Botley West Solar Farm

Applicant's Response to Rule 17 Letter (14th October 2025)

October 2025

PINS Ref: EN010147

Document Ref: EN010147/APP/17.8

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

Prepared by:	Prepared for:
RPS **101 Park Drive, Milton Park, Abingdon, Oxfordshire, OX14 4RY** **United Kingdom**	**Photovolt Development Partners GmbH, on behalf of SolarFive Ltd.**

Contents

Appendices

Appendix 1: Response to ExA's Point 9 – Part 2: Further Exclusion of Land from Solar Panel Development

Appendix 2: Response to ExA's Points 9 and 10 – Part 3: Applicant's Without Prejudice LVIA Offer

Appendix 3: Response to ExA's Point 7 – Land Use

Appendix 4: Response to ExA's Point 14 – Cumulative Effects

1 Applicant's Response to Rule 17 Letter (14th October 2025)

1.1 Request for further information

Point No	Request for further information	Applicant's Response
Socioeconomics		
1	As discussed during Issue Specific Hearing 2 (ISH2), the Examining Authority (ExA) have concern that the list of Very Special Circumstances (VSC) in relation to the Green Belt appears to be flexible and subject to change. This results in a degree of uncertainty for the ExA at this stage of the Examination. Please confirm whether the list of VSC is likely to be subject to further amendments. How much confidence should the ExA have in the VSC as currently listed?	The Applicant's VSC case is unchanged from its submission as set out in Appendix 8 of its Planning Supporting Statement [**REP1-013**]. No further alterations are intended to be made and the ExA can take full confidence in relying on that case. At that stage, VSC7 (Community Benefit fund) and VSC8 (discounted electricity prices) were withdrawn. This was in response to discussions at the Issue Specific Hearing. Whilst the Applicant accepted that community benefits (as set out in VSC7 and VSC8) cannot count towards the planning balance, the Applicant still considered there to be value in those benefits that could be attributed to the VSC case. However, whilst both VSC7 and VSC8 (as previously included) plainly have a positive benefit attached to them, the Applicant confirmed that they would not be part of its planning balance case and the successful VSC case does not depend on them. Thus, the Applicant deleted them from the VSC case. The remaining VSC case as set out in [REP1-013] is considered sufficient to meet the relevant policy tests, reiterating that NPS EN-1 confirms that the starting point is that CNP Infrastructure will meet the test where development is proposed in the Green Belt.
2	The area identified for the location for the proposed education facility has not been removed from the Order limits. Is there an identified need for additional biodiversity net gain in this specific area?	Retaining this land as part of the Project allows additional BNG and other ecological enhancement to be secured. The Applicant considers this is important in its planning balance case, where, overall, benefits will outweigh harm. It is important to ensure that there are sufficient areas of land that can be incorporated into the BNG calculations to deliver the BNG commitments under Requirement 7 of the dDCO – for example, during detailed design, there may be some areas of the Project site that are required for the generation of solar energy instead of as 'natural habitat'. Therefore, it is important for the Applicant to have a degree of flexibility with respect to where habitat creation associated with the delivery of BNG is able to be undertaken to ensure that the solar generation level and BNG commitments are both met. In addition, the land will also act as extra mitigation for farmland/wintering birds and other bird species. Although this would not change the overall conclusions with respect to these receptors in EIA terms, the inclusion of additional grassland creation will benefit bird populations overall.
3	Please confirm how the suggested location for the community food growing areas were selected. What formal consultation took place in relation to this matter?	The Phase One consultation materials (leaflet and event boards), found in the Application at **[APP-026],** include the design principle that would provide "*the opportunity for continued agricultural use, to include sheep grazing, bee keeping, allotments and community gardens*". The feedback form asked for suggestions of further initiatives from the community. After the consultation, discussions began with Cherwell Collective and Chris Goodall, who wanted to grow food for the Cutteslowe Community Larder. The Phase One Consultation Summary Report **[APP-**

Point No	Request for further information	Applicant's Response
		027] stated that the Applicant was working with a number of local groups to explore benefits to the area, "*including engaging with local agricultural organisations about using areas of the site to enable community food production*". At Phase Two consultation the site maps showed areas set aside for "*proposed mitigation and enhancement areas*", of which three were discussed at the consultation events as ideal for community food growing - two at Bladon, one at Church Hanborough. These were chosen for ease of access and close proximity to settlements, enabling growers to walk or cycle to the site. The community food growing initiative is described in the consultation leaflet **[APP-029]** on the page headed "*Opportunities Beyond Solar*". Question 8 of the feedback form asked: "*Please provide any preferences for where you would like areas for community food growing to be placed*." The map on the leaflet had the text "*We are exploring areas for community food growing across three sites, and we are seeking feedback on where the community would like these areas to be located*". The Applicant held a meeting with representatives of Stop Botley West before the last Phase Two consultation event at Eynsham on 19th January 2024. The location of community food growing areas and the participation of Cutteslowe Community Larder were discussed.
4	The ExA notes that OxFarmtoFork supplies local Oxford colleges. Please provide a further explanation as to how this does not constitute a commercial enterprise and how local communities would benefit from the involvement of OxFarmtoFork.	OxFarmtoFork is a collaborative project led by Good Food Oxfordshire that connects Oxfordshire's institutions directly with local agroecological food growers. Good Food Oxfordshire exists to promote access to healthy and sustainable food for everyone in the county. OxFarmtoFork is a short food supply chain initiative that means that anyone growing food using agroecological farm methods has a local market for their produce, whatever the volume. Such farming practices nurture soil health, promote biodiversity and reduce emissions and food waste. Prioritising local produce reduces dependency on imports, strengthening regional food security. OxFarmtoFork charges buyers for using the platform, enabling it to make small grants to growers to help them get started. For every £1 spent on local produce, £2.50 is generated in social, economic and environmental value, driving prosperity for local communities. As well as direct economic value to communities, encouraging local food growers and shorter supply chains means that food producers earn a fairer share of the value. The Applicant is seeking growers from all parts of our local communities and will run a campaign to attract them to the site should DCO consent be granted - there is no compulsion to use the FarmToFork platform and some growers may prefer to sell through farmers' markets or distribute produce via food hubs or community larders. OxFarmtoFork brings social, environmental and economic benefits to the communities within which it operates, as well as promoting regenerative and sympathetic farming practices. Agroecology is a practice encouraged by the Soil Association and is designed to counter the effects of intensive farming, promoting soil health and long-term sustainable farming methods.
5	The Cherwell Collective spoke at Open Floor Hearing 3 (OFH3) and promoted the food forests concept and explained their way of working. What is not clear is what relationship, if any, this organisation has with the general community in the surrounding villages or how the locals could get involved with it. Explain.	Cherwell Collective has been working with local people in and around the areas of the solar site for five years and has identified, out of the 650 households of their current registered usership in the area, a subset with the highest need. Cherwell Collective will first approach those individuals facing the most hardship (100 people) to have one to one conversations with their team about the food growing areas, what using it would entail and to gauge interest. Cherwell Collective plan to offer some areas for high-need individual families and other plots as community growing areas with multiple households helping to maintain the sites. Cherwell Collective will support with the planning and set-up of the sites to maximise success.

Point No	Request for further information	Applicant's Response
		Once this has been secured Cherwell Collective will then offer spaces to the general community and host open days in the food forests at harvest times. If local people want to take responsibility for a particular site they will be signed-up to volunteer with Cherwell Collective for this project specifically, with CC providing equipment and support for activities on site. Cherwell Collective's target for engagement is local people who have, in the last three years, approached them for food access. Cherwell Collective has users who would benefit from access to food growing spaces in the following settlements: Yarnton, Hanboroughs, Tackley, Cassington, Bladon, Wolvercote, Kidlington, Woodstock. These households are currently accessing support through Cherwell Collective's centres in Kidlington. Access to the solar farm site would enable Cherwell Collective to bring their support into the communities. There are significant opportunities for the local community to access support from or to volunteer with the Cherwell Collective.
6	In response to ExQ2.15.6 [REP4-037], it was stated that if consent was granted, an implementation group would be formed in respect of the skills and employment programme. Please signpost to where this is detailed within the outline Skills, Supply Chain and Employment Plan. How would this be secured if it is not included within the plan?	The reference to an 'implementation group' in the response to ExQ2.15.6 is synonymous with the 'SSCE Steering Group' referred to in Figure 1: '*Indicative Organisational Framework for Delivery*' of the Outline Skills, Supply Chain & Employment Plan ('OSSCEP') [**REP4-020**]. This shows a potential organisational framework for developing and delivering the work programme post-DCO consent. The final organisational framework would be determined when discharging Requirement 13 (Skills, supply chain and employment) of the draft DCO. This requirement ensures that the final plan to be submitted for approval must be substantially in accordance with the outline skills, supply chain and employment plan. This gives certainty that the final organisational structure will be sufficiently similar to that shown in the outline plan, whilst retaining necessary flexibility to allow the most suitable organisations to be involved at the time of requirement discharge.
Land use		
7	At Deadline 4, it was confirmed that the proposed amount of Best and Most Versatile (BMV) land to be utilised had increased from 38% to 42%. Additionally, the response to ExQ2.11.4 [REP4-037] provided an explanation of which elements of the Proposed Development would be located on which grades of agricultural land. Please expand on the answer provided to demonstrate compliance, or otherwise, with the requirements of NPS EN-3 which states that developers must justify why the use of BMV land is necessary and whether it is feasible to locate the scheme on lower grade agricultural land, considering other material planning considerations.	Section 2.10 of NPS EN-3 does not prohibit the development of mounted solar arrays (Paragraph 2.10.30) and land type should not be a predominating factor in determining the suitability of the site location (paragraph 2.10.29). It is also recognised that at this scale it is likely that developments will use some agricultural land. (paragraph 2.10.31). NPS EN3 states in relation to agricultural land that: 1. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible. 'Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification. (Paragraph 2.10.29) 2. Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use. (Paragraph 2.10.32)

3. Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination (Paragraph 2.10.34)

In regard to Paragraph 2.10.29, the Project design process did take into account the likelihood of areas of best and most versatile land at an early stage. The attached Figure 1 shows the location of the proposed development in relation to the Provisional ALC mapping and shows the location of the Project area in the context of the wider Oxfordshire County. It is clear from this overlay that the location of the areas of the Project falls almost wholly within Grade 3 with some potential Grade 4 land, which compares favourably with surrounding districts within the County of Oxfordshire, where there are significant areas of Grade 2 and also limited areas of Grade 1 land.

Further analysis of ALC data and the likely distribution of ALC grades has been taken from the detailed ALC survey work that has been undertaken by DEFRA within the surrounding area to consider the likelihood of the presence of BMV.

Figure 2 shows the distribution of ALC survey work that has been undertaken by DEFRA in Oxfordshire using the current Agricultural Land Classification guidelines. The tables below summarise the quality of the agricultural land identified within each district, based on these surveys and excludes areas of non-agricultural land identified within the survey sites:

ALC Grade	Vale of White Horse Area of Survey	%	South Oxfordshire	%	Cherwell District	%	West Oxfordshire District	%	Botley West %
1	1.3	<0.1	10.13	1	5.34	0.2	0.0		0.2
2	234.21	16.9	247.82	24.5	552.06	29.8	44.19	2.36	7.5
3a	418.78	30.2	313.94	31.1	368.44	19.9	368.71	19.42	30.3
3b	668.7	48.4	434.5	43.0	913.64	49.4	1454.36	76.6	62.0
4	58.06	4.2	4.31	0.4	10.45	0.6	31.02	1.62	0
5	4.09	0.3	0.0		0.84	<0.1			

The totals of percentages of the best and most versatile land surveyed by DEFRA in these different areas compared to Botley West is as follows:

	Vale of White Horse	South Oxfordshire	Cherwell District Council	West Oxfordshire	Botley West
% BMV – Grades 1, 2 and Subgrade 3a	47.2	56.6	49.9	21.78	38.1

This DEFRA survey information further confirms the likelihood that a lower percentage of BMV would be expected within the West Oxfordshire District, where the Project Site is mainly located, and that the areas considered in the initial site design process would be likely to comprise predominantly Grade 3 land.

The detailed survey work undertaken by the Applicant, does show a slightly higher percentage of Grade 2 and Subgrade 3a (38.0%) than the available DEFRA survey data (21.78%) would indicate, but the dominance of lower quality Subgrade 3b land is still identified through the survey work, as would be expected within this area according to both the available desk top data and the available DEFRA survey data.

Therefore, agricultural land quality has been considered in the location of the Project area in accordance with NPS-EN3. The majority of the land comprises lower quality Subgrade 3b land and the permanent loss of approximately 5.5 ha of bmv agricultural land is not significant. Natural England have no remaining concerns in relation to agricultural land quality.

The best and most versatile land within the site will remain in agricultural land during the operational period. In accordance with NPS EN3 Paragraph 2.10.32, the proposal will enable the continued use of the land for agricultural purposes within the area of the solar installation. The oLEMP includes the description of the use of conservation grazing within the Site [**CR2-052**] and this is secured through Requirement 6 of the draft Development Consent Order [**CR2-009**].

The Applicants have also submitted an outline Soil Management Plan, where Natural England has no outstanding comments, which would enable soils within the site to be sustainably managed during construction and minimise the potential for adverse impacts on soil resources. This is fully in accordance with the advice to Applicants within Paragraph 2.10.34 of NPS-EN3.

Point No	Request for further information	Applicant's Response
		The Applicants have therefore taken into account the potential for the presence of a percentage of bmv within the Project Site. There would be no significant permanent loss of BMV as a result of the Project and the land beneath the solar arrays would not be lost from agricultural productivity during the period of long term temporary operation. See Appendix 3 in support of this response.
Landscape		
8	The landscape clarification note [REP5-006] makes no mention of the Design Manual for Roads and Bridges (DMRB). In the Applicant's responses to D4 submissions [REP5-005], Table 2.1, pdf page 7 of 57 (in response to [REP4-041]), there is some commentary on the DMRB. It is stated that the DMRB matrix was used except for one difference: "The main adaptation to the matrix in DMRB to the matrix used in the Botley West ES is the removal of the 'no change' magnitude of impact column. This is because if there is no change, then the impact is scoped out of the ES so this column is redundant." Chapters 7, 9, 10, 11, 12, 13 and others all have the no change column in the assessment matrix tables. By your own logic, if no change was a redundant column in an ES matrix, surely it should be omitted from all the assessments, but instead it is only omitted from LVIA. The ExA request justification as to why this is the case.	The EIA Regulations require the assessment and adoption of *"measures necessary to ensure that, before development consent is given, projects likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects"*. This focus on significance is integral to assessments and ensures that by concentrating on matters where significant effects may occur the process leads to steering improved design and overall betterment in the decision-making process. Schedule 4 of the EIA Regulations requires an environmental statement to include: *"a description of the likely significant effects of the development on the environment"*. The Regulations do not provide advice as to how to derive significance or what level of significance is significant. With regard to the inclusion or exclusion of a 'no change column' in the assessment matrix, the Applicant has responded to this point in its Response to the Rule 17 Letter (17th June 2025) **[REP2-029]** (paragraphs 1.1.2 to 1.1.13) and in the Applicant's response to the OHA's response to the Rule 17 Letter **[REP3-066]** (paragraph 1.2.6). This notes that EIA guidance (The state of environmental impact assessment in the UK, IEMA 2011) states that *"there is no regulatory requirement to apply the same methodological approach to significance evaluation across an EIA"*. 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 on the 10th of June 2025 and as agreed in the draft Statement of Common Grounds with the OHAs. The EIA Regulations require the reporting of significant direct and indirect effects (Part 1, Regulation 5 (2)) not every effect. GLVIA3, e.g. at paragraph 8.8 notes that LVIAs should identify and describe *"the potentially significant effects that are likely to occur."* Therefore a 'No Change' column in a landscape and visual significance matrix is redundant. Other topics may require a 'No Change' column, to follow their own topic area/institute's guidance. Even if not, those other chapters would simply otherwise include surplus detail that is not necessarily required – applying the principle above that no change is redundant – but has no bearing or implication on the validity or robustness of the likely significant effect conclusions of either the LVIA chapter or those other chapters.
9	You stated in [REP5-005] that you have taken on board the concerns raised by HE, ICOMOS-UK and others regarding land to be omitted. You also stated	The Applicant responds to this question in three parts: (1) Explanation as to why areas of removal have been agreed to previously;

Point No	Request for further information	Applicant's Response
	that at this stage that you have no intention of reducing the proposed installation area any further and this assertation was repeated at Issue Specific Hearing 2 (ISH2). Please can you explain why you were prepared to undertake the reductions in panel area that have been submitted at CR2 (in relation to the World Heritage Site (WHS)), but are not prepared to give consideration to other areas that have been suggested by professional landscape architects and by the local authorities that have a deep understanding of their local area?	(2) Explanation of why further areas of removal are not considered necessary or appropriate in light of national policy; and (3) *On a without prejudice basis,* consideration of further areas for exclusion. **Part 1 – Explanation as to why areas of removal have been agreed to previously** To be clear, the Applicant has applied the mitigation hierarchy and considered areas proposed for removal as suggested by various interested parties throughout all phases of the Project, including those suggested by professional landscape architects and by the local authorities during Examination. However, the iterative design of the Project is a balancing act between minimising the potential harm with maintaining the maximum benefit of the Project in light of the urgent need for the Project to deliver 840MW to the National Grid. There are various examples of where the considerations made by interested parties have been incorporated into the Project design, either embedded into the Project, as a result of pre-application or subsequently during the (pre-)Examination process. This includes: (a) The solar installation area was reduced from 884.6ha at the PEIR stage to 839.5ha for DCO submission, to facilitate the expansion of foraging corridors for bats; to establish a consistent buffer from residential properties; to accommodate sensitive archaeology; and consider buffer zones for utilities. This was in response to ongoing engagement with Natural England, Historic England and following responses from other interested parties and statutory undertakers respectively. (b) Then, as part of Change Request 1 during pre-Examination, the Applicant replaced two areas of solar installation for further archaeological protection and management (0.47 ha) following continued engagement with Historic England. This resulted in an 839ha of solar installation area being proposed. This was justified on the basis that there would be a minor loss of function (i.e. generation potential) and a noticeable benefit from an environmental perspective. (c) Most recently, during Examination, the Applicant submitted Change Request 2. Amongst other changes, this included: (i) a 42.3ha reduction in solar installation area southwest of Bladon and on land north of Heath Lane. This was implemented in response to feedback from Historic England as the key statutory body for the historic environment and other interested parties (Change 1); (ii) a 40.8ha reduction in solar installation area near Oxford Airport to address concerns raised by Oxford Airport regarding safe aircraft operations and light-aircraft take-off and landing (Change 2); and

Point No	Request for further information	Applicant's Response

(iii) a 6.26ha reduction in solar installation area east of Lower Road to accommodate the retention of the benefit of a restrictive covenant on land owned by Blenheim following ongoing engagement with the beneficiary of the restrictive covenant (Change 4).

