago from PVDP) on the location of the 156 large converter stations and 6 HV transformers which will be further large blots on the landscape for those residents unfortunate enough to live in close proximity to the solar farm.</p> | <p>The size of the buffer zone</p> <p>During the evolution of the design and layout of the Project, and prior to submission, the Applicant (initially comprising Mr C Leconte and Ms Jane Betts, using their combined planning and landscape experience of over 60 years) decided that it would be necessary to include buffer zones between residential properties and the solar arrays. They took this view in order to protect amenity - from a planning perspective and from a landscape perspective.</p> <p>There is no 'rule' as to what such a buffer should be; instead, it is ultimately a matter for professional judgement. They applied this judgement.</p> <p>That initial judgement eventually settled on a distance of a minimum of 25m from the curtilage of residential properties. They took the view that if a property had a view of the arrays, that distance was a good starting point to mitigate any unacceptable adverse effects.</p> <p>As a default, therefore that buffer distance was adopted by the Project.</p> <p>Importantly that 'starting point' continued to be tested and refined, mostly through the addition of additional planting within the buffer, in order to avoid what might be judged to be unacceptable planning or landscape effects.</p> <p>During this process it was decided the increase the buffer distance around Purwell Farm, to remove panel of the slopes to the west of that property, and to introduce woodland planting and hedgerows, which combined, achieved the protection of the amenity of that property. The landscaping solution incorporated in this area was also designed to avoid or minimise views across the Evenlode valley in this general area.</p> | Landscape_and_Visual_Impacts |

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| | | | <p>The landscape team tested whether the affected residential properties triggered the need for a RVAA. Only brief reference to such a test was made by the Applicant in its submission document [insert ref], but the workings/methodology that was applied, is now enclosed.</p> <p>It can be seen that some properties fall within the 50-250m within which properties might need to be assessed from a RVAA perspective. However, it remains that in the professional opinion of the Applicant no property would trigger the need for Step 4 of the RVAA.</p> <p>The Applicant understands that there may be a difference of opinion or judgement applied to this process, but this process was thorough and objective. Whilst some residual effects may remain, the Applicant has nevertheless applied the mitigation hierarchy in an appropriate manner.</p> <p>The location of the 156 large converter stations and 6 HV transformers</p> <p>The locations of the Power Conversion Systems (PCS) are shown on the Illustrative Masterplan [CR2-026]. The colour of which are a matter for detailed design but are proposed to be a suitable colour to site more comfortably within the landscape.</p> | |
| REP5-097 | Hilary Owen | <p>ExQ2.11.12 and 13</p> <p>Loss of Green Belt The current and proposed loss of Green Belt in the area is alarming. The demands of Oxford City and the Oxford University Colleges for land for housing and laboratory facilities and Blenheim's ongoing house-building aspirations (albeit as "Pye Homes") mean that the Green Belt is rapidly diminishing and there will soon be a 'greater Oxford'. Moreover, Blenheim Palace will have lost the rural setting which contributes to its much vaunted World Heritage status. There is no need for solar panels to be built on Green Belt land - there are many roofs in the area where solar panels can be placed, including the roofs of the thousands of homes in Blenheim's future plans for the area. Loss of Green Belt also means loss of biodiversity.</p> | <p>The Applicant has nothing further to add in respect of its assessment of the Projects impact upon the Green Belt.</p> <p>Loss of Green Belt does not equate to loss of biodiversity. The opposite is true as evidenced by the Applicants evidence in its BNG Report [ES Appendix 9.13 EN010147/APP/6.5].</p> | Green_Belt |
| REP5-097 | Hilary Owen | <p>ExQ2.11.4 and 7</p> <p>Loss of BMV Land</p> <p>Given the current ideas on Climate Change, I consider that food security will be of even more importance than energy security in future. Whereas solar panels can be placed on roofs, as stated above, crops cannot. Should we be jeopardising the country's food security by reducing the area of land available for food production by building a gigantic solar farm? Blenheim (or more exactly the Vanbrugh Unit Trust) will presumably make a great deal of money by renting out land for the solar farm but at what cost to food production security, biodiversity and the palace's World heritage status?</p> <p>Among all the figures being bandied about I have yet to find a calculation on the cost to the environment for the manufacture, construction, transportation and demolition of this vast enterprise (panels, concrete, steel, etc.). It has been suggested that if all the waste material went into landfill after its useful life, it would fill the entire existing capacity.</p> | <p>The Applicant proposes to continue to use the land underneath the solar array for agricultural productivity through conservation grazing, and Blenheim Estate has the experience and resources to be able to implement this type of grazing at scale. A description of this proposal is provided in the outline Landscape and Ecological Management Plan [CR2-051].</p> <p>The draft DCO makes provision for the decommissioning process, aligned to the draft Decommissioning Plan [REP4-030], including the proposed processes for recycling materials.</p> | Agricultural_Land_Use |
| REP5-105 | Katharine Southwell | <p>As a resident of Shipton Slade Farm hamlet, I am encouraged by the Oxford Host Authorities' support in opposing this development. Their recommendation to remove solar panels from boundary fields 1.17 and 1.18 affirms what we have long argued: that installing panels in this vale would severely damage the character and setting of our community.</p> <p>It is disappointing, however, that the applicant continues to resist making changes, despite the Planning Examiner's own assessment that the impact on our hamlet would be "severe." Field 1.17 alone spans 100 acres, lies on a visible slope facing Woodstock's new estates, and borders a well-used public footpath. Crucially, it adjoins land containing three ponds, home to a large population of Great Crested Newts—a</p> | <p>This is noted. The Applicant has submitted Change Request 2 documents that highlight changes to the Order Limits and removal of fields.</p> <p>The Applicant has carried out a Residential Visual Amenity Assessment, which includes Shipton Slade Farm. This is submitted at Deadline 6 [EN010147/APP/17.13].</p> | acknowledgment response required |

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| | | protected species whose habitat would be at risk. The developer's repeated claims that much of the installation will be hidden are simply not credible. Fields like 1.17 cannot be screened by a few hedgerows. As someone who works from home, I am also deeply concerned about the prolonged noise and disruption this project would cause, especially from pile-driving equipment operating six days a week for months. We've already experienced this from a smaller installation near the old Banbury Road, and the idea of such disruption right on our doorstep is immensely distressing and would certainly be detrimental to my mental health and my business. In closing, I would like to thank the Planning Examiners for their detailed and thorough assessment of this proposal. I greatly appreciate your recognition of the real and lasting impact this development would have on our community. | | |
| REP5-107 | Kenneth John Clark | <p>FIRST COMMENT</p> <p>ExQ1.5.26 - Funding and Corporate Structure</p> <p>Having read the Applicant's response to this (and adjacent funding questions), I can see no demonstrable proof that the company (Solar Five Limited) or its parent company (Cranssetta Investment Ltd) has, or will be able to acquire, the financial resources required to build and maintain this national infrastructure project. Should there not be some requirement to provide such a guarantee before any potential consent is granted – including a remedy if the company is unable to raise the money or is sold off to a third party at any stage? (I have noted the Applicant's response to Q1.1.6 on decommissioning).</p> <p>Whilst mentioning the parent company (Cranssetta Investment Ltd), I have not seen anything in writing which refutes any possible Russian link to the funding. I raised this with PDP and various government departments in early 2024 and the same question was raised in Parliament by the Oxford West and Abingdon MP, Layla Moran on June 27th, 2023 @ 6.19pm as shown here https://hansard.parliament.uk/commons/2023-06-27/debates/1557FA76-F69E-4E14-B459-10BD7B BB0917/RepurposingRussianAssetsToRebuildUkraine.</p> <p>A short extract from her question says.....</p> <p>"The company behind it, Photovolt Development Partners, is registered in Germany but owned by Cyprus company Cranssetta Investments Ltd. The sole shareholder is a Yulia Lezhen. A New York court case last year revealed that Yulia Lezhen's husband, Dmitry Glukhov, was the primary beneficial owner of a goldfield development company that borrowed \$58 million from Uralsib bank. The litigating company said that there was never any goldfield to be found. It looked for infrastructure, but did not find it. It alleged that the company was, in fact, a front to syphon off assets. It further said that it was not the only one, and that there were dozens of such companies, of which Photovolt—about to build to Botley West—was one".</p> <p>I would be very grateful if the Applicant could respond on these points.</p> <p>SECOND COMMENT</p> <p>Q1.5.26 - Funding and Corporate Structure</p> <p>Chris Stark (Head of Mission Control at Dept of Energy), when interviewed on BBC World at One on Dec 13, 2024, said that "The biggest barrier [to achieving the energy system that we need] is actually the way in which we manage the queue of projects to connect to our grid. So, we already have in the queue more capacity than we will ever need for our energy system." Indeed, I understand that the existing pipeline of projects offering renewable energy will already provide more than five times the energy that the government says it will need by 2035 - so why do we even need to consider another massive project like this?</p> | <p>Funding for the project's construction will be structured upon consent being granted. As explained during the examination, SolarFive is a special purpose company set up to develop, build and operate the project. SPV's are used to ringfence financing and provide a maximum of legal protection, this is absolutely common in infrastructure projects of this size. There is no necessity for SolarFive to procure or even hold sizeable assets on its balance sheet until consent is being granted and construction of the project begins. We have repeatedly responded to the unfounded allegations, that have been published by Private Eye. Unfortunately MP Layla Moran, having obviously obtained her information from the same source, has refused to meet with the Applicant, despite several attempts to discuss the issue and provide clarifications. We can only repeat that allegations are completely false and were rejected in court.</p> <p>Second comment: National Grid has assigned priority to the Botley West project under new Gate 2 regulations, which means the power to be generated by this particular project is required. Gate 2 has been designed to reduce the grid application queue and support only real projects.</p> | Funding_and_PPA |
| REP5-111 | Margaret Anne Lawrence | <p>Q2.1.5 It appears that the design of the substation is not settled and to be resolved. How then can the Applicant say that it will have no visual impact and how can we comment on its effect?</p> <p>Light and noise pollution will be substantial. Visually, the substation area can be seen from footpaths regularly used by a large number of people from Cumnor and Botley. Any substation in this location would be visible at the top of Tumbledown</p> | <p>The LVIA [CR2-021] includes an assessment of effects of the substation. It has identified and acknowledges a significant visual effect from Representative Viewpoint 50.</p> <p>The impacts of the Project have been carefully considered in relation to the existing landscape and other sensitive receptors. Impacts will be minimised by a</p> | acknowledgment response required |

