



Botley West Solar Farm

Applicant's Responses to other D6 Submissions

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Approval for issue

Jonathan Alsop

10 November 2025

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1 Introduction

1.1 Purpose of this Document

- 1.1.1 The purpose of this document is to provide the Applicant's response to submissions made by interested parties at Deadline 6 of the Examination.
- 1.1.2 The Development Consent Order (DCO) application for Botley West Solar Farm (the Application) was submitted on 15 November 2024 and accepted for Examination on 13 December 2024. Deadline 1 of the Examination was on 4 June 2025, Deadline 2 was on 1 July 2025, Deadline 3 was on 22 July 2025, Deadline 4 on 22 August 2025, Deadline 5 on 12 September 2025 and Deadline 6 on 20 October 2025.
- 1.1.3 The list of Interested Parties' that submitted representations at Deadline 6 are set out in **Table 1.1** below.
- 1.1.4 A total of 134 submissions were submitted to the Examination at Deadline 6. 67 of these were from the Applicant, with 67 being from Interested Parties. The Examination library includes references up to [REP6 -135] but the Applicant notes that [REP6-099] is 'not in use'.

1.2 Structure of this document

- 1.2.1 This document provides a response from the Applicant to Written Representations submitted at Deadline 6 and is structured as follows:
- **Table 2.1:** Applicant's Responses to Representations submitted at Deadline 6 – Local Authorities and Statutory Consultees;
 - **Table 2.2:** Applicant's Responses to Representations submitted at Deadline 6 – Non-Statutory Consultees; and
 - **Table 2.3:** Applicant's Responses to Representations submitted at Deadline 6 – Public/Landowner.
- 1.2.2 Submissions received by Interested Parties are presented as verbatim text (unless it has been more appropriate to summarise) and are then responded to by setting out the Applicant's position on the matter at the time of writing.
- 1.2.3 To increase the conciseness of this document similar points have been grouped together and summarised. The reference number column in the tables below refers to the reference given to the submissions made by Interested Parties.
- 1.2.4 The documents submitted with the Application are also referenced in this document, using the reference number [APP/x.y], where the last three numbers are the application document number, as set out in the Examination Library. All documents are also presented in numerical order in the Guide to the Application [Revision 11, as updated for Deadline 7].

Table 1.1: List of Interested Parties that submitted Representations at Deadline 6

Examination Reference Number	Interested Party
REP6-068	Begbroke and Yarnton Green Belt Campaign (BYG)
REP6-069	Begbroke and Yarnton Green Belt Campaign (BYG)
REP6-070	Begbroke and Yarnton Green Belt Campaign (BYG)
REP6-071	Begbroke and Yarnton Green Belt Campaign (BYG)
REP6-072	Begbroke and Yarnton Green Belt Campaign (BYG)

Examination Reference Number	Interested Party
REP6-073	Begbroke and Yarnton Green Belt Campaign (BYG)
REP6-074	Begbroke and Yarnton Green Belt Campaign (BYG)
REP6-075	Bethany Chesser
REP6-076	Bladon Parish Council
REP6-077	Bojan Ivanovic
REP6-078	Bojan Ivanovic
REP6-079	Cassington Parish Council
REP6-080	Cherwell Collective
REP6-081	Christopher Nuttall- Smith
REP6-082	CPRE Oxfordshire
REP6-083	Cumnor Parish Council
REP6-084	Cumnor Parish Council
REP6-085	Cumnor Parish Council
REP6-086	Dan Levy
REP6-087	David J. Rogers
REP6-088	Frances Stevenson
REP6-089	George David William Smith
REP6-090	Graham Raymond Brown
REP6-091	Hill Grove Family Farm Ltd
REP6-092	Historic England
REP6-093	Ian William Coy
REP6-094	James Price
REP6-095	Joanna Norton
REP6-096	Jonathan Ford
REP6-097	Josephine Christine Coy
REP6-098	Karen Squibb Williams on behalf of Dustin Dryden
REP6-099	NOT IN USE
REPi6-100	Karen Squibb Williams on behalf of Dustin Dryden
REP6-101	Karen Squibb- Williams on behalf of Mr John Wynne
REP6-102	Lesley Sims
REP6-103	Martin Oldfield
REP6-104	Michael Brown
REP6-105	Michael Field
REP6-106	Mike Gorick
REP6-107	Mr and Mrs R Cooke
REP6-108	Mr Dustin Dryden

Examination Reference Number	Interested Party
REP6-109	Mr Dustin Dryden
REP6-110	National Grid Electricity Transmission plc
REP6-111	Nigel Pearce
REP6-112	Nigel Pearce
REP6-113	Oxford Aviation Services Limited
REP6-114	Oxford Aviation Services Limited
REP6-115	Oxfordshire County Council
REP6-116	Oxfordshire County Council
REP6-117	Oxfordshire Host Authorities
REP6-118	Oxfordshire Host Authorities
REP6-119	Oxfordshire Host Authorities
REP6-120	Paul Hoddy
REP6-121	Professor Stephen Westaby
REP6-122	Richard Devereux- Cooke for Hanborough Parish Council
REP6-123	Richard Devereux- Cooke for Hanborough Parish Council
REP6-124	Rosemary E Lewis
REP6-125	Rosemary E Lewis
REP6-126	Rosemary E Lewis
REP6-127	Rosemary E Lewis
REP6-128	Siemens Healthcare Limited
REP6-129	Southill Community Energy
REP6-130	Stop Botley West Limited
REP6-131	Sustainable Woodstock
REP6-132	Tim Sumner
REP6-133	Tom Lewis
REP6-134	Victoria Whitford
REP6-135	Dr Stuart Brooks

2 Applicant's Responses to Representations provided at Deadline 6

2.1 Local Authorities and Statutory Consultees

Table 2.1: Applicant's Responses to Representations provided at Deadline 6 – Local Authorities and Statutory Consultees

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP6-092	Historic England	<p>World Heritage Site matters including ICOMOS review and derivation of benefits to heritage assets</p> <p>2.2. Historic England is aware of the difference in its own professional judgement to those reached by ICOMOS International (hereafter ICOMOS) in their Technical Reviews.</p> <p>Historic England is in dialogue with ICOMOS following their latest Technical Review (REP4-052) regarding their assessment of the level of harm to the OUV of the WHS. The State Party has also requested further clarification from ICOMOS following this latest Technical Review. We understand ICOMOS intends to provide a further report to the State Party before the close of the Examination and have ensured that they are aware of the Examination's timetable.</p> <p>2.3. Historic England's assessment, as set out in our Written Representations (REP1-086; 5.20-5.47), was structured to follow the approach set out by UNESCO in their guidance and has taken account of how the application site contributes to the significance and experience of the WHS/RPG in accordance with our own guidance in GPA3. The UNESCO/GPA3 methodologies are compatible and can both be utilised within the planning system. Using these methodologies alongside the information provided by the applicant, we assessed the impact on the property's OUV, including in relation to each of the attributes of OUV and the ability to appreciate them, as well as the integrity and authenticity of the WHS.</p> <p>2.4. Historic England will communicate any further relevant correspondence from UNESCO/ICOMOS that we receive to the ExA.</p>	The Applicant notes this response. There is nothing further for the Applicant to add as this element of the submission relates to matters between Historic England and ICOMOS.	Historic_Environment
REP6-092	Historic England	<p>Change Request 2 and other areas proposed for exclusion</p> <p>2.5. Historic England welcomes the changes brought forward in Change Request 2, which have removed the solar panels from those fields with a strong intervisibility with and connection to the WHS and from which the Blenheim ensemble can be appreciated in a countryside setting. These changes appear to have minimised harm to OUV and avoided intervisibility with the WHS, broadly addressing the harm we identified in our earlier advice.</p> <p>2.6. The applicant has maintained, in its revised HIA submitted at Deadline 5, that Attribute 7 is the sole attribute that is affected by the development. As set out in our Written Submissions (REP1-086; 5.12-5.13), whilst we agree that Attribute 7 draws strongly on the contribution made by the property's setting to its significance, it is not the only attribute that does so. Attributes 1,4 and 5 convey associative values that can also be drawn from the contribution made by the WHS' setting. Having reviewed the applicant's revised Heritage Impact Assessment (CR2-036), those attributes and the impact of the proposed development on these have not been fully considered as part of their assessment.</p> <p>2.7. In Historic England's view, the revised development would continue to place solar panels on fields which contribute to the ability to appreciate or to the maintenance of the attributes of OUV of Blenheim. However, in our view solar panels on these fields would not harm the contribution made by those fields to those attributes, but would nonetheless result in a change in how the land supports Blenheim. The change to the use of the land while under PV panels would still support and maintain Blenheim's OUV.</p>	<p>The Applicant welcomes the confirmation from Historic England that the placement of Solar PV panels would not harm the contribution that any land within the Order Limits makes to the attributes that convey the Outstanding Universal Value (OUV) of the Blenheim Palace World Heritage Site (WHS). This position is in general accordance with the conclusion of our assessment as set out in ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2-036], where we explain how the proposed development would not result in any harm to the OUV of the WHS.</p> <p>The Applicant maintains their position that only Attribute 7 is concerned with the wider setting of the WHS, and that Attributes 1, 4 and 5 are concerned only with the WHS itself and not its wider setting.</p>	Historic_Environment
REP6-092	Historic England	<p>Archaeology including trial trenching and Samsons Platt</p> <p>2.8. Following the Issue Specific Hearing Historic England has recently received the draft trial trenching report from the Applicant. We are reviewing this document, and we will continue to discuss this matter with the applicants. We will provide the Examining Authority with our representations on this matter by Deadline 7, if not earlier.</p>	<p>The Applicant has engaged with Historic England regarding the trial trenching results in the vicinity of the Scheduled Monument at Sansom's Platt. Adjustments have been made to the Works Plans to respond to concerns raised by Historic England, and these adjustments are indicated on the Works Plans submitted at Deadline 7. These adjustments ensure additional protection of buried archaeological remains associated with the Scheduled Monument, and also ensure that the change within the setting of the Scheduled Monument does not result in substantial harm to its heritage significance.</p> <p>The Applicant maintains its position that the change within the setting of the Scheduled Monument would result in less than substantial harm to the Scheduled Monument, and very</p>	Historic_Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			much at the lower end of the scale of less than substantial harm.	
REP6-092	Historic England	<p>5. Comments on the Examining Authority's proposed schedule of changes to the draft Development Consent Order (dDCO)</p> <p>5.1. Historic England has no comment to make in relation to the Examining Authority's proposed changes to the draft Development Consent Order. However, Historic England would note that further to our Written Representations (request for inclusion as a consultee on certain matters – REP1-086; 7.3), and subsequent confirmation of the Applicant's willingness to engage in dialogue on this (REP4-038), we are pleased to report that there has been positive discussions for provision within Requirements 5, 6, 8 and 12 of Schedule 2 of the DCO for Historic England to be a named consultee. We are in the process of agreeing appropriate wording for these Requirements with the applicant and that this can then be incorporated into the DCO.</p>	<p>The Applicant updated the draft DCO at Deadline 6 [REP6-004] to include the latest consultee wording. For completeness, the Applicant has also made a submission regarding the adequacy of this wording in its Response to ExA's Rule 17 Letter (23 Oct 2025) (see question 18). The wording is agreed with Historic England; confirmation of this is set out in line 5.1.8 in the Statement of Common Ground with that organisation [EN010147/APP/11.7/4].</p>	Historic_Environment
REP6-092	Historic England	<p>6. Comments on any other information and submissions received at D5</p> <p>Change 1 - Reduction in Order Limits boundary to reduce the solar installation area south west of Bladon, and removal of solar arrays on land east of Bladon and north of Heath Lane</p> <p>6.4. Change 1 has removed solar development from the fields we requested in our Written representations (REP1-086; 5.56) to the southwest and south of Bladon.</p> <p>6.5. We consider that this amendment has resulted in the removal of solar panels from those fields that have a strong intervisibility with, and connection to, the WHS and from which the Blenheim ensemble can be appreciated in a countryside setting. In our view, these changes have minimised the harm to OUV and avoided intervisibility with the WHS, broadly addressing the harm we identified in our earlier advice.</p> <p>6.6. A further iteration of the HIA has been submitted as part of the documentation supporting the change request. As outlined above, Historic England has drawn different conclusions from its own assessment of the potential impact on the World Heritage property's OUV. Our assessment has been undertaken in accordance with UNESCO's 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context and our own Good Practice in Planning Advice on the Setting of Heritage Assets (2017). We considered how the setting of the property contributes to its attributes of OUV and the ability to appreciate them as well as its authenticity and integrity. The baseline for assessing impact on OUV is set at the time of inscription. This is as described in the Statement of Outstanding Universal Value adopted, retrospectively, by UNESCO in 2013. As a standalone document produced to inform the overall Environmental Impact Assessment, it would be in our view entirely appropriate for the HIA to apply the relevant methodology in relation to the WHS in isolation. Its results can still inform the overall conclusions of the Environmental Statement.</p> <p>6.7. The subject of cumulative impact is part of our ongoing dialogue with ICOMOS as outlined above. This point will be addressed as part of our concluding submission at Deadline 7.</p> <p>6.8. As set out in our Written Representations (REP1-086; 6.20) we stated we would provide comment on the additional visualisations we requested from the applicant to address gaps in the assessment. These have now been provided by the applicant in document 12.7 Additional Photomontages for Historic Environment Assessment (Rev 1) (CR2-059). We welcome this submission, which confirms solar arrays would not be visible from within the World Heritage Site or from the fields we have identified as those which have a strong intervisibility and connection to the World Heritage Site. The visualisations demonstrate there would be no impact during the operation of the development. We are also content that following the Change Request 2, the impacts from the construction and decommissioning phases (e.g. noise and lighting) from within the World Heritage Site (REP1-086; 6.21) would be minimal and any residual impacts can be minimised through the measures set out in the Outline Code of Construction Practice (CR2-045; 1.8.17).</p>	<p>The Applicant welcomes the confirmation from Historic England that no solar PV panels or associated infrastructure would be visible in views from within the WHS.</p> <p>The Applicant also welcomes the confirmation from Historic England that impacts on the WHS from noise and lighting during construction and decommissioning would be minimal and can be suitably controlled through the measures set out in the Outline Code of Construction Practice Part 1 (Rev 4) [CR2-045].</p> <p>The Applicant has applied the methodology set out in UNESCO's 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context. The outcome of this is presented in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site (Rev 1) [CR2-036]. Where the Applicant has undertaken a cumulative effects assessment, the methodology has been based on the PINS guidance published online as Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. The outcome of this is presented in ES Chapter 7: Historic Environment (Rev 3) [CR2-019].</p>	Historic_Environment
REP6-092	Historic England	<p>Change 2 - Reduction in Order Limits boundary to reduce the solar installation area near to Oxford Airport</p> <p>6.9. This change has removed solar arrays from fields near Oxford Airport. As set out in our written submission (REP1-086; 5.86-5.88) some of these fields contribute to the significance of the Church of St Michael, Begbroke, as it is from within some of these fields that the church can be experienced within its traditional agricultural context.</p> <p>6.10. The removal of these fields for solar production does therefore help to better preserve the countryside setting the church can be experienced within. In our view this does, to a degree, reduce the harm the development would have on the church's significance through development in its setting.</p> <p>6.11. We maintain the position that the proposed development would continue to erode the ability to</p>	<p>The Applicant notes this response. The Applicant welcomes Historic England's confirmation that this change will help to better preserve the countryside setting the church can be experienced within.</p> <p>The Applicant maintains their position that the likely magnitude of impact on the Grade II* listed Church of St Martin at Begbroke is negligible adverse, resulting in a long-term, reversible minor adverse effect. This is set out in paragraphs 1.9.55 - 1.9.61 of ES Appendix 7.5: Settings</p>	Change Request Historic_Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>experience the church in its traditional agricultural context from the fields to the north of the church. As set out in our Written Representations (REP1-086; 5.90) we concluded the magnitude of impact would be low adverse by the criteria offered in Table 7.9 and in NPS terms would amount to modest harm to the significance of the heritage asset from development within its setting. Whilst this change does slightly reduce the harm, it is not sufficient to change the conclusions we have reached on the level of harm this would cause.</p> <p>6.12. Therefore, our position as set out in our Written Representations (REP1-086; 5.91-5.92), remains valid.</p>	<p>Assessment (Rev 3) [CR2-038]. The assessment found that although the impact would be reduced as a result of the changes set out in the accepted Change Request 2 Notification Report, this reduction would not be great enough to achieve a step change down from the previously assessed likely magnitude of impact, i.e this would remain as negligible adverse, and the subsequent effect would remain as long-term, reversible and minor adverse. In terms of the likely harm to the significance of the designated heritage asset, the Applicant's position is that the harm would be 'less than substantial', and very much towards the lower end of that scale.</p>	
REP6-117	Oxfordshire Host Authorities	<p>Issue 3c Ecology and Biodiversity</p> <p>On the subject of bat mitigation, the OHA are broadly aligned with the position of Natural England set out in their letter dated 3rd October 2025. We agree with Natural England's comments that further analysis of the bat survey results is required before the proposed mitigation and compensation measures can be agreed.</p> <p>The proposal for a 3-tiered system of buffers alongside hedgerows and woodlands is welcomed, and we agree that the specifications and locations for all Tier A buffers must be confirmed before approval. We request that the locations of all Tier A flight paths must be clearly identified on a set of plans for clarity and agreement and adopted as part of the DCO. Although a list is described in Section 8.5.2 of the oLEMP and Section 8.5.3 states that "<i>given the importance of the Tier A buffers to the bat ecology within the landscape, the location of these will be fixed at this stage to ensure their location is secured by virtue of their inclusion within this oLEMP</i>", we cannot currently see these on a map of the site and no specification is provided for the length or area. Further details therefore must be provided.</p> <p>Monitoring of bats is welcomed but this should be for a longer term than is usually required for protected species licensing and cover the lifetime of the development. Monitoring both along flightlines and within the areas of solar panels should be included.</p> <p>As set out in our previous responses, research has shown that breeding skylark are not supported within solar farms. We commented at Deadline 5 [REP5-125] to set out why we do not agree that skylarks will be adequately compensated through the provision of the measures set out in the Skylark Technical Note. We are therefore of the view that off-site compensation for loss of breeding habitat is required, whilst we have referred to the need for a Farmland Bird Strategy to achieve this, we recognise that this would primarily compensate for loss of skylark breeding habitat and therefore agree with the Examiner's suggestion that might be more appropriately referred to as a Skylark Mitigation Strategy.</p> <p>The applicant's response to the Examining Authority's Second Witten Questions August 2025 [REP4-037] regarding skylarks (see page 77 – 78) is based on providing new habitat across the project site for skylark combined with the influence of enhanced foraging for this species on the surrounding fields around the site, which they quantify as being able to support some 119 skylark territories. This seems to miss the point that skylarks will not be able to nest within the project site as they do not use solar farms.</p> <p>Any enhancement of habitat onsite will only serve to provide for foraging skylarks, which might give neighbouring pairs a boost in terms of breeding success. But there would still be a loss of suitable habitat for breeding, which would result in a reduction in breeding and therefore a decline in the local population. We accept that the current situation is variable depending on the crop rotation within the arable fields year on year, but the local population continues to persist despite this. However, the solar farm will make the site unsuitable for breeding completely and therefore, offsite compensation is required to ensure that the population of this priority species is restored in line with national planning policy.</p> <p>Missing ecological assessment at this late stage, including in relation to bats and watercourses, highlights our concerns as to how the mitigation hierarchy can be applied to inform design of the scheme.</p> <p>The OHA agree that the subject of Bird Strike was best dealt with under the topic of aviation safety. But there is still a monitoring issue regarding the potential for birds to hit into the solar panels having mistaken</p>	<p>Further analysis of the data with respect to bats was provided in Rev1 of the Bat Technical Note submitted at Deadline 6 [REP6-044]. This has been discussed and agreed with Natural England with respect to both the extent of analysis and the location of Tier A buffers. The oLEMP has been updated at Deadline 7 accordingly. To address the OHA's concerns, this has included details of the length (22.09km) and area (85ha) covered by the Tier A buffers and a figure showing their location has been included (Figure 8.1).</p> <p>As set out in section 12.12 of the oLEMP [REP6-034], monitoring for bats will comprise static monitoring of key flight lines with full details set out in the Bat Technical Note [REP6-044]. Sections 4.18 to 4.25 of the Technical Note provide details of this monitoring which will include positions within solar panel arrays. As set out in section 11 of the oLEMP [REP6-034], monitoring will be in years 1, 2, 4, 6 and 10 followed by every 5 years for the lifetime of the Project.</p> <p>With respect to skylark, it is simply not the case that skylark do not use solar farms for nesting full stop. It is true that there is no evidence of skylark nesting within panel arrays and this is acknowledged within the Skylark Technical Note [REP4-037]. However, there is extensive evidence that skylark will continue to use solar sites for foraging (as set out within the Applicant's Response to the ExA's Schedule of Changes to the DCO [REP6-051]). There is therefore no reason to suspect that the species will not continue to nest in areas of grassland that are suitable for them. If it were the case that skylark did not use solar sites, all solar development in the UK would be required to provide off-site mitigation for this species rather than providing open areas of grassland within the projects to facilitate skylark nesting.</p> <p>Also as set out within the Applicant's Response to the ExA's Schedule of Changes to the DCO [REP6-051], providing areas of suitable grassland for this species within the project site is the approach that has been adopted and accepted for all NSIP-scale solar development that has been consented that the Applicant is aware of, none of which have required off-site mitigation provision but which have similar impacts to the Project.</p> <p>The removal of solar arrays from Field 1.13 to further buffer the Scheduled Monument at Samsons Platt (as</p>	Local_Ecology_and_Nature