The LVIA in Chapter 8 has been updated in light of Change Request 2. The resulting layout as a result of Changes 1, 2 and 4 encouraged a reduction in landscape and visual effects compared to the Deadline 5 layout. This is supported in the Environmental Statement Addendum [**CR2-071**].

While the main drivers for Change Request 2 were to reduce effects on the Historic Environment (Change 1) and safety concerns at Oxford airport (Change 2), there have been additional environmental benefits in LVIA terms. For landscape and visual resources and receptors this has included:

- Increasing the distance between visual receptors at The Oxford School of Drama/ Sanso's Farm (150 m at its closest point), from Oxfordshire Way, in the part of Bladon, which is next to the A4095 (300 m at its closest point), and at Begbroke (350 m at its closest point);
- Panels have been removed from fields to the west and south of Mill Farm (170 m at its closest point), which extend between Lower Road and River Evenlode;
- Panels have been removed from fields extending between A4095 and Cassington Road, to the north of Burleigh Woods; and
- Removal of panels has reduced effects on PRoWs, around Begbroke and Bladon.

This series of adjustments to the solar installation areas of the project shows a continued application of the mitigation hierarchy to refine the Project proposals as part of an iterative design process.

Where land has been removed, this has been facilitated as a result of better-known design which has evolved as the Project has progressed. For example, following a more detailed analysis of panel spacing and consideration of a narrower placement of panels (still within the parameters in the Outline Layout and Design Principles), the Applicant has found a solution to utilise a more efficient layout with sufficient certainty that the benefits of the Project can be achieved with the remaining land. The Applicant has therefore demonstrated willingness to sacrifice certain parcels of land in exchange for environmental improvements, where that land is no longer considered necessary. Further, in accordance with paragraph 2.10.55 of NPS EN-3, initial design iterations incorporated necessary overplanting of solar panel arrays to account for long-term efficiency degradation and to secure the agreed export capacity. Subsequent refinements to optimise layout and design efficiency allowed some reduction in land area, while maintaining the required generating capacity and delivering enhanced environmental outcomes.

Point No	Request for further information	Applicant's Response
		Part 2 – Explanation of why further areas of removal are not considered necessary or appropriate in light of national policy From a landscape perspective, the reductions already made to the solar installation areas (driven by other reasons as set out above) have allowed for a decrease in both landscape and visual effects, especially in relation to visual receptors in the settlements of Bladon, Begbroke village and users of Lower Road. This approach aligns with paragraph 5.10.26 of NPS EN-1 which states: "*Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project".* However, paragraph 5.10.26 of NPS EN-1 continues to recognise that *"reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output".* In other words, the degree to which adverse effects are mitigated needs to be balanced against the generation of renewable energy. This is supported by the following provisions from NPS EN-1: • Paragraph 5.10.35 which identifies the test: "*The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*". • NPS EN-1 recognises that "*it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts*" (paragraph 3.1.2), "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*…" (paragraph 5.10.5), and "*all proposed infrastructure is likely to have visual effects for many receptors around proposed sites*" (paragraph 5.10.13). • Paragraph 4.2.15 confirms that "…*these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts*". In summary, impacts are envisaged and accepted under national policy given the scale of such projects, therefore it is a high bar to determine if they are 'so damaging' to justify the loss of potential delivery of renewable energy. The need for 'the most exceptional circumstances' is a particularly high bar, noting that all solar DCOs to date have been granted, even where likely significant effects are anticipated from a landscape perspective. The Applicant is not aware of any exceptional circumstances that apply here, never mind 'the most exceptional circumstances' as required by policy. Mitigation has been secured in the various management plans secured through the DCO requirements, most notably the oLEMP, and the Project has been refined as explained in Part 1 to ensure a balance of adverse effects and confidence in delivery at scale is achieved.

Point No	Request for further information	Applicant's Response
		The Applicant has continued to consider areas of removal as suggested by interested parties (e.g. the OHAs) in light of the policy. Notably, if all of the areas proposed to be removed by OHA in [**REP4-075**] were applied, this would result in a loss of **495MWp**. This would make the scheme not even close to being viable. To make these changes would therefore directly conflict with the policy position set out in paragraph 5.10.26 of NPS EN-1 as to do so would represent '*a significant operational constraint and reduction in function'*. This would fail to achieve the urgent need for this type of development. Therefore, whilst the Applicant has reduced the scale of the Project already which has the benefit of reducing landscape and visual effects in accordance with NPS EN-1, there is no policy support for the further reductions as requested. This would be contrary to the overwhelming support for the urgent need (paragraph 3.2.6 NPS EN-1) for large scale infrastructure and the 'substantial weight' (paragraph 3.2.7 NPS EN-1) that should be given to this need. Appendix 1 of this Rule 17 response offers more detail from a technical perspective in support of this position. For completeness, paragraph 5.10.26 of NPS EN-1 identifies that there may be "*exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function."* The Applicant has considered the proposals made by the OHA in this context and is unable to identify any areas where it can achieve a 'very significant benefit' in exchange for a 'small reduction in function' only. In other words, the cost of being able to achieve a 'very significant benefit' would result in far greater than 'small loss in function'. By way of example: • **Northern area** - the OHAs have suggested that fields 1.14 and 1.18 (amongst others) should be removed - all areas of the panels in the northern area are already located in landscape sub-types with a low susceptibility to solar energy (Renewable energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire, LDA, 2016) or in a Cherwell District landscape character area, which abut these areas of low susceptibility. This would not remove areas of panels from landscape sub-types of medium or high susceptibility and in landscape terms would therefore not deliver a 'very significant benefit'. There would be a reduction of the impacts on views from publicly accessible viewpoints, e.g. public rights of way, however these are already significantly screened. There would likely be some reduction in the impacts experienced by residents of the closest properties, e.g. Weaveley, but not to a degree that meets the 'very significant benefit' threshold. The removal of more panels from the field adjacent to this property (field 1.14) would also not deliver a 'very significant benefit'. • **Central area** – the OHAs have suggested that solar panels are omitted from fields 2.114 and 2.92.3, either side of Lower Road (amongst others). The central area's landscape sub-types have a mixed susceptibility to solar energy development (low to medium). None of the sub-types within this area have a high susceptibility. These two fields have a medium susceptibility. Removing the solar panels from the fields would therefore not bring very significant landscape benefits. As the fields are low-lying and not on the more prominent valley sides, the removal of the panels from the fields immediately adjacent to Lower Road would be screened by the existing hedgerows, which would be enhanced where required and managed to a suitable height. These fields do not feature so prominently in the views across the valley

from public rights of way, nor would they significantly improve the views from residential properties. Their removal would not provide significant visual benefits.

- **Southern area** – the OHAs have suggested that all of the fields within the southern area be removed, despite the South Oxfordshire and Vale of the White Horse Renewable Energy Study – Landscape Sensitivity Assessment (LUC, 2024) stating that the two landscape character areas that the Project straddles in this area having a moderate (LCA 14A) and moderate-High (LCA 9G) sensitivity to the amount of solar. The latter sensitivity is increased by historic assets that are not visible from, or close to, the area of the project. Whilst landscape benefits may be achieved through reducing the Project scale, this scale of removal would represent a significant loss of function.

The below table summarises the loss of function associated with some of the proposed removals, representing a more than minor loss of function:

Field number	Installation area loss	Loss in installed capacity
1..17	18,50 ha	30,83 MWp
1..18	9,00 ha	15,00 MWp
3..12	1,00 ha	1,67 MWp
3..14	1,50 ha	2,50 MWp
3..17	0,40 ha	0,67 MWp

In any event, paragraph 5.10.26 also states that "*In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function"* (our emphasis). In other words, even if those exceptional circumstances were to apply (which the Applicant contends do not), there is no obligation under the NPS that would require the Secretary of State to consider that the very significant benefit would outweigh the small reduction in function. In this context, the fact there would in fact be a less than 'very significant benefit' achieved and a large reduction in function, gives unequivocal justification for the Applicant's decision to retain those land parcels. The Applicant is satisfied, based on its professional opinion and in recognition of the mitigation secured for the Project, that the residual adverse effects are acceptable on balance of the substantial benefit to be achieved. The Applicant's position is that this aligns with the national policy position outlined above.

Part 3 – Without Prejudice Offer

Notwithstanding the above, in recognition of the apparent weight given by the ExA to suggestions made by the OHAs and other IPs with regard to landscape impacts, the Applicant has attached to this Rule 17 response, at Appendix 2, a without prejudice offer of additional mitigation. This is offered on a without prejudice basis only, in

Point No	Request for further information	Applicant's Response
		the event that the ExA or SoS is minded to disagree with the Applicant and conclude that further mitigation is necessary under the policy tests. The plan at Appendix 2 (part (a)) sets out possible reductions in scale of solar installation within the areas suggested by the OHAs, where the ExA / SoS may best balance the mitigation of landscape and minimizing of loss of function, ***if*** it is considered that exceptional circumstances apply and further mitigation is required. The plan includes a reduction of solar panel areas in response to the suggestion from the OHA (shown coloured purple for the purposes of this question) and an increase in buffer zones from some residential receptors (shown coloured yellow for the purposes of question 10 below). The consequence, in terms of the reduction in generation capacity of the Project, of removing the solar panels from each of the areas shown on the without prejudice offer plan is set out in the table at Appendix 2 (part (b). The reasoning for the areas of removal selected for the without prejudice offer are explained below, there are three main reasons: • A reduction of effects on landscape character – removing panels from the higher slopes in the central and southern areas. • A reduction of effects on visual receptors at publicly accessible locations – removing panels from either side of the Evenlode when viewed for public rights of way on either side in the central section and from the high ground to the north of Hill End in the southern section. • A reduction of effects on visual receptors at private properties – Weaveley in the northern area, Purwell Farm and properties at Barrow Court in the central area and Denmans Farm in the southern area. Two other areas in the northern section have been suggested as areas that might be removed. These are to provide an additional buffer to Samson's Platt. These removal of these areas would also have beneficial effects for landscape character and also views from publicly accessible locations and from private properties. See the plan at Appendix 2 (part (a)) to this response for the plan showing the areas of removal and buffer zones that form the without prejudice offer. Part (b) of Appendix 2 explains the loss of function associated with each proposal.
10	In EXQ2.9.5 we asked about residual effects. In your response at [REP4-037], you stated that where residual effects are perceived by others to be of a greater magnitude, then these are generally subjective opinions and do not materially affect the assessment of significant effects. This comes across as being very dismissive of anyone's view but your own. Given that the view on	The Applicant has approached this question in three parts: (1) Explanation of and justification for the approach taken by the Applicant; (2) Explanation of the more detailed assessment undertaken and confirmation as to how that aligns with our approach taken to date and national policy; and (3) *On a without prejudice basis*, consideration of increased buffers from residential properties.

Point No	Request for further information	Applicant's Response
	residual effects is shared by the Host Authorities, Historic England and many of the Interested Parties (IP's). The ExA find it extraordinary that you have just repeated your approach and methodology, when this has been questioned on numerous occasions both in writing and in the previous hearings. Many of the IP's as well as the host authorities and Historic England have made valid professional judgements that should be considered as such. Please could you explain why you still consider your approach to be correct and everyone else's approach to simply be subjective opinions that would not materially affect your assessments?	**Part 1 – Explanation of and justification for the approach taken by the Applicant** On assessing the effect on landscape character, the Applicant has been guided by the Local Planning Authorities' evidence base, which includes landscape character assessments and two renewable energy studies undertaken for West Oxfordshire District Council and South Oxfordshire and the Vale of the White Horse District Councils. The two studies assess the susceptibility and sensitivity of various areas within West Oxfordshire and the Vale of the White Horse Districts that have the potential to host solar farms. The Vale of the White Horse study assesses sensitivity to solar farms of different sizes. These studies are: • West Oxfordshire District – '*Renewable Energy And Low Carbon Energy Assessment And Strategy For West Oxfordshire'* (Landscape Design Associates (LDA) 2016). This strategy assesses the suitability of landscape character areas and landscape sub-types to accommodate different types of renewable energy, including solar farms; and • South Oxfordshire and the Vale of the White Horse Districts – *'South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment'* (Land Use Consultants (LUC) 2024). This study similarly describes the sensitivity of each identified landscape character area to wind energy and different sizes of solar farm. Professional judgement is a very important part of LVIA as set out in GLVIA3, paragraphs 2.23 to 2.26. This is not to dismiss the views of others', but to identify that there is inherent subjectivity in the relevant guidance and the difference in professional opinion does not act as evidence that the Applicant's approach is not justified in line with the relevant guidance. As the Applicant has raised in its earlier responses, five Chartered Landscape Architects have worked on and reviewed the judgements made as part of the landscape assessment. The judgements made by the Applicant are peer-reviewed, sound and professional. Three of those Landscape Architects have worked in Oxfordshire for over 35 years each. The Applicant notes that the authors of the West Oxfordshire renewable energy strategy, LDA, are based at Worton Rectory Park (located off the Yarnton Road, between Cassington and Yarnton) and therefore the Applicant recognises that those authors are suitably located to accurately characterise the landscape. The West Oxfordshire and the South Oxfordshire and the Vale of the White Horse renewable energy studies both find that there is some capacity for solar farms within their respective districts. Where Historic England and/or the Host Authorities have found impacts on the significance of designated heritage assets as a result of change within their settings to be greater than those identified by the Applicant, the Applicant has considered these but cannot depart from its own professional judgement simply because this differs to another. This position that these judgements are subjective are not intended to be seen as dismissive but a reflection of the Applicant's honest assessment as professional advisers. Historic England's 2017 guidance document *The Setting of Heritage Assets* states with regard to the undertaking of the assessment of multiple assets within an Environmental Impact Assessment Framework '*Each of the stages may involve detailed assessment techniques and complex forms of analysis such as viewshed analysis, sensitivity matrices and scoring systems. Whilst these may assist analysis to some degree, as setting and views are matters of qualitative and expert judgement, they cannot provide a systematic answer*'. The critical point with regard to the current application, insofar as Historic England is concerned, is the consideration of harm to the significance of heritage assets, as that is the policy requirement (rather than

Point No	Request for further information	Applicant's Response
		consideration of magnitude of impacts and significance of effects which reflects EIA terminology). The Applicant's position is that all harm to the significance of heritage assets is less than substantial. With regard to designated heritage assets this position is shared by Historic England and the Host Authorities. The correct policy test is therefore the one set out in paragraph 5.9.32 of NPS EN-1: "*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*." A second relevant policy is set out in paragraph 3.3.8 of NPS EN-3 in a section regarding *Factors influencing site selection and design* and which states: "*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."* Whilst conscious not to repeat earlier submissions, for completeness, the Applicant notes that its LVIA methodology follows the guidance set out in GLVIA3 and Landscape Institute Technical Guidance Note 2024-01: 'Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment', Third edition (GLVIA3) (TGN-2024-01), amongst other documents as set out in paragraphs 1.1.2 to 1.1.12 of [**REP2-029].** This methodology was tested at the Mona Offshore Wind Farm DCO Examination – as explained in paragraphs 1.2.7 to 1.2.8 of [**REP3-066]** – where the ExA reported that *"Based upon the above considerations, the ExA has no substantiative concerns regarding the Applicant's assessment methodology and is satisfied that the approach and assessment are in line with the provisions set out in Section 5.10 of NPS EN-1 and Section 2.8 of NPS EN-3"* (ExA's Report to the SoS for DESNEZ, paragraph 4.1.28). Whilst there may be multiple potential approaches that can be taken due to the flexibility of the relevant guidance, the Applicant wants to reiterate that its assessment definitions, criteria and application used in the Botley West LVIA have therefore not altered from those deemed acceptable. The Applicant appreciates that alternative approaches are possible and flexibility is facilitated in the relevant guidance as to the approach to methodology. Therefore, whilst it is an inherently subjective matter which the Applicant's professional LVIA advisers and other interested parties disagree on, this does not mean that the Applicant's approach is not supported by the relevant policy and guidance. **Part 2 – Explanation of the more detailed assessment undertaken and confirmation as to how that aligns with our approach taken to date and national policy** The Applicant has undertaken a detailed assessment, in the form of a Residential Visual Amenity Assessment (RVAA) **[EN010147/APP/17.13]**, of those properties where it was considered that the residents might experience significant visual effects. The RVAA is based on the process of four 'steps' as set up in the Landscape Institute Technical Guidance Note 2/19. The RVAA considered the following properties and assessed them in detail: 1. Upper Dornford Cottage; 2. Lower Dornford Farm; 3. Dornford Grove;

Point No	Request for further information	Applicant's Response

4. Bladon;
5. Hordley Cottages;
6. Weaveley Farm;
7. Cassington (including separate assessments of Barrow Court and Williams Court);
8. Burleigh Farm;
9. College Farm;
10. Goose Eye Farm;
11. New Barn Farm;
12. Purwell Farm;
13. Jumper's Farm;
14. Lake View and Heiderbech, Cumnor; and,
15. Denman's Farm.