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| | | Dick. It is not clear what is happening with the Red House Farm application. The area already has a planned new town development at Salt Cross near Eynsham with further major loss of green, quality agricultural land for the local population. The fields adjacent to the bottom of Tumbledown Dick are often waterlogged or flooded already. I am a regular walker on the paths here. | comprehensive designed-in landscape mitigation scheme, which has been developed and continues to be developed though the examination as part of an iterative design process in response to further concerns raised by the ExA, OHAs and other IPs. As shown on the Illustrative Masterplan [CR2-026] and the Landscape, Ecology and Amenities Plan [CR2-046] . The detailed design would be secured through requirement 5 and 6 of the DCO and be in accordance with the Outline Landscape and Ecology Management Plan [CR2-051] , including the Landscape, Ecology and Amenities Plan [CR2-046] . The Applicant acknowledges that there will be some significant effects as a result of the Project, as the example of Representative Viewpoint 50 details above. These are identified within the Landscape and Visual Impact Assessment [CR2-021] , some of these effects would be residual, i.e. for the lifetime of the Project. At the point of this submission (Deadline 6) the red House Solar Farm application to the Vale of White Horse District remains undetermined, and the Salt Cross (re-opened) AAP examination is undergoing a consultation process on policy matters. | |
| REP5-111 | Margaret Anne Lawrence | Q2.3.3 Given the long queue for existing national solar projects to be connected to the grid, why is this huge scale solar park plan required at all ? | The Applicant has nothing further to add to its previous submissions on need, and the role that Botley West can play in delivering against Government targets [PDB-014] . | acknowledgment response required |
| REP5-111 | Margaret Anne Lawrence | Q2.4.7 There is serious concern about the risk of fire as the substation is close to housing and the densely urban area of Botley and West Oxford. Given climate change and the dry, hot climates we are experiencing, it would be difficult to contain a significant fire from spreading to Oxford | Fire safety risks, including those from dry vegetation, are mitigated through setbacks from homes, clearance buffers from vegetation, and use of industry-standard infrastructure meeting all safety regulations. During operation, regular maintenance will control vegetation and ensure safe site conditions. Vegetation control is integral to fire prevention and will be addressed through regular maintenance practices, including mechanical cutting and conservation grazing, to reduce the potential for ignition beneath the panels In addition, the Applicant intention is to engage with the Oxfordshire Fire and Rescue Service, ensuring that adequate emergency accesses are maintained throughout the operational life of the project. This will ensure that any specific requirements for fire service are considered. The Project is of Critical National Priority because of the significant contribution it would provide to meeting Net Zero targets, through helping to reduce emissions that are causing climate change. | Fire_Safety |
| REP5-111 | Margaret Anne Lawrence | Q2.5.9 The funding is unclear and the applicant does not appear from their answers to be planning to manage the whole project themselves. Is it to be sold onwards ? Where does this leave local voices which are already shut out of the process via their local authorities? Q2.5.10 There has been very poor engagement and lack of answers for the local community. The size and boundaries of the project have constantly changed, making it difficult for local people to follow what is happening and new changes have not included local consultation. | The Applicant intends to invite investors to participate in the construction and operation of the Project in due course. The size of the Project has been reduced over the course of public consultations to incorporate change requests from various stakeholders. Changes in areas and boundaries may reflect mitigation measures, legal matters or technical requirements. Section 2 of the Change Request report submitted at Deadline 5 [CR2-073] , sets out the methodology and approach to consultation for the Change Request, and which was in accordance with PINS guidance, which expressly allows for targeted consultation. It nevertheless involved consultation with 51 consultees over a four week period. | Funding_and_PPA |
| REP5-111 | Margaret Anne Lawrence | Q2.6.4 Green Belt's aim is to preserve the setting and special character of the area. This project would completely destroy the setting of Cumnor and Farmoor villages. There are sweeping open views of countryside from Cumnor and Gee's Farm with views of Wytham Woods, a scientific nature research station. Mitigation suggested will in no way reinforce the character of this landscape . The impact on the character of the landscape has been inadequately acknowledged. There would be significant variance in the existing character. It is untrue to suggest otherwise. The Eynsham Road from Farmoor to Botley is a major route into Oxford. It is a narrow B road with no cycle lane. There have been cycling fatalities along this road and a long running campaign for a safe path for cyclists. Swinford Toll bridge is narrow and has a weight limit. How will large lorries access the sites in the South area? Cumnor has a narrow one way system. People living in the Botley/Cumnor area have had major | WOLP 2041 Policy PL2 The Oxford Green Belt plays a crucial role in preventing urban sprawl, protecting the unique setting and historic character of Oxford and surrounding towns, and maintaining the openness and distinct identity of settlements. Grey belt land is defined in national policy as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of the following green belt purposes: <ul style="list-style-type: none"> • to check the unrestricted sprawl of large built-up areas; • to prevent neighbouring towns merging into one another; and • to preserve the setting and special character of historic towns. Green Belt is not landscape designation. | Green_Belt |