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		<p>them as waterbodies (and aquatic invertebrates confusing them as waterbodies). Monitoring should therefore be included within the DCO and/or the oLEMP to ensure that incidents are reported to learn from experience, identify remedial action(s) and to inform future technologies and mitigation measures for other solar farms.</p> <p>With regards to the Local Nature Recovery Strategy, at ISH2 OCC outlined that this document will be going before Cabinet for approval on the 21st of October with the aim for the strategy to be adopted on the 12th of November. Being as the document is in the public domain in advance of the cabinet meeting here:https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=115&Mid=7809) and as such the applicant will have both Deadline 6, Deadline 7 and potentially Deadline 8 in which to consider this document and make changes to their submitted documents accordingly. Given this and the fact that the document will likely be adopted during the Examination, the OHA maintain that the LNRS should be given significant weight in the Examining Authority's determination of this application.</p>	<p>secured through the updated Works Plans submitted at Deadline 7) will provide a further circa 6ha of grassland to be managed for birds, including skylark taking the total provision of grassland managed for wildlife, including birds, within the Project to 159ha.</p> <p>The persistence of the local population of skylark within the area is more luck than thanks to any conservation effort – several years of the farmland that comprises the Project site being managed as winter wheat could see the majority of the population of this species decrease to a level that it would be impossible to recover from. Indeed, farming practices and the change from spring to winter wheat is considered to be the single biggest factor that has driven the decline of skylark numbers. The change from arable (including winter wheat) to grassland managed specifically for skylark and other breeding birds within the Project will maintain the habitat in ideal conditions for skylark every year meaning that the threat of local extinction due to lack of suitable nesting habitat will be removed from the area for the lifetime of the Project.</p> <p>Impacts to bats were considered within the ES Chapter 9 Ecology and Biodiversity [REP4-010]. This concluded that avoidance measures were necessary and that such measures would comprise the provision of appropriate buffers (Commitment 9.20, table 9.8.1 of ES Chapter 9). Over the course of the Examination, further clarity has been provided with respect to these buffers (via the Bat Technical Note [REP6-044]) with their location and nature agreed with Natural England [Document Ref: EN010147/APP/11.7/8 Rev2].</p> <p>Similarly, watercourses were considered as an Important Ecological Feature in ES Chapter 9 with avoidance measures incorporated into the Project through the use of buffers (secured during construction via section 1.10.13 of the oCoCP [REP6-028] and operation via section 8.2.6 of the oLEMP, and pollution prevention measures via section 1.10.36 of the oCoCP [REP6-028].</p> <p>As such, the Applicant applied the mitigation hierarchy at the time of submission, as required by the NPS, with respect to both bats and watercourses through the use of appropriate avoidance measures. The Applicant has continued to apply that hierarchy as part of its ongoing engagement with key statutory consultees.</p> <p>Monitoring of the Project site with respect to bird strike risks has been agreed with London Oxford Airport [Document Ref: EN010147/APP/11.7/5 Rev2]. This agreed position is in consideration of OASL's regulatory obligation to manage aviation safety and minimise the risk of aircraft bird strikes to as low as reasonably practicable. Monitoring of the Project site with respect to bird strike would include funding for the planning, implementation, and maintenance of an additional Wildlife Hazard Management unit. This is to be secured through a private commercial between each party, and has been recorded in the Statement of Common Ground in the meantime.</p> <p>With respect to the draft LNRS, as set out at ISH2, the Applicant's starting position is that no weight can be</p>	

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			<p>reasonably attributed to the adopted LNRS due to the lateness that any adoption would occur (the day before the Examination finishes). Therefore, if the ExA or SoS is so minded to attribute any weight to it, then only limited weight should be attributed on that basis.</p> <p>However, The Applicant has reviewed the (effectively draft) strategy in the limited time available (noting that amendments to that strategy may still be made before adoption and so reliance on the existing form is not certain). As set out in Section 7 of the oLEMP [REP6-034], the masterplan for the Project was informed by the aims of the Oxfordshire Nature Recovery Network (ONRN) with respect to the goal of providing a coherent landscape-scale enhancement to biodiversity. In particular, the Evenlode Corridor was a key component in achieving this goal, with such a corridor identified in the ONRN as one of the main opportunities in the area. The LNRS drew on the spatial priority mapping completed to inform the ONRN. As such, the inclusion of the River Evenlode Corridor as part of the Project aligns with the goals of the draft LNRS where the reversion of arable land to more wildlife-friendly management practices along the river is specifically described (page 86 of the draft LNRS).</p> <p>In addition to the strategic elements, the draft LNRS also contains a list of species priorities. Of these, the Project supports the following (measures set out are described in section 8 of the oLEMP):</p> <ul style="list-style-type: none"> • Bats (including Bechstein's and barbastelle) – provision of corridors to enable movement through the Project site and to enhance the foraging provision through diversity of habitats and therefore diversity of invertebrate abundance. • Common lizard – provision of new diversity of habitats including scrub and grassland. • Curlew – provision of flood meadow within Evenlode Corridor. • Farmland birds – provision of larger field margins (the Project site currently is largely devoid of such features), more diverse seed and invertebrate sources, over 150ha of new grassland and other habitats to be managed for bird benefit). • Fish – although the Project site excludes the channel of the river Evenlode from within the order limits, preventing any in-channel enhancements, the removal of all agricultural chemical inputs will improve the water quality of the stretch of river within the Project site which will, in turn, benefit the river's fish population. • Great crested newt – provision of water features within Tier A bat buffers and large areas of new species-rich grassland, scrub, woodland etc will ensure overall enhancement for this priority species. • Dormouse – creation of 26km of new hedgerow, enhancement of a further 26km and planting of circa 5ha of new woodland will create a substantial benefit for this species. 	

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			<ul style="list-style-type: none"> Hedgehog – creation of habitats to support dormouse will also support hedgehog. In addition, new field margins will enhance foraging opportunities for this species. Nightingale – creation of new areas of scrub across the Project will provide enhanced foraging and nesting habitat for this species. Otter – reversion of flood meadow along the river Evenlode corridor will enhance the water quality which, in turn, would enhance the habitat for fish, the main prey of otter. Water vole – the creation of substantial new buffers either side of all watercourses will enhance the burrowing and foraging opportunities for this species. In addition, the control of any mink populations along the river Evenlode (as set out in section 12.14 of the oLEMP submitted at Deadline 7) will support this species in the wider area. <p>Therefore, the Project accords with the aims of the draft LNRS through the provision of strategic enhancement (the River Evenlode Corridor) and enhancements targeting priority species. As such, if the ExA or SoS is minded to attribute any weight to the strategy, the Applicant considers that positive weight can be attributed.</p>	
REP6-117	Oxfordshire Host Authorities	<p>Issue 3d Cultural Heritage</p> <p>The OHA remain of the view that there are areas of solar panels within the proposed development that would result in a negative impact on Attribute 7 of the Blenheim World Heritage Site (i.e the rural character). The Host Authorities would welcome the chance to review Historic England's assessment of the impacts of the attributes of the World Heritage Site and to engage in dialogue with Historic England on this issue.</p> <p>The OHA maintain their position that the applicant has taken a very narrow on what is considered to contribute to the setting of the Blenheim Palace World Heritage Site as outlined within the LIR [REP1-072].</p> <p>The Host Authorities argue that the rural character of the area surrounding the palace is a significant contributing factor to the setting of the palace and as such any impacts to this character should be prevented. The OHA have set out how the applicant could reduce the impact on the setting of the World Heritage Site via the removal of panels within areas around the palace at [REP4-075]. The Host Authority's reasoning for the removal of panels from the scheme for heritage reasons is outlined within the OHA response to Action Point 16 arising from ISH2.</p> <p>Oxfordshire County Archaeological Services (OCAS) are pleased that the applicant has committed to submitting an Evaluation Reports into the examination by Deadline 6. However, it is disappointing that these documents have not been submitted earlier in the Examination. Paragraph 5.9.12 of NPS EN-1 states that the applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. The OHA outlined within the joint LIR [REP1-072] at Deadline 1 that the lack of an Evaluation Report meant that OCAS could not properly assess the significance of any archaeological remains and as such could not commit to the adequacy of mitigation proposed with regards to archaeological impacts. The submission of this report at such a late stage of the Examination means that OCAS will have less than a month to review the documents and provide the ExA with their assessment of the adequacy of the archaeological remains. It also means that OCAS will not have the opportunity to request further information from the applicant, if required, before the end of the Examination.</p>	<p>The Applicant notes the OHA's position regarding the setting of the WHS. However, the Applicant refers to its responses to Historic England's Deadline 6 submission [REP6-092], which confirms that the placement of Solar PV panels would not harm the contribution that any land within the Order Limits makes to the attributes that convey the Outstanding Universal Value (OUV) of the Blenheim Palace World Heritage Site (WHS). That Deadline 6 submission also confirms that no solar PV panels or associated infrastructure would be visible in views from within the WHS. This is important in light of Historic England's role as the key statutory consultee in respect of the historic environment.</p> <p>The Applicant has worked closely with Historic England to avoid or minimise any harm to the OUV of the WHS and would refer the OHA to Historic England's submission at Deadline 6 on this matter [REP6-092]. The Applicant would also refer the OHA to the position of ICOMOS-UK as set out in their Relevant Representation [RR-0413]. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the OUV of the UK World Heritage Sites and their settings is one of their key objectives. ICOMOS-UK state that <i>'the proposed Botley West solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as</i></p>	Historic_Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p><i>identified by the map 'Character of Setting of WHS' on page 50 of Appendix III of the Management Plan' (emphasis added).</i></p> <p>The Applicant notes the position of OCAS regarding the late submission of the reports on the results of the programme of trial trenching into the Examination. Requirement 10 in Schedule 2 of the draft Development Consent Order (Rev 8) [REP6-004] sets out that no part of the development can commence until an archaeological written scheme of investigation for that part has been agreed with the relevant planning authority. The archaeological written scheme of investigation must be substantially in accordance with the Outline Written Scheme of Investigation (Rev 3) [CR2-053] which has been developed through discussions with OCAS. Requirement 5 in Schedule 2 of the draft Development Consent Order (Rev 7) [REP6-004] also establishes that no part of the development can commence until the detailed design of that part has been agreed with the relevant planning authority. This provides OCAS with the opportunity to review the adequacy of the proposed Archaeological Protection Zones as indicated on Figures 1a - 1c of the Outline Written Scheme of Investigation (Rev 3) [CR2-053]. Any necessary adjustments or additions to the proposed Archaeological Protection Zones can be agreed within this process.</p>	
REP6-117	Oxfordshire e Host Authorities	<p>Issue 3e Landscape and Visual</p> <p>Please see OHA response to Action Point 16 from ISH2 below. Comments on the LVIA and Mitigation have also been included in the OHA responses to the Change 2 request documents and within this response.</p>	<p>In recognition of the mitigation secured for the Project, the Applicant considers 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, as outlined in the Applicant's Response to the ExA's Rule 17 Letter (14th October 2025) [REP6-052, Point 9]. For example, paragraph 5.10.5 of NPS EN-1 which states that "<i>Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>".</p> <p>Notwithstanding this, [REP6-052] also includes a Without Prejudice Offer (ref. Appendix 2). This includes further potential mitigation including the removal of additional areas of panels that would result in the possible reduction in scale of the Project. This is done on a without prejudice basis only but corresponds with some of the areas suggested by the OHAs, as referred to in [REP6-117], to identify 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 ([REP6-118]). In response to specific concerns raised regarding residential visual amenity affecting specific properties, the Applicant has also incorporated an increased buffer of 75m as part of its without prejudice offer. This increased buffer is offered over and above the embedded buffer mitigation already incorporated into the scheme design, as identified in Appendix B of the RVAA [REP6-065] and secured through the inherent limits of the Works Plans.</p>	Landscape_and_Visual_I mpacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			Please refer to the Applicant's Response to the ExA's Rule 17 Letter (14 th October 2025) [REP6-052] as well as the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025 for further clarification and detail.	
REP6-117	Oxfordshire Host Authorities	<p>Issue 3f Traffic and Transportation</p> <p>OCC is committed to working with the Applicant to find a solution whereby OCC would lay the applicants cable ducting beneath the A40 Eynsham Roundabout whilst undertaking the A40 improvement works in advance of the applicant commencing works on the proposed development. OCC is currently in negotiation with the applicant on a legal agreement which would secure these works and ensure that OCC is funded by the applicant to undertake works on their behalf.</p> <p>However, whilst an agreement between the parties in advance of a decision on the DCO being determined is preferable to both parties, in the event that the ducting is not able to be delivered during OCC's planned works on the A40, OCC request that a fall back is secured by the DCO. This fall back should ensure that if the applicant is laying a cable across the roundabout following OCC's improvement works the applicant is committed to resurfacing the entirety of the roundabout. OCC propose that a commitment is made to this effect in the outline Code of Construction Practice. A commitment should also be made at paragraph 1.7.3 of the oCTMP [REP5-041] to enter into a side agreement with OCC with regards to the resurfacing of the Eynsham Roundabout.</p> <p>OCC outlined at ISH2 that the applicant's commitment in the oOMP to not replace more than 30% of the panels within a single year was not sufficient to address our concerns with regards to the transport impacts associated with largescale maintenance. OCC drafted a Requirement in our response to ExQ2.7.8 [REP4-074] which would satisfy the Councils concerns in this matter:</p> <p>'(1) No more than 30% of solar panels constructed in the central site, northern site, or southern site may be replaced until a panel replacement construction traffic management plan and panel replacement waste management plan in respect of the relevant site has been submitted to and approved by the relevant planning authority, such approval to be in consultation with the relevant highway authority and waste authority.</p> <p>(2) In sub-paragraph (1) –</p> <p>(a) "the central site" means land within the Order limits identified as 'Central Site Area' within Figure 1.1 - Site Location & Order Limits Overview [APP-059] and</p> <p>(b) "the northern site" means land within the Order identified as 'Northern Site Area' within Figure 1.1 - Site Location & Order Limits Overview [APP-059] and (c) "the southern site" means land within the Order identified as 'Southern Site Area' within Figure 1.1 - Site Location & Order Limits Overview [APP-059]'</p> <p>OCC maintain their request that this requirement be added into the dDCO</p>	<p>The Applicant is aligned with this approach and is in discussions with the OHAs in respect of a s278 agreement to facilitate the delivery of the ducting works by OCC on behalf of the Applicant. The Applicant has chased for a first draft of the agreement from OCC on 25 October 2025, 3 November 2025, and 5 November 2025 (where the Applicant also provided its latest plans for inclusion in the agreement). This is awaited but the Applicant is eager to progress discussions with OCC efficaciously too.</p> <p>In the meantime, in recognition of the proposed fallback from the OHAs, the Applicant has secured a commitment to the resurfacing of the roundabout at paragraphs 1.9.7 to 1.9.9 of the CTMP in the outline Code of Construction Practice submitted at Deadline 6 [REP6-028]. This includes a commitment to enter into a highways side agreement pursuant to Article 14 of the draft DCO to facilitate the delivery of the resurfacing works. This is secured under the DCO through Requirement 11 (Code of Construction Practice), specifically Requirement 11(2)(a) construction traffic management plan.</p> <p>The Applicant also updated the outline Operational Management Plan (oMOMP) at Deadline 6 [REP6-032] to ensure that <i>"the panel replacement will not exceed 30% in a single year within any one site area (North, Central, or South)"</i> (our emphasis) – see paragraph 2.3.2 of the oOMP. This amendment was made to address OCC's concern that the earlier commitment was not specific enough to make it clear that the limitation applied to each site area. This is secured under the DCO through Requirement 12 (Operational Management Plan).</p>	Traffic_Transport_and_Access
REP6-117	Oxfordshire Host Authorities	<p>Section 278 agreement</p> <p>The OHA have explained in previous submissions that, before commencement of the authorised development, it is expected that OCC works will have recently been completed on the A40. OCC do not want these to be dug up under DCO powers by the applicant.</p> <p>An agreement under section 278 of the Highways Act 1980 is being negotiated between OCC and the applicant to provide, for the applicant's benefit, for ducting works to take place before the instant order is made. This will help ensure that OCC's A40 works will not have to be dug up.</p> <p>If, for some reason, the agreement falls through, OCC would like the applicant to commit to resurfacing the Eynsham roundabout.</p> <p>OCC understand this commitment will be included in the next version of the CTMP, which is due to be submitted at Deadline 6 (20 October 2025). If necessary, OCC will comment on the drafting of the commitment at Deadline 7 (10 November 2025).</p> <p>Provided the drafting which is to be included in the CTMP is satisfactory, no provision to secure the resurfacing of the Eynsham roundabout, in the circumstances mentioned above, will need to be included in the draft DCO.</p> <p>On the subject of resurfacing, the applicant maintains that resurfacing works following cable laying can be undertaken under article 8 (street works). Nothing in article 8 requires reinstatement works to be carried out to the satisfaction of the street authority. Where a statutory undertaker places utilities into the highway, OCC expects them to comply with the DfT guidance document, Specification for the Reinstatement of Highways (2020). OCC would request that a further amendment is made to the CTMP in which the</p>	<p>See the above response. The Applicant has secured a commitment to the resurfacing of the roundabout as requested by OCC at paragraphs 19.7 to 19.9 of the CTMP in the outline Code of Construction Practice submitted at Deadline 6 [REP6-028]. This includes a commitment to enter into a highways side agreement pursuant to Article 14 of the draft DCO to facilitate the delivery of the resurfacing works. The provisions of that highways side agreement will be discussed and agreed with OCC, which can therefore facilitate the delivery of the works in accordance with the Specification for the Reinstatement of Highways (2020).</p>	Traffic_Transport_and_Access

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		applicant commits to carrying out reinstatement works following any cable laying in accordance with the Specification for the Reinstatement of Highways (2020).		
REP6-117	Oxfordshire Host Authorities	<p>Highways agreements</p> <p>The Botley West Outline Code of Construction Practice [CR2-045] includes the outline construction traffic management plan ("CTMP") which states, in respect of highway side agreements, that highways side agreements made under article 14 of the draft DCO will be entered into with OCC to facilitate certain works. It is essential that these agreements are entered into before commencement of the authorised development and OCC consider the language of paragraphs 1.6.7 and 1.7.3 should be amended to reflect this. Furthermore, OCC has shared its template section 278 agreement with the applicant and is proceeding on the understanding that any side agreement will be based on that template. In the light of this, and for certainty, OCC considers the CTMP should be amended to reflect this. OCC would therefore propose the following amendments to paragraphs 1.6.7 and 1.7.3 of the CTMP (with OCC's proposed additions shown bold and underlined and deletions shown bold and struck-through) –</p> <p><i>"Highways side agreements pursuant to Article 14 of the draft DCO will be entered into with OCC to facilitate the delivery of the access junctions set out within Volume 3, Appendix 12.8 Accesses and highway drawings of the ES. The final form of the highways side agreements will be discussed and agreed with OCC post-consent once the design detail of each of the works is known. The highways side agreements will be entered into before commencement of the authorised development and will be based on OCC's template section 278 agreement"</i>. (Paragraph 1.6.7).</p> <p>...</p> <p><i>"Highways side agreements pursuant to Article 14 of the draft DCO will be entered into with OCC to facilitate the delivery of the above listed off-site highway works (the B4044 Eynsham Road / B4017 Cumnor Road / B4044 Oxford Road mini- roundabout, the B4017 Cumnor Road through Filchampstead, the B4027 / Banbury Road junction and the Burleigh Road / Yarnton Road junction). The final form of the highways side agreements will be discussed and agreed with OCC post-consent once the design detail of each of the works is known. The highways side agreements will be entered into before commencement of the authorised development and will be based on OCC's template section 278 agreement"</i>. (Paragraph 1.7.3).</p> <p>OCC consider these proposed amendments to be uncontroversial and request that the applicant confirms they will be included in the next iteration of the CTMP.</p> <p>If the applicant refuses to make these amendments, OCC will ask the ExA to recommend that article 14 is amended to restrict development on the highways works proposed under the draft DCO until an appropriate side agreement has been entered into. Such an approach is precedent in other DCOs. For example, article 23(3) (agreements with street authorities) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) provides that the undertaker cannot commence certain numbered works until the undertaker has entered into an agreement under article 23 of that order. Similarly, article 16 of the forthcoming Fenwick Solar Farm Order [REP5-004] provides that, before any work under Part 3 (streets) of that order is commenced, the undertaker must enter into <i>"an agreement which is substantially in accordance with the framework highways works agreement between the City of Doncaster Council and the undertaker dated 20 August 2025, or any subsequent replacement agreement as to highways works"</i>.</p>	The Applicant has updated the CTMP at Deadline 7 to incorporate OCC's wording, save that the obligation to enter into the highways side agreement(s) shall apply before the commencement of the relevant highway works to be subject of the highways side agreement(s) and <u>not</u> before the commencement of the wider "authorised development". It is not reasonable or appropriate for the obligation to enter into the highways side agreement(s) to potentially delay any of the other works forming part of the authorised development from commencing, when those works are unrelated to the works that are to be facilitated under the highways side agreement. In other words, for works that fall outside the scope of the highways side agreement(s), these should be able to commence in absence of the highways side agreement(s).	Traffic_Transport_and_Access
REP6-117	Oxfordshire Host Authorities	<p>Inspection fees</p> <p>OCC seeks a further amendment to the CTMP to confirm a point which has been discussed between OCC and the applicant in recent meetings. By section 75(1) of the New Roads and Street Works Act 1991, an undertaker executing street works must pay to the street authority the prescribed fee in respect of each inspection of the works carried out by the authority. For certainty, OCC requests that the application of section 75 is set out in the CTMP.</p>	<p>Article 8(3) of the draft DCO confirms that <i>"Where the undertaker is not the street authority, the provisions of sections 54 (notice of certain works) to 106 (index of defined expressions) of the 1991 Act apply to any street works carried out under paragraph (1)"</i>. In other words, the DCO already incorporates the provisions of section 75 of the New Roads and Street Works Act 1991.</p> <p>In addition, the Applicant has secured a commitment for the Applicant to reimburse the highway authority or street authority (as relevant) for any reasonable and proper costs incurred in determining if any permanent or temporary alterations to streets have been completed to the reasonable satisfaction of the highway authority or street authority (as relevant), in line with costs for similar Section 278 or Section 184 applications made under the Highways Act. This was secured at paragraphs 1.6.7 and 1.7.3 of the CTMP in the outline Code of Construction Practice submitted at Deadline 6 [REP6-028].</p>	Traffic_Transport_and_Access