Please note, the Applicant's Response to ExQ2.13.15 refers to the 19 properties that were considered as part of the initial Project design in terms of the 25m buffer zones (see Appendix B of the RVAA for). That analysis was not referring to the RVAA specifically, hence the intentional difference with the properties listed above. Not all properties that have a view of the development were included in the study, as Landscape Institute Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA) notes at paragraph A1.13 that properties should only be considered where potentially significant effects might occur.

The Applicant found that of those highlighted as potentially experiencing significant effects, only 7 were considered to experience likely significant effects. These include Weaveley Farm, Barrow Court (Cassington), College Farm, Goose Eye Farm, New Barn Farm, Purwell Farm and Denman's Farm. However, of those 7, none would have a visual experience that was "*overwhelming or overbearing*", due to the low-lying nature of the development and the embedded mitigation proposed. Therefore, based on the assessment and professional judgement, although 7 potentially significant effects have been identified, there are no effects likely to be experienced at residential properties that meet the criteria to trigger Step 4 of the RVAA. It is considered that the effects resulting from the Project would fall below the Residential Visual Amenity Threshold referred to in LI TGN 02/2019 as visual effects *"of such nature and / or magnitude that it potentially affects 'living conditions' or Residential Amenity"* (Paragraph 2.1). The guidance note further indicates that *"It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern."* (Paragraph 1.6).

Point No	Request for further information	Applicant's Response
		The Applicant also notes that TGN 2/19 quotes Inspector Lavender on the Carland Cross Windfarm inquiry, at paragraph A1.14 where he distinguishes between simply a view of a development that the resident does not wish to see and visual intrusion impacting upon living conditions: *"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)"* (Applicant's emphasis). This aligns with national policy – NPS EN1, paragraph 5.10.13 notes that: *"all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."* As noted in the Applicant's responses to comments on ExQ2 – Landscape and Visual Resources Clarification Note [**REP5-006**] NPS EN1- requires the Secretary of State to consider paragraphs 5.10.35 and 5.10.36 of the NPS: • *"The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.* • *"In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable."* As noted in previous responses a solar farm is temporary and eminently reversible, including the landscape mitigation, should it be required. Further detail on the application of national policy is summarised in the response to Question 9. **Part 3 – Without Prejudice Offer** Notwithstanding the above, in recognition of the attention given by the ExA, OHAs and other IPs with regards to residential visual impacts, the Applicant has attached to this Rule 17 response at Appendix 2 a without prejudice offer. This is offered on a without prejudice basis only, in the event that the ExA or SoS is minded to disagree with the Applicant and conclude that increased buffers are necessary to address the likely significant effects, even though such effects are envisaged under national policy. The plan includes a reduction of solar panel areas in response to the suggestion from the OHA (shown coloured purple for the purposes of question 9 above) and an increase in buffer zones from some residential receptors (shown coloured yellow for the purposes of this question).

Point No	Request for further information	Applicant's Response
		The consequence, in terms of the reduction in generation capacity of the Project, of removing the solar panels from each of the areas shown is set out in the table at Appendix 2 (part (b)). The reasoning for the increased buffers for the without prejudice offer is that, following the assessment of those properties where residents might experience potentially significant effects, of those identified only 7 were found to have the potential for significant effects (albeit not at a level to trigger a full RVAA). A buffer of 75 m has been applied to those properties where significant effects were identified. See the plan at Appendix 2 (part (a)) to this response for the plan showing the areas of removal and buffer zones that form the without prejudice offer. Part (b) of Appendix 2 explains the loss of function associated with each proposal.
11	At ExQ2, we asked question EXQ2.13.8 of all IP's as to their reaction if proposed landscape mitigation were to be omitted from the proposals, in particular hedgerows adjacent to public rights of way. This would result in un-mitigated visual effects during the lifetime of the project, but a more recognisable landscape that afforded the existing open countryside views when the project is decommissioned. The overwhelming response was that neither solar panels nor 3m hedges were considered to be appropriate in the views from the footpaths and that proper mitigation would involve greater buffers that would then not require such tall hedges to be planted. From our accompanied and unaccompanied site visits, we have experienced the sweeping open landscape views that the IP's have referred to and comes back again to the matter of the proper application of mitigation hierarchy and whether this was correctly carried out during design development. It also links back to the question we have asked before as to why, in the Landscape and Visual Assessment only, you have chosen to treat Moderate impacts as not significant. Please could you comment on this issue and try to help us resolve it?	**Hedgerow Maintenance** The Applicant has recognised the importance of existing open views. This has been acknowledged at Appendix C of the oLEMP, where the Applicant has added detail to its existing mitigation package to incorporate flexibility to balance the need for screening alongside the protection of openness: *"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."* This ensures that sufficient screening is secured – namely, the Applicant's existing commitment to approximately 3m hedgerows – whilst retaining flexibility to enable lower hedgerow heights to be maintained where doing so would prioritise retention of the open views over screening. Representative Viewpoint 38 is one example of where this may be considered, at detailed design, through consultation with the OHAs. **Landscape character** Landscape character is ever-changing, landscapes are dynamic as the Applicant has highlighted in various responses during the Examination, latterly in response to the ExAQ2.13.9 of **REP5-006**: *"Landscapes are dynamic, they are not preserved in aspic. Landscapes change due to societal needs and, in rural areas, farming practices and will also change due to climate change, as noted in the Applicant's response to REP3-077 [REP4-037]. The landscape character will also change due to landowner wishes, explained in paragraph 1.1.28 of the Applicant's Response to the Rule 17 Letter [REP2-029]. The future baseline in and around much of the Project will change at 15 years due to the planting that has taken and is taking place elsewhere on the Blenheim Estate, introducing woodlands into what were and are arable fields, enclosing the landscape and views* [the extent of some of the areas already planted by the Blenheim Estate are shown on the Landscape, Ecology and Amenities Plan (Rev 3) **CR2-043** as 'young woodland'] . *This has been taken into account when considering the effects during the first 15 years. The landscape in and around the Project will have changed further at decommissioning, as built development is proposed and any woodland will have matured, changing the nature of views still further. It is at that point in time, that a decommissioning plan can be finalised, taking into account this future landscape context."*

Point No	Request for further information	Applicant's Response
		The Applicant notes that in the central area the Salt Cross development will bring permanent built development into a rural landscape. At decommissioning the landscape mitigation, including hedgerows, could be removed if required – the Hedgerow Regulations are not an impediment to hedgerow removal. The OHA's are correct that after 30 years under Section 4 (a) of the Hedgerow Regulations 1997 hedgerows are deemed to be 'Important Hedgerows'. However, it does not prohibit the removal of hedgerows but requires landowners to justify the need for their removal, as the Applicant noted in response to [**REP4-074]** Q2.13.8 of [**REP5-005].** The landscape surrounding the Project is not devoid of hedgerows, e.g. Figures 7, 9 and 11 of Annex 3 to [**REP4-0037**] which are photographs looking from the Cotswold National Landscape (CNL) towards the Project**.** The Applicant notes that CNL Board welcomes the establishment of additional hedgerow and woodland planting in its response to the ExA's Q1 **[REP2-068]** *"The Board also considers that the 'new planting/areas for enhancement' on land between the solar PV arrays and the CNL have the potential to provide landscape enhancements which could be considered to contribute to furthering the purpose of CNL designation and should be secured as part of the Development Consent Order should, without prejudice, the Secretary of State be minded to grant such an order. As such the Board considers that the impacts of the proposal would not represent an impediment in respect of relevant authorities' adequate discharge of the s.85 CROW Act duty."* **Mitigation hierarchy** The Applicant addressed the mitigation hierarchy in paragraphs 1.1.30 to 1.1.35 of the Applicant's response to Point 4 of the Rule 17 Letter, June 2025 **[REP2-029]**. *In respect of NPS EN-1, the Applicant acknowledges paragraph 4.1.5 which sets out the need to avoid, reduce, mitigate or compensate for any adverse impacts (the mitigation hierarchy). As confirmed by paragraph 4.2.11 of NPS EN-1, Applicants must apply the mitigation hierarchy and demonstrate that it has been applied.* *"1.1.31 However, for clarity, the Applicant also reiterates that paragraphs 5.10.5 and 5.10.13 of NPS EN-1 state that: 5.10.5 Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation. 5.10.13 All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.* *"1.1.32 This is supported by paragraph 4.2.15 of NPS EN-1 which provides that "Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts".* *"1.1.33 Therefore, even where residual landscape and visual impacts are present, this does not preclude the granting of consent. The national policy envisages consent being granted with such conclusions.* The Project demonstrates the application of the mitigation hierarchy in the following ways: **Avoid** • At a macro level, significant areas of the Project were removed from development because of the need, for example, to avoid areas susceptible to flood, to protect ancient woodland and veteran trees, and where known, important archaeology (see also the Applicants answer to Q2.1.5 and it Approach to

Point No	Request for further information	Applicant's Response
		Design Note). Also, early site visits were also made to Blenheim Palace, including its south facing upper floors, not normally accessible to the public, to gain an appreciation of what if any parts of the Project might be seen when looking south towards Bladon. Fields south and west of Baldon were removed from the Project layout deliberately to avoid views between The Palace and the Project. Visits were also undertaken of the surrounding landscape. Recommendations made for panel removal and mitigation were made; this included for example, pulling the layout back from the Oxford School of Drama off the A4027, given its position against rising ground and adding in woodland planting nearby to help screen the Project in this particular location. The field south of Church Hanborough was also removed as this formed part of its Conservation Area. Site visits continued through the pre-submission period and iterative adjustments made to the design of the Project. Including linear woodland blocks, which were added to the eastern slopes of the Evenlode valley, near Purwell Farm. This was to break up the Project. Particularly within views available from areas around Lower Road and on higher ground to the west at Church Hanborough. • In addition, at a more micro level, during the evolution of the design and layout of the Project, and prior to submission, the Applicant 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. There is no 'rule' as to what such a buffer should be; instead, it is ultimately a matter for professional judgement based on years of experience in the Applicant's landscape and planning team. That initial judgement eventually settled on a minimum distance 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. This could include screen planting within that buffer, or to increase that buffer if that was judged to be necessary. As a default, therefore that buffer distance was adopted by the Project. Importantly that 'starting point' continued to be tested and refined, mostly through the addition of additional planting within the buffer, However, properties were looked at on a case-by-case and greater distances were adopted where it was considered appropriate, e.g. at Purwell Farm. This was an example where that property is in relatively high ground and Listed, and the Applicant wished to protect its setting and views of panels rising up the slope towards Purwell Farm, so it was judged to remove panels around this property, particularly to the west and south; its northern edge was well screened from existing vegetation. This property, therefore, for the reasons outlined, benefitted from a greater buffer distance than other properties within the Order Limits. Goose Eye Farm was also looked at early on. That property had a small garden along its north elevation and even after applying a 25m buffer form that edge of the curtilage was still close to the property. However, on further investigation, the Applicant chose not to alter the buffer to that property, as the only view north, with a view to the proposed arrays, were from first floor non-habitable room windows (the first-floor landing corridor). Views from non-habitable room windows are in planning terms generally considered to be less sensitive in terms of needing to protect amenity, than habitable ones.

College Farm and New Barn Farm were also looked at in detail. With additional mitigation included within the 25m buffer to the east of these properties. Including hedgerow and tree planting and small groups of trees.

- Approximately 35 hectares was removed from the Project at CR1 and further 89 Ha of solar panels have been removed from the Project due to Historic Environment, airport safety and covenants on land in the CR2 submission, this has improved the situation for both landscape and visual receptors.

Reduce/ Minimise

The Applicant has minimised the impact on the landscape character of the surrounding landscape, by adopting a scheme that minimises the loss of characteristic landscape elements, such as hedgerows and trees, by placing solar panels within fields and using existing field gates/accesses to fields. Appendix 8.3 Strategic Arboricultural Impact Assessment and Method Statement for tree protection and root protection zones, sets out the methods by which trees and hedgerows will be protected during construction and losses kept to a minimum.

The one characteristic that would be impacted by the development of the Project would be the sweeping views. The Applicant recognised the importance of retaining important sweeping views, e.g. the view of the spire of the church at Church Hanborough and did not attempt to screen such views, in fact making the church spire a focal point of views.

Due to the undulating nature of the landscape this was an appropriate design approach to take. The low-lying nature of the solar panels, following the contours of the land means that elevated features, such as church spires and elevated woods still form the skyline and are the dominant landscape feature and elements within the landscape.

Mitigate

Throughout the iterative design process the Applicant has noted the potential effects and considered what mitigation would be appropriate to minimise those effects. The embedded mitigation, arrived at in consultation with other topic specialists, such as ecologists and historic environment specialists provides a comprehensive package of measures that minimise landscape and visual effects in the longer-term, reducing any identified significant impacts, where possible within 15 years.

The Applicant recognises the tension between enhancing the landscape character and the desire to screen some views, whilst maintaining longer distance, open views and that is why a more nuanced approach to the height and alignment of hedgerows is suggested in the oLEMP submitted at Deadline 6 [EN010147/APP/7.6.3, Rev 6].

Compensate

The Applicant details the extensive landscape and ecological compensation measures in paragraph 1.1.35 of [**REP2-029].**

Point No	Request for further information	Applicant's Response
		The Applicant has described the proposed mitigation in various documents submitted to the Examination. The detailed design of which would be worked up with the relevant officers at the Local Planning Authorities and is secured by both Requirement 5 and Requirement 6 of the dDCO, e.g. if more natural alignments of hedgerows are considered to be appropriate in certain locations then, providing they do not alter the assessment of the effects considered in the ES, then these can be accommodated. The Landscape and Visual Resources Clarification Note [REP5-006], notes at paragraph 1.2.4 that *"...all effects would be reduced through the landscape mitigation proposals which in themselves are ultimately reversible."* In clarification to ExAQ2.13.9 of [**REP5-006**] the Applicant notes that *"The impacts of the project would be minimised by the comprehensive designed-in landscape mitigation scheme, as noted in paragraph 1.1.23, of The Applicant's Response to the Rule 17 Letter [REP2-029]. It also notes that post-decommissioning this landscape structure could be retained but need not be – this would be decided by the landowner/tenant at the time of decommissioning."* **Moderate effects** The Applicant set out the Landscape Institute's guidance on the matter in paragraphs 1.1.9 and 1.1.10. In which the Landscape Institute's LVIA Advisory Panel's advice/clarification to issue/question 3(5) Significance: how to assess significance, where to set thresholds and how to achieve consistency that *"As indicated at GLVIA paragraph 3.33, it is not necessary to establish thresholds for levels of significance, provided that it is made clear whether effects are, or are not, significant. However, typically, effects falling below the middle of the range of overall effect are assessed as not significant. For example if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not."* (Applicant's emphasis). In the Applicant's response to the OHA's response to the ExA's Rule 17 Letter **[REP3-066]** paragraphs 1.2.30 and 1.2.31, the Applicant provided more evidence from the Landscape Institute that there were no set thresholds of significance. However, in light of concerns raised by both the OHAs and the ExA on this point, the Applicant reviewed all assessments of moderate effects following the concerns raised at the beginning of the Examination raised in the earlier Rule 17 Letter **[PD-009]**. The Applicant responded in **REP2-029** providing the justification and finding that on review some moderate effects were significant. This is set out in REP2-029, Tables 1.1 and 1.2 of **REP2-029**. These findings (that some moderate effects were significant) was taken forward into Revision 2 of Chapter 8, submitted at Deadline 5 **[REP5-026]** and the Change Request 2 version of Chapter 8 **[CR2-021**] both of which report that some moderate effects are significant and some are not, with justifications at the receptor assessment. The Applicant agrees that the summary tables do not differentiate between Moderate (significant) and Moderate (not significant). However, the body of the text does. This distinction has been rectified in Chapter 8 (Rev 4) submitted at Deadline 6 [**EN010147/APP/6.3**]. LVIA is not a scientific discipline, it is not formulaic - it deals with perceptual qualities and relies on professional judgement. The use of the matrices may be useful but should not dictate professional judgement (LITGN-2024-01, issue 3(6)). A matrix-bound approach, is not endorsed by GLVIA3 - the reason behind this is that, based on