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| | | <p>disruption to travel into Oxford due to the prolonged closure of Botley Road thanks to a disastrous rail infrastructure project since April 2023. The rail project is not set to finish until August 2026. Nobody believes this date as the project was supposed to take 6 months and has been a catastrophic failure. To add to the miseries of travel by digging up more vital roads would be an unreasonable burden to add.</p> <p>Community compensation offered is pathetic. As Layla Moran points out: we are being offered £524 per MW. In Scotland, other similar projects have offered communities £5,000 per MW.</p> <p>High fences and hedgerows to separate the solar farm from footpaths would result in tunnel effects and make the area less open, rendering it less safe for women walking on their own. It would make it an oppressive walking environment .</p> <p>Who would pay for local waste removal sites? Is it coming from our taxes? What route would waste lorries take? As far as I am aware, the applicant has never built a project on this scale. It will be one of the biggest ever built and none on this scale have been built so close to an urban area. It is highly dangerous to do so.</p> | <p>There is no visibility of the Project from Cumnor or Farmoor villages, neither the villages would appear in views with the Project.</p> <p>The revised Landscape Character Assessment is presented in 6.5 Environmental Statement Appendix 8.5 [REP5-030] This should be read with the baseline in section 8.6 of the revised ES Chapter 8 [CR2-021].</p> <p>The Applicant has agreed an annual community benefit fund of £441,000 (£525 per MW) with OCC and the other OHA. The £5000 Scottish figure comes from wind farms in receipt of public subsidy. The Applicant and OHA will work to ensure that the annual fund has the maximum local impact, and the contribution will be indexed.</p> <p>An assessment of the impact of construction traffic upon traffic and transport receptors is set out in section 12.10 of ES Volume 1, Chapter 12 [REP5-016], which has been prepared in accordance with industry standard guidance and good practice and aligns with the approach adopted for similar infrastructure projects. It assesses the impact of construction traffic upon, amongst other things, non-motorised user delay (incorporating cyclists), non-motorised user amenity (incorporating cyclists) and road safety (including cyclists). It concludes that the construction traffic would not create any significant effects upon traffic and transport receptors.</p> <p>The access strategy set out in section 12.7 of ES Volume 1, Chapter 12 [REP5-016] and Appendix 12.6 Construction Vehicle Trip Generation Assumptions [APP-204] sets out proposed access routes and restricts construction HGVs to only suitable parts of the road network. Construction HGVs will not cross Swinford Toll Bridge or route through Cumnor. This access strategy is set out as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [CR2-045] and is secured at Schedule 13 of the Development Consent Order [CR2-009]. These access routes apply to all HGVs, including those removing any waste.</p> <p>The removal and management of waste associated with the construction and operation of the Project would be organised and funded by the Applicant.</p> | |
| REP5-115 | Michael Brown | <p>Q2.5.5 Compulsory Acquisition - Land retention at Church Hanborough</p> <p>The Applicant has failed to answer each of the four questions put to it by the ExA, but responded with unsubstantiated generalisations. It has also failed to respond at all to the questions in relation to northern section of Field 2.115. I addressed the matter of the northern section of fields 2.115 and 2.116 at D4. (REP4 – 071). They are clearly not reasonably required for the development and should therefore be removed from the Order Limits. Indeed, the section of field 2.115 is not even proposed for anything more than 'grassland'. I have not been able to identify field 2.117 referred to by the Applicant.</p> | <p>The land within the northern part of Field 2.115 is retained as managed grassland within the proposed development as part of the mitigation regarding potential impacts on the significance of the Grade II listed building known as Dunbar (formerly New Barn Farmhouse). The managed grassland also contributes towards the BNG established for the proposed development. Field 2.116 may also be utilised as managed grassland, but has also been made available for community food growing.</p> <p>Field 2.117 was in the original mapping, but it was not subsequently included within the Order Limits at the time that the application was submitted, following removal of land from the after pre-application consultation. The Applicant provided a response on this point in ExQ2.2.5 [REP4-037].</p> | Land_Agreements |
| REP5-115 | Michael Brown | <p>Q2.6.9 Cultural Heritage – Church of St Peter and St Paul, Church Hanborough</p> <p>The Applicant concedes that assessment of impact 'largely subjective', and that 'it is not unusual for specialist to have different conclusions'. Whatever adjectives are used by specialists to describe the degree of impact, I would argue that it is the impact as felt by residents, visitors, road-users and walkers along PRow, most of whom will not be specialists, that should carry the most weight. These groups of people, numbering in their thousands, enjoy the un-impacted views and landscape and naturally and properly would be adversely affected by the imposition of an industrial landscape on the foreground of a longer view towards the conservation village of Church Hanborough and its church steeple.</p> <p>As I said in my response to this question at D4 (REP4 – 071) there is an irony here because the Applicant has proposed a new PRow between Cassington and Church Hanborough which at viewpoint 38 will provide walkers with a direct view of the St Peter and St Paul church steeple. This view would be destroyed by both the tunnel</p> | <p>The Applicant's assessment of impacts and effects resulting from changes within the settings of heritage assets is set out in ES Appendix 7.5: Settings Assessment (Rev 3) [CR2-038]. The assessment has been undertaken in accordance with the relevant guidance, which considers the impact on the significance of the heritage asset and not the impact on residents, visitors, road-users or walkers along PRow. As set out in the box on page 7 of Historic England's 2017 guidance document <i>The Setting of Heritage Assets</i>, impacts on church towers and spires where these are seen in a wider setting are more likely to be on the landscape values of the tower or spire rather than on their heritage significance.</p> | Historic_Environment |

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| | | effects of the proposed hedging and the fields of solar panels and power converter stations in the foreground. I note that the ExA intends to include Purwell Farm and I hope viewpoint 38 in its ASIs. I trust also, in this vein, that the unaccompanied site visit walking south from the centre of Church Hanborough earlier this year included at least as far south as viewpoint 24. | | |
| REP5-115 | Michael Brown | <p>Q2.13.8 Landscape and Visual Amenity – Landscape mitigation and decommissioning</p> <p>1) The example of viewpoint 38 selected by the Applicant in its response to this question is a good example of the wholly misleading assertions by the Applicant throughout this long process. In relation to viewpoint 38 the Applicant refers to the illustration in the photomontage APP – 072. (Note: this reference is incorrect and should I think be to APP-078, Fig. 8.338) The photomontage of viewpoint 38 shows a comparatively narrow tunnel (perhaps about 5 degrees arc of vision) between high hedges. It is disingenuous to postulate, as the Applicant does in its answer to this question, that ‘the hedgerows would not prevent the long sweeping views characteristic of the local area’. I have stood at viewpoint 38 looking at the wide panorama of the Evenlode valley. Virtually all of this would be lost once such a hedge matures.</p> <p>3) The ExA raises the issue here of future hedgerow management. The Applicant's answer is merely to say that it will be ‘added to the decommissioning plan as appropriate, and at the relevant time’. This is not a satisfactory answer. If the ExA have asked a question, that makes it the relevant time now unless properly explained to the contrary. This is yet another example of a lack of genuine cooperation and involvement by the Applicant which appears determined on a policy of trying to ride roughshod over a host of issues.</p> | <p>‘the hedgerows would not prevent the long sweeping views characteristic of the local area’.</p> <p>Appendix C of the oLEMP now states:</p> <p><i>“Once grown hedgerows should be managed to a height of approximately 3m during operation, managed annually, accepting that hedgerows may be managed to a lower height (the locations and heights of which to be agreed in consultation with the Oxfordshire Host Authorities) in order to support important and/or more open views, provided such maintenance falls within the scope of the environmental assessment.”</i></p> <p>Viewpoint 38 is one example of where this may need to be considered further, at detailed design, through consultation with the OHAs. However, it should be noted that hedgerows at 3m, as currently shown, would not prevent the characteristic views across the valley towards Church Hanborough from this location. With the spire of the Church of St. Peter & St. Paul remaining.</p> <p>Future hedgerow management</p> <p>The Applicant would have responsibility for the management of proposed hedgerows for the lifetime of the Project. Post decommissioning this responsibility for management would return to the landowner.</p> <p>It should be noted that after 30 years under Section 4 (a) of the Hedgerow Regulations 1997 hedgerows are deemed to be ‘Important Hedgerows’. However, this does not mean that they cannot be reduced in height (as noted by the OHAs and regulated by the Management of Hedgerows (England) Regulations 2024). It does not prohibit the removal of hedgerows but requires landowners to justify the need for their removal. Section 6.1 (a) to (j) of the Hedgerow Regulations details circumstances under which the removal of any hedgerows under the Regulations may be permitted if it is required.</p> | Landscape_and_Visual_Impacts |
| REP5-115 | Michael Brown | <p>Q2.13.9 Environmental Statement and landscape effects</p> <p>This question and the Applicant's response seem to me to go to the heart of the landscape and visual effects issues, which are so central to this whole matter. The Applicant seeks to define the two effects, Landscape and Visual:</p> <p>Landscape – relates to the physical and perceptual characteristics of the land and resulting character and quality, and</p> <p>Visual – relates to the effects on views experienced by visual receptors and on the change in views experienced by people.</p> <p>Regarding Landscape, the Applicant first asserts that ‘the proposed mitigation serves its purpose and works as a positive enhancement measure’. The relevant mitigation, as I understand it, is many miles of new dense hedging as well as infilling of gaps in present hedging. To assert, as the Applicant does, that it serves its purpose can only mean that it goes some way to camouflaging the new industrial landscape. But how can it possibly be a ‘positive enhancement measure’ either during the next 40 years or after decommissioning. The physical and perceptual characteristics will be irredeemably changed for the worse. The historic landscape so valued by residents and visitors will be completely altered by miles and miles of extra straight and solid green lines designed to fit around maximum blocks of panels rather than the current somewhat haphazard field boundaries which provide endless variety.</p> <p>Regarding Visual, the ExA's references to photomontages in this question have been ignored by the Applicant. This question also asks if the Applicant can demonstrate how the change in nature of the impact has been taken into account in line with methodology with appropriate consideration of, and reference to, the correlating</p> | <p>How can it possibly be a ‘positive enhancement measure’ if the physical and perceptual characteristics will be irredeemably changed for the worse.</p> <p>Any positive enhancement is referring to the mitigation measures proposed as part of the Project.</p> <p>How the change in nature of the impact has been taken into account in line with methodology.</p> <p>Generally, with the development of ‘new’ or large-scale industrial developments, a precautionary approach has been adopted, which assumes that landscape and visual effects are weighed on the adverse side of the planning balance. Unless it is stated otherwise, the effects considered in the LVIA have been considered to be adverse.</p> <p>Whether an effect is Beneficial, Neutral or Adverse is identified based on professional judgement. GLVIA3, indicates at paragraph 2.15 that this is a “particularly challenging” aspect of assessment, particularly in the context of a changing landscape.</p> <p>The decision regarding the level of effect and the decision regarding whether an effect is beneficial or adverse are entirely separate.</p> | Landscape_and_Visual_Impacts |