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REP6-117	Oxfordshire Host Authorities	<p>Major highway works and minor highway works</p> <p>In a meeting with OCC officers on 14 October 2025, the applicant stated they did not want to enter into a highways side agreement for what they consider to be “minor” highway works, which they see as things like field crossings and bell mouths to enter fields.</p> <p>By article 9(3) (power to alter layout, etc., of streets) of the draft DCO [CR2-009] “<i>the undertaker must restore any street that has been temporarily altered under this Order to the reasonable satisfaction of the street authority</i>”. The applicant considers that, to obtain OCC’s consent under article 9(3) for “minor works”, the applicant will seek service of a notice under section 184 (vehicle crossings over footways and verges) of the Highways Act 1980. However, section 184 applies in limited circumstances (“where the occupier of any premises adjoining or having access to a highway maintainable at the public expense habitually takes or permits to be taken a mechanically propelled vehicle across a kerbed footway or a verge in the highway to or from those premises ...”) and so it is not clear how any “minor” highway works which fall within article 9(1) (which concerns works identified in Schedule 5 (alteration of streets)) and which do not fall within section 184 will be controlled.</p> <p>This is because works falling within article 9(1) are not subject to any consent and so, while (per article 9(3)), OCC will, in theory, be able to require restoration works to be carried out to its reasonable satisfaction, the absence of a consenting provision means OCC will not know that the works’ details are satisfactory or whether the way in which the works have been carried out is acceptable. OCC will only be able to comment at the end of the process; however, it will not have been able to comment on two preceding stages (i.e. the design stage and the carrying out stage). OCC considers the most straightforward way of improving this situation is to make the work falling under article 9(1) subject to OCC’s consent. OCC would therefore propose that article 9(4) is amended as follows (amendment bold and underlined) –</p> <p>“The powers conferred by paragraph (1) and (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority”.</p> <p>OCC would also welcome an explanation from the applicant as to which highway works it considers to be “minor” highways works.</p>	<p>The discussions between the Applicant and OCC on 14 October 2025 with regards to ‘major highway works’ and ‘minor highway works’ were intended to clarify when the obligation to enter into a highways side agreements will arise in relation to highway works. However, this appears to have confused matters and so the Applicant has summarised the structure of the consent (and appropriate controls) in detail below, to give comfort to the OHAs.</p> <p>Firstly, Article 9(1) of the draft DCO provides a specific highways power. Namely, it gives consent to carry out specific highways works, that are identified in Schedule 5. The CTMP in the outline Code of Construction Practice [REP6-028] then secures a commitment to enter into a highways side agreement “<i>to facilitate the delivery of the access junctions set out within Volume 3, Appendix 12.8 Accesses and highway drawings of the ES</i>” (para 1.6.7) and “<i>to facilitate the delivery of the above listed off-site highway works (the B4044 Eynsham Road / B4017 Cumnor Road / B4044 Oxford Road mini-roundabout, the B4017 Cumnor Road through Filchampstead, the B4027 / Banbury Road junction and the Burleigh Road / Yarnton Road junction)</i>” (para 1.7.3). This commitment therefore ensures that all works set out in Schedule 5 and consented through Article 9(1) will be subject to an obligation to enter into a highways side agreement. This will primarily be ‘based on OCC’s template section 278 agreement’, however as set out in the CTMP, “<i>The final form of the highways side agreements will be discussed and agreed with OCC post-consent once the design detail of each of the works is known</i>”. This will enable an agreement akin to that of a Section 184 Agreement (licence) of the Highways Act 1980 to be entered into for any of those works which the Applicant and the OHAs to be more ‘minor’, where a s278 agreement is therefore not considered to be appropriate. In any event, the works consented under Article 9(1) will be subject to an agreement with OCC.</p> <p>For completeness, the wording in the CTMP has been amended at Deadline 7 to align with the request of the OHA’s above, confirming that the agreement must be entered before the commencement of such works.</p> <p>Secondly, in addition to the specific power, Article 9(2) provides the Applicant with a general highways power. Whilst broader in nature, this general power is suitably controlled by Article 9(4) which states that “<i>The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority</i>”. This would facilitate the delivery of those unknown works pursuant to the general power, through either a s278 agreement or s184 license (or otherwise) as considered appropriate once the detail of those works is known.</p> <p>In light of the above, the additions to Article 9 of the draft DCO [CR2-009] suggested by OCC are not necessary or reasonable in planning terms because the objectives of those additions are already achieved:</p>	Traffic_Transport_and_Access

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP6-117	Oxfordshire Host Authorities	<p>Section 106 agreement</p> <p>Regarding obligations under section 106 of the Town and Country Planning Act 1990, the OHA have previously explained they consider two obligations are required.</p> <p>The first would secure a fee for the work carried out by the district councils in reviewing BNG monitoring reports prepared by the applicant and undertaking BNG-related site visits. Under the TCPA regime, such a fee is secured by section 106 agreement. (The applicant has stated that the oLEMP sets out how BNG monitoring will be undertaken. It does; however, the oLEMP does not provide for the payment of the fee mentioned above).</p> <p>The second obligation would secure a financial contribution of approximately £300,000 for off-site improvements in respect of public rights of way works. The applicant does not want to enter into a section 106 agreement.</p> <p>The OHA do not consider these payments should be secured by requirement. (Because requirements are the DCO equivalent of planning conditions and planning conditions should not be used to secure financial payments). However, since a DCO is a statutory instrument, and as much a piece of legislation as an Act of Parliament, it can make provision for the payment of a sum of money. (The instant dDCO [CR2-009] does so, for example, in paragraph 5 (fees) of Schedule 16 (procedure for discharge of requirements)). To secure these payments under the dDCO, the OHA consider a new article should be included (after existing article 46 (National Grid substation works) to secure the payment via agreement (which could be entered into under (say) section 1 of the Localism Act 2011 and section 111 of the Local Government Act 1972). To that end, the OHA would suggest the following text –</p> <p>“Financial arrangements for the relevant planning authority and the highway authority</p> <p>(1) The undertaker, the relevant planning authority and the highway authority, (“the parties”) are to agree in writing the financial contribution to be made available by the Applicant for the benefit of the relevant planning authority and the highway authority.</p> <p>(2) The agreement referred to in paragraph (1) is to be made prior to the commencement of the authorised development.</p> <p>(3) The financial contribution referred to in paragraph (1) is to be used for—</p> <p>(a) monitoring by the relevant planning authority of BNG monitoring reports prepared by the undertaker;</p> <p>(b) undertaking by the relevant planning authority of BNG-related site visits; and</p> <p>(c) undertaking off-site improvements to the public right of way network by</p> <p>(4) If agreement is not reached regarding the financial contribution, the parties are to agree that the matter is referred to an agreed independent assessor or arbitrator, or failing agreement to be appointed on the application of any of the parties (after giving notice to the other parties) by the President of the Institution of Civil Engineers (“the President”).</p> <p>(5) The parties are to agree a timetable with, and the provision of papers and documents to, the agreed independent assessor or arbitrator or with the arbitrator appointed by the President.</p> <p>(6) The costs of the consideration of the financial contribution (referred to in paragraph (1)) by the agreed independent assessor or arbitrator, or the arbitrator appointed by the President, is to be paid by the undertaker.</p> <p>(7) The reasonable costs of the relevant planning authority and the highway authority is to be agreed between the parties and paid by the undertaker.</p> <p>(8) The agreed independent assessor or arbitrator or the arbitrator appointed by the President is to prepare a recommendation regarding the appropriate level of the financial contribution referred to in paragraph (1).The recommendation referred to in paragraph</p> <p>(7) is to be submitted to the Secretary of State by the undertaker together with any supporting papers and documents provided to the agreed independent assessor or arbitrator or arbitrator appointed by the President.</p> <p>(9) In relation to the recommendation, the Secretary of State may—</p> <p>(a) approve the recommendation;</p>	<p>(a) Agreement with OCC is required for all of the specific works under Article 9(1) / Schedule 5 through the commitments in paragraphs 1.6.7 and 1.7.3 of the CTMP in the outline Code of Construction Practice [REP6-028]; and</p> <p>(b) The current drafting of the DCO under Article 9(4) ensures consent of the highway authority is also required for any general works under Article 9(2).</p>	
			<p>This response deals with each obligation in turn.</p> <p>BNG Monitoring</p> <p>To be clear – and to confirm the point made at the meeting between the Applicant and OHAs on 14 October 2025 – under the Development Consent Order (DCO) framework, monitoring obligations set out in a management plan approved pursuant to a Requirement are the responsibility of the <u>undertaker</u>, not the relevant planning authority.</p> <p>The outline Landscape and Ecology Management Plan [REP6-034] includes the necessary provisions in relation to BNG monitoring, as the OHAs have acknowledged. For example, paragraph 12.1.2. of the oLEMP confirms that “<i>All monitoring described below will be reported to the relevant planning authority and will include details of any necessary remedial measures or modifications to individual LEMPs</i>”. This wording confirms that the undertaker is responsible for both conducting the monitoring and bearing its associated costs. The role of the relevant planning authority is to receive the monitoring reports and, where necessary, review any proposed updates to the LEMP.</p> <p>The final LEMP must include similar BNG monitoring provisions pursuant to Requirement 6(2) which states that the final LEMP must be substantially in accordance with the oLEMP. Further, Requirement 6(3) confirms that the final LEMP “<i>must be implemented as approved...</i>”. In other words, the burden will be on the undertaker to ensure that the project is implemented in accordance with the approved plan, including the BNG monitoring provisions.</p> <p>Importantly, the DCO fee schedule in Schedule 16 of the draft DCO already provides for the costs associated with any such approvals <u>and</u> re-approvals of the LEMP, as may be required as a result of the implementation of the monitoring obligation. This is because paragraph 5 of Schedule 16 of the DCO [REP6-004] was updated at Deadline 6 to confirm that “<i>Where an application is made to the relevant planning authority for a discharge, a fee is to apply and must be paid to the relevant planning authority for each application...</i>”. This includes the discharge of requirements itself (i.e. the oLEMP/LEMP), but also “<i>Each subsequent application for the discharge...</i>”.</p> <p>This approach differs from that under a Town and Country Planning Act (TCPA) application, where the local authority may be directly responsible for monitoring and where fee schedules are often structured accordingly. It appears that the OHAs’ position may be based on this TCPA model,</p>	Local Ecology and Nature

Examination Library Ref.	Name	Comment	Applicant's Response	Issues										
		<p>(b) refuse the recommendation; or</p> <p>(c) modify the recommendation in such way as the Secretary of State thinks fit".</p> <p>This suggested provision is based on the text included in article 65 of the A122 (Lower Thames Crossing) Development Consent Order 2025 (SI 2025/462).</p>	<p>which is not applicable in the context of a DCO. It is unreasonable and unjustified in a DCO context for the undertaker to be charged fees for any monitoring activities which be effectively carried out at the discretion of the OHAs, when the undertaker is already obligated to carry out and fund the monitoring itself pursuant to the obligations secured under the DCO (a breach of which is a criminal offence pursuant to section 161 of the Planning Act 2008). Any monitoring that the OHA's wish to carry out to ensure compliance with the DCO obligation falls under the ordinary role and responsibility of the relevant planning authority and is not a matter that should be privately funded, as the relevant commitments of the undertaker to deliver the monitoring (including the funding of such monitoring) has already been secured under the DCO. There is therefore no justification for a separate s106 agreement as the performance and funding of the relevant mitigation is already secured under the DCO.</p> <p>The level of fees payable under Schedule 16 – including in relation to re-approvals that may arise as a result of the monitoring provisions – accords with recent solar DCO precedent including the Tillbridge Solar Project Order 2025; the Heckington Fen Solar Park Order 2025; the West Burton Solar Project Order 2025; and the Cottam Solar Project Order 2025. The Applicant sets out a table below with shows the Applicant's approach to securing BNG mitigation:</p> <table><tr><th>Solar DCO</th><th>Additional funding</th></tr><tr><td>Heckington Fen Solar Park</td><td>There was a s106 agreement for the scheme, but no funding for BNG monitoring.</td></tr><tr><td>Oaklands Farm Solar Park</td><td>There was a unilateral undertaking for the scheme, but no contribution in relation to BNG monitoring.</td></tr><tr><td>Byers Gill Solar</td><td>No s106 agreement.</td></tr><tr><td>East Yorkshire Solar Farm</td><td>No s106 agreement.</td></tr></table> <p>It is also notable that the earlier draft DCO – which proposed lower fees to be payable, as it was based on regulation 16(1)(b) of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 – was accepted by the Secretary of State in the East Yorkshire Solar Farm Order 2025. Furthermore, the Stonestreet Green Solar Order 2025 does not include any fee provisions for the discharge of Requirements at all. The Applicant therefore considers that the revised fee schedule which has been included in the final draft DCO represents a precedent-aligned position, appropriately addressing the concerns raised by the local authorities as relevant in the context of this nature and scale of development.</p> <p>Finally, compliance with DCO provisions is governed by Part 8 of the Planning Act 2008. Section 161 explicitly states that “a person commits an offence if, without reasonable excuse, the person... fails to comply with the terms of an order granting development consent.” This</p>	Solar DCO	Additional funding	Heckington Fen Solar Park	There was a s106 agreement for the scheme, but no funding for BNG monitoring.	Oaklands Farm Solar Park	There was a unilateral undertaking for the scheme, but no contribution in relation to BNG monitoring.	Byers Gill Solar	No s106 agreement.	East Yorkshire Solar Farm	No s106 agreement.	
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			<p>applies to all terms of the DCO, including the carrying out of any monitoring obligations pursuant to a Requirement.</p> <p>The Requirements are drafted to ensure that the Applicant must implement the management plans “as approved,” including any monitoring obligations within those approved plans. Therefore, if the Applicant fails to do so, enforcement action is available under the existing legislative framework. It is not necessary for a separate monitoring role to be placed on the OHAs. As such, the inclusion of additional monitoring fees is unnecessary and unsupported by precedent. Notably, none of the above mentioned made solar DCOs include any specific fee provisions for monitoring fees.</p> <p>Off-Site PRoW</p> <p>In terms of the second request, to secure a financial contribution for off-site improvements in respect of public rights of way works, it is not necessary or reasonable for any DCO provision to be incorporated into the DCO to require this as the Applicant is not relying on any offsite PRoW measures in the planning balance.</p> <p>For context, following ongoing engagement with the OHAs, the Applicant's “PRoW offering” can be categorised into two parts:</p> <ol style="list-style-type: none"> (1) Onsite – the measures are relied on as mitigation and are therefore secured: (1) through provisions in the oLEMP secured under Requirement 6, including for new permissive routes and cycleway provision and greenways; and (2) the management of PRoW during construction and decommissioning through the outline PRoW management plan (part of outline Code of Construction Practice secured under Requirement 11); and (2) Offsite – these measures are being considered by the Applicant on a voluntary basis in response to suggestions made by the OHAs but such offsite measures are <u>not</u> being relied on in the planning balance because they are not required to mitigate any effects arising from the Project. Hence, there is no need to secure a commitment to fund these works, and to do so would not be necessary or reasonable and <i>ultra vires</i>. <p>Notwithstanding, the Applicant continues its engagement with the OHAs to discuss an appropriate level of funding to be agreed as part of its wider Community Benefit offering (along with the Community Benefit Fund being offered by the Applicant). The appropriate mechanism to secure both funds – the Community Benefit Fund and any funding for offsite PRoW measures – will be through a Section 111 agreement. This agreement will be a simple contract, with the important point being that the contract states that it is made pursuant to Section 111 of the Local Government Act 1972, which grants local authorities the power to do anything that facilitates or is incidental to the discharge of their functions. A section 106 obligation is not appropriate because this would</p>	

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REP6-117	Oxfordshire Host Authorities	<p>PC004 – New Requirement – Farmland Bird Strategy</p> <p>The OHA agree with the ExA's reasoning for the inclusion of this requirement. In terms of the drafting, if possible at this stage, the OHA consider it would be helpful if a new sub-paragraph was added explaining where the “<i>area in which the compensation measure to be provided</i>” will be located.</p> <p>The OHA are content with the suggestion of the ExA at ISH2 to alter the wording of the draft requirement to refer to a ‘Skylark Strategy’ as opposed to a ‘Farmland Bird Strategy’.</p>	<p>suggest that the funding is to secure mitigation measures, which as explained above is inaccurate. The s111 agreement does not need to be entered into pre-consent, noting that it is not necessary or relevant in planning terms for this to be a planning obligation.</p> <p>The Applicant is in discussions with the OHA's on Heads of Terms with a view to enter the agreement at prior to the DCO application being determined (and conditional on the DCO being made).</p>	
REP6-117	Oxfordshire Host Authorities	<p>PC005 – Article 6</p> <p>The OHA agree with the ExA's reasoning for the deletion of this provision because no agreement has been reached on the applicant's proposed protective provisions. Owing to this, there is no reason to retain in the draft DCO (i) sub-section (a) of article 6 (in relation to s.23 of the Land Drainage Act 1991) and (ii) the protective provisions included at Part 3 (for the protection of drainage authorities) of Schedule 15 (protective provisions) to the draft DCO.</p> <p>In any event, the OHA would prefer to retain the use of the Land Drainage Act (“LDA”) regime, which they are used to and which works. The protective provisions would reduce the time for determining applications from a maximum of 62 days (if an application covered (say) July and August or December and January) to 28 days. The OHA consider such a reduction is unrealistic because that is not the timeframe the relevant team works to. Having said that, applications under s.23 of the LDA are generally dealt with in around a month (the average is around 32 days), though this timeframe does not include any the time taken for any pre-application discussions. Obviously, complex applications can take longer. The LDA process is straightforward for an applicant and works. The OHA will work proactively with any applicant in respect of an application and would emphasise that using the LDA regime does not mean the process cannot be managed in a forward-looking way.</p> <p>The OHA have mentioned in previous submissions that there is an agency agreement in place between OCC and the district councils which allows the district councils to determine applications under the LDA. The agency agreement does not provide for determining applications under the instant Order and so it would have to be reworked to provide for this. The OHA would prefer to avoid this additional administrative step, especially since a satisfactory regime is already in place to determine applications</p>	<p>See the Applicant's Response to the ExA's Schedule of Changes to the dDCO [REP6-051].</p> <p>The Applicant has reached out to the OHA's post-Deadline 6 to clarify the nature of its concerns with the drafting of the protective provisions at Part 3 of Schedule 15. From previous discussions and this Deadline 6 submission, the Applicant understands that the concern is focused on the timescales. If the concern is limited to the timescales only, the Applicant may update the protective provisions to secure an agreeable timeframe to facilitate the disapplication of the LDA 1991. In absence of any such agreement, the Applicant can notify the ExA/SoS post-Examination of any subsequent updates required to the protective provisions. The Applicant accepts that in absence of agreement, sub-section (a) of article 6 (in relation to s.23 of the Land Drainage Act 1991) will need to be deleted from the made Order.</p> <p>The Applicant proposes to retain Part 3 of Schedule 15 in the DCO in any event, as the Applicant's position remains that these provisions are most suitable and standard practice to protect drainage authorities. The provisions included aligns with the recent solar precedent from all recent solar DCOs, where the wording is either the same or very similar in structure and intent. In any event: “<i>The provisions of this Part of this Schedule have effect for the protection of the drainage authority <u>unless otherwise agreed in writing between the undertaker and the drainage authority</u></i>”. This provides flexibility for the protective provisions to fall away if considered appropriate, even if included in the DCO.</p>	Local_Ecology_and_Nature DCO_Process
REP6-117	Oxfordshire Host Authorities	<p>REP5-005 – 15.2 Applicant's Responses to other D4 Submissions and comments on Interested Parties' Responses to ExA's Second Written Questions (ExQ2) Submitted at D4</p> <p>Page 16- OCC outlined at ISH2 that the applicant's commitment in the oOMP to not replace more than 30% of the panels within a single year was not sufficient to address our concerns with regards to the transport impacts associated with largescale maintenance. OCC drafted a Requirement in our response to ExQ2.7.8 [REP4-074] which would satisfy the Councils concerns in this matter:</p>	<p>The Applicant updated the outline Operational Management Plan (oOMP) at Deadline 6 [REP6-032] to ensure that “<i>the panel replacement will not exceed 30% in a single year within any one site area (North, Central, or South)</i>” (our emphasis) – see paragraph 2.3.2 of the oOMP. This amendment was made to address OCC's concern that the earlier commitment was not specific</p>	Project_description_and_Design_parameters