Point No	Request for further information	Applicant's Response
		the matrix, when a highly sensitive receptor experiences low magnitude effects, this results in a moderate effect. That 'formula' does not take into account whether the proposed development is a wind farm or a solar farm, for example, two very different forms of development. As the nature of developments differs, not all low magnitude impacts or even medium magnitude impacts would achieve the perceived prominence to be judged as moderate and significant effects. If there are apparent anomalies in the significance of some combinations, this is generally where professional judgement has been used which appear counter to the combination of sensitivity and magnitude of impact in the matrices, but where the reality, using professional judgement, is something different, i.e. there are constraints with simply using the thresholds/definitions in the matrices. The assessment, which deals with perceptual effects, has a limited scale of ratings to represent the relationship of effects to the threshold of significance. (Points 6.1 and 6.2 **[REP5-029]).**
12	In their relevant representation [RR-0793], Oxford County Council stated that any planting proposed around public rights of way should have a clear corridor of 15m between hedges, and this is repeated in their response to EXQ2.13.7 [REP4-074]. Furthermore, in their response to EXQ2.13.8 they have suggested that a more nuanced approach to the design, allowing for hedges that are not necessarily in straight lines along either side of a pathway, would provide for some more open spaces that feel less oppressive, and gaps in the hedges that could allow for views over the countryside. They also suggest that if greater buffer zones were applied to the layout, then the hedges could be lower in places, allowing views over the top. Taking all these points together would provide a more naturalistic and appropriate response to the issue of planting hedges along footpaths in order to screen the development. However, your response to this is that public rights of way flanked by hedgerows is a characteristic feature of the existing landscape and that you propose a minimum of a 5m corridor within which the paths would run. In the latest revision of the Outline Landscape and Ecology Management Plan (OLEMP) [CR2-051], you have provided indicative footpath plans, showing a footpath width of 3m between hedges, with footpath/cycleways at 9m wide. Please explain the discrepancy between your stated footpath widths	The oLEMP **[EN010147/APP/7.6.3, Rev6]** has been amended at Deadline 6 to correct the discrepancy regarding the footpath widths. The minimum corridor distance between the hedges is now illustrated as 5m, as it should have been previously. It should be noted that this is the width of the footpath corridor. The width including the hedgerows would be minimum of 10m. The footpath plans within the oLEMP are indicative and should not be considered detailed design. They have indicated a linear and more curved footpath design, which would help to create more open spaces along the route of the green ways. However, subject to detailed design, a more nuanced approach, in consultation with the OHAs, could be considered in order that the hedgerows can be planted in a more sympathetic / naturalistic way, i.e. not in straight lines, as long as it does not compromise the findings in the LVIA. It is the Applicant's view that the proposed widths for public rights of way, at a minimum of 5m between the hedgerows, are sufficient. However, it is also acknowledged that the proposed mitigation planting would result in a change in views available within the landscape. With the proposed landscape mitigation occasionally acting as a partial screen, channelling views and impeding open aspects. However, these effects would only occur within short sections of routes, with typically wider views available, as routes pass through the countryside. However, with the undulating nature of topography and suitable widths for PRoW corridors, views of the wider landscape and key features such as church spires, distinctive landforms (including Burleigh Wood) would remain open and available to users of the public rights of way network. The beneficial effects to landscape character assist in balancing any intermittent adverse effects or screening of views. In relation to the heights at which hedgerows are to be maintained, allowing lower heights in places, to further minimise the enclosing nature of the proposed hedgerow along a PRoW, it should be noted that the amended provision at Appendix C of the oLEMP now states: "*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*."

Point No	Request for further information	Applicant's Response
	(5m) and the indicated widths in the OLEMP. Also, please explain why have you not responded to OCC's suggestions but instead continued to state that narrow greenways are characteristic in the area where is has been indicated by several IP's, and confirmed through the ExA's own site visits, that these instances are the exception and not the rule?	
13	In your revised ES Chapter 8 [CR2-021], paragraphs 8.8.9 and 8.8.10 have a number of mitigation measures and principles listed. Please could you signpost the ExA as to where we will find these commitments secured?	The wording of paragraph 8.8.9 of the revised ES Chapter 8 [**CR2-021**] refers to design objectives, which is reflected at paragraph 2.1 of the outline Landscape and Ecology Management Plan [**CR2-051**]. These design objectives are not intended to be secured directly, rather the Project includes mitigation measures that are appropriately secured in order to achieve those design objectives. For example: • In relation to Landscape Integration and Local Character (design objective): (a) To '*respond to the setting, scale and character*' the following mitigation measures are secured – - The Landscape, Ecology and Amenities Plans [**CR2-043**] is referred to within the oLEMP, secured under Requirement 6 of the draft DCO. This sets out indicatively how the various landscape and ecology mitigation measures are proposed to be applied to respond to setting, scale and character. For example, the plans show areas of woodland, tree belt and hedgerow planting, that would link to the existing Ancient Woodland and young woodland areas and restore and enhance the structure of the landscape. - These Landscape mitigation proposals follow, to a large part, the management guidelines proposed in the various landscape character documents which seek to introduce, restore or enhance landscape character elements, as the Applicant has noted in the Applicant's response to the Rule 17 Letter [**REP2-029**] (paragraph 1.1.19) and the Applicant's response to the OHA's response to the Rule 17 Letter [**REP3-066**] (paragraph 1.2.18). As noted in paragraph 1.1.44 of the Applicant's original response to the ExA's Rule 17 Letter [**REP2-029**] there is a tension within the host landscape character areas, between the introduction and/or restoration of beneficial landscape character elements, aspirations set out in the landscape character areas' management guidelines, and the visual impacts that would arise from those stated management ambitions. Tensions, raised by the OHAs, in regard to hedgerows and the potential for the proposed hedgerows to screen views, *"An additional point is that the effect of the mitigation itself (hedgerows etc) should also be considered as part of the judgments, as it is a change that would be brought about by the proposed development – blocking views etc. This will give rise to a permanent change to the landscape character and views."* ([**REP-049**], page 4 of 24). The Applicant notes that enhancing the landscape character, by following the management guidelines would

result in an improvement of landscape character. A change in views, due to implementation of the landscape management guidelines, would occur, whether or not the Botley West Solar Project was being proposed, paragraphs 1.2.22 and 1.2.23 of [**REP3-066]**.

(b) To '*provide screening to the Site'* the following mitigation measures are secured –

- The Landscape, Ecology and Amenities Plans [**CR2-043**] is referred to within the oLEMP, secured under Requirement 6 of the draft DCO. This provides the illustrative landscape and ecology proposals, including landscape mitigation proposed as screening, which would have to be approved by the relevant officers at the local planning authorities. In addition, the detail of the proposed fencing (permanent and temporary) is secured by Requirement 8 of the dDCO. All details of which must be approved by the relevant local planning authorities. Commitments as to the design of that fencing has been added to the Outline Layout & Design Principles document at Deadline 6 in response to discussions with the OHAs, to set the design framework that will apply when discharging Requirement 5 (Detailed design approval).

(c) To '*provide an appropriate setting for the proposals*' the following mitigation measures are secured –

- The Landscape, Ecology and Amenities Plans [**CR2-043**] is referred to within the oLEMP, secured under Requirement 6 of the draft DCO. The landscape proposals include, for example, areas of woodland and hedgerow planting that would link to existing woodlands to restore and enhance the structure of the landscape. These plans have been developed together with the ecology team and therefore enhance the habitats present within the Order Limits.

(d) To '*enhance and protect the existing landscape fabric'* the following mitigation measures are secured –

- The Landscape, Ecology and Amenities Plans [**CR2-043**] is referred to within the oLEMP, secured under Requirement 6 of the draft DCO. These show additional areas of landscape and ecological mitigation, including additional tree planting, e.g. wet woodland within the Evenlode valley.
- There is a minimum distance between residential property boundaries and table areas of approximately 25m. This helps to protect the existing landscape fabric. This is secured in the outline Layout & Design Principles [**REP4-032**].

- In relation to Landscape Amenity (design objective) – The Public Rights of Way Management Strategy (within the Outline Code of Construction Practice), secured through Requirement 11 of the DCO, includes various provisions to maintain and enhance, where possible, the local residents' and visitors' experience within this landscape. For example, paragraph 1.3.5 confirms that "*the location of PRoW and other routes with public access have also been verified through consultation with PRoW officers from relevant Local Authorities and site visits undertaken in 2024*". Amongst other things, the PRoW Management Strategy also deals with the implementation of signage during the construction phase to

Point No	Request for further information	Applicant's Response
		manage resident and visitor experience. The exact locations of those will be finalized as part of detailed design. • In relation to biodiversity (design objective), the following mitigation measures are secured – Requirement 7 of the draft DCO includes a commitment to deliver biodiversity net gain. This has been updated in the latest version of the draft DCO submitted at Deadline 6 to include specific figures of biodiversity gain (70% habitats; 50% hedgerows and 20% watercourse). The explanation for this is in response to the ExA's request in its proposed Schedule of Changes to the DCO [**PD-015**], submitted at Deadline 6. The wording of paragraph 8.8.10 of refers to 'inherent or industry practice measures'. The below sets out each of these measures and where they are secured: • "*Minimised ground excavation: The panels would be mounted upon a prefabricated alloy metal frame. The module frames will be anchored to the ground via steel piles, which will be driven approximately 1.5 m- 3 m below ground. The framed mounting system would be pile-driven. Therefore, no foundations would be required*." This has been added into the updated Outline Layout & Design Principles submitted at Deadline 6, secured under Requirement 5. • "*…The temporary construction compound area will be reinstated and reseeded following the completion of construction works and the removal of all temporary structures*." This has been added into the updated Code of Construction Practice submitted at Deadline 6, secured under Requirement 11 of the dDCO. • "*Areas of new hardstanding would be limited to the Project Substations, and inverter foundations*." This has been added into the updated Code of Construction Practice submitted at Deadline 6, secured under Requirement 11 of the dDCO. • "*Existing structure vegetation, such as field boundary hedgerows and woodlands such as Pinsley Wood, Burleigh Wood, Bladon Heath, Smith Hill Copse, Denman's Copse, Saddle Copse, Whitley Brake helps to screen and break up the Project in views to it and helps to integrate the Project into the surrounding landscape*;" No action needed, as this utilises existing landscape as part of embedded design in accordance with NPS EN-3 2.10.100. • "*Existing vegetation along the site's perimeters and within it have been identified as being important landscape elements in the existing landscape character and will be retained and enhanced with new and appropriate planting where vegetation is presently sparse. This will avoid direct landscape effects and reduce visibility of the Project*." This has been added into the updated outline Lanscape and Ecology Management Plan submitted at Deadline 6, secured under Requirement 6 of the dDCO. • "*Vegetation removal will be kept to a minimum as far as practicable, as shown on the hedgerow removal plans [EN010147/APP/2.10]."* This has been added into the updated outline Lanscape and Ecology Management Plan submitted at Deadline 6, secured under Requirement 6 of the dDCO.

Point No	Request for further information	Applicant's Response
		• "*Utilising a sensitive colour palette for built structures to aid assimilation into the landscape*." This has been added into the updated Code of Construction Practice submitted at Deadline 6, secured under Requirement 11 of the dDCO. For the avoidance of doubt: • The first part of bullet point 2 in paragraph 8.8.10 of Chapter 8 is not applicable as this Project is not proposing BESS; and • Bullet point 7 in paragraph 8.8.10 of Chapter 8 is not correct as temporary closure and diversions of PRoW are proposed. This is set out in Part 2 of Schedule 6 of the DCO. Albeit, to reassure the ExA, any temporary closure and diversion will be controlled by the provisions secured in the Outline Public Rights of Way Management Strategy. For example, a period of at least seven days' notice of any temporary closure of PRoW would be provided by the contractor to the relevant Local Authorities, and if relevant, land agents and/or persons with interest in land (see paragraph 1.5.2 of the outline PRoW Management Strategy [**CR2-045**]).
14	At ExQ2.9.3 [PD-012] the ExA asked for more detail regarding four important and relevant cumulative effect projects. In response you stated more detail would be forthcoming in the updated Cumulative Effects Assessment (CEA) at Deadline 5 [REP5-022]. Taking the example of Salt Cross Village, which comprises 2,200 houses and 40ha employment land, this is only five mentions in the CEA and no detailed assessment. In relation to landscape, there is a tabulated conclusion stating: "No significant effects" but that relates to Salt Cross grouped with 9 other projects, including a 500-dwelling scheme at Perdiswell Farm. Can you justify how you reached that conclusion and can you provide the detail requested in ExQ2.9.3?	The assessment of cumulative effects has been covered separately within individual topic chapters of the ES and brought together in a concluding summary ES Chapter (Chapter 20). The four schemes in question are all identified in the list of cumulative schemes and have been considered by topic authors for relevance on whether cumulative effects could occur. All projects and plans considered alongside the Project have been allocated into 'tiers' reflecting their current stage within the planning and development process. A tiered approach as set out in in the Planning Inspectorate's Planning Advice Note Seventeen: Cumulative Effects Assessment, is a recommended process for undertaking cumulative effects assessments in the context of NSIPs (requirement of NPS EN-1 and NPS EN-3). ExQ2.9.3 [**PD-012**] the ExA asked for more detail regarding four important and relevant cumulative effect projects: **1) The 2MWe floating solar farm at Farmoor Reservoir (P18/V2796/SCR)** This development was excluded from the CEA shortlist at the time of submission due to its Tier 2 status, since 2018, as a screening request only, and that only those developments which are 'reasonably likely to come forward' should be considered. Whilst it is understood that Thames Water's own website was updated in 2025 to indicate that it proposes to progress this project, no further submission has been made to the Vale of White Horse District Council at this point. **2) The 65ha solar farm on adjacent/ adjoining land at Red House Farm** At the time of submission, Red House Farm was a Tier 2 development, but has since been the subject of a re-submission, it remains undetermined. **3) The Salt Cross housing allocation**

Point No	Request for further information	Applicant's Response
		The Salt Cross housing is Tier 1 development which falls within the Semi-enclosed rolling vale farmland Landscape Sub-type (LST). It's Tier 1 because an outline application was submitted for the project, but that was in July 2020, and the application remains undetermined due to a court case and subsequent re-opening of the AAP examination. **4) The proposed outline housing development by Blenheim Palace;** An application on the same site was refused in July 2015. At the time of submission of the Botley West a further application 22/01715/OUT for housing had been withdrawn in 2023. However, a new outline application on the same site was submitted in June 2025, this application remains undetermined. A table is included at Appendix 4 to this Rule 17 response providing further commentary on the cumulative effects assessment respective to each of the four schemes and against each topic chapter of the ES.
15	A minor point on the revision numbers for the OLEMP. The latest revision at [CR2-051] is Revision 5; but most of the document still has Revision 4 on the footnote and Appendix C still states Revision 1 on the footnote. Please can this be tidied up for the next revision so that it is clear as to which version of the document is being referred to.	The oLEMP [**EN010147/APP/7.6.3**] has been updated at Deadline 6 (Revision 6) and the revision numbers will be reflected accurately on each corresponding appendix.
Climate change resilience		
16	In Action point 24 of ISH 1 [EV5-010], you were asked how the lessons learned from the solar farm incidents at Porth Wen, Cirencester and Verwood, would be incorporated in your design. The ExA felt you didn't answer this question adequately, so in our second written questions ExQ 2.4.7 [PD-012] we asked for further clarity. In your response at D1, Appendix 2 [REP1-019], with specific reference to high wind resilience, you have referred to the development being built to relevant design standards and modules being no taller than 2.2m at a low angle. The ExA still feel you haven't answered the question with sufficient detail to alleviate concerns that your proposed development will be resilient to these extreme weather incidents. Presumably the solar farms at Porth Wen, Cirencester and Verwood, would have been built to	The Project is being designed with enhanced resilience measures (for example, lower structure height, cross bracing between posts, lower tilt angles, and high wind monitoring) that reflect the latest industry standards and lessons learned from earlier sites, including Porth Wen Solar Farm in the UK, which experienced structural damage during severe wind events, as well as comparable sites in Germany that have faced similar storm-related issues. An analysis of these cases was undertaken to identify structural vulnerabilities and to incorporate targeted improvements into our design. This included a desktop review of storm-damaged sites to identify vulnerabilities such as high structure height and limited bracing. These were addressed in our design through lower structures, deeper piles, and reinforced mounting structures. In addition to meeting BS EN 1991-1-4 (the British and European standard for assessing wind actions on structures, which defines how wind loads are calculated and applied to ensure structural safety and stability under different wind conditions) and the most recent IEC (International Electrotechnical Commission) and MCS (Microgeneration Certification Scheme) requirements, covering international technical standards for solar equipment and UK quality standards for installation and performance, these have been refined since around 2020 to better address wind uplift and mounting system performance. The design adopts the improved engineering practices now reflected in UK guidance. A key difference from the Porth Wen site is the overall structure height: the proposed installation has a maximum module height of 2.3 m, compared to around 3 m at Porth Wen. This is

Point No	Request for further information	Applicant's Response
	similar manufacturing standards to the ones you have proposed and that they would have done their research and found wind speeds have historically been below 90 mph, yet the solar farms still suffered severe damage. So the question is why should the ExA consider the risk of storm damage to your proposed development is lower than the solar farms at Porth Wen, Cirencester and Verwood. What's different about your solar farm, or what will you be doing differently so the farms is not subjected to the same damage in the event of such extreme weather.	secured in the outline Layout and Design Principles [**REP4-032**] which explains that the heigh of the solar PV modules will be approximately 0.8 m at lower edge; approximately 2.20m at higher edge when land is flat; and approximately 2.30m at higher edge when land is not flat. This lower profile substantially reduces wind exposure and uplift forces, directly improving structural stability and resistance to extreme weather. The mounting structures will use deep driven or screw pile foundations verified through geotechnical testing, and additional metal cross bracing between posts to increase frame stiffness and resistance to movement under high winds. Module tilt angles between 12° and 18° are intentionally lower than those used in many UK solar farms, which typically exceed 25° (noting Porth Wen was 25°), further reducing wind loading on the panels. Material durability is also being prioritised, with structural components to be selected for resistance to fatigue and deformation under repeated high wind loads (including galvanised steel structures, aluminum module frames with protective coating, and stronger pile sections) ensuring long-term stability of the installation. Recent updates such as IEC 62808 (2020, Wind Load Testing of Solar Mounting Systems) and MCS 012 Issue 3.0 (2021, UK Mounting Requirements) introduced stricter testing and anchoring criteria than those applied when earlier solar farms were constructed. Operational planning further strengthens resilience: during both construction and operation, the Environmental Management Plan will include protocols for safe mode where appropriate. The project will also include a storm response protocol, meaning a clear operational procedure for monitoring weather conditions, securing equipment ahead of severe storms, and carrying out inspections before restarting the site.The Applicant has updated the outline Operational Management Plan and Code of Construction Practice at Deadline 6 to secure these measures. Together, these measures and updated standards ensure a significantly higher level of structural stability and resilience under extreme weather conditions than previous UK and German solar farms.