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| | | photomontages. Again this is ignored by the Applicant. The conclusion must be that the Applicant has either no satisfactory answer despite having been given a number of opportunities or is not able or willing to engage with the ExA in the proper way. | | |
| REP5-115 | Michael Brown | <p>Q2.13.14 Viewpoints The Applicant's answer to this question is evasive. From the time of the Scoping Opinion and up to the present, the issue of a lack of photomontages has been made repeatedly and is still ignored by the Applicant. My point has always focussed first on the Applicant's limited selection of viewpoints for photomontages. My understanding from emails to me from the three local planning authorities is that there was no communication with them about the Applicant's selection of proposed or actual limited viewpoints for photomontages. At Table 7.2 of the Scoping Opinion it specifically required the Applicant to provide evidence of this but it has not yet done so despite the robustness and clarity of the ExA's request for evidence. I went into some detail about the lack of photomontages and evidence in my Relevant Representation RR – 0998, paras. 2 – 18. Although my focus in this context has been on the dearth of photomontages, I have also joined others in the request for more and better sited viewpoints. My previous request, particularly in the context of the cumulative negative impacts on the pleasure of landscape and visual amenity along PRow and roadways (especially Lower Road along the Evenlode valley) have not been addressed in any substantive way by the Applicant.</p> | <p>Limited selection of viewpoints for photomontages and the request for more and better sited viewpoints.</p> <p>In terms of viewpoint agreement. A ZTV and Representative Viewpoints figure(s) was included at scoping. Details of correspondence with local authorities, regarding the inclusion of requested viewpoints, is given at Table 8.5 of the LVIA. Any authority not included within this table, is due to there being no specific mention / requests within their respective scoping consultation response in 2023.</p> | Landscape_and_Visual_Impacts |
| REP5-115 | Michael Brown | <p>Q2.13.15 Residential Visual Amenity Assessment Again more evasion by the Applicant. The Order Limits of the Project, as at present proposed come right up to our garden wall, but our own property is not included in the list 1 – 18 unless New Barn Cottage is just another mistake. In 'Nominations for locations for ASI' (REP2-121) I included some photographs taken from our property. In my view the Applicant should be required to produce a full RVAA. At best all the Applicant has done in its reply to this question is to list what it has done, whilst ignoring the questioned 'methodology that lead to the assumption that the RVAA was not required.</p> | <p>The Applicant has carried out a Residential Visual Amenity Assessment, which is submitted at Deadline 6 [EN010147/APP/17.13]. This document gives details as to the methodology followed in completing the RVAA (section 8.9).</p> <p>Please refer to the Applicant's response to REP5-075 in respect of the purpose of the RVAA.</p> | Landscape_and_Visual_Impacts |
| REP5-115 | Michael Brown | <p>Q2.14.1 Noise and Vibration – cumulative noise in Public Rights of Way Important as this is, could this question be extended to residential buildings. Currently many buffers are still proposed at 25 metres, whilst the answer to this question informs us that at upwards of 100 metres away a PCS will be slightly audible. PCS's may well not be at the perimeter of the block of panels but nevertheless this suggests that there needs to be a minimum distance imposed for any one, let alone more than one PCS from every residential property. From other answers to Q2.14 there is the strong impression that there is much work still to be done here including consideration of noise from inverters.</p> | <p>As is detailed in ES Chapter 13 - Noise and Vibration [APP-050], noise from the PCS units has been assessed at residential dwellings in accordance with <i>British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound</i>. The assessment shows that noise from the PCS units will be less than 5dB above the background sound level at all receptors. In most cases, noise from the PCS units is below the existing background sound level.</p> <p>It would not be appropriate to determine a set distance between receptors and PCS units as the background sound level varies for each receptor.</p> | Noise_and_Vibration_Impact |
| REP5-116 | Michael Field | <p>Decommissioning: August Update (ExQ2.1.17) In place of the disposal method for PV panels described in the ES – transportation to [non-existent] panel-recycling facilities – the Applicant has presented its revised strategy [REP4-037, page 15]. The PV panels will be sold as second-hand units; the proceeds of the sale will cover the cost of decommissioning. Applicant's analysis The panels will have 6 years of usable life remaining and a resale value of 12.6% of the initial cost (£108m). From this, the Applicant calculates a second-hand value of \$0.02 per per [sic] watt. The Applicant notes that this is half the typical value for second-hand PV in the US (\$0.05 per per watt), according to analysis by its US source, Nerdwallet. The calculated decommissioning cost is based on data published on another US website, Solarrecycling: \$30,000 to \$56,300 per megawatt. These values are first converted to 'per watt' values by dividing by a million: \$0.03 per watt [correct] and \$0.20 per watt [obviously incorrect]. The lower of these two values is selected [why?] and reduced further by dividing by 2 (the 'utility scale effect' [?]) to obtain the final value, \$0.015 per watt. This is below the</p> | <p>To avoid repetition regarding the market price of used panels, and to substantiate the conclusion that the decommissioning proceeds exceed decommissioning expenses, the Applicant has evaluated the scrap value of photovoltaic panels, cables and mounting structures, including the cost of extracting such materials from solar panels. The market value of the panels is at least equal to their scrap value. For cables and mounting structures only the scrap value applies. It should be noted that each panel weighs 33.5 kg, and thus 1.8 million panels amount to a total weight of 60.3 kilotons. Of this, 48.3 kilotons consist of valuable resources, such as 974 tonnes of copper, 7,256 tonnes of aluminium, and 36 tonnes of silver. Cables add a further 3,857 tonnes of copper, and mounting structures add 38,183 tonnes of stainless steel. The current market price for silver is 600,000 EUR/t, 7,000 EUR/t for copper, 1,500 EUR/t for aluminium and 1,090 EUR/t for stainless steel. The total current market price for the panels, cables, and mounting structures is therefore 111.8 million EUR, see enclosed calculation table. The Department of Energy Security and Net Zero has the following position on the matter: "Decommissioning costs involve the expenses related to safely dismantling and removing the infrastructure of a solar farm at the end of its operational life. ..., four data points were used to calculate an average decommissioning cost of £15k/MW, with a low</p> | Decommissioning |