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>'(1) No more than 30% of solar panels constructed in the central site, northern site, or southern site may be replaced until a panel replacement construction traffic management plan and panel replacement waste management plan in respect of the relevant site has been submitted to and approved by the relevant planning authority, such approval to be in consultation with the relevant highway authority and waste authority.</p> <p>(2) In sub-paragraph (1) –</p> <p>(a) "the central site" means land within the Order limits identified as 'Central Site Area' within Figure 1.1 - Site Location & Order Limits Overview [APP-059] and</p> <p>(b) "the northern site" means land within the Order identified as 'Northern Site Area' within Figure 1.1 - Site Location & Order Limits Overview [APP-059] and</p> <p>(c) "the southern site" means land within the Order identified as 'Southern Site Area' within Figure 1.1 - Site Location & Order Limits Overview [APP-059]</p> <p>OCC maintain their request that this requirement be added into the dDCO.</p>	<p>enough to make it clear that the limitation applied to each site area. This is secured under the DCO through Requirement 2 (Operational Management Plan).</p>	
REP6-117	Oxfordshire Host Authorities	<p>REP5-006 – 15.3 Applicant's Responses to comments on ExQ2 - Landscape and Visual Resources Clarification Note</p> <p>At a meeting held on 10 June 2025 the OHA agreed that the guidance listed in para 1.1.3 are industry best practice but did not agree 'to the principle of the LVIA methodology used by the Applicant' as stated in para 1.1.4. The LVIA methodology still appears to be in development, as of October 2025. The Statement of Common Ground mentioned in Para 1.1.5 is still in draft form.</p> <p>With regards to paras 1.2.1 to 1.2.5 covering the assessment of viewpoints, the OHA has provided comments to the Change 2 documents including the LVIA summary in Table 8.22 (Table 8.24 in previous revisions) and the new associated appendices within the Change 2 as well as the Deadline response documents.</p> <p>The OHA accept the Energy National Policy Statements which are referenced in Joint LIR [REP1-072] and agree that nationally significant energy infrastructure projects will have adverse effects on the landscape. However, as covered in Section 7.3 of the Joint LIR, the OHA do not judge that the LVIA or the EIA process has been used to minimise the effects on landscape character and views, by the use of the mitigation hierarchy. This point is also covered in the OHA's design evolution/ iterative design section of the Joint LIR. The subsequent revisions to the LVIA and the DCO have not adequately addressed the OHA concerns.</p> <p>The applicant states in their response to the Relevant Representations [REP1-020] (page 144 and 152) 'For the purposes of the Project, those effects of Moderate adverse or below are considered to be not significant. Taking the proportionality approach to the assessment, it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors.' This points to a design that has not been adequately developed and refined through the iterative process of LVIA, with the objective of reducing levels of effect, where it is possible. The OHA consider there are a very large number of changes that could be made to the design to reduce the number of significant effects and has set these out [REP4-075].</p> <p>The statement illustrates the OHA concerns with regards to the LVIA and its assessment of effects, as raised in the OHA [REP2- 049] response to the Rule 17 letter Issue 2: Assessment of Effects.</p>	<p>Moderate effects</p> <p>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).</p> <p>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.</p> <p>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 [REP6-012].</p> <p>LVIA is not a scientific discipline, it is not formulaic - it deals with perceptual qualities and relies on professional</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>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 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.</p>	
REP6-117	Oxfordshire Host Authorities	<p>Section 1.3 Part 3 – Clarification of the Applicant's Response to the ExA's Second Written Questions for Landscape and Visual Amenity</p> <p>Q2.13.4 With regards to Landscape effects – operation, the applicant states 'The review is being undertaken as part of the wider review to assess the effects of the Applicant's Change Request 2 Notification [REP2-045] and will be submitted at Deadline 5.' The OHA do not consider that this has been adequately addressed in the Change 2 LVIA.</p> <p>Q2.13.7 Hedges - the applicant states that the LEMP has been revised 'The wording in Appendix C of the oLEMP has been revised and submitted as an updated document to clarify that 3 m would be the approximate height that hedgerows will be maintained at, unless there is a requirement from the LPAs to maintain them at a different height (e.g. to protect important views that they may wish to define).' The OHA have not found this revision in the Change 2 LEMP. As covered elsewhere in the OHA Change 2 response and in OHA response to EXQ2 2.94 [REP4-074], the OHA are concerned that the issues relating to the proposed location of the solar arrays and the substation are fundamental and cannot be addressed by the LPAs proposing different hedgerow heights as part of a LEMP once the Works Plans have been agreed.</p> <p>Q2.13.9 The OHA also remain concerned about the impact the proposed mitigation hedgerows will have on the views and the ability of users of the landscape to be able to appreciate the landscape they are within.</p> <p>Q2.13.10 Definition of temporary - the OHA are still concerned how the Change 2 LVIA has addressed temporary impacts within the methodology when considering the magnitude of impact.</p> <p>Q2.12.12 LVIA methodology and assessment of effects - the OHA remain concerned about the methodology and assessment of effects. This is covered in the OHA comments on the Change 2 LVIA and the OHA Response to DL 6.</p> <p>Q2.13.14 Viewpoints – the OHA considers its previous responses relating to the EA as still valid. 55 viewpoints were proposed as part of the EIA scoping and 55 viewpoints are still being used in the EIA. The OHA's comments provided on viewpoints at the scoping and PIER stage did not result in the addition or change of viewpoints to the LVIA. It is also noted the ZTV work that was provided before or as part of the Scoping or PIER stage was based on the solar panels alone, but no other elements such as the transformers and built structures, which are typically higher.</p>	<p>Please refer to the Applicant's response to Point 11 of the ExA's Rule 17 letter (14th October 2025) [REP6-052] which addresses mitigation and hedgerow maintenance.</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP6-117	Oxfordshire Host Authorities	<p>REP5-009 – 15.6 Botley West Bat Technical Note</p> <p>As set out at ISH2 (see ISH2 Written Summary of Oral Submission above), OHA broadly agree with the proposed tiered approach to buffering of hedgerows and woodlands, and request that the specification for Tier A buffers, and their location, is identified on plans that form part of the DCO. This should be informed by the further analysis of bat data required by Natural England in their letter for ISH2.</p> <p>OHA note that the Bat Technical Note describes treatment for buffers alongside hedgerows but not does propose a different treatment for buffers of woodlands, we request clarification as to the intended habitat provision within woodland buffers. OHA request that justification for the buffer widths proposed is provided and suggest consideration of a wider buffer to the woodlands supporting bat roosts, particularly to join Bladon Heath Wood and Burleigh Wood where radio tracking has demonstrated that this area formed part of Bechstein 95% KDE home range.</p>	<p>The location of Tier A buffers is explicitly referenced and described on Figure 8.1 of the oLEMP submitted at Deadline 7.</p> <p>Habitat provision within woodland buffers will be similar to that alongside hedgerows, to be managed to create as many ecotones as possible. Section 8.5.7 of the oLEMP submitted at Deadline 7 has been updated to expand that woodland buffers will be managed to facilitate woodland expansion, where appropriate.</p> <p>Buffer widths were agreed with Natural England, as set out in the SoCG between the Applicant and Natural England [EN010147/APP/11.7/8].</p> <p>There is already an area some 160m wide where Bladon Heath and Burleigh Wood meet that is free of panels that will be managed to ensure connectivity between the woodlands is maintained.</p>	Local_Ecology_and_Nature
REP6-117	Oxfordshire Host Authorities	<p>REP5-026 – 6.3 Environmental Statement Chapter 8 - Landscape and Visual Impact Assessment (Clean) (Rev 2)</p> <p>OHA note this document is superseded by [CR2-021] Environmental Statement Chapter 8 - Landscape and Visual Impact Assessment (CR2) (Clean) (Rev 3). Further comments on LVIA are also made in the OHA's response to the Change 2 Request.</p> <p>Although additional paragraphs, sections and additional appendices have been added to the LVIA, these do not satisfactory address OHA's concerns about how the site has been assessed, the quality of the LVIA and how it has informed the selection and iterative approach to the design of the site area, in order to reduce effects (See [REP1-072] OHA Joint Local Impact Report).</p> <p>There have been very limited changes in the assessment outcomes, and the OHA are still concerned that the LVIA seriously underplays the scale of the effects of the development on landscape character and views, especially with regard to the expected Magnitude of impact, and therefore the significance of the effect. These issues were raised in the OHA Joint Local Impact Report [REP1-072]. While the amended LVIA [CR2-022] has added paras 8.5.17 and 8.5.19 to address the duration and reversibility of effects, the LVIA methodology is still not clear how these effects are weighted with regards to size, scale and geographical extent, which also inform the Magnitude judgement within the impact assessment. The LVIA reports most of the Magnitude judgements as Low (leading to effects being considered not significant), or when a Medium magnitude is given, it is not judged to result in the expected Moderate to Major level of significance as per Table 8.22. This point is further covered in the OHA General observations on CR2. There is a considerable amount of inconsistency in the information provided in the revised LVIA [CR2-022].</p>	<p>Please refer to the Applicant's response to the ExA's Rule 17 letter (14th October 2025) [REP6-052] which addresses many of these issues raised]. An updated landscape chapter was also submitted at Deadline 6 [REP6-012].</p> <p>However, the Applicant also summarises how these concerns have been addressed as part of the Examination process.</p> <p>Moderate Effects</p> <p>Dealing with Moderate Effects in more detail, the Applicant sets out how the Applicant's approach in line with the Landscape Institute's guidance on the matter in paragraphs 1.1.9 and 1.1.10 of Applicant's Response to Rule 17 Letter (17th June 2025) on Environmental Statement Landscape and Visual Impact Assessment [REP2-029].</p> <p>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.</p> <p>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 first responded in [REP2-029] providing the justification and finding that on review some moderate effects were significant (see Tables 1.1 and 1.2 of that response document). 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</p>	Landscape_and_Visual_Impacts

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distinction has been rectified in Chapter 8 (Rev 4) submitted at Deadline 6 [REP6-012].

[REP6-117](#)

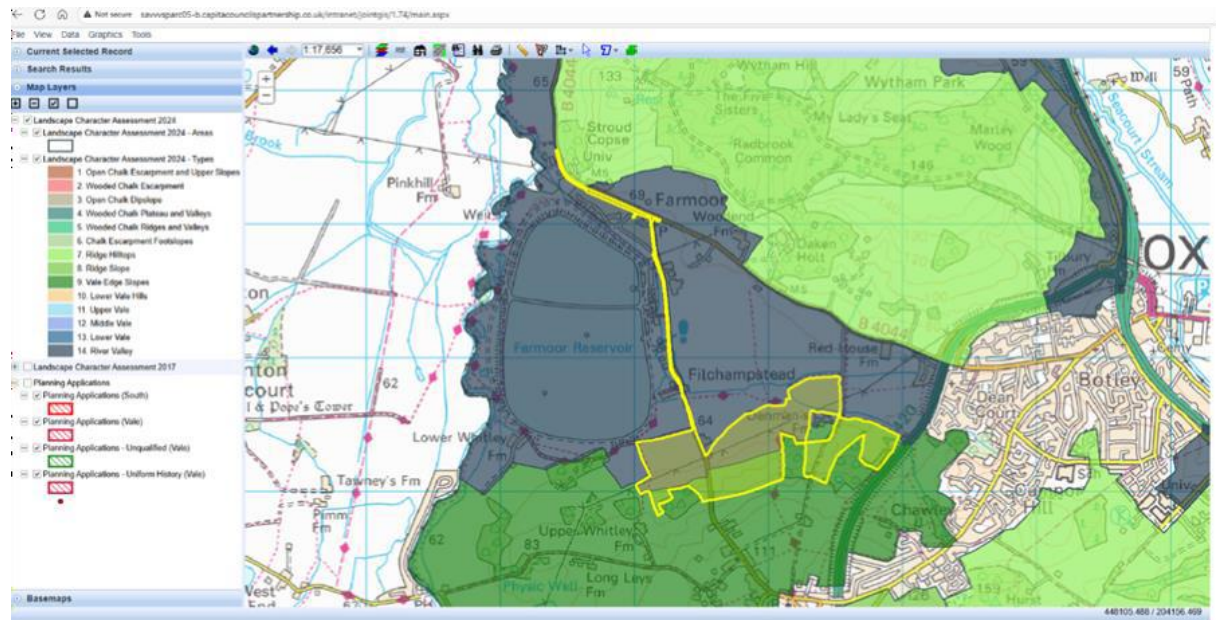
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Landscape Character

The main text of the LVIA has been updated and now references the Vale of White Horse and South Oxfordshire District Council Joint Landscape Character Assessment 2024, para 8.6.50 to 8.6.52. However, these changes have not been taken through the report as apparent in paras 8.9.48 and 8.9.55 where the old LCAs are referenced.

For example, the referencing of VoWH Landscape Character Areas (LCA) in the LVIA is not very clear. It is assumed that references are predominately based on the Landscape Character Type rather than the much more detailed LCA information. For example, the VOWH Landscape Character Assessment description of the 14A Farmoor Reservoir Valley LCA contains no reference to the River Thames or the Chiltern Way as neither are these are located close to or within the 14A LCA, however, these are mentioned in paras 8.6.51 and 8.6.52 of the revised LVIA. The LCA Joint Landscape Character Assessment contains information about Key characteristics, Description, Valued qualities, Forces for change and Landscape strategies and guidelines but none of these are referenced in the [CR2-022] 6.3 version of the LVIA. However, it is noted that 8.6.53 does correctly reference the South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment, which states that both the Northern Vale Edge Slopes LCT and River Valley LCT have 'high' landscape sensitivity to large scale solar energy development.

The associated ES - Figure 8.246 Local Landscape Character Areas and APP-143 6.5 ES – Appendix 8.1 Landscape Character in [APP-070] have not been updated to reflect the reference to the Vale of White Horse and South Oxfordshire District Council Joint Landscape Character Assessment 2024, and the Landscape Character Areas (LCA) present in the Southern Section of the site. If these plans were updated, it would illustrate that the text within the LVIA is inaccurate with regard to where the LCA boundaries fall in association to the scheme. The 9G Northern Vale Edge Slopes LCA boundary is located approximately 130m to the south of the overhead lines and the 14A Farmoor Reservoir Valley LCA is located to the north of the 9G Northern Vale Edge Slopes LCA. Approximately half the southern solar area is in the 14A Farmoor Reservoir Valley LCA, including the locations for the site for the NG substation.



The inaccuracy of the information added to the LVIA with regards to the Landscape Character is a concern with regards to the assessment of the landscape character of the site. A new appendix, [REP5-031] Appendix 8.5 Landscape Character Assessment has been submitted, but it seems to confuse Landscape Character Types (LCT) and Landscape Character Areas (LCA). For example, the detail within the Vale of White Horse and South Oxfordshire District Council Joint Landscape Character Assessment 2024 is predominately focused on Landscape Character Areas. Appendix 8.5 [REP5-031] assesses that the Northern Vale Edge Slopes LCT 9G (should be referenced as LCA) has a high-medium sensitivity to the project but does not correctly identify that half the site including the substation is located within the

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 Applicant's approach is explained in more detail in Applicant's Response to ExA's Rule 17 (14 Oct 2025) [REP6-052] (see the response to point 10).

Moderate effects

The Applicant's response in respect of significance of effects is set out in the above row.

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Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		Farmoor Reservoir Lower Valley LCA 14A. The OHA still query the levels of significance with regards to landscape character outlined in para. 8.14.4, in which it states that there would be a Minor to Moderate adverse (not significant) significance of effect upon those landscape character areas as a whole, within which the Project is located. At a local level, landscape characterising effects of the Project site, within a small part of the LCA(s) are considered Moderate adverse (not significant). This point is also covered in OHA's comments on the magnitude.		
REP6-117	Oxfordshire Host Authorities	<p>Design Approach in Respect of Landscape and Visual Matters</p> <p>The OHA are concerned about the text within this new section (paras 8.8.7ff). While the majority of the principles in the section are acceptable, the OHA cannot see how the LVIA has followed these principles. It is also queried if these have been written bespoke to the site, as they are very general and have been added retrospectively to the LVIA being undertaken. For example, para 8.8.10 states: <i>'Temporary construction compound will be located near the Site entrance of the proposed BESS area, which is well contained from views from the outside. The compound area will be reinstated and reseeded following the completion of construction works and the removal of all temporary Structures.'</i> However, there is no BESS proposed as part of this project, and the three proposed construction compounds are not all well screened, but will be highly visible in views, especially the Southern Compound area, which is proposed on an open slope with a gradient greater than 1 in 10. The construction compound areas are also proposed for the inclusion of solar arrays during the operation period.</p> <p>In para 8.8.9, it refers to 'in line with all biodiversity objectives listed in Section 10 below', however, there is no Section 10 in the LVIA.</p>	Please refer to the Applicant's Response to Point 11 and 13 of the ExAs Rule 17 Letter (14 th October 2025) [REP6-052] which provides further clarification on the matter of design objectives within the LVIA (Point 13) and the mitigation hierarchy and design (Point 11) more generally. That draft response signposts where the mitigation relied upon is secured.	Landscape_and_Visual_Impacts
REP6-117	Oxfordshire Host Authorities	<p>Significance</p> <p>The LVIA states in para. 8.5.30: <i>'Where the landscape or visual impact has been classified as Major and Major to Moderate this is considered to be equivalent to a significant effect. Moderate effects may or may not be significant, depending on the particular circumstances arising and professional judgement. In this instance justification has been provided in the receptor assessment.'</i></p> <p>However, Table 8.22: Summary of potential environmental effects, mitigation and monitoring, does not include a column listing whether moderate significances are classed as significant or not. It is therefore hard to follow the summary of effects, and the reader is left not knowing what should be classed as significant. It is noted that there are numerous discrepancies between the table and the assessments contained in the LVIA appendices, and that it is not clear which judgement are considered to be the correct ones.</p> <p>It is noted that 'The Definitions of Significance of Effects Matrix' has been removed from the LVIA. This was previously presented at table 8.13 of the LVIA. It is not clear why this has been done.</p>	<p>Table 8.22 of Chapter 8 - Landscape and Visual Impact Assessment (Rev 4) has been updated to include details of significant effects [REP6-012].</p> <p>The descriptions in Table 8.13 'Definitions of Significance of Effects Matrix' only appeared to reflect on a magnitude of impact, not combining both of the categories. The sensitivity and magnitude, which have to be combined for the significance criteria, are very different categories, and which are defined by combining specific criteria. In order to form a judgement regarding the overall significance of effects, this determination requires the application of professional judgement and experience to take on board the many different variables which need to be considered, and which are given different weight according to site-specific, development-specific and location-specific considerations in every instance.</p>	Landscape_and_Visual_Impacts
REP6-117	Oxfordshire Host Authorities	<p>RVAA and buffer zones</p> <p>Appendix 1 of the Joint LIR [REP1-072], set out the OHA concerns about the methodology that led to the assumption that the RVAA was not required. With regards to the updated LVIA version 6.3 [CR2-022] the approach has not changed. Regarding Private Views para 8.6.132 states: "While there is no legal "right to a view", the viewpoints from private properties have been considered in the design of the Project, and a range of mitigation measures (including a minimum 25 m offset from the outer edges of residential properties) have been proposed to soften viewpoints that will ensure the Project is appropriately responds and is respectful to the surrounding landscape."</p> <p>The LVIA scopes out the assessment of private views from residential properties and the need for an RVAA on the basis: "Due to the low level of the Project, particularly the solar arrays, and proposed mitigation, there is no potential for any private views to be adversely affected to an extent that would result in a level of harm of Substantial, which trigger the threshold for an RVAA being required. As such, private views are not considered further in this Chapter". (Para 8.6.134)</p> <p>Within the amended LVIA, there is still very limited mention of residential properties and private views and additional detail about the impact of the scheme on residential receptors has not been provided. There has been no change in the approach to RVAA.</p> <p>Private views are covered in paragraph 8.6.132. This paragraph refers to a 25m offset being used, but does not list how this distance was determined, and which private views have been looked at when setting this offset. It does not explain why this offset was considered appropriate for all locations, especially where solar panels are located on slopes above properties, such as the Southern Section of the scheme</p>	The Applicant submitted a Residential Visual Amenity Assessment (RVAA) [REP6-064] and [REP6-065] at Deadline 6. This document has been updated and re-submitted at Deadline 7. See also the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025) also submitted at Deadline 7.	Landscape_and_Visual_Impacts