APPENDIX 1

Response to ExA's Point 9 – Part 2: Further Exclusion of Land from Solar Panel Development

Policy Context

As set out in the main body of the Applicant's response to the ExA's Point 9 (Part 2) above, the removal of panels must be balanced with the viability of the solar farm and the need to generate as much energy as possible from renewable sources. This is in accordance with section 104 of the Planning Act 2008, which confirms that the National Policy Statements (NPSs) have primacy when considering Critical National Priority (CNP) infrastructure.

This Appendix builds on that national policy by reference to the local plans. Two of the three Local Planning Authorities have commissioned renewable energy strategies, which form part of the evidence base for their Local Plans:

- West Oxfordshire District – '*Renewable Energy And Low Carbon Energy Assessment And Strategy For West Oxfordshire'* (LDA, 2016). This strategy assesses the suitability of landscape character areas and landscape sub-types to accommodate different types of renewable energy. This study forms part of the evidence base of the WoDC Local Plan.

- South Oxfordshire and the Vale of the White Horse Districts – '*South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment*' (LUC, 2024). This study forms part of the evidence base of the emerging South Oxfordshire and Vale of White Horse District Councils Local Plan.

Cherwell District - Cherwell District Landscape Assessment was updated in 2024, which serves as the current Landscape evidence base for the district. However, there is currently no assessment of landscape sensitivity to renewable energy.

Technical reasons for not excluding further areas.

The OHAs' landscape consultant, LUC, proposed 11 areas to be excluded from the development of the solar panels, as described in paragraph 2.67 of Appendix 1 to the Joint Local Impact Report (LIR) **[REP1-072]**. Further to the report the OHAs have provided their own 'omission' maps at Annex 1, Appendix 1 of the OHA's Response to ExA's Second Written Questions (July 2025) **[REP4-075]** which show additional areas of land that they suggest should be excluded on heritage, as well as landscape and/or visual grounds.

Note, the 'Areas Proposed for Panel Removal' contained areas where panels have never been proposed (from submission), due to a number of reasons including landscape and heritage, e.g. in the central section, the two fields to the east of Lower Road and west of Eynsham Mill, or the two fields south of Church Road in Church Hanborough, both examples never had panels proposed.

Whilst the LUC suggested areas for removal relate to the guidance within the renewable energy strategy documents (both those relating to the VoWH District and West Oxfordshire District) the OHAs' omission maps contradict these documents – which form part of the evidence bases of their own Local Plans. In contrast, the Applicant used the advice within the WODC and VoWHDC documents when considering the suitability of the different landscape character areas, types and sub-types for solar farm development and no solar panels have been located on those landscape character types that are considered to have a High susceptibility to solar farm development, most are located in areas of Low susceptibility.

The Applicant notes that some of the suggested LUC and OHAs' omissions are coincidental with the Change Request 2 land exclusions, e.g. those around Bladon, south of Grove Road (A4095) and Begbroke. Indeed, in some areas, the land excluded exceeds the areas suggested in the LUC list. However other areas suggested by LUC and latterly by the OHAs have not been excluded.

The areas included in the OHA plans at Annex 1, Appendix 1 of the OHA's Response to ExA's Second Written Questions (July 2025) [**REP4-075**] have been considered in detail by the Applicant. The reasons for retention of solar installation are summarised here, with reference to the renewable energy strategies undertaken by LUC and LDA for the LPAs, where relevant to the Project site. The site has been considered in the three main site areas.

<u>Northern Area</u>

West Oxfordshire District's renewable energy strategy assesses the suitability of landscape character areas and susceptibility of landscape sub-types to accommodate different types of renewable energy (Renewable Energy And Low Carbon Energy Assessment And Strategy For West Oxfordshire, LDA, 2016).

Most of the northern section of the Project, is located within the Eastern Parks and Valleys Landscape Character Area (LCA) Open Limestone Wolds Landscape Sub-type (LST) and the Semi-enclosed Limestone Wolds LST.

Which have Low susceptibility to solar fam development.

The Project areas located within Cherwell District fall within the Lower Cherwell Floodplain LCA. The LCA abuts with West Oxfordshire LCA Eastern Parks and Valleys LCA, Open Limestone Wolds LST, which has a Low susceptibility to solar farm development. Based on the Low susceptibility of adjacent landscape character areas and shared qualities of that landscape, the susceptibility of Cherwell Floodplain LCAs to the type of low-lying development proposed is also considered to be Low, resulting in Medium-Low sensitivity overall.

Further detail on specific areas is provided below:

- The 270 m long section of Stratford Lane (part of Oxfordshire Way), which is lined by the hedgerow, abuts the field with the proposed solar panels. The field with the proposed solar panels would be well screened by the existing vegetation and the proposed woodland planting to the east. To the east a large area has been removed due to archaeology and allowing sufficient buffers around Sansom's Farm, for example.

- Potential effects in relation to Hordley Farm and Weaveley Farm have been assessed (Reference Appendix). The proposed mitigation planting would mitigate visual impacts and therefore the removal of the panels was not considered necessary.

- Areas around Shipton Slade Fam, to the west of Banbury Road, falls within the Lower Cherwell Floodplain LCA and is considered to be of medium-low sensitivity. This LCA is a large-scale agricultural landscape. The Project would occupy a small area of this large scale LCA, and it is judged that the intrinsic and prevailing characteristics of the Lower Cherwell Floodplain LCA would not be affected by the introduction of the Project within a small part of it. This area of land therefore remains within the Project.

Central Area

This area sits wholly within West Oxfordshire and as such its suitability to accommodate renewable energy is assessed in the LDA renewable energy strategy. The majority of the solar installation lies within the Eynsham Vale LCA which overall is considered to be more suitable for solar development. The solar farm is located in the Semi-enclosed Rolling Vale Farmland LST (Medium susceptibility) and Open Rolling Vale Farmland LCT (Low susceptibility) to solar farms. A small section in the northwest lies within the Eastern Parks and Valleys LCA, Semi-enclosed Limestone Wolds LST, which has a Low susceptibility to solar farm development.

Further detail on specific areas is provided below:

- Within the central area of the Project, large areas have been removed for heritage and the safety of Oxford Airport. In particular, around the settlements of Bladon and Begbroke. It is noted that in these areas, the removal of solar panels (Change 1 and Change 2), go further than LUC recommendations within Appendix 1 of the OHA Joint LIR report [**REP1-072**]. Mapped areas provided by the OHA at Deadline 4 [**REP4-075**], have gone substantially further than the LUC recommended areas for removal in the LIR report.

- When considering these additional ‘omission’ areas, the Applicant has had regard for the existing landscape character of the Central Project Area and available studies detailing the suitability of landscape character areas to accommodate different types of renewable energy (Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire, LDA, 2016).

- The majority of the Central Project Area falls within the Eynsham Vale LCA, which has been identified as ‘More Suitable’ for solar development. There is a small area to the north of the Central Project Area which falls within the Eastern Parks and Valleys LCA, identified as ‘Less Suitable’ for solar development. However, areas of solar development at this location are located in the Semi-enclosed Limestone Wolds (large-scale) Landscape sub-type (LST), which is noted as being of Low susceptibility to solar farm development.

- Looking at the landscape character in more detail, the Floodplain Pasture LST has been identified as an area where there is limited scope to accommodate renewables development. This area is primarily covered by the Evenlode Valley. Beyond this, is the Semi-enclosed Flat Vale Farmland LST, which is identified as providing opportunity for renewables development, particularly solar. This is due to the extent of the vegetation offering notable screening.

- The solar arrays and associated development within the Central Project Area have therefore been designed to avoid the more sensitive parts of the local landscape, such as the Floodplain Pasture LST (Evenlode Valley), and instead locate on the less sensitive Semi-enclosed Flat Vale Farmland LST. Although there is existing vegetative cover providing notable screening in these areas, the Project has supplemented this with designed in mitigation, including hedgerows, trees and woodland on the Evenlode Valley sides which would assist in reducing the scale of the Project and better integrate it into the existing landscape.

Southern Area

This area sits wholly within the Vale of White Horse District. LUC undertook the landscape sensitivity to renewable energy study for SODC and VoWHDC (South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment, LUC, 2024). This study forms part of the evidence base of the emerging South Oxfordshire and Vale of White Horse District Councils' Local Plan.

LUC suggested small areas for removal of solar panels within the southern area within the Joint OHAs' LIR report **[REP1-072]** which aligns with the renewable energy strategy, which they authored - that some solar farm development would be acceptable in the VoWHD LCTs in which the Botley West Solar Farm Project is proposed. In contrast, the OHAs' omission maps **[REP4-075]** show all of the areas of solar panels removed within the Vale of the White Horse.

It is noted that the landscape character of these areas is influenced by, amongst other development:

- Two sets of high voltage overhead transmission lines with associated pylons which cross the landscape: One line to the north of Smith Hill Copse; and, the second line to the southeast of Farmoor village
- Farmoor Reservoir, in places 7 m higher than the surrounding landform
- The A420, which crosses the valley on a viaduct to the east of the LCTs
- The urban areas of Botley to the east and Cumnor to the south.

The proposed location of Substation(s), backed by the north-facing slope of Smith Hill, faces the large-scale man-made water body (Farmoor Reservoir) to the north. The location provides visual containment and the required scale to absorb the proposed development. Additionally, the settlement of Cumnor (including its Conservation Area) remains entirely outside the ZTV for all the built elements of the project.

Most of the southern section of the Project lies within the Northern Vale Edge Slopes LCT, which is not subject to any landscape designations. The landscape is valued for its openness, allowing wide panoramic views of the surrounding landscape. It is a landscape that has been considered highly sensitive to a large-scale solar farm development by the 'South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment'. The Sensitivity Assessment states in relation to the Northern Vale Edge Slopes LCT: *"Features which increase sensitivity to solar PV development include the large parkland estates at Hinton Manor and Buckland House (RPGs), which provide a sense of time-depth and the invisibility with the low-lying River Thames floodplain. Features which reduce sensitivity include the strong pattern of woodland blocks and hedgerows, which would provide opportunities for screening."*

However, the southern section of the Project is 9km from these identified historic assets (Hinton Manor and Buckland House) of increased sensitivity - outside the 5km study area agreed with the OHAs. The Project is not visible from these historic assets, nor are their settings considered to be affected by it - Historic England has not raised the possibility of the Project affecting these properties as a concern.

Taken together - the distance from those elements that raise the sensitivity of the LCA, the influence of large-scale infrastructure, the presence of a strong pattern of woodland blocks and hedgerows, the sensitivity of the Northern Vale Edge Slopes LCT, in the locality of the Project, is considered to be medium to solar farm development.

In addition, the LUC Sensitivity Study considers solar panels of up to 4 metres in height, which would overtop typical hedgerow development. The proposed panel height of the Project is 2.3m, which clearly implies a greater capacity for lower-lying panels within the landscape.

The Project is in a transitional landscape character area. The areas of panels proposed for the southern area are 23.2 Ha (at the small end of the 'Large' solar farm category, which ranges from 20 to 50 Ha) of the built elements of the Project lies within the Northern Vale Edge Slopes LCA 9G and 10.26 Ha (a mid-range 'Medium' solar farm) within the Farmoor Reservoir Lower Valley LCA 14A. The latter is also considered to have medium sensitivity, due to the flat topography, urban influences of Farmoor and Botley, the A420, and large-scale fields defined by hedgerows. It is judged that the intrinsic and prevailing characteristics of the Northern Vale Edge Slopes LCT highlighted in the LUC Sensitivity Study would not be discernibly affected through the introduction of the Project.

Further detail on specific areas is provided below:

Cumnor Parish Neighbourhood Plan Important Views (Feb. 2021) was reviewed in order to identify appropriate representative viewpoints in relation to the southern section of the Project Site. A number of Representative Viewpoints (51, 53, 55) included are equivalent to or as near to published important views (3, 24, 31) within the Northern Vale Edge Slopes. None of these views would be significantly affected:

- View 3 From Denman's Copse across Farmoor valley to Reservoir and Cotswold Hills
- View 24 Panorama of Denman's Farm towards Farmoor Reservoir
- View 31 Smith Hill Copse.

It is considered that the landscape of the Northern Vale Edge Slopes LCT has the ability to absorb the type of

development proposed. Due to the features of the site, providing both visual containment and scale to accommodate the proposed electricity infrastructure, with minimum impact on both landscape and visual receptors, no areas of the southern section of the Project are considered for exclusion.

References:

Landscape Design Associates (2016) Renewable Energy And Low Carbon Energy Assessment And Strategy For West Oxfordshire.

Land Use Consultants (2024) South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment.

APPENDIX 2

Response to ExA's Points 9 and 10 – Part 3: Applicant's Without Prejudice LVIA Offer

Part (a) - Plan

w/p - Areas for removal

w/p - Increased buffer zone

Legend

Site Location and Order Limits

Existing Infrastructure and Other Features

Areas of Archeological Interest

Proposed Landscape and Other Features

New Planting / Areas for Enhancement

Proposed Infrastructure and Land Use Features

Fence

Indicative Maintenance Roads

Solar Panels and Conservation Grazing Areas

PCS Units

Project Substation

Project Main Substation

OHA Areas Proposed for Panel Removal

Heritage

Landscape

Landscape following Site Visit

Applicant's without prejudice LVIA offer

w/p - Areas for removal

w/p - Increased buffer zones

w/p - Additional mitigation:

Tree belt

Area of Woodland cops

Hedgerow with trees

Reinforced Hedgerows

Project				Status		
Botley West Solar Farm				Illustrative		
Id.	Changes	Date	Name		Date	Name
				Edit	21.10.2025	E. Mnasri
				Check	21.10.2025	H.Trabelsi
				Appendix 2		
A	Created	21.10.2025	E. Mnasri			

0 217.3913 434.7826 Meters

Scale: 1:7250 at A0

Title: Without Prejudice Offer Plan Northern Part

Photovolt Development Partners GmbH
Kurfürstendamm 52
10707 Berlin, Germany

w/p - Areas for removal

w/p - Increased buffer zone

KIDLINGTON CP

HANBOROUGH CP

BEGBROKE CP

YARNTON CP

EELAND CP

Legend

Site Location and Order Limits

Existing Infrastructure and Other Features

Areas of Archeological Interest

Proposed Landscape and Other Features

New Planting / Areas for Enhancement

Proposed Infrastructure and Land Use Features

Fence

Indicative Maintenance Roads

Solar Panels and Conservation Grazing Areas

PCS Units

Project Substation

Project Main Substation

OHA Areas Proposed for Panel Removal

Heritage

Landscape

Landscape following Site Visit

Applicant's without prejudice LVIA offer

w/p - Areas for removal

w/p - Increased buffer zones

w/p - Additional mitigation:

Tree belt

Area of Woodland cops

Hedgerow with trees

Reinforced Hedgerows

Project				Status		
Botley West Solar Farm				Illustrative		
Id.	Changes	Date	Name		Date	Name
				Edit	21.10.2025	E. Mnasri
				Check	21.10.2025	H.Trabelsi
				Appendix 2		
A	Created	21.10.2025	E. Mnasri			