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| | | secondhand PV resale rate calculated above (\$0.02), thus confirming a fully costed Decommissioning Plan. | <p>cost of £4k/MW and a high cost of £25k/MW." (Chapter 5.8.1, DESNZ in Renewable Energy Generation Cost and Technical, Assumptions – Onshore Wind and Solar PV Cost of Electricity Report Update 2024, , 14 July 2025, https://assets.publishing.service.gov.uk/media/68ba91f411b4ded2da19fe92/onshore-wind-and-solar-pv-cost-electricity-report-update-2024.pdf).</p> <p>We are applying an average decommissioning cost of £15k/MW as a 'best case' scenario, while ignoring the minimum low cost of £4k/MW and are applying the maximum high cost of £25k/MW in a 'worst case' scenario. To summarise, a thorough review has verified our initial supposition. The revenues of 111.8 million EUR have been ascertained to exceed the costs of 83,8 – 111,1 EUR at current prices. The same can be said of the anticipated revenues and costs in 40 years' time. Over time, the inflation rate of natural resource prices will exceed that of industrial services, such as decommissioning. Over the past 40 years, the weighted price increase of copper, silver, aluminium and stainless steel was 392% whereas industrial services, such as recycling had seen a price increase of 53%. For further details, we are referring to the enclosed calculation table.</p> <table><tr><th></th><th>Year 2070</th><th>Year 2025</th></tr><tr><td>Total recovery revenues</td><td>278.718.913,28</td><td>111.784.972 €</td></tr><tr><td>Decomissioning costs 2025</td><td></td><td></td></tr><tr><td>Best case: 15kEUR/MWp</td><td>44.880.276,57 €</td><td>18.000.000,00 €</td></tr><tr><td>Decomissioning costs 2025</td><td></td><td></td></tr><tr><td>Worst case case: 25kEUR/MWp</td><td>74.800.460,96 €</td><td>30.000.000,00 €</td></tr><tr><td>Recycling costs 2025</td><td></td><td></td></tr><tr><td>best case 43 kUSD per panel</td><td>164.037.410,88 €</td><td>65.790.000,00 €</td></tr><tr><td>Recycling costs 2025</td><td></td><td></td></tr><tr><td>worst case 53 kUSD per panel</td><td>202.185.645,97 €</td><td>81.090.000,00 €</td></tr><tr><td>Revenues over Cost best case</td><td>31.652.990,74 €</td><td>27.994.971,53 €</td></tr><tr><td>Revenues over Cost worst case</td><td>1.732.806,35 €</td><td>694.971,53 €</td></tr></table> | | Year 2070 | Year 2025 | Total recovery revenues | 278.718.913,28 | 111.784.972 € | Decomissioning costs 2025 | | | Best case: 15kEUR/MWp | 44.880.276,57 € | 18.000.000,00 € | Decomissioning costs 2025 | | | Worst case case: 25kEUR/MWp | 74.800.460,96 € | 30.000.000,00 € | Recycling costs 2025 | | | best case 43 kUSD per panel | 164.037.410,88 € | 65.790.000,00 € | Recycling costs 2025 | | | worst case 53 kUSD per panel | 202.185.645,97 € | 81.090.000,00 € | Revenues over Cost best case | 31.652.990,74 € | 27.994.971,53 € | Revenues over Cost worst case | 1.732.806,35 € | 694.971,53 € | |
| | Year 2070 | Year 2025 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| REP5-117 | Michael John Gorick | 1/ref Nov 23 impact statement pp14 5.37 Concrete shoes and pile driven rods to support the panels. Reference to this has not been made clear either then or since. Any installation using concrete introduces carbon. The reference to this does not give any indication of the quantity, placement or impact on the land. | Panels will be mounted on metal frameworks supported by galvanised steel piles or screws, with depths of 1–3 m This is set out in Rev 5 of the Applicant's oLDP document [EN010147/APP/7.7] and Chapter 6 of the ES [APP-043] . No concrete foundations are proposed to support the panels. | Project_description_and_Design_parameters | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| REP5-119 | Miles Clissold Tuely | <p>Q2.1.7. This question needs to be answered as the neighbouring owners must know what lighting is proposed and motion sensitive lighting is the most effective.</p> <p>Q 2.3.2. Schedule 9 of The Electricity Act sets out clearly the obligations required for new installations which include “ protecting sites of historic interest “. Enclosure no. 1.12 already has nine single electricity poles and two doubles in two different power lines. Any further installations will clearly breach this duty. Also. the damaging effect on the Grade 2* Hordley House has clearly not been considered.</p> <p>Q 2.6.3. The setting of the WHS within the OUV is considerably spoiled by the inclusion of enclosures 1.11, 1.12 and 1.13 which have the effect of leading up to the WHS in an attractive corridor. All these should be taken out of the scheme. Field 1.12 in particular not only has two power lines crossing it but also a busy public footpath and a Heritage Oak Tree in the southern part.</p> <p>Field 1.13 can be seen in its entirety from the B 4027 and there is no roadside hedge to screen it. The hedge on its northern boundary will take many years to have any screening impact.</p> <p>Q 2.6.12. Hordley House. The Applicant claims to be considering a possible reduction of panels in the area of this Grade 2* listed house. There is indeed a very strong and historic relationship between this property and the area to the south and south-east (sic as the ExA's text reads “ the south-west “). This is also the site of a deserted</p> | <p>The Applicant would refer to their response to the second ICOMOS Technical Review [REP4-052] which is set out in the Applicant's Responses to other D4 submissions and comments on Interested Parties' Responses to ExA's Second Written Questions (ExQ2) submitted at D4 [REP5-005], and also to the updated Heritage Impact Assessment submitted in response to Change Request 2 (ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2-036]).</p> <p>The Applicant's updated assessment, following the acceptance of the changes set out in Change Request 2, is that the proposed development would not result in any harm to the significance of the Blenheim Palace World Heritage Site.</p> <p>The Applicant's assessment of impacts and effects resulting from changes within the settings of heritage assets is set out in ES Appendix 7.5: Settings Assessment (Rev 3) [CR2-038]. Any harm to the significance of the Grade II* listed Hordley House would comprise 'less than substantial' harm in terms of national planning policy as set out in the National Policy Statements (NPSs) and the National Planning Policy Framework (NPPF).</p> <p>The relevant policy test is therefore the one set out in paragraph 5.9.32 of NPS EN-1 (the Overarching National Policy Statement for Energy): <i>Where the proposed development will lead to less than substantial harm to the significance of the</i></p> | Historic_Environment | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>village. The whole of field 1.12 should be taken out.. The setting of the WHS within the OUV is considerably spoiled by the inclusion of enclosures 1.11, 1.12 and 1.13 which have the effect of leading up to the WHS in an attractive corridor. All these should be taken out of the scheme. Field 1.12 in particular not only has two power lines crossing it but also a busy public footpath and a Heritage Oak Tree in the southern part.</p> <p>Field 1.13 can be seen in its entirety from the B 4027 and there is no roadside hedge to screen it. The hedge on its northern boundary will take many years to have any screening impact.</p> <p>Q 2.6.12. Hordley House. The Applicant claims to be considering a possible reduction of panels in the area of this Grade 2* listed house. There is indeed a very strong and historic relationship between this property and the area to the south and south-east (sic as the ExA's text reads " the south-west "). This is also the site of a deserted village.</p> <p>The whole of field 1.12 should be taken out.</p> | <p><i>designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.</i></p> <p>With regard to the public benefits of the proposed solar farm, paragraph 3.3.8 of NPS EN-3 (Renewable Energy Infrastructure) addresses the issue of National Designations in terms of factors influencing site selection and design: <i>In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether it is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target.</i></p> | |
| REP5-131 | Richard Tyler | <p>Additional question:</p> <p>I cannot see anywhere in the documents filed that the applicant has proposed any mitigation for the additional likelihood of storm rain water run off from the fields between Bladon and the Cassington Road turn off, which were flooded in the winter of 2024/25, leading to road closure and the abandonment of one vehicle that broke down in the flood. Given this is a major access road for emergency services, as well as school buses, HGV construction vehicles working on existing projects, and local residents, what measures will the applicant take to ensure the use of these fields for solar power generation will not increase the likelihood of run off water leaving the fields and collecting on the A4095. And would the applicant consider creating a large buffer zone from the A4095 for BNG, perhaps to the line of the existing public right of way in the fields concerned?</p> | <p>The comment is noted. Multiple responses have been provided in regard to existing flood risk areas outside of the Project boundary. Please refer to REP1-049, REP1-131, and REP1-142.</p> | Hydrology_and_Flood_risk |
| REP5-132 | Rosemary Lewis | <p>Comments on Change Request 2</p> <p>Change 10 – Education Facility</p> <p>The whole idea of siting an Education Facility in this location is misguided, unplanned and inappropriate as many IPs including Bladon Parish Council have pointed out. In particular, it has been pointed out that it will not be possible to use the "existing access" mentioned by the Applicant as it is too narrow for construction vehicles or school buses, it is only 3m wide in places and there are no passing places, parking or turning facilities. This surely ends any possibility of this facility going ahead. It is not satisfactory to finalise details after the DCO is granted. In any case only location, size and scale are mentioned in the design plans. What about management and ongoing funding? This could so easily become a white elephant. A much better solution would be to locate the facility within Hill End Centre which has been an education facility for over 100 years. It is a well-established and respected organisation with expertise, space, good vehicular access and able to cope with many visitors (currently around 24,000 annually). It is likely that they could accommodate an area for information about the Solar Installation and might welcome funding from the Applicant to do so. It is located adjacent to the Southern site but clearly the Applicant is unaware of its existence. If they'd consulted properly with those who know the local area they would not have made this glaring error in dumping an ill planned facility in such an inappropriate place. It should also be pointed out that they would not, in any case, be likely to get planning consent from the Local Authority to erect a building in the Green Belt and within the setting of WHS Blenheim Palace especially as panels in the fields behind it are due to be removed on Heritage Grounds (as described in Change 1) of this document. Please remove the proposal to build an Education Facility in Bladon.</p> | <p>The Education Facility - Change 10 – was identified within Change Request 2 and supporting documents were submitted on 12 September 2025. It was also agreed at the point of that submission, and following consultation on the Change Request, that the Education Facility would be removed from the DCO application. This removal has been accepted by the ExA in its response to Change Request 2.</p> | acknowledgment response required |
| REP5-133 | Rosemary Lewis | <p>4.1.The Applicant has failed to take the opportunity, in their revised Glint and Glare Report, to distinguish between existing and proposed vegetation in their assessment of impact on Residential properties.</p> | <p>The consideration of both existing and proposed vegetation within a Glint and Glare Assessment is a typical methodology and presents a holistic view of the screening which will be experienced over the operational lifetime of the project, including how planting establishes over time.</p> | Glint_and_Glare |