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		<p>or adjacent to Shipton Slade Farm. There are many properties across the site where panels are proposed in multiple directions, surrounding the property on several sides, or on slopes above it, where effects could be considered to be overwhelming/overbearing, resulting in effects on residential visual amenity which tip beyond the Residential Visual Amenity Threshold (RVAT) set out in the Landscape Institute guidance. Goose Eye Farm is an example.</p> <p>In Table 8.15: Description of Views from Representative Viewpoints, Viewpoints 46 and 47 are the only viewpoints that list residents as part of the receptors. Denman's Farm and Jumpers Farm are referenced in paragraph 8.11.38 with regards to the cumulative assessment but not elsewhere. Similarly, residential views from closer areas of settlements such as Cassington, Begbroke and individual farmsteads have not been assessed.</p> <p>Using the Southern Section of the site as an example, the [AS-043] Ben Prior submission indicates the views towards the solar panels and substation that are available from the residential properties to the east of the B4017 Tumbledown Hill just north of Cumnor Village. There is limited information with regards to the impact of the scheme on these properties, including east of Tumbledown Hill around Jumpers Farm, and the properties of Filchampstead, Lower Whitley Road, which sit south of the Substation, as these are not mentioned in the LVIA.</p>		
REP6-117	Oxfordshire Host Authorities	<p>Mitigation</p> <p>The LVIA does not adequately address concerns previously expressed with regards to design mitigation and the impact of hedgerows, both during operation and decommissioning. The OHA does not feel that there is enough information in the LVIA and the wider application to inform mitigation measures that are characteristic to their location, and to be able to assess the impact of the proposed hedgerows on the effect of views, including from the public rights of ways.</p> <p>With views being an important characteristic element of the local landscape, the loss of views will also impact the landscape character of an area. The LIR [REP1-072] and OHA Responses to Examining Authority's Second Written Questions (ExQ2) Q2.13.8 [REP4-074] cover the OHA response with regards to mitigation and hedgerows.</p> <p>The standard proposed height of 3m is well above head height and will change the availability of open views across the landscape and does not reflect a bespoke approach.</p> <p>All the landscape mitigation proposals need to be more nuanced in terms of their design. For example, hedgerows might not be the most appropriate approach in all locations, but the use of woodland blocks or woodland belts might be more in keeping with the local character. Where hedgerows are used a more differentiated approach should be adopted. For example, hedgerows should be planned so that they sweep further away from paths in places, to create a series of spaces which are less oppressively enclosed, and which enhance the character of the journey along them; they could have gaps to allow open views across the countryside; different types and categories of hedge could be proposed. Essentially, landscape proposals need to be carefully designed, implemented and maintained to establish a robust landscape framework, which can help soften and integrate development. It is not simply a case of seeking to block views, as this would be inappropriate and out of character.</p> <p>The design of the hedgerow locations and maintained heights should go hand in hand with the design of the areas in which solar panels are proposed. It is not an issue that can be covered retrospectively once the Operational Development Areas have been agreed.</p> <p>OHA also note that there are still unresolved issues with regards to bats and hedgerows, and the location and height of hedgerows needed for bat mitigation will have not been assessed as part of the LVIA work and fed into the site design. There are also unresolved issues with regards to drainage and newt mitigation which are also proposed within these hedge corridors. Again, these issues should not be left to the development of the Outline Layout and Design Principles after the DCO has been granted, as the Operational areas of the Solar panels will have been consented.</p>	Please refer to the Applicant's response to Point 11 of the ExA's Rule 17 letter (14 th October 2025) [REP6-052] which addresses mitigation and hedgerow maintenance.	Landscape_and_Visual_Impacts
REP6-117	Oxfordshire Host Authorities	<p>REP5-031 – 6.5 Environmental Statement Appendix 8.5 Landscape Character Assessment</p> <p>References to this document are also included in the OHA response to REP5-026 (above).</p> <p>This is a separate document on landscape character, and the updates and findings appear not to have been carried through to the LVIA. The document provides an update on the landscape character information and assessment, but it is difficult to follow as it neither includes a map nor are the locations and sources given for the different landscape character areas quoted in the text, i.e. which District LCA they are quoted from. In addition, the terminology of landscape character types (LCT) and landscape character areas (LCA) is confused in many places.</p>	Please refer to the Applicant's Response to Point 10 of the ExAs Rule 17 Letter (14 th October 2025) [REP6-052] which provides further clarification on the approach taken and with regard to the magnitude of effect.	Landscape_and_Visual_Impacts

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		<p>It also remains difficult to get a sense of what the key characteristics for different parts of the site are and how they have informed the location and design of the development.</p> <p>The document assesses the magnitude of impact mostly as low or negligible resulting non-significant effects, which remains difficult to understand considering the extent, scale and nature of the development in this rural landscape. The assessment gives limited recognition to the vast scale of the development, and the contribution the lost agricultural land uses make to the landscape character. At the same time there is an overreliance in the assessment on the existing boundary vegetation and new hedgerow planting, and their effectiveness in mitigating impacts on landscape character and views.</p>		
REP6-117	Oxfordshire Host Authorities	<p>REP5-037 – 6.5 Environmental Statement Appendix 8.6: Public Rights of Way and Recreational Routes Assessment</p> <p>Impacts on PRoWs are also covered in the OHA response on the applicant's latest revision on the LVIA [REP5-026] (above).</p> <p>This is a new separate assessment. It very broadly considers the effects of construction, then deals with the long-term operational effects on a series of routes. Viewpoints are referenced, but there is no reference made to accompanying maps showing the routes and viewpoints, or ZTVs, which would be useful. It would then be clearer which PRoW have been assessed and which have not.</p> <p>Construction effects are covered only very broadly (paras 1.1 - 1.2.5), only mentioning construction compounds in relating to residential amenity and a high-level consideration of cabling.</p> <p>For each route, the assessment provides a short description of the route, although it does not give a flavour of the views available from the route and how the landscape is currently and will be experienced after development. The description reads as if it was not based on field work. The applicant should be asked to confirm what field work was undertaken to inform the work, which directions the PRoW was walked in, the time of year, whether vegetation was in leaf etc. Elements of the baseline information in the different PRoW appear to have been added to the LVIA, but details regarding the assessment don't seem to have been carried over into the LVIA.</p> <p>Essentially, the fact that the magnitude of change to views along the length of the route will alter is recognised – i.e. it will vary from negligible through to high. The assessment then seeks to make an 'overall' judgement, which seems to leave aside what would be the significant effects from certain sections, having the effect of diluting the inevitable significant effects from certain sections. The proposed new hedgerows are described as having a beneficial effect (enhancement), although the assessment does not seem to recognise that they will block views, resulting in adverse effect in that respect.</p> <p>The 'vast scale of the landscape' is referenced as a mitigating factor, but the assessment does not give a flavour of the vast scale of development proposed and seen within the wider landscape, as it speaks mainly about changes in fields next to the PRoWs – i.e. the more immediate and close proximity changes.</p> <p>Some limited significant visual effects are predicted, which seems to suggest a general misunderstanding of the way in which people appreciate and use the PRoW network, ie going out for a day or an hour or so to enjoy a scenic walk along the local PRoW network, and the views available across the landscape from that network. It seems likely that there would be a much greater number of significant effects than are reported in this assessment.</p>	<p>Field work was undertaken in winter 2023/2024 and summer 2024 to capture the 55 Representative Viewpoints. During these site visits, visits prior to and subsequent to these dates, public rights of way throughout the Project site and within the wider 5km study area were walked in each direction in order to gain an understanding of the local landscape. These site visits helped inform the LVIA [REP6-012].</p>	Landscape_and_Visual_Impacts
REP6-117	Oxfordshire Host Authorities	<p>REP5-045 – 7.6.3 Outline Landscape and Ecology Management Plan (Clean) (Rev 4)</p> <p>This document is superseded by [CR2-051] – 7.6.3 Botley West Outline Landscape and Ecology Management Plan Rev 5 (Clean) and the OHA response to the latest changes to this document can be found in our separate Deadline 6 Response to Change Request 2.</p> <p>With reference to Rev 4 OHA consider that a more integrated approach to monitoring is needed with regard to BNG (currently based on habitat condition assessments) and species (currently reliance on protected species licensing requirements only) – protected species licensing is only usually secured for 2 years but the solar farm should be monitored for the full lifetime of the project. BNG monitoring should be for lifetime of solar farm (42 years as commented previously), but this should be carried out in conjunction with species monitoring – habitat suitability and condition will have a knock-on impact on use by</p>	<p>As set out in section 13.1.1 of the oLEMP [REP6-034], monitoring is proposed in Years 1, 2, 4, 6 and 10 followed by every 5 years of the lifetime of the Project. As set out in section 12.1.2 of the oLEMP, all monitoring will be reported to the relevant planning authority and will include details of any remedial measures considered necessary, based on the findings of the monitoring. The monitoring methods are set out in section 12 of the oLEMP.</p> <p>The Bat Technical Note [REP6-044] includes details of monitoring as it relates to bats at sections 4.18 to 4.25.</p>	Local_Ecology_and_Nature

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		<p>associated species, e.g. hedgerows for bats and dormice, nesting birds, etc.</p> <p>Monitoring methodologies and timings must be confirmed as part of the LEMPs submitted for each phase of the development to provide full details of monitoring and remediation measures that could be implemented where necessary. The oLEMP appears to only refer back to the requirements in the DCO. Section 17 of the oLEMP covers management reviews and actions, with reference to the production of monitoring reports and any subsequent changes to the management plan. However, it doesn't stipulate where these monitoring reports will be made available and who will be involved in agreeing or approving them. Will they be submitted to the OHAs for approval before any changes are implemented? The Bat Technical Note by Sylva does not cover monitoring – no recommendations for this have been included. A consistent approach is needed in order to be able to compare the baseline with future assessments. Static detector monitoring for bats is a good way forward, but there should also be some transect surveys and/or additional static detectors deployed within the solar arrays to monitor activity to provide a complete picture of the ongoing use of the site by foraging and commuting bats, and the functional link with known bat roosts.</p> <p>Issue with decommissioning previously raised – monitoring will be important in terms of establishing what is present on site and the impact of the removal of the solar farm during the decommissioning phase due to likely impacts on species. It is assumed that the site would be reverted back to a form of agricultural use that would not detract from the biodiversity value that has been achieved.</p> <p>Otters and water voles – we understood that surveys to establish a baseline are underway for the watercourse units for BNG, but it would also make sense for baseline otter and water vole surveys to be carried out, so that monitoring also encompasses these protected species in relation to the proposed enhancements to the watercourse and floodplain meadows. It is understood that the outline Code of Construction Practice now includes a requirement for otter and water vole surveys prior to construction; but in the absence of data at application stage, these surveys should provide the basis for ongoing monitoring – the oLEMP therefore should be updated to include these species. We advocate for the oLEMP to include mink control within the scheme boundaries (and ideally beyond) during the lifetime of the project, as it is known to be one of the main factors in the dramatic decline of this species. A scheme of this scale which incorporates significant lengths of watercourse provides an opportunity to manage the mink population in a strategic manner and therefore benefit the local water vole population.</p> <p>Invertebrates – monitoring in the oLEMP only refers to insect hotels (or hives). These are generally considered to be urban type features that are installed in parks and gardens to create habitat for invertebrates rather than a more natural approach should be implemented at the solar farm. Perhaps deadwood piles and beetle banks or other similar features would be more appropriate (as well as management of habitats).</p> <p>Skylarks - The oLEMP only focusses on skylark plots and does not cover the management of grassland areas for skylarks (as foraging habitat). This should be amended to ensure that the ongoing management of the grassland areas within the solar farm incorporates measures to increase the availability of invertebrate prey through other means rather than artificially creating plots of bare ground. Management principles should be sufficient to deliver this rather than having to deliberately create skylark plots at all of the locations specified on the plans. This would be easier to monitor in the long term.</p> <p>Landscape and visual concerns with regard to the OLEMP are also covered in the OHA's response to [REP5-006] (above) and the revised LVIA [REP5-026] (above). Landscape and visual concerns predominately relate to the use and management of hedges, including the hedgerow height, as mitigation.</p> <p>The OHA consider that the mitigation proposals need to be more nuanced in terms of their design. For example, hedgerows might not be the most appropriate approach in all locations, and where hedgerows are used a more differentiated approach might be required.</p> <p>As already mentioned above the OHA are concerned that the issues relating to the proposed location of the solar arrays and the substation are fundamental and cannot be addressed by the LPAs proposing different hedgerow heights as part of a LEMP once the Works Plans have been agreed.</p>	<p>This includes the provision of static monitoring within solar arrays.</p> <p>Agreed re the importance of monitoring pre decommissioning.</p> <p>No formal surveys were undertaken for otter and water vole during the watercourse BNG surveys but no signs of these species were noted within the order limits other than otter on the Evenlode, as previously found. Although the Applicant does not agree that, at this stage, since all their habitats are protected, monitoring for otter/water vole should be required, an additional section (12.1.3) has been added to the oLEMP submitted at Deadline 7 to allow for the monitoring to be expanded to cover other species/habitats, should pre-commencement surveys highlight that such monitoring would be required.</p> <p>Mink monitoring has been included within section 12.14 of the oLEMP submitted at Deadline 7.</p> <p>The invertebrate monitoring procedure has been updated in the oLEMP submitted at Deadline 7 to include monitoring of deadwood piles as well as insect hotels.</p> <p>The oLEMP was updated at Deadline 6 to provide further details of how grassland will be managed for skylark (in particular at section 11.1).</p> <p>Mitigate</p> <p>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.</p> <p>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 [REP6-034].</p>	
REP6-117	Oxfordshire Host Authorities	<p>REP5-048 – Figure 20.1 - Cumulative Developments - West Oxfordshire (Rev 1)</p> <p>There are three proposals included on the cumulative developments – West Oxfordshire map where the status has changed. One additional approval has been granted for a solar farm and BESS within the parish of Curbridge since the cumulative developments list was compiled.</p>	<p>It is noted that the status has changed for three applications identified on Figure 20.1;</p> <ul style="list-style-type: none"> University Farm Solar (23/00760/SCREEN) – development was included in the updated Chapter 20 - Cumulative Effects and Inter-relationships submitted at D6 [REP5-022]. It is a non-EIA development and 	Cumulative_Impacts

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Cumulative Developments Reference	Updated Planning Reference	Description	Status
23/00760/SCREEN	24/01565/FUL	Installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage	Approved Subject to S106
23/00770/SCREEN	25/00234/FUL	Installation of a ground mounted solar PV, energy storage system	Application Refused
22/01330/OUT	24/00795/RES	Reserved matters application detailing layout, scale, appearance and landscaping for the construction of 150 new homes,	Approved
N/a	24/03278/FUL	Construction and operation of a ground-mounted solar farm with battery energy storage system (BESS)	Approved

REP5-049 – Figure 20.2 - Cumulative Developments - Cherwell (Rev 1)

CDC would like to draw attention to the submission of application 25/02190/HYBRID for up to 9,000 dwellings and including an area of solar PV of circa 9.1ha at Heyford Park on 09 September 2025. In addition, the New Towns Taskforce: Report to Government published on 28 September 2025 recommends Heyford Park as a New Town location for up to 13,000 homes.

REP5-050 – Figure 20.3 - Cumulative Developments - Vale of White Horse and OCC (Rev 1)

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

- sited 8km from Botley West. The scale of proposed development and distance from Botley West have not required topic specific assessment of cumulative effects assessment (CEA).
- Ramsden Solar Farm (23/00770/SCREEN) is a smaller scheme than University Farm and further away from Botley West at 9.5km. The Applicant notes that the subsequent application was refused. The development was included in the updated Chapter 20 - Cumulative Effects and Inter-relationships submitted at D6 **[REP5-022]**, however was not scoped into any topic specific cumulative effects assessment for the same reasons as University Farm. It is noted that the application for this site has been refused although it is possible the Applicant may appeal.
- Land north of Witney Road, Long Hanborough (22/01330/OUT) for 150 dwellings – this site was also assessed, and on submission of Reserved Matters the proposal remains in Tier 1 of the CEA. This was not scoped into any topic specific CEA for the following reasons.
 - The cumulative development is outwith the defined study area for a given topic (scale and/or distance)
 - Landscape – discounted from the CEA as the ZTV(s) (Figures 8.7 to 8.11 **[APP-082 to APP-085]**) demonstrate limited or no potential intervisibility with any part of the Project and cumulative scheme(s)
- Land (E) 431186 (N) 208772 Witney Road Brize Norton Oxfordshire (24/03278/FUL) – this development is located approximately 11km west of the Botley West Solar Farm development and covers an area of approximately 46ha. It is unlikely that this development, together with the BWSF project, would result cumulative impacts during the construction or operation phase.

Figure 20.2 – The Applicant notes this comment, the recent date of the application and its status. The submission of this application comes after the submission of Botley West and it is for the Applicant of this development to present assessment of CEA and whether Botley West would add cumulatively to the overall effects. For Botley West, this proposed development is located beyond the Zones of Influence of topic chapters. Significant cumulative effects are not anticipated to occur.

Figure 20.3 – The Applicant notes this comment.

REP6-118	Oxfordshire Host Authorities	Response to Issue Specific Hearing 2 Action Point 16 - Clarification note on solar installation reduction	The Applicant has submitted a without prejudice offer in the Applicant's Response to the ExA's Rule 17 Letter (14 th October 2025) [REP6-052, Point 9] which proposes areas of removal for solar installation in accordance with some of the suggestions made by the OHAs. It explains the reasoning for these specific areas, along with application of	Landscape_and_Visual_Impacts
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Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>the policy test(s) to achieve a balance between landscape benefit and function of the development. This without prejudice offer is also supported by the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025), submitted at Deadline 7.</p> <p>Additionally, it should be noted that solar panels have been removed from field 1.13 in the updated Works Plans submitted at Deadline 6, near to Samsons Farm (following continued engagement with Historic England in respect of the Scheduled Monument), as also shown on the updated Landscape, Ecology and Amenities Plan [EN010147 APP 7.3.3_Rev 4] submitted at Deadline 7.</p>	
REP6-119	Oxfordshire Host Authorities	<p>Change Request 2 does not address concerns that the OHA have previously expressed in the LIR [REP1-072] and the Responses to Examining Authority's Second Written Questions (ExQ2) [REP4-074], especially 2.13.11, and the associated Responses to Examining Authority's Second Written Questions (ExQ2), Appendix 1 - Landscape and Heritage Omission Maps [REP4-075].</p> <p>The Change Request 2 does not address ExQ2 2.9.4 [REP4-074] which covers why the OHA considers that the scheme is not satisfactory, based on the limited information in the LVIA on approach to the design or mitigation.</p> <p>The OHA would expect to see an appraisal of the relative landscape/visual/residential visual amenity sensitivities of the different parts of the site, and for this to inform the design. Panels should be removed from the more sensitive areas and focused across areas of lower sensitivity, where there are fewer open views across the landscape, where the landscape character is more ordinary, where key features would not be masked, key views blocked, or effects upon residential visual amenity considered overwhelming etc. Once the design is the very best that it can be (avoiding sensitive areas, being compact, logical, using areas that are naturally more screened etc), it is then important to apply further mitigation measures, such as proposed planting.</p> <p>More fundamentally though, the design embedded mitigation, achieved through changes to the layout and positioning of panels, would have been very different, and a more sympathetic scheme could have been developed. This could still be a sizable project, but would be concentrated on the less sensitive areas, away from villages and individual hamlets or farms, and away from the visible steeper slopes and elevated land where the development would be far more widely seen, leading to a reduction in unacceptable levels of adverse effects.</p> <p>There is also a considerable amount of inconsistency in the information provided in 6.3 LVIA [CR2-022]. Below are some of the examples where information is not consistent. Other examples are listed in the OHA Deadline 6 response. The number of inconsistencies within the LVIA makes it difficult to follow the assessment of the proposed development.</p>	<p>Please refer to the Applicant's response to Point 11 of the ExA's Rule 17 letter (14th October 2025) [REP6-052] which addresses mitigation and hedgerow maintenance.</p> <p>A more detailed response is also provided in the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025), including an explanation as to how the design of the Project has already been embedded into the Works Plans to ensure that landscape effects are suitably avoided or mitigated through the implementation of appropriate buffers.</p> <p>The Applicant also submitted a Residential Visual Amenity Assessment (RVAA) [REP6-064] and [REP6-065]. This document has been updated at Deadline 7.</p>	Landscape_and_Visual_Impacts
REP6-119	Oxfordshire Host Authorities	<p>Appendix 8.7 Representative Viewpoint Assessment [REP5-038]</p> <p>OHA remain concerned about the assessment. In many places, the term Low is used to describe the Magnitude, but the OHA would be expect a least a Medium Magnitude, such as in the Southern Area Viewpoints 45, 46, 47, 48, 51, 52 and 53. Even where a Medium Magnitude is recorded with a High Sensitivity of receptor, using the Table 8.12 Assessment Matrix, it would be expected that a Moderate to Major level of effect would be recorded. However, in many places this is not the case, such as for Viewpoint 49; a Moderate adverse level of effect, that is not considered significant, is recorded. There are numerous examples in Appendix 8.7, under Operation and Maintenance Phase Effects, where a Medium Magnitude is reported, with a High Sensitivity of receptor, where a Moderate level of effect, which is not considered by the applicant to be significant, rather than a Moderate to Major level of effect is recorded (which would be considered significant). Other examples, in the Northern Site include Viewpoints 5b, 5c, 10, 11 and 13.</p> <p>There are inconsistencies between the levels of effect set out in the new Appendix 8.7 and how they are recorded in Table 8.22: Summary of potential environmental effects, mitigation and monitoring.</p> <p>For example, the assessment for Viewpoint 48 during Construction is recorded in Para 1.2.51 as Medium Magnitude of change resulting in a temporary Moderate adverse level of effect which is considered significant. During Occupation (para 1.3.98) Year 1 reports a High Magnitude, resulting in a Major adverse level of effect, which would be considered significant. At summer Year 15 (para 1.3.99), a Medium-High Magnitude of effect is reported, resulting in a Moderate/Major adverse level of effect, which is considered significant.</p> <p>This however is recorded differently in Table 8.22: Summary of potential environmental effects. In the</p>	<p>The Applicant notes this response. A response to the points raised is dealt with the various responses above, by reference to the responses to the Rule 17 Requests and updated landscape assessments submitted into the Examination.</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>Table, Viewpoint 48 has a Medium Magnitude of effect for both Construction and a Low Magnitude of effect for Operation, giving a Moderate level of effect at Year 1 and a Minor level of effect at year 15 for both Construction and Operation.</p> <p>There are similar issues with lack of consistency of judgements for the Northern Site. The viewpoints above are used as examples of the issues that are apparent with regard to Appendix 8.7 and Table 8.22. The OHA welcome the reduction in Order Limits and removal of solar arrays (in part of heritage and in part for the airport), but the changes do not go in any way far enough to reflect the areas suggested for removal by ICOMOS and the OHA, for landscape, visual, residential visual amenity, and heritage reasons. It is the OHA's position that taking on board these changes, to remove panels from areas of highest landscape, visual and residential vial amenity sensitivity, is fundamental mitigation for the project.</p>		
REP6-119	Oxfordshire Host Authorities	<p>Changes to the Project (16.1 Cover Letter)</p> <p>1. Reduction in Order Limits boundary to reduce the solar installation area southwest of Bladon, and removal of solar arrays on land east of Bladon and north of Heath Lane.</p> <p>The OHA welcome the removal. Although the proposed reduction in solar panel installation would go some way to mitigating the impact of development on sensitive receptors to the south of Bladon and north of Heath Lane, the OHA consider that there will still be residual effects arising from the proposed development where panels and associated infrastructure remain in the Central Area, particularly in proximity to Ancient Woodland and Public Rights of Way. The setting of Blenheim Palace WHS is not clearly defined. Please see the OHA's Written Summary of Oral Submission for ISH2 for the OHA's latest position on the setting and the Outstanding Universal Value of the World Heritage Site</p> <p>2. Reduction in Order Limits boundary to reduce the solar installation area near to Oxford Airport. CDC welcomes the removal of panels from the parcels to the south of London-Oxford Airport. The removal of panels from these areas overcomes our objection regarding the coalescence of Kidlington and Begbroke and the loss of some areas of Grade 2 BMV agricultural land. CDC observes that the removal of panels from areas within the Oxford Green Belt is an additional improvement which will ensure that the areas omitted will continue to serve the purposes of the Green Belt. This is particularly beneficial for the parcel to the east of the A44 where the loss of GB would be more harmful due to the role this area plays in preventing the sprawl of Kidlington and the coalescence of settlements and in preserving the setting of the GB. Our concerns in this regard were set out in Cherwell's individual LIR [REP01-052] with reference to the Cherwell Green Belt Study: Additional Green Belt Site Assessments 2023 which was attached to the individual LIR as Appendix 2.</p> <p>Change 2 also appears to CDC to be significantly beneficial to public safety by retaining a larger safeguarded zone immediately south of London-Oxford Airport which would allow safer crash landings in the event of engine failure after take-off. Whether the extent of panels removed in this location is adequate will need to be confirmed by the airport operator, but CDC consider this to be a substantial improvement.</p> <p>Furthermore, CDC supports the removal of panels from the areas to the north and west of Begbroke village which would substantially reduce harmful visual impacts for residents and would better preserve the settings of Begbroke Conservation Area and its listed buildings.</p> <p>Re-siting of Secondary Substation:</p> <p>CDC has no objection to the re-positioning of the secondary substation adjacent to the A44 from the southern side of the field boundary to the northern side of the boundary or to the reduction in its height from up to 6m to a maximum of 5m. It is noted that the secondary substation would otherwise remain the same as originally proposed. The re-siting would bring the structure into closer proximity with an existing range of farm buildings next the road and therefore make it a less isolated feature than in the previous position. This is considered to be a moderate improvement. Again, subject to confirmation from the airport operator, the new location would appear to be an enhancement in terms of public safety. Proposals for its screening with landscape planting should be clarified and require approval prior to implementation.</p> <p>Position of Temporary Construction Compound:</p> <p>CDC has no objection to the re-orientation of the temporary construction compound (by rotating it roughly 90 degrees) and, subject to confirmation from the airport operator, it appears that this will improve public safety by retaining a safe zone to the south of the airport runway. It is assumed that the access to this compound would remain largely the same as for the original compound and that the DCO would continue to require the decommissioning/removal of the compound along with any screening and landscaping enhancements deemed necessary.</p>	<p>The Applicants response is as follows:</p> <ol style="list-style-type: none"> 1. The OHA's support for the removal of panels near Bladon is welcome. The Applicant has seen no expert support to increase buffers around ancient woodland. The minimum 15m buffers to ancient woodland have been set according to Natural England and government guidance. As such, these are considered appropriate to protect the woodland itself. Any effects upon rights of way have been avoided or minimised in accordance with the application of the mitigation hierarchy. If additional buffers are necessary due to the requirements for greater offsets to protect bats, then these will be incorporated. The Applicant also refers to Historic England's Deadline 6 submission [REP6-092], which confirms that the placement of Solar PV panels would not harm the contribution that any land within the Order Limits makes to the attributes that convey the Outstanding Universal Value (OUV) of the Blenheim Palace World Heritage Site (WHS). That Deadline 6 submission also confirms that no solar PV panels or associated infrastructure would be visible in views from within the WHS. This is important in light of Historic England's role as key statutory consultee in respect of the historic environment. 2. The OHA's support for removal of panels near London Oxford Airport is welcomed, as is removal of their objection on coalescence/Green Belt, safety, heritage and BMV grounds. The Applicant also welcomes their support to the re-siting of the secondary substation, and construction compound. 3. The Applicant note the OHA's concerns regarding the new siting of the Main and Secondary substation on the Southern site. The Applicant accepts that some residual landscape and visual effects will remain, but landscaping around the margins will help offset any adverse effects. This is supported by the Environmental Statement Addendum [CR2-071]. <p>The siting of this infrastructure has been fully considered in the Applicant's CR2 submission. The Applicant can confirm that a minimum 5 m buffer is maintained.</p> <p>Mitigation planting is secured through Work No. 8 and Work No. 6, as shown on the Works Plans.</p> <p>Access to the substations from the road is secured through Work No. 9, and access within the field is</p>	Project_description_and_Design_parameters