0 217.3913 434.7826 Meters

Scale: 1:7250 at A0

Title: Without Prejudice Offer Plan
Middle Part

Photovolt Development Partners GmbH
Kurfürstendamm 52
10707 Berlin, Germany

w/p - Increased buffer zone

w/p - Areas for removal

Valley Farm

MS Eynsham Road

Farmhouse

Stimp Cott

Red House Farm

CUMNOR CP

Nobles

Filchampstead

Oxford Greenbelt Way

Jumpers

Saddle Copse

A 420

ushy Leaze Copse

Whitley Brake

Upper Whitley Farm

Tumbledowns

New Farm

3.1
3.2
3.3
3.4
3.5
3.6
3.7
3.8
3.9
3.10
3.11
3.12
3.13
3.14
3.15
3.17

Legend

Site Location and Order Limits

Existing Infrastructure and Other Features

Areas of Archeological Interest

Proposed Landscape and Other Features

New Planting / Areas for Enhancement

Proposed Infrastructure and Land Use Features

Fence

Indicative Maintenance Roads

Solar Panels and Conservation Grazing Areas

PCS Units

Project Substation

Project Main Substation

OHA Areas Proposed for Panel Removal

Heritage

Landscape

Landscape following Site Visit

Applicant's without prejudice LVIA offer

w/p - Areas for removal

w/p - Increased buffer zones

w/p - Additional mitigation:

Tree belt

Area of Woodland cops

Hedgerow with trees

Reinforced Hedgerows

Project: Botley West Solar Farm

Status: Illustrative

Id.	Changes	Date	Name		Date	Name
				Edit	21.10.2025	E. Mnasri
				Check	21.10.2025	H.Trabelsi
				Appendix 2		
A	Created	21.10.2025	E. Mnasri			

0 75 150 Meters

Scale: 1:2500 at A0

Title: Without Prejudice Offer Plan Southern Part

Photovolt Development Partners GmbH
Kurfürstendamm 52
10707 Berlin, Germany

Part (b) – Loss of Function

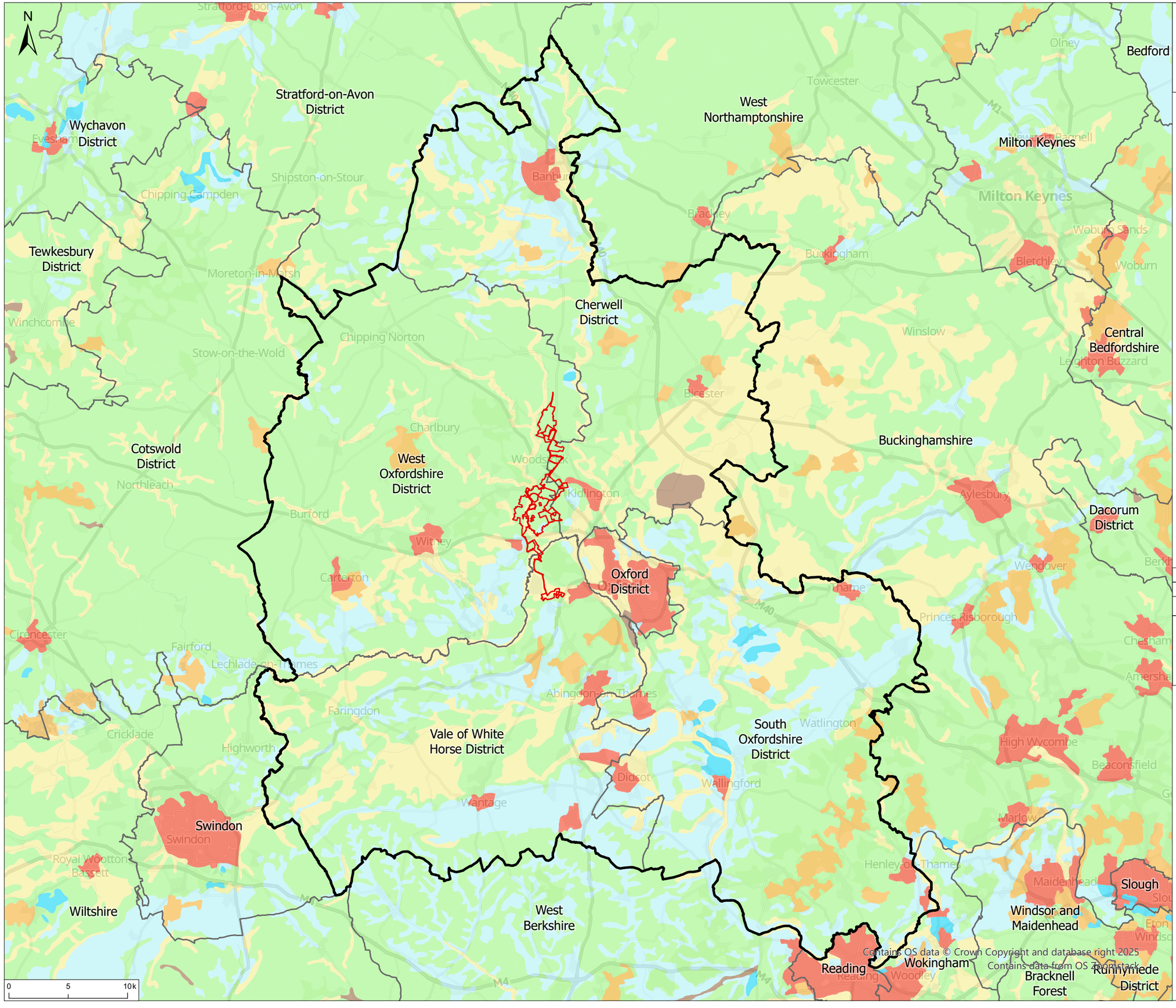
Applicant's without prejudice LVIA offer'		
Total	32,68 ha	54,46 MWp

w/p – areas for removal	Location	Loss in installation area	Capacity Loss
1,12	North	2,20 ha	3,67 MWp
1,13	North	2,25 ha	3,75 MWp
2,41	Middle	1,40 ha	2,33 MWp
2,86	Middle	2,01 ha	3,35 MWp
2,89	Middle	0,86 ha	1,43 MWp
2,118	Middle	5,95 ha	9,92 MWp
2,120	Middle	5,56 ha	9,27 MWp
3,4	South	0,40 ha	0,67 MWp
3,6	South	1,32 ha	2,20 MWp
3,8	South	1,53 ha	2,55 MWp
Total		23,48 ha	39,13 MWp

w/p – increased buffer zones	Location	Loss in installation area	Capacity Loss
Weaveley Farm	North	2,70 ha	4,50 MWp
Perwell Farm	Middle	0,84 ha	1,40 MWp
Increased buffer near Cassington	Middle	1,46 ha	2,43 MWp
Denmans Farm	South	4,20 ha	7,00 MWp
Total		9,20 ha	15,33 MWp

APPENDIX 3

Response to ExA's Point 7 – Land Use



Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Order Limits
- Oxfordshire County
- District Boundaries

ALC Grades (Provisional)

- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Non Agricultural
- Urban

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

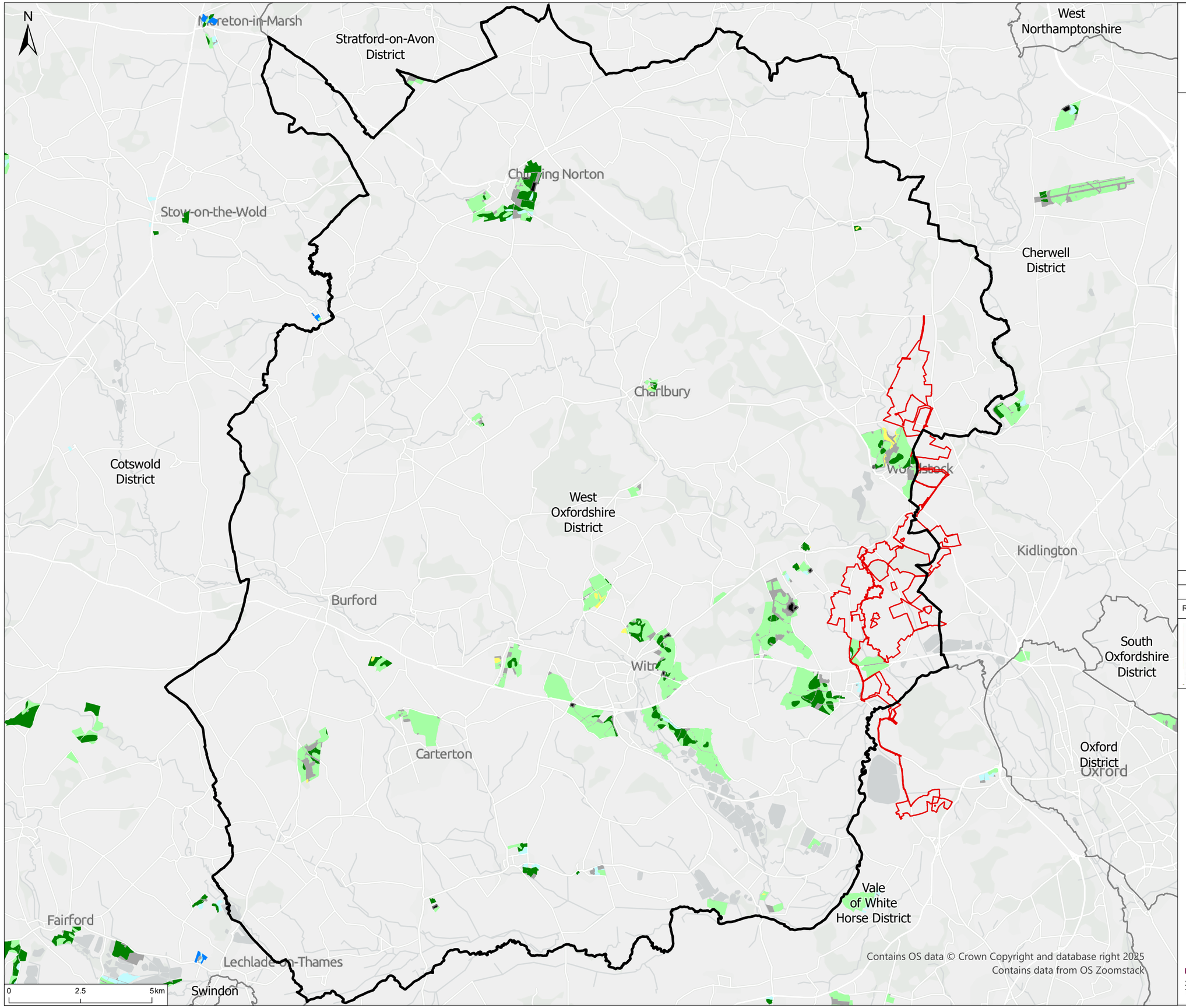
rps A TETRA TECH COMPANY

Client	PVDP
Project	Botley West Solar Farm
Title	Provisional Agricultural Land Classification - Oxfordshire

Status	Drawn By	PM/Checked By
FINAL	JM	LM
Drawing Number	**Scale @ A3**	**Date Created**
12426-0237-02	1:300,000	JUNE 2025
Figure Number		**Rev**
1		-

rpsgroup.com
20 Western Avenue, Milton Park, Abingdon, Oxfordshire, OX14 4SH
T: +44(0)1235 821 888 E: rpsox@rpsgroup.com

P:\eur-mpfs-02.eur.rpsgroup.com\Projects\12426 Proposed DCO Scale Solar Development 860mw\Tech\Drawings\12426-0239-01.aprx



Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Order Limits
- District Boundaries

ALC Grades (Post 1988)

- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Not Surveyed
- Other

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

rps A TETRA TECH COMPANY

Client	PVDP
Project	Botley West Solar Farm
Title	Agricultural Land Classification Grades - Post 1988 - West Oxfordshire District

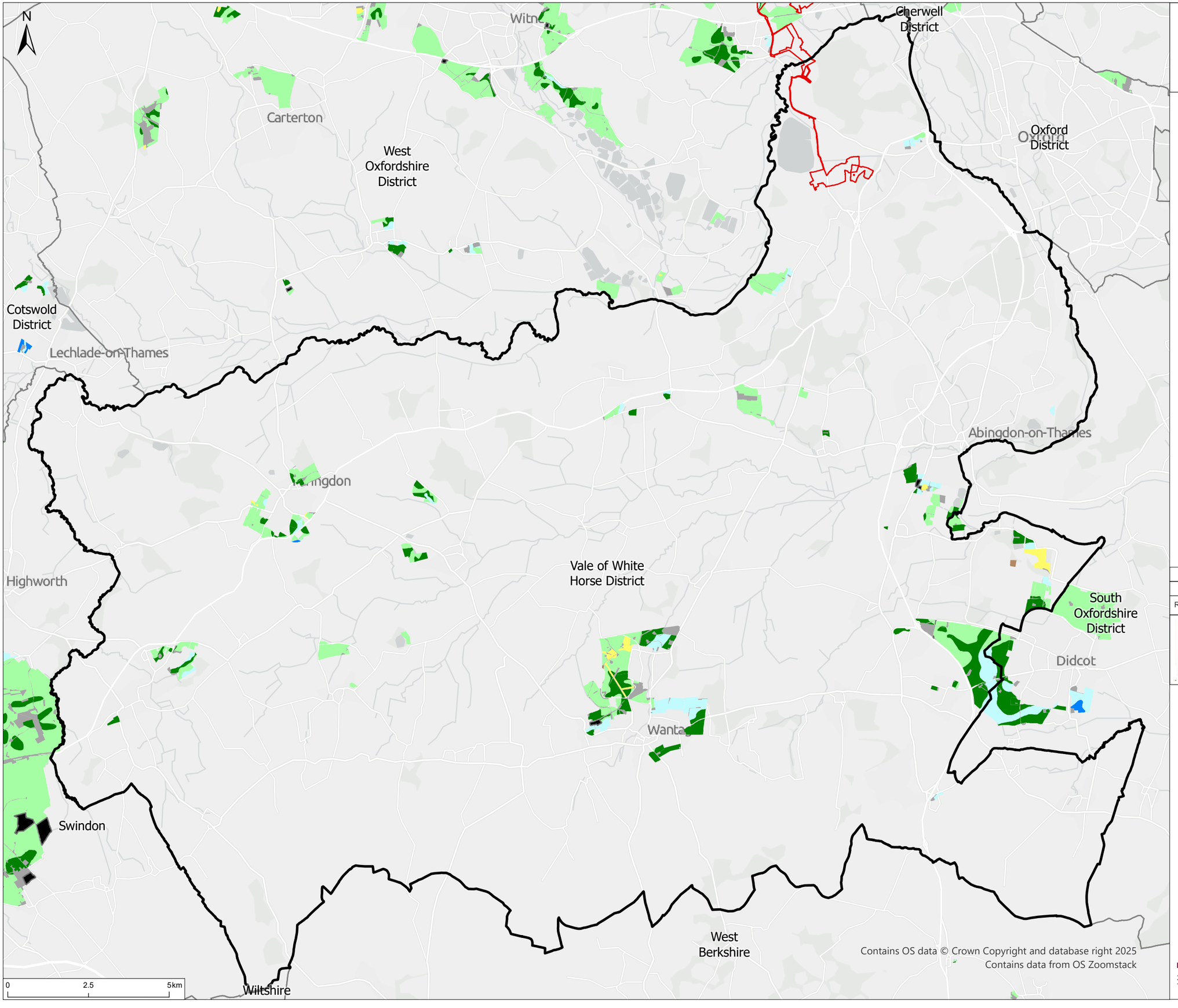
Status	Drawn By	PM/Checked By
FINAL	JM	LM

Drawing Number	Scale @ A3	Date Created
12426-0237-02	1:125,000	JUNE 2025

Figure Number	Rev
2	-

rpsgroup.com
20 Western Avenue, Milton Park, Abingdon, Oxfordshire, OX14 4SH
T: +44(0)1235 821 888 E: rpsox@rpsgroup.com

P:\eur-mpfs-02.eur.rpsgroup.com\Projects\12426 Proposed DCO Scale Solar Development 860mw\Tech\Drawings\12426-0241-01.aprx



Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Order Limits
- District Boundaries

ALC Grades (Post 1988)

- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Not Surveyed
- Other

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

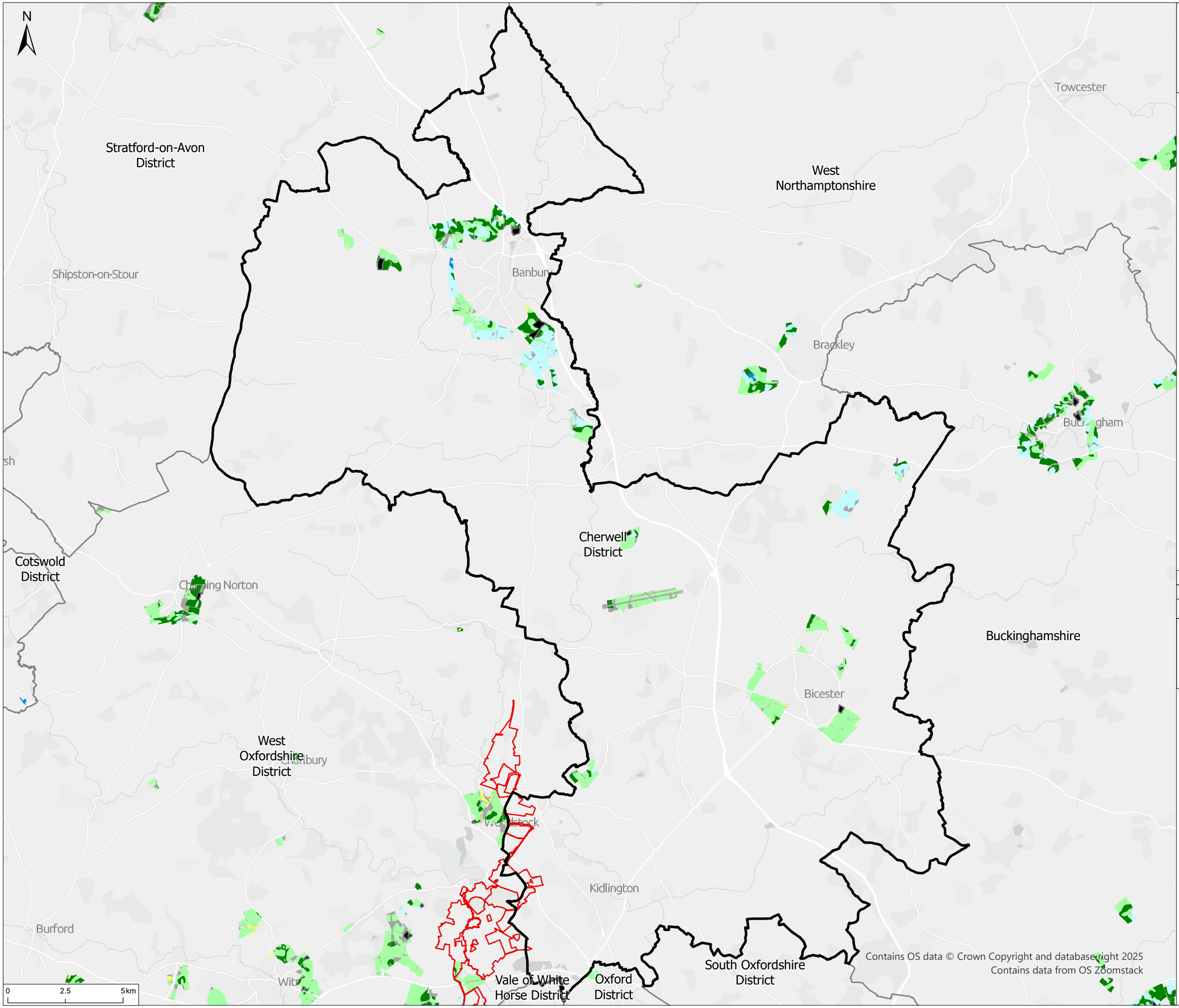
rps A TETRA TECH COMPANY

Client	PVDP
Project	Botley West Solar Farm
Title	Agricultural Land Classification Grades - Post 1988 - Vale of White Horse District

Status	Drawn By	PM/Checked By
FINAL	JM	LM
Drawing Number	**Scale @ A3**	**Date Created**
12426-0237-02	1:110,000	JUNE 2025
Figure Number		**Rev**
2		-

rpsgroup.com
20 Western Avenue, Milton Park, Abingdon, Oxfordshire, OX14 4SH
T: +44(0)1235 821 888 E: rpsox@rpsgroup.com

P:\eur-mpfs-02.eur.rpsgroup.com\Projects\12426 Proposed DCO Scale Solar Development 860mw\Tech\Drawings\12426-0241-01.aprx



Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Order Limits
- District Boundaries

ALC Grades (Post 1988)

- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Not Surveyed
- Other

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

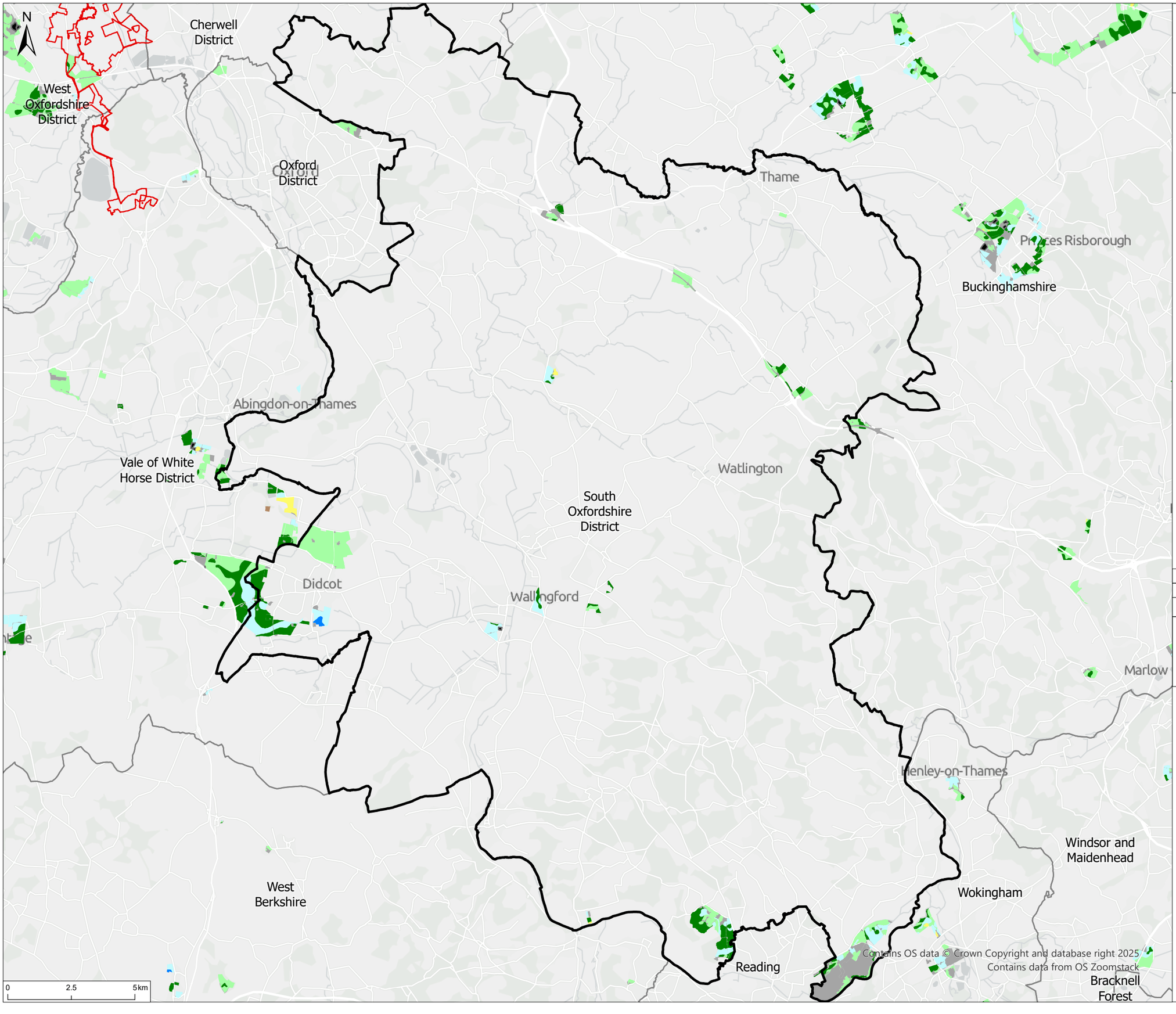
rps A TETRA TECH COMPANY

Client	PVDP
Project	Botley West Solar Farm
Title	Agricultural Land Classification Grades - Post 1988 - Cherwell District

Status	Drawn By	PM/Checked By
FINAL	JM	LM
Drawing Number	**Scale @ A3**	**Date Created**
12426-0237-02	1:155,000	JUNE 2025
Figure Number		**Rev**
2		**-**

rpsgroup.com
20 Western Avenue, Milton Park, Abingdon, Oxfordshire, OX14 4SH
T: +44(0)1235 821 888 E: rpsox@rpsgroup.com

P:\eur-mpfs-02.eur.rpsgroup.com\Projects\12426 Proposed DCO Scale Solar Development 860mw\Tech\Drawings\12426-0241-01.aprx



Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

- Order Limits
- District Boundaries

ALC Grades (Post 1988)

- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Not Surveyed
- Other

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

rps A TETRA TECH COMPANY

Client	PVDP
Project	Botley West Solar Farm
Title	Agricultural Land Classification Grades - Post 1988 - South Oxfordshire District

Status	Drawn By	PM/Checked By
FINAL	JM	LM
Drawing Number	**Scale @ A3**	**Date Created**
12426-0237-02	1:140,000	JUNE 2025
Figure Number		**Rev**
2		-

rpsgroup.com
20 Western Avenue, Milton Park, Abingdon, Oxfordshire, OX14 4SH
T: +44(0)1235 821 888 E: rpsox@rpsgroup.com

P:\eur-mpfs-02.eur.rpsgroup.com\Projects\12426 Proposed DCO Scale Solar Development 860mw\Tech\Drawings\12426-0241-01.aprx

APPENDIX 4

Response to ExA's Point 14 – Cumulative Effects

Chapter	Farmoor Reservoir - P18/V2796/SCR *(Request for a Screening Opinion for 7.3MW solar generator on part of reservoir)*	Red House Farm - P23/V2624/FUL *(Installation of ground mounted solar photovoltaic array with associated infrastructure, security fence, CCTV, cable route, landscaping, and onsite biodiversity net gain (Resubmission). (Amended by information received 28 May and as amplified by information received 24 June 2025)*	Salt Cross Garden Village - 20/01734/OUT *(2,200 dwellings and 40ha of employment land)*	***Land South of Perdiswell Farm* 25/01510/OUT** *(Outline planning application for the erection of up to 500 dwellings and commercial floorspace (Use Class E) with associated access, open space and infrastructure - All Matters Reserved except for Access)*
Chapter 7 - Historic Environment	This development was excluded from the CEA undertaken for submission due to its status as being in screening since 2018. Only those developments which are 'reasonably likely to come forward' should be considered.	This development was considered as a Tier 2 project within the CEA undertaken for submission. The assessment identified that the proposed Red House solar farm is located within the settings of some of the same designated heritage assets which also have visibility of the Project, specifically the Grade II listed Red House Farmhouse (NHLE 1048341). The proposed Red House Farm solar farm is located between the Grade II listed building and the Project, and if both solar farms were consented they would appear to be one larger scheme. The contribution made by the Red House Farm solar farm to any harm to the significance of the Grade II listed Red House Farmhouse may be slightly greater than the contribution made by the Project due to proximity, but this difference would be	This development was considered as a Tier 2 project within the CEA undertaken for submission. It was considered alongside another development – 22/01008/ CCREG Eynsham Park and Ride and Science Transit. The assessment identified that these two schemes are adjacent to each other, with the proposed garden village also being directly adjacent to the Site (immediately south west of the Central Site Area). The park and ride scheme has been consented and is under construction whilst the outline application for the garden village has not yet been determined although the land is allocated for this purpose in the West Oxfordshire Local Plan 2031.	The resubmission of this scheme falls alongside other residential developments at Woodstock (21/00189/FUL; 21/00127/OUT: 16/01364/OUT). The CEA for these found that these three developments could all be seen as falling within the setting of the Blenheim Palace WHS, therefore there is the potential for cumulative impacts to occur. It is however our opinion that that the resubmission of the Perdiswell Farm scheme would not introduce any greater cumulative effects beyond those previously considered.

		marginal. The contribution of both schemes would be time-limited and fully reversible. Should there be any temporal overlap between the construction, operation and maintenance, and decommissioning phases of the Project and the construction or operation and maintenance or decommissioning phases of the Red House Farm solar farm, the cumulative impact on the significance of the Grade II listed Red House Farmhouse would be greater than for the Project when considered on its own.	These schemes may be located within the settings of some of the same designated heritage assets which have been assessed in respect of the Project, specifically the four Grade II listed buildings at City Farm (NHLE 1052428; NHLE 1198172; NHLE 1052429; NHLE 1198161). The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in no change within the setting of this group of Grade II listed buildings. Consequently, there would be no cumulative effects.	
Chapter 8 - Landscape & Visual Impact Assessment	This development was excluded from the CEA due to its status in screening since 2018. Only those developments which are 'reasonably likely to come forward' should be considered.	This scheme has been fully considered within the scope of the cumulative assessment reported in the LVIA Chapter. The proposed Red House Farm Solar Farm of 95 hectares, located immediately to the north of the southern section of the Project, would comprise a lower, flatter land, which gently falls towards Farmoor Reservoir. The area of the lower-lying vale is overlooked by the landforms to the north and south, which form a strong backdrop to the valley landscape. Only the northernmost edge of the southern section of the Project, including 1.6 km cable corridor, is within the River Valley LCT. The Red House Farm Solar Farm would cover the fields to the	This scheme has been fully considered within the scope of the cumulative assessment reported in the LVIA Chapter. The Salt Cross housing is Tier 1 development which falls within the Semi-enclosed rolling vale farmland LCT. The mixed use development to the north of Eynsham forms an extension to the village. The entire development is located within the West Eynsham Strategic Development Area, which	An application on the same site was refused in July 2015. At the time of submission of the Botley West a further application 22/01715/OUT for housing had been withdrawn in 2023. However, a new outline application on the same site was submitted in June 2025, this application remains undetermined. 25/01510/OUT is included within the CEA section of the revised Chapter 8 LVIA, submitted at this Deadline 6. The perception of cumulative effects on the wider landscape of Lower Cherwell Floodplain LCA, within which the cumulative scheme and a small part of the Projects sits, would

south of the B4044 and to the west of the A420. Both developments are low-lying and therefore well screened by intervening vegetation. Viewpoints 46, 47, 49 within the LCT and Viewpoints 52, 53 and 54 on the north facing slope of the adjacent Vale Edge Slope LCT, which overlook the River Valley LCT, illustrate the landscape context for this potential future cumulative situation. Due to the relatively small scale of the River Valley LCT, as the reservoir covers most of the LCT, and due to the proximity of the main transport corridors, urban edge, and relatively minimal effects attributable to the Project, the cumulative effects upon the wider landscape of River Valley LCT would be perceived as a low magnitude of impact, resulting in Minor adverse and not significant effect.

Due to the distance of Jumpers Farm from the proposed Red House Farm, potential cumulative effects would not be higher than the effects attributable to the Project individually, which are Minor and not Significant. Refer to the Residential Visual Amenity Assessment [EN010147/APP/17.13].

The main assessment presented in the RVAA concludes a Medium-high magnitude of impact attributable to the Project upon Denman's Farm, resulting in a Major/moderate adverse (significant) level of effect on completion, which in the long term would reduce to a Moderate not significant effect. The proposed Red House Farm would appear in views to the north, extending the view of solar panels up to and as far as the B4044 at a distance of 800m. The magnitude of impact would be high, resulting has low susceptibility to this type of development.

The central section of the Project abuts the consented housing development 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 edge of the proposed housing development. Due to the intervening vegetation, there would not be any intervisibility between the developments. The mixed use development with building heights of up to 16 mixed-use development is a permanent and more prominent-looking m is a permanent and more prominent looking development in a rural environment, whereas the Project would be decommissioned in 42 years' time. Therefore, the perceivable change in the landscape character would be mostly attributable to the large scale housing development. The perception of cumulative effects upon the wider landscape of Semi-enclosed rolling vale farmland is considered as a medium magnitude of impact, resulting in Moderate/minor adverse and not significant effects. The permitted developments and the Project would extend the developed nature of the existing agricultural land. However, due to the proposed comprehensive mitigation measures/ landscape strategies, it is expected be perceived as a low magnitude of impact, resulting in Minor adverse and not significant effect.