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| REP5-133 | Rosemary Lewis | <p>4.2.They have failed to produce the promised images of vegetation for the Central and Southern Sites, thereby preventing further independent scrutiny of their assessments.</p> <p>4.3.This has resulted in a significant under-reporting of the number of properties suffering at least moderate impact and a false conclusion that an RVAA has not been triggered.</p> <p>4.4.They have refused to carry out an RVAA despite repeated and numerous calls from ExA and other IPs including OHA to do so and have failed to justify this refusal.</p> <p>4.5.This issue goes to the heart of what the vast majority of the Community feel is the problem with this proposal - that it's too big and in the wrong place. Affecting nearly around 25,000 people in 11,000 properties with 1.5km, it is the largest and most densely populated site of any Solar Farm proposal yet examined in the UK and the Community feel extremely strongly that their views (literally!) have been ignored.</p> <p>4.6.While appreciating that ExA cannot force an Applicant to make changes to their DCO, I would respectfully request that, if the Applicant refuse to make significant reductions to the panel area - in line with the recommendations of OHA, HE, ICOMOS, several Parish Councils and many other IPs - that ExA give this very serious consideration in deciding the fate of this DCO application.</p> | <p>It is unclear what promised images REP5-133 is referring to, and the Applicant respectfully asked for clarification and specific reference(s) so this can be addressed appropriately.</p> <p>It is noted that, if REP5-133 is referring to the Photomontages, these have been updated to incorporate the lower approximate hedgerow height of 3m. These updated photomontages were included as part of the Deadline 5 submission [CR2-032].</p> <p>The Applicant has carried out a Residential Visual Amenity Assessment. This is to be submitted at Deadline 6 [EN010147/APP/17.13].</p> <p>The Applicant has taken on board concerns raised by Historic England, ICOMOS and others in respect of land to be omitted from the proposed development. In recognition of this feedback, the Applicant has submitted Change Request 2 alongside Deadline 5 which includes the removal of large areas of land from the Project as well as further scheme refinements which reduce the solar installation in other areas.</p> <p>It is recognised that the OHA does not consider these changes go far enough.</p> <p>To confirm however, at this stage the Applicant has no intention of reducing its Order Limits or proposed installation area any further.</p> | Landscape_and_Visual_Impacts |
| REP5-134 | Siemens Healthcare Limited | <p>Question 2.7.14 Protective Provisions</p> <p>6. Siemens considers that bespoke protective provisions could resolve the differences between the parties and should be included within the DCO. The reasons requiring the same are set out in detail in its Deadline 4 submissions [REP4-080] from paragraphs 11 to 18, which shall not be repeated for the purpose of this response.</p> <p>7. The Applicant has denied the need for protective provisions in its response [REP4-037]. They say this is because they are not necessary or justified. Siemens do not agree. The Applicant refers to significant mitigation proposed to Siemens to be secured under the DCO Requirements, to ensure that any potential impact of Siemens will be suitably protected. Siemens is not aware of any mitigation offered which requires Wharf Road to stay open to traffic with suitable traffic management systems, or there being any mechanism for doing so that would replace the need for protective provisions.</p> <p>8. The Applicant has stated that Wharf Road will stay open. Siemens needs to be confident that this is the case. The primary position is that the Cassington Road routing option should be chosen. Absent this, protective provisions are required for Siemens to ensure that this major local employer is able to continue to operate.</p> <p>9. Siemens have highlighted the apparent risks with the proposed works to Wharf Road in its submissions [REP4-080]. Notably that although the proposed works will engage an area which is adopted highway, the works suggested are not typical highways works. They are much greater in extent and potential impact than the typical maintenance works required to Wharf Road.</p> <p>10. Whilst the Applicant has suggested that suitable traffic management works will be put in place, and that at least one lane of Wharf Road will remain open, the proposed DCO does not secure this.</p> <p>11. Protective provisions are necessary to protect specific parties, who would be subject to unacceptable impact if the protective provisions are not agreed. Whilst the current provisions in the DCO concerning road closures may be sufficient for less sensitive uses, Sieman's have highlighted [REP4-080] the significant risk to their operation if there is disruption to access.</p> <p>12. In order to address this risk, protective provisions which require all reasonable endeavours to co-ordinate the execution of the works in order to ensure the safe and efficient operation of Siemens' factory and/or operations are necessary. To support this it is also necessary to include compensation and access requirements.</p> <p>13. The Applicant clearly hopes (as does Siemens) that these works can be undertaken in such a way as to avoid significant disruption to Siemens' factory. However hope is not sufficient, the DCO needs to secure the necessary protections. There is also concern that the scale of the project means that there is a real risk that keeping Wharf Road open would not be achieved as currently drafted. Accordingly to</p> | <p>In a meeting between the Applicant and Siemens following CAH1, it was agreed between both parties that Siemens' concerns would be effectively managed through:</p> <ul style="list-style-type: none"> (a) updating the Construction Traffic Management Plan (CTMP) to include traffic management provisions that would facilitate continued use of Wharf Road – this is captured in the updated CTMP submitted at Deadline 6. The wording has been shared with Siemens; (b) protective provisions to be included in Schedule 15 of the DCO to secure an indemnity in favour of Siemens – this is captured in Part 8 of Schedule 15 of the updated DCO submitted at Deadline 6. The wording has been shared with Siemens; and (c) Requirement 11 (Code of Construction Practice) of the DCO to be updated to add Siemens as a consultee in respect of the CTMP insofar as it relates to Wharf Road. This is captured in the updated DCO submitted at Deadline 6. | Cable_Routes |

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| | | reduce risk the Applicant should route the cable via Cassington Road. If this is not agreed, then protective provisions are required to provide greater certainty that works will be undertaken so as to secure the joint aim (with the Applicant) that Wharf Road stays open to traffic and that this does not cause significant disruption to Siemens. | | |
| REP5-134 | Siemens Healthcare Limited | <p>Question 2.16.1</p> <p>14. Siemens remains significantly concerned regarding the proposed works and how they will be undertaken. In Siemens opinion, the most appropriate way to overcome these concerns and to limit the impacts to Wharf Road and its accessibility is for the proposed works to be relocated and undertaken along Cassington Road.</p> <p>15. No mitigation has been provided or proposed which addresses these concerns.</p> | See above. | Cable_Routes |
| REP5-134 | Siemens Healthcare Limited | <p>Cable Route Option Studies</p> <p>16. Our Deadline 4 submissions [REP4-080] highlighted that we had not been provided the Cable Route Options Study. This was submitted at Deadline 4 [Rep4-039] by the Applicant.</p> <p>17. Our response to this document is set out at Appendix 1.</p> <p>18. Siemens do not consider the Options Appraisal provided by the Applicant at [REP4-089] sufficiently deal with these concerns and do not appropriately deal with the Road Management requirements in order to provide the assurance which is necessary for Siemens regarding access to its factory.</p> <p>19. Siemens rely on the Options Appraisal prepared by JLL, which is appended to this response at [REP4-039].</p> <p>20. In summary we are concerned that the risk of significant economic impacts are fully considered (indeed the section of socio-economic effects states that no socio-economic effects are anticipated), despite the potential significant disruption to Siemens.</p> <p>21. The Cable Route Options Study is based on the assumption that traffic movement will be maintained. Maintaining traffic movement is very important for the operation of Siemens' business. The Cable Route Options Study states that cables will be laid pursuant to the street works powers under Part 3 of the DCO and in accordance with the permit scheme (see paragraph 2.4.8 of REP4-039). These powers do not provide any certainty that Wharf Road will not be closed (either due to technical reasons, or because this is later preferred by the Applicant). They also do not provide any certainty that the proposed traffic management options will be suitable.</p> <p>22. The lack of certainty regarding both the road closure and traffic management is not reflected in the options appraisal. If this risk were accurately reflected, it is considered that option 2, which uses Cassington Road would be preferred.</p> | <p>See above.</p> <p>In addition, to confirm that the scope of the EIA Socio-Economic assessment [APP-052] does not include impact on individual businesses. However, the conclusion that no significant socio-economic impacts are anticipated is based upon professional judgement derived from the best available information, including the assumption that traffic movement will be maintained throughout construction. As per the above, this assumption is supported by the additional provisions built into the CTMP to facilitate continued operational access.</p> | Cable_Routes |
| REP5-138 | Stewart Thompson | <p>Ecology</p> <p>As a biodiversity specialist of more than 30 years, with a demonstrable (and independent) record in ecological impact assessment, I felt well placed to undertake an assessment of the likely impacts of this proposed development. In keeping with other key areas raised in this consultative process, the applicants have done little, if anything, to address concerns raised post PEIR and beyond. In all honesty I am astounded by both the disregard for the ecological impact of the proposal and the naivety of the responses from the applicants to address the concerns raised. In particular, I fail to see how they seriously think that any species-specific negative impacts experienced will be more than offset by Biodiversity Net Gain (BNG) which has no precautionary principle enshrined within it – it is a habitat removal-based algorithm which takes no account of the actual factors that make the habitat attractive to wildlife. A good example of this are hedgerows (which have their own legal regulations incidentally) which owe their ecological functionality to a complex interplay of biotic and abiotic factors, of which age and connectivity are key. As the proposal makes clear – significant amounts of hedgerow will be impacted, both directly and indirectly. So simply stating that the development will remove X amount of hedgerow (usually measure in metres or kilometres) but will be mitigated by the planting of X amount + Y% increase cannot be viewed as “like for like”. This development, if given planning permission, will very likely seriously impact floral and faunal diversity. For the numerous protected/red-listed farmland species the site</p> | <p>As set out in oLEMP [CR2-051], the Project will deliver over 26km of new hedgerow and 26km of enhanced hedgerow. Only circa 600m of existing hedgerow will be impacted by the Project resulting in a gain of over 50% in hedgerow units in BNG terms.</p> <p>A quantitative assessment of the potential for the Project site to support skylark post construction has been set out in the skylark Technical Note (Annex 6 of the Applicant's response to ExQ2 [REP4-037]). Further details with respect to how grasslands would be managed for the benefit of skylark, in particular to ensure that such land is managed to allow skylark (and other bird species) to raise multiple broods of young in one season, have been added to the oLEMP sections 8 and 11 at Deadline 6.</p> <p>The Bat Technical Note was submitted at Deadline 5 [REP5-009] and has been updated at Deadline 6 [EN010147/APP/15.6] This provides IPs with additional clarity with respect to the measures the Project will adopt to avoid impacts to bats through the creation of appropriate buffers. It sets out the nature of the buffers, that they will be delivered in three tiers and describes the location of the largest tiers in detail, based on the analysis of survey data and what this demonstrates with respect to where and how bats use the landscape. The Technical Note also sets out how the buffers will be established and managed. These details have been carried over into the oLEMP to ensure they are secured.</p> | Local_Ecology_and_Nature |