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>3. Refinement of Project layout and design to reposition the Main Project substation and secondary substation as shown on Sheet 13b of the Works Plans [AS-005].</p> <p>VWHDC consider the revised location of the main substation and additional solar panels will have a detrimental impact on the landscape.</p> <p>It is noted that limited space has been allowed to mitigate the substation buildings and associated plant. There needs to be a minimum 5m offset between boundary fencing and adjacent vegetation, so space to provide mitigation planting would be limited. Mitigation planting areas need to be illustrated on the Works Plan, as do other easement routes which could prevent mitigation planting.</p> <p>Furthermore, the Works Plan [CR2-005] does not indicate access routes to the substation sites.</p> <p>4. Reduction in Order Limits boundary to reduce the solar installation on land east of Lower Road. The OHA welcome the removal.</p> <p>5. Refinement of Project layout and design to remove solar installation areas overlapping with Flood Zones 2 and 3.</p> <p>As established through discussion at the Issues Specific Hearing 2, held 8 October, further clarification is required for those additional panels proposed for the southern site area, as it appears from figure 1.1 Appendix 2: Hydrology and Flood Risk Technical Note 2 [CR2-071] these additional panels will be located within flood zone 2.</p> <p>6. Refinement of Project layout and design to include an additional solar installation area within the Southern Site.</p> <p>VWHDC consider additional solar panels in this location will have a detrimental impact on the landscape. The addition of more panels runs counter to repeated requests for a reduction in scale of this proposed development. It also does not allow for improved mitigation (planting to help provide a landscape framework).</p> <p>7. Reduction in Order Limits boundary to remove small parcels of land owned by Oxfordshire County Council (Estates).</p> <p>CDC has no objections to the minor reductions to the red line site area to the north-east of Perdiswell Farm and west of Upper Campsfield Road.</p> <p>OCC welcomes the reduction of the Order Limits to remove OCC Estate's land.</p> <p>8. Refinement of Project layout and design to reposition the Public Rights of Way proposed to be stopped up and diverted back to definitive alignment.</p> <p>The OHA note that there has not been a wider review and sense check of the development areas to minimise impacts, as previously raised such as small areas of solar panels adjacent to footpaths routes. This is covered in the OHA Joint Local Impact Report [REP1-072] including paragraphs 7.3.81 to 7.3.86. CDC have no objections to the proposals to reinstate the line of the footpath along the definitive right of way between Begbroke and Bladon.</p> <p>In principle OCC support the use of the definitive map for plotting Rights of Way within the order limits and recognise that the applicant is attempting to alleviate OCCs concerns around doglegs within the PRow network.</p> <p>However, OCC is concerned that unrecorded public rights may subsist on the non-definitive (walked) lines that are in use on the ground if they have been used 'as of right' by the public for 20 years or more without challenge. This may result in a situation whereby the walked route on the ground is added to the Definitive Map following a successful claim for public rights, resulting in two routes running parallel to each other, the legal line and the walked route.</p> <p>This may cause the applicant to unintentionally put panels across routes in use on the ground on which currently unrecorded public rights exist. If these are subsequently claimed as PRow and added to the Definitive Map, the legal line would then be obstructed. OCC would oppose any development obstructing the PRow.</p> <p>OCC believes that the simplest solution is as outlined in response to question 1.17.20 at ExQ1 [REP2-049] in so far as the applicant should divert sections of the legal line that do not align with the walked route as originally proposed but expand the order limits to prevent dog legs in the PRow.</p> <p>9. Reduction in Order Limits boundary to remove an area of land along Wharf Road.</p> <p>WODC support this change.</p>	<p>secured through Work No. 6, , as shown on the Works Plans..</p> <p>The access drawing for Gate 8 from the B4017 / Cumnor Road is included in [APP-206] Appendix 12.8 – Accesses and Highway Drawings Part 1 of 4.</p> <p>4. The Applicant welcomes the OHA's support for the removal of panels east of Lower Road.</p> <p>5. See the Applicant's response to Q15 in the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025), submitted at Deadline 7.</p> <p>6. In respect of landscape impact arising from the proposed additional solar arrays on the Southern Site is concerned, the Applicant already is proposing additional hedge/tree screening along its northern boundary. It is considered this is sufficient to avoid or minimise any adverse effects arising from this change. This is supported by the Environmental Statement Addendum [CR2-071].</p> <p>7. The Applicant welcomes support for this change.</p> <p>8. The Applicant welcomes support for the repositioning and diversions proposed by the Applicant which were proposed by OCC as a result of discussions with the authority. In the event that a claim is made to assert rights over non-definitive (walked) routes on the ground, the Applicant is able to rely on its powers sought under Article 11(7). Namely, "<i>The undertaker, during and for the purposes of carrying out the authorised development, may temporarily close, prohibit the use of, restrict the use of, alter or divert any public right of way within the Order limits which is added to the definitive map and statement (within the meaning of the Wildlife and Countryside Act 1981) on or after 15 November 2024</i>". The reason and justification for this power is set out in the Explanatory Memorandum but, in short, it is included to address the exact scenario identified by the OHAs.</p> <p>9. The Applicant welcomes support for this change.</p> <p>10. The Applicant welcomes support for this clarification.</p> <p>11. No new ZTVs have been submitted to reflect this minor increase in height of the NGET substation because – as confirmed by the ES Addendum [CR2-071] – "<i>A significant visual effect has already been identified on a reasonable worst case basis within the LVIA, Representative Viewpoint 50, as a result of views to the NGET substation. An increase in the maximum height, to 15 m, would not materially affect this conclusion</i>". In other words, the existing photomontages remain sufficiently indicative when considered against the assumed likely significant effect on a reasonable worst-case basis. Therefore, the change to the parameter figure falls within the scope of the initial environmental assessment, such that it is not necessary to prepare a full suite of new indicative documents showing the 15m maximum height. This height is secured in the Outline Layout & Design Principles [REP6-038].</p>	

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>10. Clarification of the role of the community educational facility. OHA welcome the clarification on this element of the proposed development.</p> <p>11. Refinement of Project layout and design to secure the latest design parameters for the new National Grid substation. The location of the NGET substation will have a detrimental impact on the landscape and views, and VWHDC is disappointed heights are increasing again, beyond that assessed in the Environmental Statement. It is noted the changes to the size and height of the proposed NGET substation are not recorded in a change to the description of the scheme between the original LVIA [APP-045] and the Change 2 LVIA [CR2-022]. VWHDC has consistently been concerned that the actual design of the NGET substation is not informed by an assessment of its impacts and the size and parameters set aside for it are only getting bigger. VWHDC therefore repeats its request for a rerun of the ZTV and visualisation work to reflect the change in dimensions and locations, taking account additional viewpoints previously requested. It is not clear in the LVIA, the size of the built form that has been used in the ZTV and LVIA assessment, as there are no dimensions except height in Table 8.17 Maximum design scenario considered for the assessment of potential impacts. There are no revised ZTVs submitted to support the application to test the changes, due to the increased height and changes in width and length of the NG substation buildings. The ZTV work is based on the NGET substation height of 12.5m, not 15m as now proposed, and this is just for the built elements; it does not include associated plant and the connection to the pylon.</p>		
REP6-119	Oxfordshire Host Authorities	<p>CR2-009 – 3.1 Draft Development Consent Order (Clean) (Rev 7) OHA is concerned with the wording of Part 6, Article 38 of the DCO which allows hedges and trees to be removed. The OHA raised concerns around the powers of Article 38 in the Local Impact Report [REP1-072] that have yet to be satisfactorily addressed. Given the applicants proposed bat mitigation strategy, the wording of this section will need to be revised to ensure that those hedgerows/trees that are part of the bat corridor mitigation are retained/protected. The best way to ensure this, is to ensure that Local Authority consent is required for the removal, cutting back or lopping of any hedge or tree not covered within Schedule 12 of the dDCO.</p> <p>OHA consider the Design Principles Document [REP1-014] does not adequately reference all design parameters set out in ES Chapter 6 Project Description [APP-043]. Other Infrastructure Parameters (Fence heights, CCTV and lighting) specified in table 6.4 of Chapter 6 are not referenced and these are required in relation to Requirements 5 and 8.</p>	<p>To confirm, Article 37 of the latest draft DCO deals with the "Felling or lopping of trees and removal of hedgerows" (it was previously numbered Article 38).</p> <p>The Applicant notes that Article 37(6) of the DCO already secures that: <i>"the undertaker may not pursuant to paragraphs (1) and (5) fell or lop a tree or remove hedgerows within the extent of the publicly maintainable highway without the prior written consent of the highway authority, and the highway authority may attach reasonable conditions to any such consent."</i> (Our emphasis).</p> <p>Sub-paragraph (1) provides the general power to fell or lop any part of the authorised development or cut back its roots; whilst sub-paragraph (5) provides the specific power for the removal of hedgerows specified in Schedule 12.</p> <p>In either case, where such removals are within the publicly maintainable highway, the DCO therefore already appropriately secures the need for highway authority consent. The Applicant therefore considers that the OHA's concern is already secured in the existing DCO drafting. This has strong precedent, for example recently in the Tillbridge Solar Order 2025. Where tree or hedgerow removal is proposed in private land, there is no justification for highway approval to be required as it is a matter for the property agreements with the landowner. The exercise of any such powers will also be subject to any other controls in the DCO Requirements, for example the outline Landscape and Ecology Management Plan secured under Requirement 11.</p> <p>To confirm, the Applicant updated the Outline Layout and Design Principles at Deadline 6 [REP6-038] to capture additional parameters from ES Chapter 6 Project Description [APP-043] in relation to fencing, CCTV and lighting. See section 1.3 (Other Infrastructure) of the Outline Layout and Design Principles, which breaks down the parameters</p>	DCO_Process

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			secured in relation to each of 'Fencing', 'CCTV' and 'Lighting'.	
REP6-119	Oxfordshire Host Authorities	CR2-011 – 3.3 Explanatory Memorandum (Clean) (Rev 7) OHA remain concerned about the lack of fixed detail with regards to proposed Mitigation. Para 1.5.12 states Any illustrative development layouts have been submitted to provide illustrative examples of the different design layouts that have been considered for the Project that could be built out within the "consent envelope". This is a very open statement with regards to the amount of Design to be finalised after the DCO is granted.	<p>The Applicant's approach to showing illustrative design detail during Examination is standard, noting that detailed design will be finalised post-consent. This is secured through Requirement 5 of the draft DCO which ensures that final design must 'accord with' with the Outline Layout and Design Principles, which secures the appropriate parameters of design. This final design will be subject to the approval of the relevant planning authority and so sufficient control is retained by the relevant planning authority prior to the commencement of the Project.</p> <p>All of the other Requirements in Schedule 2 of the draft DCO also ensure that outline mitigation measures are secured pre-consent, with final details of those mitigation measures to be determined post-consent but pre-commencement, and with those measures to be 'substantially in accordance with' those outline measures.</p> <p>Therefore, design detail is appropriately fixed to the extent the final design must be at least substantially in accordance with the outline measures in the various management plans and must accord with the parameters in the Outline Layout & Design Principles.</p> <p>The Applicant also re-iterates that various mitigation measures were embedded into Project design and have secured through the natural limitations of the Works Plans. For example, the Works Plans secure clear areas of archaeological protection and avoid areas identified as requiring buffer zones for LVIA reasons (see Appendix B of the RVAA [REP6-065] and the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025) for more explanation here). The DCO will only provide consent for the works powers (set out in Schedule 1 of the DCO) in the areas where the corresponding numbered works are shown on the Works Plans. The avoidance of certain powers in certain areas is the clearest form of the application of the mitigation hierarchy.</p> <p>This approach is essential to balance the security of mitigation measures with the necessary flexibility for the Project to have certainty of delivery post-consent.</p>	DCO_Process
REP6-119	Oxfordshire Host Authorities	CR2-032 – 6.4 Environmental Statement Figure 8.248 to 8.371 Photomontages (Winter and Summer) (Rev 2) This document does not indicate that there has been any change in the Photomontages to reflect the changes in the height and massing of the NGET Substation.	<p>The wireline shown on the photomontage for Representative Viewpoint 50 was based on the assumed maximum height provided by National Grid at the time of submission of the DCO Application.</p> <p>The maximum height has since increased, hence its inclusion as part of Change Request 2. No new ZTVs have been submitted to reflect this minor increase in height of the NGET substation because – as confirmed by the ES Addendum [CR2-071] – "A significant visual effect has already been identified on a reasonable worst case basis within the LVIA, Representative Viewpoint 50, as a result of views to the NGET substation. An increase in the maximum height, to 15 m, would not materially affect this conclusion".</p> <p>In other words, the existing photomontages remain sufficiently indicative when considered against the</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>assumed likely significant effect on a reasonable worst case basis. Therefore, the change to the parameter figure falls within the scope of the initial environmental assessment, such that it is not necessary to prepare a full suite of new indicative documents showing the 15m maximum height. This height is secured in the Outline Layout & Design Principles [REP6-038].</p> <p>For completeness, details such as platform levels, land-modelling (e.g. cut and fill balance), and soft landscape mitigation will be finalised as part of detailed design – where the relevant planning authority will have a right of approval pursuant to Requirements 5 of the draft DCO – noting that any final design must accord with the maximum parameters set out in the Outline Layout & Design principles [REP6-038] (including the maximum 15m height).</p>	
REP6-119	Oxfordshire Host Authorities	CR2-040 – 6.5 Environmental Statement Appendix 9.13 Biodiversity Net Gain Statement (Clean) (Rev 1) There is a new hedgerow proposed on the Nget In - Post Development Habitats Plan Fig 1.7 Rev 01 running through the solar arrays north of Deadmans Farm which is not on the Illustrative Masterplan Figure 2.3 Plan [CR2-025] or space allowed for this hedgerow on the Works Plans Sheet 13b of 13 [CR2-005]. This hedgerow is also not present on the 7.3.3 Landscape, Ecology and Amenities Plan Rev 3 plan [CR2-043].	The hedgerow has been included on the revised Rev 4 7.3.3 Landscape, Ecology and Amenities Plan submitted at Deadline 7.	Local_Ecology_and_Nature
REP6-119	Oxfordshire Host Authorities	<p>CR2-042 – 7.3.2 - Operational Development Areas Plan (Rev 2) Sheet 13 of 13 Rev 2 does not key where the Project Main Substation is on the plan.</p> <p>CR2-043 – 7.3.3 - Landscape, Ecology and Amenities Plan (Rev 3) It is noted there are areas proposed where footpaths do not have any mitigation treatment, such as either side of the Oxford Green Belt Way 184/15/30.</p> <p>CR2-044 – 7.3.4 - Temporary Facilities Plan (Rev 2) There is no indication of how the level change will be incorporated into the Southern Site compound, much of which is greater than a 1 in 10 slope.</p>	<p>7.3.2 - Operational Development Areas Plan. Noted - The plans are updated for Deadline 7.</p> <p>7.3.3 - Landscape, Ecology and Amenities Plan. It is noted that parts of the Oxfordshire Greenbelt Way (PRoW 184/15/30) are outwith the Project Order Limits and therefore it is not possible to have mitigation either side of this PRoW for its entire length. The Landscape, Ecology and Amenities Plan has been updated and submitted at Deadline 7 (Rev 4). Within the southern section of the Project, proposed mitigation includes reinforced hedgerow planting and tree planting to the northern boundary of the Projects' southern section. There is proposed hedgerow planting to the west of PRoW 184/15/30 as it continues south, adjacent to Fields 3.8 and 3.9. Hedgerow reinforcement and tree planting to the southern boundary of Field 3.8 will help to minimise the effects of the Project from the Oxfordshire Greenbelt Way further to the south.</p> <p>7.3.4 - Temporary Facilities Plan. The plan doesn't show the elevation profile. Indication of how it will be incorporated in the southern construction compound will be assessed at the detail design stage.</p>	Project_description_and_Design_parameters
REP6-119	Oxfordshire Host Authorities	CR2-045 – 7.6.1 Botley West Outline Code of Construction Practice (Clean) Part 1 (Rev 4) OHA maintain that construction hours should be limited to 07.30H-18.00H Monday to Friday, 07.30H-12.30H on Saturdays and no time on Sundays, Bank and Public Holidays. As detailed in our response to ISH2 Action Point 21, a longer quiet period at the weekend would be preferred to a slightly shorter construction period due to many residents benefitting more from peacefulness during this time than during the working week. OHA welcome confirmation to engage with Thames Water for construction and excavation works within 200m of the Farmoor Reservoir embankments.	<p>In response to Action Point No. 20 arising at Issue Specific Hearing 2, the Applicant confirmed that a reduction in working hours from 07:00-19:00 to 07:00-13:00 on Saturdays would result in an additional 9.45 weeks added to the Construction Programme [REP6-047]. The revised requested, as set out in REP6-119, for the programme to be 07:30-18:00 on Monday to Friday and 07:30-12:00 on Saturday would result in an additional 27.37 weeks to the Construction programme.</p> <p>The Applicant cannot agree to the revised request as this would have a substantial additional impact on the construction programme and risk efficient delivery of the</p>	Construction_period_and_methods