Due to the distance between the built elements of the Project and the cumulative scheme, there would be limited or no cumulative visual effects. However, as the cumulative scheme is abutting the cable corridor between the northern and central sections of the Project, should there be a temporal overlap at construction, there would be a temporary landscape and visual effect. This is not assessed to result in any change or additional cumulative effects beyond those previously considered.

		in major and significant effects, which in the long term would reduce to a Moderate not significant effect. Footpath 184/15, Footpath 184/16 and Footpath 184/22 would extend through both developments. Therefore, additional sections of these routes would be affected by the development, increasing the overall magnitude of impact to medium-high, indicating Moderate and Significant adverse effects in the medium term. In the long term, with established mitigation planting, it is expected that the effects will reduce to a Moderate/ minor not significant effect.	that the developments would be fully integrated into the local landscape. In visual amenity terms the approved residential development should be considered as recipients of potential effects. However, due to the existing and comprehensive landscape proposal of the Garden Village, there would not be any intervisibility between the developments.	
Chapter 9 – Ecology & Nature Conservation	This development was excluded from the CEA undertaken for submission due to its status as being in screening since 2018. Only those developments which are 'reasonably likely to come forward' should be considered.	The future Red House Farm solar farm is located adjacent to the Southern Site Area. The updated work to support the application identified the presence of badgers, bats, various bird species and great crested newt. As such, there is the potential for overlapping habitat loss and disturbance impacts with these receptors that were also identified as using the Southern Site Area. However, both Projects include suitable mitigation measures such that any cumulative increase in habitat loss and disturbance would be avoided. For example, the Red House Ecology and Landscape Mitigation and Enhancement Plans include various buffer zones and new wet tussock grassland planting along the southern boundary (i.e. that which falls adjacent to the Project). Simultaneously, the Project includes various buffers to protect bats and the habitat features present along the same boundary. This provision of buffers on both sides of the shared boundary will ensure that wildlife can	This development was considered as a Tier 1 project within the CEA undertaken for submission. Work to support the Garden Village application identified the presence of GCN, grass snake and otter. The assessment considered the potential for cumulative effects due to habitat loss with the overall conclusion being that, since both the Project and the Garden Village included measures to ensure that these species are both protected during construction and deliver mitigation habitat provisions. With respect to disturbance, in particular, for most receptors, although there was some potential overlap between the populations on the Project site and the Garden Village, this would only be for a short duration (likely <1yr of construction). As such, no additional cumulative effects were considered likely. With respect to otter, the overlap	The resubmission of this scheme falls alongside other residential developments at Woodstock (21/00189/FUL; 21/00127/OUT: 16/01364/OUT) which were considered as Tier 1 projects within the CEA undertaken for submission. The assessment considered a number of overlapping receptors including badger, GCN and bats. The consideration of these effects would be the same for the revised scheme submitted in June 2025. The June 2025 scheme includes appropriate mitigation and avoidance measures for all receptors to ensure that overlapping cumulative effects are unlikely.

		still move between the sites and the surrounding landscape. On this basis, no additional cumulative effects are considered likely.	between the populations present would only occur within the Evenlode Corridor where no construction activities are planned. As such, no cumulative effects were considered likely.	
Chapter 10 – Hydrology & Flood Risk	The project is considered a Tier 1 project, and the overall conclusions of the ES Chapter 10 Hydrology and Flood Risk remain. The area of the BW Solar Farm Order Limit which is located closest to the future Farmoor Solar Farm comprises the cable route along Cumnor Road. These cable laying works will be a short-term activity and unlikely to coincide with the construction of the Farmoor Solar Farm, given the short-term construction timeline. Therefore, a significant adverse cumulative construction hydrology and flood risk increase is considered unlikely. In accordance with NPS (where relevant), the NPPF and PPG, the solar farm development would be required to implement a series of construction mitigation measures to manage surface water drainage during construction. The decommissioning conclusions and approach will be the same.	The project is considered a Tier 1 project, and the overall conclusions of the ES Chapter 10 Hydrology and Flood Risk remain. The future Red House Farm solar farm is located adjacent to the southern section of the Botley West project solar farm. The southern section is the most likely area to experience impacts, as topography slopes towards our Botley West project at this location. In accordance with NPS (where relevant), the NPPF and PPG, the solar farm development would be required to implement a series of construction mitigation measures to manage surface water drainage during construction. The decommissioning conclusions and approach will be the same. In accordance with NPS (where relevant), the NPPF and PPG, the solar farm development would be required to attenuate surface water runoff, where practicable, to the greenfield runoff rate prior to discharge into the local drainage network or surrounding surface water environment. This provides a betterment in	The project is considered a Tier 1 project, and the overall conclusions of the ES Chapter 10 Hydrology and Flood Risk remain. The Salt Cross Garden Village is located adjacent to the central section of the Botley West project solar farm. The central site is most likely to experience any impacts due to its proximity and potential topography slopes to this location. In accordance with NPS (where relevant), the NPPF and PPG, the residential and commercial development would be required to implement a series of construction mitigation measures to manage surface water drainage during construction. The decommissioning conclusions and approach will be the same. In accordance with NPS (where relevant), the NPPF and PPG, the residential and commercial	The project is considered a Tier 1 project, and the overall conclusions of the ES Chapter 10 Hydrology and Flood Risk remain. The area of the Botley West Solar Farm Order Limits which is located closest to the future Land South of Perdiswell residential development comprises the cable route along Shipton Road and Upper Campsfied Road, and HDD works to the roundabout on the A44. These cable laying works will be a short-term activity, and so cumulative adverse construction effects in respects to hydrology are considered unlikely. In accordance with NPS (where relevant), the NPPF and PPG, the solar farm development would be required to implement a series of construction mitigation measures to manage surface water drainage during construction. The decommissioning conclusions and approach will be the same.

	In accordance with NPS (where relevant), the NPPF and PPG, the solar farm development would be required to attenuate surface water runoff, where practicable, to the greenfield runoff rate prior to discharge into the local drainage network or surrounding surface water environment. This provides a betterment in surface water will be attenuated at the source during operation. The cumulative magnitude is therefore, considered to be negligible adverse during construction and operation. In the ES Hydrology and Flood Risk Chapter the conclusions of the	surface water will be attenuated at the source during operation. The cumulative magnitude is therefore, considered to be negligible adverse during construction and operation.	development would be required to attenuate surface water runoff, where practicable, to the greenfield runoff rate prior to discharge into the local drainage network or surrounding surface water environment. This provides a betterment in surface water will be attenuated at the source during operation. The cumulative magnitude is therefore, considered to be negligible adverse during construction and operation.	In accordance with NPS (where relevant), the NPPF and PPG, the solar farm development would be required to attenuate surface water runoff, where practicable, to the greenfield runoff rate prior to discharge into the local drainage network or surrounding surface water environment. This provides a betterment in surface water will be attenuated at the source during operation. The cumulative magnitude is therefore, considered to be negligible adverse during construction and operation.
Chapter 11 – Ground Conditions	The Farmoor Reservoir area is not located within a MSA for sand and gravel nor is it located within any identified areas of potential contamination which may be affected by the BW Solar Farm.	The Red House Farm area is not located within a MSA for sand and gravel nor is it located within any identified areas of potential contamination which may be affected by the BW Solar Farm.	Salt Cross Garden Village is located within a MSA for sand and gravel. This will require minerals to be scoped into the application and as the proposed development will permanently sterilise the resource it will likely require a detailed MRA and relevant mitigation. As the BW Solar Farm will only temporarily sterilise the mineral resource it will not contribute to any significant adverse cumulative effects in this regard. Salt Cross Garden Village is also located on a historical landfill. In	The Land South of Perdiswell Farm is not located within a MSA for sand and gravel nor is it located within any identified areas of potential contamination which may be affected by the BW Solar Farm.

			accordance relevant legislation and guidance including relevant NPS, the NPPF and PPG it is considered that the application will be required to appropriately mitigate any land contamination impacts on human health and the environment and its construction will be undertaken in accordance with best practice measures. The BW Solar Farm will not contribute to any significant adverse cumulative effects in this regard.	
Chapter 12 – Traffic & Transport	Farmoor Reservoir has been scoped out of the CEA, since no Traffic and Transport related documents were submitted as part of its planning application, therefore the applicants of the proposal did not predict it would generate a material volume of traffic. If a material volume of traffic was to be generated by the proposal or if significant transport implications could arise then, in accordance with the NPPF, a Traffic and Transport related document would be necessary to assess the impact of that traffic. With no such document, it is concluded that the proposal would not generate a material volume of traffic into the traffic and transport study area during the peak construction period of the Project in 2026 and thus was scoped out of the CEA.	Red House Solar Farm has been included within the CEA. This is confirmed in Table 12.33 of Volume 1 Chapter 12 Traffic and Transport of the ES [REP5-016].	Advice from Planning Officers at West Oxfordshire District Council have advised the Applicant that construction of the Salt Cross Garden Village is unlikely to commence until 2029. Therefore, on the basis of the advice from Planning Officers at West Oxfordshire District Council, there would be no temporal overlap with the peak construction period of the Project in 2026 and it has thus been scoped out of the CEA. This is confirmed in Table 12.33 of Volume 1 Chapter 12 Traffic and Transport of this ES [REP5-016].	Land South of Perdiswell Farm was scoped out of the CEA since it is not predicted to generate a material volume of traffic with a temporal overlap with the Project. Its planning application scoped out an assessment of Traffic and Transport of its construction phase. If a material volume of construction traffic was to be generated by the proposal or if significant transport implications could arise then, in accordance with the NPPF, a Traffic and Transport assessment would be necessary to assess the impact of that construction traffic. With no such assessment, it is concluded that the proposal would not generate a material volume of construction traffic into the traffic and transport study area during the peak construction period of the Project in 2026 and thus was scoped out of the CEA.

				The planned occupation date of the first dwelling is 2028 (as confirmed within its planning application documents) and it would take a number of years well beyond 2028 for those dwellings to become occupied such that they would generate a significant volume of traffic. Therefore, there is no operational temporal overlap with the peak construction period of the Project in 2026. Thus, Land South of Perdiswell Farm was scoped out of the CEA.
Chapter 13 – Noise & Vibration	The area of the BW Solar Farm Order Limits which is located closest to the future Farmoor Solar Farm comprises the cable route along Cumnor Road. These cable laying works will be a short-term activity and unlikely to co-inside with the construction of the Farmoor Solar Farm. Therefore, a significant adverse cumulative construction noise effect is considered unlikely. The future Farmoor Reservoir solar farm is located away from operational phase noise sources, and so a significant adverse cumulative operational noise effect is considered unlikely.	The future Red House Farm solar farm is located adjacent to the southern section of the BW solar farm, and the receptor at Denhams Farm is considered most likely to experience any cumulative effect. Therefore, for clarity this receptor has been considered below. Construction phase works at BW solar farm will be controlled through the CoCP which will ensure that BPM is implemented, and LSEs are avoided. Therefore, a significant adverse cumulative construction noise effect, due to Red House Solar Farm, is considered unlikely. The noise and vibration assessment for BW does not identify any significant adverse effect during the operational phase. Further,	The Salt Cross Garden Village is located adjacent to the central section of BW solar far, and the receptor at New Whittles Farm is considered to be representative of the future project. Construction phase works at BW solar farm will be controlled through the CoCP which will ensure that BAT is implemented, and LSEs avoided. Therefore, a significant adverse cumulative construction noise effect due to Salt Cross Garden Village is considered unlikely. The BW assessment does not identify any significant adverse effects during	The area of the BW Solar Farm Order Limits which is located closest to the future Land South of Perdiswell residential development comprises the cable route along Shipton Road and Upper Campsfied Road, and HDD works to the roundabout on the A44. These cable laying works will be a short-term activity, and so cumulative adverse construction effects are considered unlikely. The future Land South of Perdiswell residential development is located away from operational phase noise sources, and so a significant adverse cumulative operational noise effect is considered unlikely.

		operational phase sound is far below the background sound level at Denhams Farm. Therefore, a significant adverse cumulative operational noise effect, due to Red House Solar Farm, is considered unlikely.	the operational phase at New Whittles Farm, or any other receptor. Further, operational phase sound is far below the background sound level at this receptor. Therefore, a significant adverse cumulative operational noise effect due to the future Garden Village is considered unlikely.	
Chapter 14 – Climate Change	As is detailed within the IEMA (2022) GHG in EIA Guidance all developments that emit greenhouse gas (GHG) have the potential to impact the atmospheric mass of GHGs as a receptor and so may have a cumulative impact on climate change irrespective of geographic location. Consequently, cumulative effects due to other specific local development projects cannot be individually identified and assessed. When evaluating the impact of the Project the atmospheric mass of GHGs has been defined as a high sensitivity receptor. This approach is consistent with the IEMA (2022) GHG in EIA Guidance.			
Chapter 15 – Socio-Economics	This development was excluded from the CEA undertaken for submission due to its status as being in screening since 2018. Only those developments which are 'reasonably likely to come forward' should be considered.	Red House Farm - P23/V2624/FUL would contribute to 2,196 estimated jobs created over its construction period. This additional number would create a slight deficit of circa 700 construction workers, however still a surplus of circa 14,400 when considering 'Skilled Trades' workers. There will be a negligible impact on temporary accommodation, as the expected need for construction bedspaces would increase from 520 to 601 – which would mean there is over 8 times the available bedspaces in a given year. Overall, there are no significant cumulative effects when considering this development.	Salt Cross Garden Village - 20/01734/OUT was assessed in the SEIA (Table 15.22, map number 1). No of dwellings is written as "220" but this is a typo and the assessment correctly used "2,200" as the dwelling no. Overall there are no significant cumulative effects when considering this development.	Land South of Perdiswell Farm 25/01510/OUT was assessed in the SEIA (Table 15.22, map number 15). Overall there are no significant cumulative effects when considering this
Chapter 16 – Human Health	The Project is located within the reservoir area and therefore it has been included in the human health study area and assessment of effects.	The Project was considered in the cumulative assessments of some of the technical assessments that have informed the health assessment (e.g. Traffic and Transport, Landscape and Visual Impact,	This scheme has been fully considered within the scope of the cumulative assessment (as a Tier 1 project) reported in Chapter 16: Human Health of the ES.	The Human Health team have had ongoing discussions with the Oxfordshire County Council Public Health team to address potential

				cumulative issues from this development.
		The remaining technical disciplines that inform the Human Health assessment, namely Hydrology and Flood Risk, Noise & Vibration, Socio-economics, Ground Conditions, Climate Change, and Agricultural Land Use and Public Rights of Way; all conclude that no cumulative effects are anticipated from this development. Therefore, no further cumulative human health impacts are anticipated, and the overall conclusions of Chapter 16 of the ES remain.		Appendix 16.4 of the ES details the Public Rights of Way that will be impacted (both adversely and beneficially) by the Project, and the communities that will be affected by this. Communities in Woodstock, Bladon, Shipton-on-Cherwell and Thrupp have all been considered here, and associated public health effects have been discussed in Chapter 16: Human Health. These communities are included in the health assessment, and no further material changes are anticipated to its conclusions.
Chapter 17 – Agricultural Land Use and Public Rights of Way	This project would be located within the reservoir area and would not therefore be likely to have physical effects on agricultural land or PRoW.	Red House Farm was assessed as a Tier 2 project within ES Chapter 17: Agricultural Land Use and PRoW. The solar farm was assessed as likely to have a permanent effect on a small area of agricultural land, which together with the land within the Project would not lead to a significant loss of BMV. The overall conclusions of the ES remain.	This project was assessed as a Tier 1 project within ES Chapter 17: Agricultural Land Use and PRoW. The cumulative assessment of Tier 1 projects concluded that there would be a significant Major Adverse cumulative loss of bmv land. The overall conclusions of the ES remain.	Perdiswell Farm was assessed as a Tier 1 project within ES Chapter 17: Agricultural Land Use and PRoW. The cumulative assessment of Tier 1 projects concluded that there would be a significant Major Adverse cumulative loss of bmv land. The overall conclusions of the ES remain.

Chapter 18 – Waste & Resources	This development was considered as a Tier 2 within the CEA undertaken for submission. Waste from the development may lead to cumulative effects of landfill void capacity, however the development will be required to minimise waste and divert waste from landfill as part of the planning process e.g. construction waste will be managed through a Site Waste Management Plan. The overall conclusions of the ES remain. ikely to lead to further depletion of landfill void capacity. However, as part of planning requirements, other projects will be required to minimise waste and divert waste from landfill to reduce their reliance on landfill	This development was not considered in the CEA for submission. However, waste will be required to minimise waste as part of the planning process. The cumulative effect will not be significant.	This development was considered as a Tier 2 within the CEA undertaken for submission. Waste from the development may lead to cumulative effects of landfill void capacity, however the development will be required to minimise waste and divert waste from landfill as part of the planning process e.g. construction waste will be managed through a Site Waste Management Plan. The overall conclusions of the ES remain.	This development was considered as a Tier 2 within the CEA undertaken for submission. Waste from the development may lead to cumulative effects of landfill void capacity, however the development will be required to minimise waste and divert waste from landfill as part of the planning process e.g. construction waste will be managed through a Site Waste Management Plan. The overall conclusions of the ES remain.
Chapter 19 – Air Quality	The project is considered a Tier 1 project, and the overall conclusions of the ES Chapter 19 Air Quality remain. The area of the BW Solar Farm Order Limit which is located closest to the future Farmoor Solar Farm comprises the cable route along Cumnor Road. These cable laying works will be a	The project is considered a Tier 1 project, and the overall conclusions of the ES Chapter 19 Air Quality remain. The future Red House Farm solar farm is located adjacent to the southern section of the BW solar farm.	The project is considered a Tier 1 project, and the overall conclusions of the ES Chapter 19 Air Quality remain. The Salt Cross Garden Village is located adjacent to the central section of BW solar farm.	The project is considered a Tier 1 project, and the overall conclusions of the ES Chapter 19 Air Quality remain. The area of the Botley West Solar Farm Order Limits which is located closest to the future Land South of Perdiswell residential development comprises the cable route along

	short-term activity and unlikely to coincide with the construction of the Farmoor Solar Farm, given the short-term construction timeline. Therefore, a significant adverse cumulative construction air quality increase is considered unlikely. The cumulative magnitude is therefore, considered to be negligible adverse during construction and operation.	Construction phase works at BW solar farm will be controlled through the CoCP which will ensure that dust mitigation is implemented. Therefore, a significant adverse cumulative construction air quality effect, due to Red House Solar Farm, is considered unlikely.	Construction phase works at BW solar farm will be controlled through the CoCP which will ensure that dust mitigation is implemented. Therefore, a significant adverse cumulative construction air quality effect due to Salt Cross Garden Village is considered unlikely.	Shipton Road and Upper Campsfied Road, and HDD works to the roundabout on the A44. These cable laying works will be a short-term activity and will be controlled through the CoCP which will ensure that dust mitigation is implemented, and so cumulative adverse construction effects in respects to Air Quality are considered unlikely.