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| | | supports, I continue to have significant concerns surrounding those raised in my initial response to the PEIR and beyond, especially for bats and farmland birds. Rather conveniently, we await the provision of a technical note on bat mitigation measures where, one would assume, we obtain clarity as to how bats will be monitored pre and post development and what will happen if, for example, it is demonstrated that bat populations/species are negatively impacted by the development. Why this has not already been produced is simply beyond me – every species of bat in the UK is protected under wildlife law. It is unacceptable to effectively agree mitigation after the development is given consent. I have similar concerns surrounding the inadequate provision of mitigation measures for the suite of farmland birds the overall footprint of the development will impact. The mitigation emphasis centres upon one species (skylark) for which “plots” have been identified, some of which will be too small to support skylark territories. For the larger ones, should they work as a mitigation intervention, at best they will only support around half of the current population of skylarks that the development will displace. To conclude, globally the UK resides in the bottom 10% of the most nature-depleted countries. This proposal will only move them further down the ranks. | | |
| REP5-138 | Stewart Thompson | <p>Flood risk.</p> <p>My overall concern here is that there would appear to be nothing new from the applicants, in that they have failed to address my concerns previously raised post PEIR. I indicated that there was need to explore appropriate flood risk modelling which is predicated upon the need for water infiltration testing. This has not been carried out, without any justification for its exclusion, noting here that the Examiners supported this suggestion in their report. I therefore continue to question why the applicants have not adequately modelled their proposed mitigation, and perhaps more worryingly, why they have not produced a detailed design of any mitigation measures for the likely increased flood risk the development will pose? This design cannot be simply “bolted on” post consent and to support this is a dereliction of duty by all involved in the plan-decision making process surrounding this development. To conclude, the applicant has persistently refused to address the need for appropriate flood prevention measures in relation to this development. Why this matters personally, is that the village I live in, and those adjacent to it, have a long history of flood-related events and the development as proposed does nothing to avoid areas of high flood risk.</p> | <p>A response was provided to the ExA at Deadline 2 in regard to the two matters raised, see Q2.10.3 and Q2.10.5 [REP4-037].</p> | Hydrology_and_Flood_risk |
| REP5-145 | Tim Sumner | <p>Trial trenching results, Sansoms Platt</p> <p>It is noted that in their submission [REP2-056], HE (Historic England) is still concerned about the level of impact assessed and the potential for the area of nationally important archaeological remains to be greater than the area currently scheduled.</p> <p>It is also noted in HE’s response to EXQ1.6.45 [REP2-025] that the results of trial trenching will be available at DL5. However, in [CR1-003] HE state that the trial trenching was commenced in August 2024. In their responses to EXQ1.6.35, both Oxford County Archaeology Service (OCAS) [REP2-050] and HE [REP2-056] have indicated that “they are awaiting this important information in order to be able to more fully assess the potential impact on archaeological site.....”</p> <p>The applicants response (Q2.6.19. Aug 2025) is to affirm “the Applicant has committed to avoiding impacts on all areas of significant archaeological remains through the design of the Project.” and refers to awaiting the trial trenching results.</p> <p>The applicants reliance on trial trenching to inform its decision as to where to build solar panels in the Northern section is absolutely flawed.</p> <p>They are ignoring satellite evidence – see below - and crucially they are ignoring Blenheim’s own Ground Radar mapping which has uncovered an enormous extension of the Roman Town extending a considerable distance alongside their planned positioning of solar panels and within their planned cable run. See Ground radar map below.</p> <p>The satellite picture below clearly identifies below surface disturbances justifying a</p> | <p>The Applicant does not recognise the reference to ‘<i>Roman remains in the top right hand corner</i>’. If this refers to the small enclosure in the north-eastern part of Field 1.11 as revealed by the geophysical survey, this has been found through the trial trenching to be of Late Iron Age date and ius not part of the Roman site centred on Sansom’s Platt. An archaeological protection zone has been established which encompasses the Late Iron Age enclosure: this is in order to avoid any impacts on the buried archaeological remains during construction of the proposed development.</p> <p>No trial trenching has been conducted by Oxfordshire County Council archaeologists as asserted by the IP. The trial trenching was carried out by suitably experienced archaeological contractors engaged by the Applicant, with all of the work monitored by the County Archaeology Service.</p> | Historic_Environment |

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| | | complete ground radar survey of this field meaning it must be completely taken out of the proposed Botley West Solar Farm scheme. I note that the developers have acknowledged the presence of Roman remains in the top right hand corner and have taken this area out of their plans but completely surrounded it with solar panels – no buffer zone included. It is, I suggest, unlikely that a solitary random building was positioned outside of the town in that area - rather it demonstrates the town extends throughout this field as will be explained below. Similarly, the developers have pulled back from the bottom of the field (Akeman Street) because of the results of the trial trenching conducted by Oxford County Council archaeologists. However, as is acknowledged above, OCC wish to “be able to more fully assess the potential impact on the archaeological site.....” | | |
| REP5-145 | Tim Sumner | <p>The extent of the Roman Town in this main field must without doubt extend alongside the below photo which is a ground radar survey undertaken by Blenheim and shows the considerable extent of the Roman Town extending beyond Hordley House. And up to Lower Dornford Farm and Cottage to the North West - the red areas being Roman buildings. This town was not built in an L shape as the developers would seem to imply. Rather, a more accurate extent of the town would be to circle the red dotted area with the currently protected Platt area which then indicates that this was a large, significant trading town extending to Hordley House, Lower Dornford Farm and Cottage, around Sansoms Cottage and The Oxford School of Drama and NE towards Sturdy's Castle – all proven by ground radar, Roman remains, trenching and Satellite images. Crucially, it was a days march from Bicester Fort and, therefore, a stop over for legionnaires, their chariots, weapons of war and troops and horses who all needed supplies and accommodation. Historians know it was supplied from farms in Tackley giving access to Akeman Street which ran through the Town and provided a major trading route between Cirencester and St Albans, hence the towns value to troop movements. The horses would have to be housed overnight and so, I suggest field 1.11 provides an ideal turnout location for this, giving reason as to why some areas of field 1.11 have no detectable buildings and why there is further development at the top end of the field. Horses would not be housed and turned out in the centre of the town -where we have discovered Roman buildings nor in the hilly fields around Sansoms Platt containing a Villa and other buildings.</p> | <p>A magnetometer survey (not ground radar survey as stated by the IP) was undertaken on behalf of Blenheim Estate to inform a programme of tree planting. The survey covered land to the east and north east of the Scheduled Monument. As such, the survey did not show ‘<i>the considerable extent of the Roman town extending beyond Hordley House</i>’ or towards Lower Dornford Farm and Cottage. The survey found that activity likely to be associated with the Roman town extended to the east and north-east and subsequently the tree-planting was designed to avoid these areas. Further magnetometer survey within the Order Limits was undertaken on behalf of the Applicant: the results are presented in ES Annex 7.3: Geophysical Survey Report [APP-133 – APP-140]. Specifically with regard to the area around the Sansom's Platt Scheduled Monument, the results are set out in APP-134.</p> | Historic_Environment |
| REP5-145 | Tim Sumner | <p>Finally, the row of trees going top to bottom in photo 1 and photo 2 and alongside the ground radar discovery of buildings is Dornford Lane - a route that was used by a farm further North to bring produce and animals to Blenheim Hunting Lodge for King Richards feasts. The developers intend to run their cables down this route which means they will dig right through this section of the Roman Town (field 1.11 which the developers have acknowledged contains Roman buildings following OCC's trenching and the red dots which indicate by Blenheim's ground radar more Roman buildings.) It is beyond argument - this route cannot be used for cabling otherwise the developer is digging through a major part of the town which, at Sansoms Platt, is a protected monument submit, the developers relying on trial trenching to determine the full extent of this huge Roman Town and its surrounds is akin to holding a candle in the doorway of a darkened aircraft hanger to determine its size. As so many parties are saying – more investigation needs to be done throughout the</p> | <p>It is incorrect for the IP to claim that the Applicant intends to run cables along Dorford Lane and through any part of the Roman settlement centred on the Sansom's Platt Scheduled Monument. Figure 2.1B in ES Figures 2.1a - 2.4c - Illustrative Masterplan (Rev 2) [CR2-026] shows Dornford Lane and also the indicative 275kV cable route and cable corridor. No indicative cable route passes along Dornford Lane. Similar information is provided in Figure 5.2 in ES Figures 5.2 - Illustrative Masterplan Cable Corridor (Rev 1) [CR2-028]. The 275kV cable route crosses the Roman road known as Akeman Street at a location just to the west of Sturdy's Castle – this is shown on Figure 5.2 in ES Figures 5.2 - Illustrative Masterplan Cable Corridor (Rev 1) [CR2-028]. The crossing will be undertaken using a form of trenchless technology known as Horizontal Directional Drilling (HDD), thus avoiding any impact on the Roman road. This is HDD1 in ES Appendix 6.2: Cable Laying Methodology and Indicative HDD Crossing Locations</p> | Historic_Environment |