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>critical national priority infrastructure. Whilst the scope of the environmental assessment has been carried out on a reasonable worst-case basis (07:00 to 19:00 Monday to Saturday), a substantial increase of 27.37 weeks to the programme may alter the impacts to be expected if the works are to be experienced over a longer duration.</p> <p>Therefore, to ensure certainty of delivery in accordance with the connection agreement and for consistency with the scope of the environmental assessment, the Applicant cannot accept the revised programme of working hours in [REP6-047].</p>	

2.3 Non-Statutory Consultees

Table 2.2: Applicant's Responses to Representations provided at Deadline 6 – Non-Statutory Consultees

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP6-068	Begbroke and Yarnton Green Belt Campaign (BYG)	<p>It is an uncomfortable truth that the only entity that has remained steadfastly consistent in its approach to the impact of development on the OUV of Blenheim Palace is ICOMOS International. Their consistency has created some alarm amongst other stakeholders.</p> <p>1.1 The Blenheim Trustees hold responsibility for safeguarding the WHS. As is well known, they prepared the Blenheim Palace World Heritage Site Revised Management Plan 2017. This includes the important Setting Study in Appendix III. The Study underlines the high importance of the wider setting to the OUV of the WHS. It is neatly summarised in paragraph 5.07 as shown below.</p> <p>1.2 This paragraph contrasts very strongly with what is now proposed by the Trustees. It is followed by the map shown below highlighting some of the features of the landscape considered to be important. Since the text on the map is difficult to read, even on the copy on the Blenheim website, BYG has added explanatory notes below.</p> <p>1.3 In paragraph 4.15 of Appendix III, the Study highlighted the potential risks from large scale development and included "Large-scale renewable energy generation schemes such as solar farms or tall wind turbines". This is precisely the risk that has now materialised.</p> <p>1.4 The foregoing summary provides the context for the views now being expressed by ICOMOS International. It indicates why they are so concerned by what is being proposed.</p> <p>2.1 A letter written by the Blenheim Trustees in 2016 is attached to our submission REP5-063. It argued that the presence of Green Belt land provided the protection needed for the OUV of the WHS; in consequence, no protective buffer zone was required. Yet it is this Green Belt land which the Trustees now propose to industrialise with the BWSF solar development.</p> <p>2.2 The conclusions of their own Management Plan described above are potentially inconvenient for the Trustees. They would be able to raise significant funds from the BWSF project for the family members who benefit from the wider estate. The somewhat convoluted document they commissioned from tor&co (REP5-063) really adds nothing sensible to the debate and could be interpreted as an attempt to move the goal posts on behalf of the Trustees.</p> <p>3.1 The position taken to date by Historic England (HE) is very difficult to understand. In their D5 submission (REP5-098) they included the following statement.</p> <p>3.2 It really is not clear why this statement was made. The meaning of the wider setting of the Blenheim WHS is well understood. It is even a term used by Historic England themselves in their submission REP1 026 (07/02/24) when describing Blenheim Estate land outside the park itself. Yet to date the approach taken by HE with BWSF has been to limit their focus to the small parcels of land abutting the curtilage of the WHS, and only to deal with specific heritage sites within the larger Blenheim Estate area.</p> <p>3.3 As shown previously, the Central Site is largely the area considered in the 2017 Blenheim Management Plan to be the rural landscape that contributes to the OUV of the WHS. No view has explicitly been expressed by HE regarding the general impact on the OUV that would arise from the effective industrialisation of this Central Site by the BWSF project.</p> <p>3.4 On the contrary, in paragraph 6.34 of the report by tor&co commissioned by Blenheim Estate, the following information is provided. 3.5 HE made this statement as though the industrialisation of the remainder of the central part of the WHS's wider setting has no relevance to its OUV. This view is simply not consistent with the concerns raised in the 2017 Management Plan.</p> <p>3.6 It is also of interest that tor&co expressed frustration in their following paragraph 6.35 that HE had previously informed Blenheim that the removal of the panels would "be sufficient to avoid any harm to the contribution made by the rural landscape to the significance of the WHS and to maintenance of its attributes of OUV"; i.e. with the previously qualifying word 'potential' removed.</p> <p>3.7 This is an extraordinary conclusion, completely at odds with the Setting Study in the 2017 Management Plan. The indication is that HE has previously been excessively accommodating towards Blenheim during early discussions of the BWSF project.</p> <p>3.8 On the other hand, ICOMOS International has correctly and consistently maintained their more comprehensive approach to setting. It is BYG's view that considerable weight should be attached to their conclusions.</p>	<p>The Applicant notes the comments from BYG regarding the setting of the Blenheim Palace WHS. In their Deadline 6 response [REP6-068], BYG refer to Figure 5 in Appendix I of the 2017 Revised WHS Management Plan and provide some commentary (paragraph 1.2) with regard to land identified on this figure as '<i>areas containing some intervisibility with the World Heritage Site</i>', and '<i>Woodlands and plantations contributing to the setting of the World Heritage Site</i>'. This first of these refers to land within the view cone extending south-east from the palace towards the tower of the Church of St Martin, Begbroke (this is the principal design alignment for the buildings and landscape within the WHS). The Applicant has ensured that no part of the proposed development would be visible in outward views from the WHS and within this view cone. This position has been agreed with Historic England in their Deadline 6 response [REP6-092]. With regard to the '<i>Woodlands and plantations contributing to the setting of the World Heritage Site</i>', the Applicant would point out that no woodland (including plantations) would be removed for the construction and operation of the proposed development.</p> <p>The Applicant has worked closely with Historic England to avoid or minimise any harm to the OUV of the WHS and would refer BYG to Historic England's submission at Deadline 6 on this matter [REP6-092]. The Applicant would also refer the OHA to the position of ICOMOS-UK as set out in their Relevant Representation [RR-0413]. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the OUV of the UK World Heritage Sites and their settings is one of their key objectives. ICOMOS-UK state that '<i>the proposed Botley West solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map 'Character of Setting of WHS' on page 50 of Appendix III of the Management Plan</i>' (emphasis added).</p>	Historic_Environm ent
REP6-069	Begbroke and Yarnton Green	<p>Deadline 6, BYG: ADDENDUM, to BYG D6 Comment on tor&co's D5 representation on behalf of BE (REP5-063)</p> <p>Following submission of our D6 Comment on tor&co's D5 representation a further, relevant, document was posted on 2 October on the Cherwell DC planning portal. It deals with the application by Blenheim Estates</p>	<p>The Applicant notes these comments from BYG regarding the planning application for residential development on land South of Perdiswell Farm. The cumulative effects of residential development at Woodstock, along with the proposed</p>	Historic_Environm ent

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
	Belt Campaign (BYG)	for housing on land to the South of Perdiswell Farm (25/0150/OUT). 1.The document is a letter dated 17 September from the Director of UNESCO to the Ambassador, Permanent Delegate of the UK to UNESCO. It deals with this planning application and also makes specific reference to BWSF. 2.The letter is attached for convenience. In it, UNESCO confirms its agreement with Historic England's view that the planning application contains "insufficient information" and asks for further assessments to be undertaken. 3.It also references the ICOMOS Technical Review of February 2024 and its relevance to the application and indicates that the cumulative impacts of developments around Blenheim, including BWSF, need to be assessed. 4.Our understanding of this letter is that it seeks that decisions on all development proposals around the WHS be delayed until there is a better understanding of their impact. The level of seniority at which it was written – and received - emphasises the global significance of the WHS. 5.As we conclude in our original representation on this matter (receipt ref. 37741), the work undertaken by tor&co on this planning application for housing has been seriously criticised by the relevant authorities on the issue. By extension, tor&co would appear not to have the relevant expertise to comment authoritatively on the impact of BWSF.	development, are addressed in ES Appendix 7.4 Heritage Impact Assessment (Rev 1) [CR2-036].	
REP6-070	Begbroke and Yarnton Green Belt Campaign (BYG)	Begbroke and Yarnton Green Belt Campaign (BYG) Deadline 6, BYG: Comments on the Applicant's response to BYG's D4 submissions The following statements made by the Applicant in its response to our D4 submissions (REP5-005 pages 34-37) require further comment. 1."All information on Cranssseta Investments Ltd. is publicly available and can be obtained from pen sources or relevant databases. Such information transparently shows all financial statements of the company. The Applicant strongly denies any irregularity in the origin of funds or any of its business operations". If such information in respect of Cranssseta Investments is publicly available, then - given that the company is currently the source of all funding for the project - it is extraordinary that these financial statements have not been submitted to the ExA. It is notable that the official Cypriot company website appears to show that no financial statements have been filed since 2022. 2. "Julia Lejeune and Yulia Lezhen are two forms of the same name and both are commonly used". We will merely observe that, as far as we can determine, Ms Lezhen has only used the name Lejeune once, and that was when making the original SolarFive Limited filing at Companies House. In all the other European companies that BYG has found it is always Lezhen. These companies include Cranssseta Investments (Cyprus), Mulledmont (Ireland), PVDP (Germany), JBG Power (Germany), Nordian Acquisition (Netherlands), Terasol Energy (Netherlands). Furthermore, when referring earlier to the name Lezhen in REP3-064 page 11, the Applicant confirmed their explanation that "The spelling of the name follows the transcription from Republic of Cyprus records which are maintained in Greek characters." It remains the case that the use of two different names at Companies House in respect of filings for SolarFive Limited is a serious matter. 3. "The Applicant developed 1GW solar generation in Japan". The Applicant still confuses the issue by using the term "developed" as though it includes construction. Peter Gerstmann and the late Dmitry Glukhov were indeed involved in creating sites for solar development in Japan. But there is no evidence that this involved any construction of those sites. BYG set out a clear summary of their track record in our original submission RR-0092 which demonstrated this. The Applicant's detail in REP5-005 pages 34-37 does nothing to indicate that our summary and conclusion are incorrect. Their latest summary, when read carefully, fails to specifically confirm that PVDP itself was involved in any construction and is merely a list of background details of little relevance. BYG stands by the summary in RR-0092. For the Applicant to convince us that they were involved in any construction, it would be necessary prove that the details in our summary are incorrect.	1. The Applicant has submitted all financial statements requested by ExA, which are those of SolarFive Ltd and of Photovolt GmbH. The latest of those statements can be found appended to the Deadline 5 Cover Letter at [REP5-001]. 2. We confirm that "The spelling of Yulia Lezhen's name follows the transcription from Republic of Cyprus records which are maintained in Greek characters." It should be noted that is permissible under the Companies Act for a name originally in a non-Roman script to be delivered plus a transliteration. However, a correction was duly filed on July 12, 2023 to ensure consistency and alleviate any unnecessary concern. 3. The Applicant has nothing further to submit on this matter. Its earlier representations deal with this, for example its response to relevant representations [REP1-020] (see 'Developer capability and past performance'); and the Applicant's Response to the Examining Authority's First Written Questions [REP2-025] (see Q1.5.27). The Applicant also recently provided comprehensive oral submissions on Funding – see the Applicant's Written Summary of its oral submissions at Compulsory Acquisition Hearing (specifically agenda item 3c) [REP6-046].	Funding_and_PPA
REP6-071	Begbroke and Yarnton Green Belt Campaign (BYG)	Deadline 6, BYG: Comment on Financial Statements of Cranssseta Investments Limited. Following our previous D6 submission BYG: Comments on the Applicant's response to BYG's D4 submissions (uploaded on 21.9.25) further evidence has come to light which requires this update submission. 1. The Applicant claims (REP5-005 pages 34-37) that "All information on Cranssseta Investments Ltd. is publicly available and can be obtained from open sources or relevant databases. Such information transparently shows all financial statements of the company". This statement is seriously misleading. The latest financial statements filed for the company are for the year ended 31 December 2014. These were only	The Applicant has nothing further to add on this matter. The Applicant's position in relation to funding is primarily set out in the Funding Statement [APP-022] and as supported in its oral submissions at the Compulsory Acquisition Hearing – see the Applicant's Written Summary of its oral submissions at Compulsory Acquisition Hearing (specifically agenda item 3c) [REP6-046]	Funding_and_PPA

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>filed with the Cypriot registry in May 2024, having only been signed by the auditors in October 2023.</p> <p>2. There are, in fact, four filings of financial statements at the Cypriot registry as shown in the table below. The Applicant has indicated that Cransseta is the major source of funding for the project (REP2-025, answer to Q1 5.26). It is clear why audited financial information - for the major source of funding and the owner of Photovolt Development Partners (PVDP) - has not been provided to the ExA. It is simply not available. As can be seen from the table, there has been a belated attempt to produce audited financial information, but that process is still many years behind. In any event, audited information produced many years after the financial year in question has very doubtful credibility. It would not be accepted, for example, by potential funders of the project; such potential funders being crucial for any chance of the Botley West project being developed.</p> <p>3. The 2014 financial statements filed in 2024 were, in fact, revised versions of statements that were audited and filed in 2022. Copies of both these statements are attached. As far as the financial information and audit opinion are concerned, there is little change between the two. Both versions of the statements show a loss for the year of €4.5 million, excess liabilities of €7.6 million, and an expressed concern by the auditors as to whether or not the company was a going concern (page 3).</p> <p>4. However, there are some important differences in the notes to the accounts.</p> <p>4.1 It will be seen that in notes 21.3 and 21.4 of the 2022 filed statements (Appendix 2), Dmitry Glukov, Yulia Lezhen's late husband, is named as a related party with loans outstanding. In the statements filed in 2024, all references to Glukhov have been removed.</p> <p>4.2 In note 21.4 of the 2022 filed statements, there is a reference to Jarret Overseas Limited as a related party. Jarret Overseas was another Glukhov company that was named in the Ingtorgstroy Discovery Application document, a copy of which has previously been submitted by BYG (RR-0092, Appendix 2). The reference to Jarret Overseas has also been removed in the 2014 statements filed in 2024.</p> <p>5. The filed accounts for the four years also reveal another important piece of information. It is stated that (our underlining): "The Company is owned by Mrs Yulia Lezhen, a non Cyprus tax resident, who owns 100% of the Company's shares". In a formal statement filed with the Cypriot authorities, this appears to contradict the statement made by the Applicant (Rep5-005) that "Ms Lezhen is a Cypriot national and has lived permanently in Cyprus since 2012; prior to that she was resident in Germany. Ms Lezhen is a taxpayer in Cyprus, which is her place of business and location for the education of her children". The latter statement would appear to be another partial truth given to the ExA by the Applicant, presumably to mask an unhelpful reality.</p> <p>6. These accounts are out of date and of no use from a financial point of view. They do provide further evidence that the Applicant is unsuitable to be considered for controlling a project of this scale, with such significant impacts. No financial evidence of any substance has been provided to the ExA. As has often been the case in this examination, the evidence that has been provided turns out to be incomplete or inaccurate at best.</p>		
REP6-072	Begbroke and Yarnton Green Belt Campaign (BYG)	Deadline 6, BYG: Comment on tor&co's D5 representation on behalf of BE (REP5-063)	This is noted and has been responded to above.	acknowledgment response required
REP6-073	Begbroke and Yarnton Green Belt Campaign (BYG)	<p>1 Item 3a - DCO</p> <p>1.1 We welcome the ExA's decision to require the DCO to be amended to include a Decommissioning Fund (PD-015; PC002). The importance of decommissioning and securing the funding for this activity has been a significant element of BYG's argument since its first appearance in our Relevant Representation (RR0092). This view was reinforced by the Applicant's inadequate response to ExA's questions at ISH1 (transcript part 3, from 01:05). It is anticipated that the Applicant will accept the amendment, and we need not repeat our arguments on this matter here. If it is rejected by the Applicant at D6, we will comment on the reasons given for the rejection in a further representation at D7 and summarise our views on this fundamental matter in our Closing Statement.</p> <p>1.2 In REP3-084 we suggested that PART5: para 20(1) of the DCO should be modified by reducing the 5 years allowed to start the CPO process to 2 years. REP3-084 provided detailed reasons for this suggestion. However, the ExA has not included such an amendment in PD-015. Alternatively, we therefore suggest that consideration is given to including deliverable milestones in the 5 year period so that the OHA and/or SoS can review whether reasonable progress is being made. After 2 years the money required to execute the CPO might be provided and irretrievably ring-fenced. At year 3, a significant proportion of the total funding required for the construction of the scheme might be independently evidenced and monitored until a material</p>	<p>1.1 The Applicant's response in relation to the request for a Decommissioning Fund is set out in the Applicant's Response to the ExA's Schedule of Changes to the dDCO [REP6-051] (see PC002).</p> <p>1.2 Five years is the heavily precedented position, including the most recent granted solar Projects such as Tillbridge Solar Project Order 2025 and Stonestreet Green Solar Order 2025. To clarify, the time limit in Article 19 (previously 20) does not prevent the exercise of compulsory acquisition powers within that period. It is to ensure that such powers are not indefinitely sitting over a particular parcel of land for a longer period and so must be exercised before the expiry of that period. In any event, Article 45 ensures that the undertaker must not exercise the compulsory acquisition</p>	Legal