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| | | Northern sector. Indeed the Dornford Farm area has its own rich history alongside the Roman era. So, please take out the whole of the Northern sector from the developers plans. Future generations are about to lose their heritage and this uniquely pristine area lost forever. | [APP-130], with the image on page 6 of that document showing the cable route and the HDD compounds to the north and south of the Roman road. Figure 2.1C in ES Figures 2.1a - 2.4c - Illustrative Masterplan (Rev 2) [CR2-026] shows the indicative location of a 33kV cable route which crosses the southward continuation of Dornford Lane to the south of the Sansom's Platt Scheduled Monument. Again, this crossing would be undertaken using HDD. This is HDD7 in ES Appendix 6.2: Cable Laying Methodology and Indicative HDD Crossing Locations [APP-130], with the image on page 7 of that document showing the cable route and the HDD compounds to the east and west of the lane. The cable route, and the locations of the HBB compounds, have been selected to avoid any impacts on archaeological remains associated with the Roman settlement centred on Sansom's Platt. | |
| REP5-148 | Wootton Parish Council | We are aware of the consideration being given to the area around Hordley House and Samson's Platt and refer to this in point 4. 1. Wider buffer zones around residential properties close to the solar arrays. Information so far has been unclear and we would welcome plans showing the exact measurements for the North Site. Currently a minimum buffer of 25m for residential properties is proposed (which some variations) This is lower than any other NSIP proposal so far submitted and fuller information and consideration is needed. The current plan causes considerable detrimental impact on the visual amenity to residents and visitors (including recreational walkers and riders) at the western edge of the DCO site. In particular, existing and future residents of Dornford Cottage would benefit from a guaranteed buffer of 120 metres minimum between the boundary of the property and the solar panels. This minor alteration would also greatly reduce the adverse visual intrusion for visitors and walkers along the adjacent well-used footpath. See map below at points marked in a yellow line. 4. RE Hordley House and Samson's Platt area on the North Site. We repeat our request that the panels be omitted from fields 1.12 and 1.11. We strongly support the recommendations in the attached map below. | The Applicant has produced a Residential Visual Amenity Assessment (RVAA) [EN010147/APP/17.13] which has assessed effects from residential properties and has also provided further clarification regarding the analysis of buffer zones to residential properties, PVDP Buffer Zone Analysis, within Appendix B to the RVAA, including the area around Samson's Farm. Please refer to the Applicants' response to REP5-097 below, in respect of buffer zones to residential receptors. | Historic_Environment |
| REP5-148 | Wootton Parish Council | 2. Hedgerows and screening of PROWs. There needs to be a minimum width of 10 metres along all footpaths/cycleways with 15-20m stretches in key sections of the Oxfordshire way and Akeman street footpaths. The existing plans would be very detrimental to the aesthetic enjoyment of this paths and rights of way because they will be encased between high fences or hedges - or have views of solar arrays. We request more detailed information on the planting of screening and hedgerows. In addition, clear contractual agreements are needed to ensure maintenance of hedgerows and trees. 3. There is a need for updated clear plans and maps from the applicant showing the most recent revisions. This has been requested by the Planning Inspectorate but has not been produced. | The design has allowed for a minimum 10m corridor to all retained public rights of way throughout the Project, and the detailed design will be secured through the PRoW strategy. In addition, Appendix C of the oLEMP has been updated at Deadline 6 to state that: "Once grown hedgerows should be managed to a height of approximately 3m during operation, managed annually, accepting that hedgerows may be managed to a lower height (the locations and heights of which to be agreed in consultation with the Oxfordshire Host Authorities) in order to support important and/or more open views, provided such maintenance falls within the scope of the environmental assessment." | Public_Right_of_Way |

Reference

Annex 1 – Details calculation for REP5-116

| Longi panel type LR 7-72 HDG 585 - 620 M | | | | | | |
|--|-----------------------|---------------------------|---------------------------|--------------------------------|--------------------------------|---------------|
| Material Modules | Per module (kg) | Total recoverable (t) | Initial scrap price (€/t) | Price in year n (€/t) | Estimated revenue at EoL (EUR) | current value |
| Glass (tempered) | 23 | 37.331 t | 20 | 50 | 1.861.570 € | 746.615 € |
| Aluminum (frame) | 4 | 7.256 t | 1.500 | 3.740 | 27.137.981 € | 10.884.150 € |
| Polymers (EVA+backsheets+JB) | 5 | 891 t | 0 | 0 | 0 € | 0 € |
| Silicon (cells) | 1 | 1.719 t | 50 | 125 | 214.247 € | 85.928 € |
| Copper (cables/busbars) | 1 | 974 t | 7.000 | 17.453 | 16.996.946 € | 6.816.915 € |
| Silver (paste) | 0 | 36 t | 600.000 | 1.496.009 | 54.275.962 € | 21.768.300 € |
| Tin (solder) | 0 | 115 t | 25.000 | 62.334 | 7.141.574 € | 2.864.250 € |
| Other/minor | 0 | 13 t | 0 | 0 | 0 € | 0 € |
| | | 48.333,90 | | | | |
| Material Cables | Total recoverable (t) | Initial scrap price (€/t) | Price in year n (€/t) | Estimated revenue at EoL (EUR) | | |
| Copper (275kV) | 1.010 t | 7.000 | 17.453 | 17.627.975 € | 17.627.975 € | 7.070.000 € |
| Copper (DC cable 6mm ²) | 847 t | 7.000 | 17.453 | 14.783.064 € | 14.783.064 € | 5.929.000 € |
| Copper (DC cable 150mm ²) | 2.000 t | 7.000 | 17.453 | 34.906.882 € | 34.906.882 € | 14.000.000 € |
| | | 3.857 | | | | |
| Material Mounting structures | Total recoverable (t) | Initial scrap price (€/t) | Price in year n (€/t) | Estimated revenue at EoL (EUR) | | |
| Stainless steel | 38.183 t | 1.090 | 2.718 | 103.772.710 € | 103.772.710 € | 41.619.815 € |
| | | | | | 278.718.913 € | 111.784.972 € |

| | Year 2070 | Year 2025 |
|--------------------------------------|------------------|-----------------|
| Total recovery revenues | 278.718.913,28 | 111.784.972 € |
| Decommissioning costs 2025 | | |
| Best case: 15kEUR/MWp | 44.880.276,57 € | 18.000.000,00 € |
| Decommissioning costs 2025 | | |
| Worst case case: 25kEUR/MWp | 74.800.460,96 € | 30.000.000,00 € |
| Recycling costs 2025 | | |
| best case 43 kUSD per panel | 164.037.410,88 € | 65.790.000,00 € |
| Recycling costs 2025 | | |
| worst case 53 kUSD per panel | 202.185.645,97 € | 81.090.000,00 € |
| Revenues over Cost best case | 31.652.990,74 € | 27.994.971,53 € |
| Revenues over Cost worst case | 1.732.806,35 € | 694.971,53 € |

Simple recycling: USD 20.00 -25. 00 per panel (25.00 due to economies of scale)

Thermal processing: Extra USD 5.00 - 10.00

Specialized extraction: USD 8.00 per panel when processing bulk orders (100+ units)

chapter Processing fees in <https://solarrecycling.com/how-to-save-money-recycling-solar-panels/>

| Item | recent (2025) | nominal % change ≈ | | | weighted average |
|--|--|---|------|-------------|------------------|
| Copper (spot/futures) | ≈ \$9,513 / t (Q2 2025 FRED/IMF) | +~589% (≈6.9×). | 589% | 84.314.868 | 31,3% |
| Silver (spot) | ≈ \$50 / oz (2025 recent peak) | +~714% (≈8.1×). | 714% | 54.275.962 | 20,1% |
| Aluminum (primary) | \$2,526 / t (Jun 2025) | +~65% (1990→2025) — see note. | 65% | 27.137.981 | 10,1% |
| Stainless steel (representative PPI) | PPI values in recent years ≈160–200 (Dec2010=100 base) | order +100–200% for many stainless categories (very product-dependent). | 150% | 103.772.710 | 38,5% |
| weighted average commodity price increase | | | 392% | 269.501.522 | 100,0% |
| Material recyclers (PPI: PCU4299304299304) | Aug 2025 ≈ 152.8 | +~53% since Dec-1986 (PPI). | 53% | | |

The value of recovered materials from end-of-life panels is projected to grow dramatically, with one estimate putting the value at \$80 billion by 2050. Strong and consistent demand for solar panel materials will push manufacturers to rely more heavily on recycled sources, especially for materials like aluminum, which saves significant energy when recycled.