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>start has been made on construction.</p> <p>1.3 At ISH2 concern was expressed about the grid connection date slipping back to 2029. As PART 5: para 20(1) of the DCO is currently drafted, acquisition of the land by the Applicant will not even have been required by that time, let alone the connection of a functioning scheme to the grid.</p>	<p>powers unless it has first put in place either a guarantee or other suitable form of security. This ensures that sufficient funding is secured in relation to the exercise of those powers, if required.</p> <p>1.3 The Applicant has submitted a Statement of Common Ground with National Grid at Deadline 7 which confirms that the proposed grid connection date is 2029. To confirm, the Applicant's intention is to seek all land rights voluntarily and avoid the need to exercise compulsory acquisition powers. For example, the Applicant has entered voluntary land agreements with all of the main site landowners and so compulsory acquisition powers will be necessary as a fallback only. If all land rights are acquired voluntarily, then the Project can be delivered without the need to exercise compulsory acquisition powers. However, to the extent compulsory acquisition powers do need to be exercised in order to meet the 2029 connection date (for example, any sections of the cable corridor that are unknown/unregistered or where land agreements are outstanding), then it is of course in the Applicant's interests to ensure that they are exercised in time to facilitate the grid connection. It is not necessary or appropriate for the DCO to require compulsory acquisition powers to be exercised.</p>	
REP6-073	Begbroke and Yarnton Green Belt Campaign (BYG)	<p>2 Item 3d - Cultural Heritage</p> <p>2.1 During ISH2 we drew the ExA's attention to two D6 representations already submitted by BYG. These have not yet been given a document number and may not have been read by the ExA before ISH2.</p> <p>2.2 The first was a "Comment on tor&co's representation on behalf of Blenheim Estate" (REP5-063) regarding the impact of BWSF on the setting of the WHS (Receipt ref. 37741). This attached an eleven-page representation from Heritage England to Cherwell District Council (CDC) dated 31 July 2025. This representation criticised the inadequacy of tor&co's analysis of the heritage impact which was submitted as part of the Application for housing proposed by Blenheim Estates at South Perdiswell Farm in June 2025 (APP 25/01510/OUT). On the basis of this highly critical representation by HE we suggested in our own representation that tor&co lacks the authority to opine on BWSF as it does in REP-063. The speaker before our representative at ISH2 was Dr James Weir, representing BE. Dr Weir is the Technical Director responsible for heritage at tor&co. Not surprisingly, he repeated the approach taken in REP-063.</p> <p>2.3 Having heard HE's comments at ISH2 about the impact of BWSF we suggest that the approach taken by HE in respect of the proposed development at South Perdiswell is materially different from this and deserves consideration by the ExA.</p> <p>2.4 The second D6 representation by BYG that Dr Hearne referred to in respect of this matter was an Addendum to the first representation (Receipt ref. 37747). The purpose of this was to place before the Examination a letter from the Director of UNESCO (dated 17 September 2025) to the Ambassador of the UK Delegation to UNESCO which also concerned BE's proposed housing development at South Perdiswell Farm. It confirms that UNESCO and ICOMOS concur with HE's critical position on the Application. However, it goes further in a manner which is relevant and of significance to this Examination: "ICOMOS has, however, noted the existence of other ongoing applications in the wider setting of Blenheim...which should be considered in assessing cumulative impacts in addition to those of the BWSF".</p> <p>2.5 Having introduced the UNESCO letter when Dr. Hearne spoke at ISH2, BYG was surprised to hear the Applicant suggest it has little relevance to forming an opinion about BWSF. In this regard and following the representations from HE and UNESCO, it is notable that CDC has moved the target decision date for the application for housing on land South of Perdiswell Farm from 29/9/25 to 28/2/26. We presume this is to ensure that the required additional heritage analysis is completed, although we do not yet know by whom.</p> <p>2.6 As part of its argument about UNESCO the Applicant thought it appropriate to refer to Stonehenge and the Government decision in 2024 regarding putting the A303 in an adjacent tunnel. The Stonehenge, Avebury and Associated Sites WHS is the only other WHS in open countryside in the Southeast of England. The Applicant claims this was its primary area of search in its site selection process. The other WHSs are in urban areas: London, Bath and Canterbury. The Applicant wants us to believe that it could not avoid placing its desired solar farm adjacent to a WHS, despite the fact there are only two in open countryside in the Southeast, together comprising only about 3500ha.</p>	<p>The Applicant notes the comments from BYG regarding the proposed residential development at Land south of Perdiswell Farm and refer to our response provided above.</p> <p>In regard to the comments from BYG regarding the decision-making process for the proposed A303 Stonehenge Tunnel highways scheme, the Applicant considers that BYG have misrepresented the Applicant's reference to this scheme at ISH2. The context for the Applicant's reference to this scheme was in respect of the responsibilities of the UK government in relation to the 1972 UNESCO Convention Concerning the Protection of the World Cultural and National Heritage, to which the UK is a signatory. A 2024 Appeal Court decision (<i>R (Save Stonehenge World Heritage Site) v Secretary of State for Transport</i> [2024] EWCA Civ 1227) established that proper application of UK legislation and policy within the decision-making process ensures that international obligations would not be breached. This is the issue raised by the Applicant at ISH2 which made reference to the Appeal Court decision.</p> <p>The Applicant notes the comments from BYG regarding the additional funding benefits for the maintenance of the World Heritage property arising from increased rents for the land. These comments are addressed below.</p>	Historic_Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>2.7 Whatever the respective merits of Blenheim and Stonehenge in heritage terms, in terms of planning designation Blenheim is the only one of those two which abuts an area of Green Belt. On this basis, it can be argued that the Application Site is the most constrained solar farm site in the Southeast. [The presumption being that land inside either WHS could not be used.]</p> <p>2.8 As we have indicated in several representations, starting with RR-0092, we believe that the Applicant's explanation of its site selection process lacks credibility. Perhaps before the SoS decides on any DCO made for BWSF he might like to pause and read the plaque at the entrance to Stonehenge (see photograph below in Annex 1).</p> <p>"The UNESCO World Heritage Convention lists cultural and natural sites of Outstanding Universal Value which should be protected for the benefit of all humanity."</p> <p>2.9 Anyone dealing with matters relating to historic assets would undoubtedly not support the Applicant's view that the opinion of UNESCO should be ignored. It seems to us that UNESCO rarely intervenes in detailed planning matters. The fact that UNESCO and ICOMOS have taken a detailed interest in developments proposed by BE around the Blenheim WHS is highly significant. Of similar significance is their view that there should be a cumulative impact assessment of all developments around the WHS. This is something that HE appears to support by virtue of its support for the ICOMOS technical reviews.</p> <p>2.10 A third D6 representation already made by BYG is relevant to the topic of "derivation of benefits to heritage assets". Our representation (uploaded on 21.9.25) commented on REP5-065 produced by Withers LLP on behalf of BE. Our analysis of this concluded "...no firm evidence has been provided...that the WHS will obtain any additional benefit from the solar project."</p> <p>2.11 This representation did not refer to the 2006 Maintenance Fund mentioned in REP3-068. However, as the ExA specifically asked about it in ISH 2 (ISH2 Action point 15), our opinion continues to be that it provides no guarantee of the provision of additional funds from BWSF to the WHS. It does not therefore change the conclusion in our document already submitted.</p>		
REP6-074	Begbroke and Yarnton Green Belt Campaign (BYG)	<p>Deadline 5, BYG: Comment on the note provided by Withers LLP in D5</p> <p>The note provided by Withers LLP in REP5-065 on the Blenheim Palace 1984 Maintenance Fund is helpful. It finally provides some of the information requested from Blenheim Estates much earlier in the examination process.</p> <p>However, when taken together with all the information already provided, considerable doubt remains as to whether any funds resulting from the solar project will provide additional benefit to the World Heritage Site.</p> <p>1. The latest financial statements of the Blenheim Palace Heritage Foundation for the year ended December 2024 include the following statement.</p> <p>Trustees and the management team have committed to spend £40m on vital restoration as part of the 10-year goals launched in 2017. This will be funded through profits of the visitor business and commercial operations, along with relevant grants and donations from related entities.</p> <p>2. In REP3-064 (page 10) the Applicant provided the additional information below in respect of the responsibilities of the Vanbrugh Unit Trust.</p> <p>The Vanbrugh Unit Trust (VUT) does not have an obligation to provide funds to the World Heritage Site. Outside of the 1984 Maintenance Fund obligations, any contributions to the Heritage Property are made on a discretionary basis to meet the demands of the World Heritage Site as outlined in the World Heritage Site Management Plan and Blenheim ten-year goals.</p> <p>3. In other words, a 10-year plan has been established including restoration; legally binding payments are made by the 1984 Maintenance fund towards the restoration; and part of the funding for the plan will come from discretionary contributions from VUT (the amount of current such contributions being unknown).</p> <p>4. However, in the absence of any binding commitment or evidence to the contrary, it cannot be assumed that the planned discretionary payments made by VUT will not actually be reduced to the extent that the legally binding payments made by the 1984 Maintenance fund permit.</p> <p>5. BYG therefore remains of the view that no firm evidence has been provided to the ExA demonstrating that the WHS will obtain any additional benefit from the solar project. There might simply be a change in the mix of the sources of funding which, in total, would remain the same.</p>	<p>Blenheim Palace is a separate organization from the Applicant and the Applicant cannot comment on Blenheim Palace Heritage Foundation financial matters. However, the two following paragraphs from [REP5-062] are key:</p> <ul style="list-style-type: none"> "As a consequence of the receipt of the rents from the Solar leases (both indirectly via the turnover rent paid by VUT, and directly from rents paid by the Solar Developer to the Maintenance Fund), the amount that the Maintenance Fund pays towards the Heritage Property is expected to increase from £88,000 to approximately £440,000 per annum. " (paragraph 3.1) "These assumptions are subject to confirmation of the final drawdown areas to be included in Solar leases and the detailed commercial performance of the Botley West scheme once operational but represent a reasonable assessment based on the proposals and economics circumstances today." (paragraph 3.2) <p>This indicates the likely increase in funds to be made available, but explains why a binding commitment to that particular increase cannot be committed to at this stage.</p>	Funding_and_PPA
REP6-076	Bladon Parish Council	<p>Heritage Views</p> <p>The Parish Council is concerned that the impact on heritage views has not been thoroughly evaluated, as the visual impact assessments for the proposal appear incomplete. Together with other stakeholders, the Parish Council is still concerned with the loss of heritage views from the Parish towards the Blenheim Estate and across the Thames Valley, caused by the installation of the proposed panels, hedges, and tall fencing.</p>	<p>The Applicant notes this comment from Bladon Parish Council. The Applicant has provided an assessment of the likely impacts and effects on the significance of heritage assets as a result of the change within their settings. This is presented in ES Appendix 7.5: Settings Assessment (Rev 3) [CR2-038]. The assessment refers to visualisations wherever these are relevant.</p>	Historic_Environm ent

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			A separate set of photomontages from viewpoints agreed with Historic England has also been prepared (Additional Photomontages for Historic Environment Assessment (Rev 1) [CR2-059]).	
REP6-076	Bladon Parish Council	<p>Public Rights of Way</p> <p>Despite the proposed removal of certain panel areas south of Bladon, the Parish Council is still concerned that all public footpaths accessible directly from the village will continue to be significantly impacted by the Solar Farm.</p> <p>The Parish Council would also like to re-clarify that, although pedestrian access is allowed into the Blenheim Estate via Bladon Gate and Eagle Lodge, these routes are permissive rather than formal Rights of Way and could be removed at any time, which would mean that the residents will have no access to open spaces without solar panels and fencing.</p>	<p>The impacts on the operation of the network of PRow will be managed through the construction phase in accordance with the outline PRow management plan [REP6-028].</p> <p>Without Prejudice to the rights of Blenheim Palace Heritage Foundation which cares for the World Heritage Site, the applicant can confirm that Blenheim has no intention of removing any permissive routes into and around the Parkland.</p>	Public_Right_of_Way
REP6-076	Bladon Parish Council	<p>Effect on Overwintering Birds</p> <p>The Parish Council understands that there have been questions raised regarding the overwintering bird populations that utilise the land impacted by the Solar Farm.</p> <p>The Council wishes to inform the ExA that the Bladon area routinely supports flocks of overwintering birds and, in support of this, a Parish Councillor who has been an active user of the public rights of way for many years would like to submit the following witness statement: -</p> <p>I regularly see the flocks of rooks from the Bladon to Campsfield footpath, which nest in the lime/plane trees by Eagle Lodge. Later in Autumn huge flocks of geese arrive in successive skeins to feed here, settling overnight on the Bladon end of the Blenheim Park lake. Migrating redwings also appear in numbers in many years. Seeing these beautiful migrants foraging is one of the great pleasures of late afternoon winter walks around Bladon fields.</p>	<p>The overwinter population of birds identified during the surveys to inform the assessment is described in ES Appendix 9.10 Wintering Bird Survey Report [APP-159]. In agreement with the Parish Council, this shows that there are flocks of various species recorded across the Project site during the winter months. The presence of these birds has therefore been appropriately captured as part of the initial environmental assessment.</p>	Local_Ecology_and_Nature
REP6-076	Bladon Parish Council	<p>Lack of Consultant / Loss of Amenity for Children</p> <p>The Parish Council appreciates that a speaker at the recent hearing highlighted to the ExA that an important group that will be impacted by the solar farm has not yet been consulted.</p> <p>Given the substantial scale of the Solar Farm, there will be a significant decrease in accessible outdoor areas for children. This reduction will extremely limit the opportunities for exploration and experiential learning, and will affect both current and future generations. In particular, children in Bladon are likely to be significantly impacted, as the currently available areas, South of Bladon, which are accessible directly from the village, will become inaccessible due to the installation of high fencing around much of the site, and as mentioned above, access to Blenheim Estate is permissive and can be removed at any time.</p>	<p>The Applicant acknowledges this comment but confirms that the level of consultation undertaken, and information presented throughout the preapplication stage met the legislative requirements of the Planning Act 2008 and associated guidance.</p> <p>This has been evidenced in the Consultation Report [APP-024] and confirmed in the Acceptance checklist (s55) [PD-001] and Notification of Decision to Accept Application [PD-002], which was submitted to the Planning Inspectorate and accepted for examination.</p>	Consultation_Process
REP6-076	Bladon Parish Council	<p>Community Food Growing/Market Garden</p> <p>The Parish Council is concerned about the lack of a specific consultation on the proposed areas for community food growing projects and the lack of detail regarding the infrastructure needed to support these growing areas, such as water supply and storage facilities for equipment, etc.</p> <p>The Parish Council is also concerned that the proposed community food growing areas in Bladon, which will be accessed from lanes currently used only by a few residents, will significantly increase the number of traffic movements along the lanes compared to current farming practices.</p> <p>An increase in traffic movements is highly likely, as the users of these growing areas will most likely be travelling from outside of Bladon, especially if they are to be used by charities such as Cherwell Collective, who will attract users from surrounding areas.</p> <p>The Parish Council is also concerned that some of the proposed users of these community food growing areas are to be used by commercial enterprises such as OxFarmtoFork or other market gardeners. The use of these growing areas by commercial enterprises cannot be classed as a community benefit.</p>	<p>The intention is that the users of the community growing areas will be drawn from nearby settlements - certainly in the case of allotments and of Cherwell Collective's food forests. If a field is being used by a single grower then the traffic will be less than currently generated by commercial farming. Cherwell Collective supports a number of clients in Bladon and the aim of the food forests is for them to be within walking or cycling range of potential growers.</p> <p>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</p>	Community_Food_growing_Location

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			<p>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.</p> <p>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. The Applicant will use OxFarmToFork to help identify potential occupiers of the food growing areas. The Applicant will work with the parish councils to engage with local growers or those who are thinking of starting growing their own food. Access to this formerly closed land will be a remarkable opportunity for local residents to grow food for their own consumption or for sale to the colleges or at farmers' markets, to the benefit of their physical and mental health, while helping the soil to recover from years of intensive farming. The Applicant understands the parish council's concern over how the food growing areas will be operated and will consult and work with them to ensure that the initiative benefits the whole community.</p> <p>As far as the community growing areas are concerned, the details and acceptability of these, will be determined by the OHA's via approval of the Outline (then detailed) Operational Management Plan (REP6-9032). The intention is to provide space for at least two food growing community groups (up to 30ha) to operate on the Site, secured by means of an Agricultural License Agreement. This is secured under the oOMP and Requirement 12 of the DCO.</p>	
REP6-076	Bladon Parish Council	<p>Securing Community Benefits from Future Owners</p> <p>The Parish Council seeks assurance that the proposed Community Benefits, whether the financial contributions or the provision of community food growing facilities, will be legally binding on all future owners/operators of the Solar Farm, thereby safeguarding these benefits throughout the duration of the project.</p>	The community benefit fund will be secured through a Section 111 agreement with the OHA to deliver the annual fund payment throughout the operational life of the project.	Community_Benefits_and_Impacts
REP6-076	Bladon Parish Council	<p>Change 1: Reduction in Order Limits Boundary</p> <p>BPC acknowledges the proposed reduction in the Order Limits boundary, which is intended to decrease the solar installation area to the south-west of Bladon and remove solar arrays from land situated to the south-east of the village and north of Heath Lane.</p> <p>While the removal of solar arrays from several parcels of land near Bladon is seen as a positive step, Bladon Parish Council continues to express reservations regarding the ongoing physical and visual changes that will result from the proposal. The current plans still pose adverse effects on both the Green Belt and the public rights of way (PRoW), with the scale of the reduction not going far enough to alleviate these concerns. Despite these proposed adjustments, numerous public rights of way near the village will remain bordered by solar panels. Notably, these are the only PRoW available for residents in the vicinity. The Parish Council maintains that the Bladon area will experience significant physical and visual changes, impacting both local residents and visitors who use these routes for leisure and for accessing local amenities.</p> <p>BPC has observed that the Change 1 area includes several proposed community food growing sites. According to the application's supporting documents, a portion of this land may be allocated for use by OxFarm to Fork as a market garden.</p> <p>BPC seeks clarification regarding the suitability of this land for commercial market gardening, given that nearly all of the land within the DCO area is being classified as low-grade agricultural land. BPC is concerned that PVDP's evaluation of agricultural land has not been confirmed by an independent third party, and BPC asks that PVDP submit independent evidence supporting the grades assigned to the land within the DCO area as part of the application process.</p> <p>BPC wishes to express its concern that the areas allocated for community food growing initiatives, especially</p>	<p>The Applicants welcomes the views of the IP regarding Change 1 as being a positive step. The Applicant also notes the ongoing reservations expressed in respect of effect upon the Green Belt and PRoW. However, the Applicant is of the firm view that whilst some impacts are inevitable (for urgently needed renewable energy), these are not all negative. It is positive that this area can contribute to the Country's urgent need for renewable energy; that it will help address the climate change emergency that the IP's own authority has declared; that it will bring very positive benefits in terms of increasing biodiversity net gain; that it will allow a continuation of agricultural use beneath the arrays; protect previously unprotected underground archaeology; it will also increase, not decrease, public access and enjoyment to the whole area and, following decommissioning, leave a lasting landscape legacy.</p> <p>As far as the community growing areas are concerned, the details and acceptability of these, will be determined by the OHA's via approval of the Outline (then detailed) Operational Management Plan (REP6-9032). The intention is to provide space for at least two food growing community groups (up to 30ha) to operate on the Site, secured by means of an</p>	Community_Food_growing_Location

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		a commercial market garden, may result in a significant increase in daily traffic compared to the very limited farm vehicle movements that these areas currently attract. Since the intended access routes to these areas are not yet finalised and their assignment for particular projects is pending, BPC cannot offer detailed feedback regarding the potential effects on local residents associated with the proposed usage and access routes.	Agricultural License Agreement. This is secured under the oOMP and Requirement 12 of the DCO.	
REP6-076	Bladon Parish Council	<p>Change 10: Clarification of the role of the community educational facility</p> <p>Bladon Parish Council (BPC) wishes to express its disappointment to PVDP that neither the parish council nor the wider Bladon community was specifically consulted regarding the proposed community educational facility prior to its inclusion in the application. BPC is of the view that a consultation would have enabled the council to raise several important concerns at an earlier stage.</p> <p>Had such consultation taken place, BPC would have highlighted a number of issues, including the siting of the facility within the Green Belt, the nature of the current access route to the proposed location, and the potential negative consequences for the local community. BPC notes that the documentation provided does not clearly set out the facility's intended purpose, its operational and management arrangements, or whether there is genuine demand from local schools for such a facility.</p> <p>BPC does not consider that there are any positive benefits to locating the educational facility in Bladon or within the Green Belt. The council is concerned that the facility would bring negative effects to the village, including increased traffic and a rise in visitor numbers using an access road already known for its limitations. There is also concern about potential disturbance to the peaceful environment enjoyed by users of Public Right of Way (PRoW) 132/2/10.</p> <p>BPC is of the view that there is no justification for locating the facility in Bladon or anywhere within the Green Belt. Given the overall scale of the proposal, the council believes there should be many alternative locations available outside the Green Belt that would be more appropriate. For example, sites with direct access to Lower Road or the A4260 north of Woodstock—both outside the Green Belt—would offer more suitable and accessible options.</p> <p>Regarding access to the proposed educational facility, BPC notes that the current access road is limited to single-file traffic and lacks designated passing points. There is a pinch point at the entrance, restricting the width further and making the road inaccessible to larger vehicles such as ambulances and skip lorries. There has been a specific incident in which a resident was required to be transported to an ambulance waiting on the main road due to these constraints.</p> <p>The proposal to use this road as the main access for either the educational facility or the proposed community food growing area raises significant safety concerns for pedestrians. The route serves as the primary walking path to the recreation ground, allotments, cemetery, and St Mary's Church (including Sir Winston Churchill's grave).</p> <p>Additionally, visibility at the junction of the lane and the main road is limited, heightening the risk of vehicles meeting head-on and forcing one to reverse onto the main road or to a wider section. This scenario creates further safety hazards for all road users.</p> <p>BPC requests that, should a need for an educational facility be demonstrated, PVDP consider siting it in a different location outside the Green Belt. The council intends to inform the Planning Inspectors of these concerns as part of the ongoing inquiry.</p>	Despite originally being requested by Oxfordshire County (as education authority), they and the other OHAs have now decided that, on balance, they do not wish to see the education facility building. As a result, the Applicant has therefore withdrawn its offer to provide such a building, and this was set out in Change Request 2.	Community Benefits and Impacts
REP6-079	Cassington Parish Council	Gwent Levels Post Construction Monitoring part of the evidence base required for the Gwent Levels Future Wales: Policy 9 Pilot Project	This is noted and no response required.	acknowledgment response required
REP6-083	Cumnor Parish Council	<p>2. Prior to the ExA's Accompanied Site Inspection (ASI1) and the latest unaccompanied site visit (USI6) to the Parish, and the Compulsory Acquisition Hearing (CAH1) and Issue Specific Hearing (ISH2), Cumnor Parish Council (CPC) had intended to submit a further extensive assessment of the errors and omissions in the applicant's D5 submissions to the ExA, including those in the Change Request.</p> <p>3. However, given the ExA's forensic evidence led methodology, CPC now assesses that the ExA has already identified key issues with the application that so concern the Parish Council and the residents of the parish.</p> <p>4. CPC therefore welcomes all the ExA's proposed changes to the draft Development Consent Order (dDCO) as set out in PD-015, the robust questions in the ExA's Rule 17 letters (PD-009, PD-010 and especially PD-017) and the EA's action points resulting from CAH1 and ISH2.</p> <p>5. So, save for one further example of the applicant's inability or unwillingness to engage with the required mitigation hierarchy, CPC has decided to rely on its previous submissions, including its commentary on the applicant's previous submissions – see para 3 in REP5-076.</p>	The Applicant notes Cumnor Parish Council's decision not to submit a further assessment of its own. See also Applicant's Response to the ExA's Schedule of Changes to the dDCO [REP6-051].	acknowledgment response required

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REP6-083	Cumnor Parish Council	<p>6. REP5-076 described CPC's assessment of the applicant's REP4-038, an assessment CPC repeats in respect of the applicant's D5 submissions, including those relating to the Change Request.</p> <p>7. Turning to the applicant's engagement with the mitigation hierarchy, CPC observes that this must surely start with accurate 'baseline' information and data about aspects of the application; be it noise, landscape, ecology, PRow, land quality, flood risk etc. etc.</p> <p>8. Therefore, the applicant's image in REP5-029 (and repeated as a cropped image in the Change Request documentation at CR2-032) provides one example amongst many where inaccurate information provided to the ExA negates any subsequent assessment of harm and thence mitigation.</p> <p>9. CPC notes that the applicant has used this photograph to assert the invisibility of the DCO site from Viewpoint 53 and so the need for mitigation. Elsewhere in REP5-029 (Figure 8.236 on page 236) the applicant uses the same methodology for Viewpoint 52 on Tumbledown: this time with a photograph evidently taken under a hedge on the edge of the carriageway of the B4017.</p> <p>10. For Viewpoint 53, taking the photograph 1.5m from the ground from a position behind a field of fully grown maize does not accurately represent the kinetic viewpoints at and between Cumnor Neighbourhood Plan Important Views 3 and 16 (REP1-057 and REP1- 062).</p> <p>11. As REP1-062 (a document both approved and positively commented on by the Neighbourhood Plan Examiner) shows on page 9 and page 23, the Important Views do show the DCO site to both the west and east of the B4017 as it descends Tumbledown towards Filchampstead.</p> <p>12. This is but one case amongst many of the evident deficiencies through both errors and omissions in the application, as the ExA will have seen for themselves during, for example, ASI1, USI1 and USI6.</p>	<p>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:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	Landscape_and_Visual_Impacts
REP6-084	Cumnor Parish Council	Written summaries of oral submissions made at any Hearings held during the week commencing 6 October 2025	The Applicant notes Cumnor Parish Council's position.	acknowledgment response required
REP6-085	Cumnor Parish Council	<p>Cumnor Parish Council - Comments on ExA proposed changes to dDCO for Deadline 6</p> <p>1. Of the 1,418ha of land for the three solar power stations proposed by PVDP, 81ha - comprising the whole of the applicant's southern power station and the applicant's southern part of cable routes between the central and southern power stations – is located in Cumnor Parish, which in turn sits within the administrative area of the Vale of White Horse District Council (VWHDC).</p> <p>2. Cumnor Parish Council (CPC) welcomes all the ExA's proposed changes to the draft Development Consent Order (dDCO) as set out in PD-015.</p> <p>3. In particular, and with reference to CPC's Deadline 6 (D6) submission on the Issue Specific Hearing 2 (ISH2) held on 9th October 2025, CPC especially welcomes PC001.</p> <p>4. Similarly, in view of the lack of financial data provided by the applicant thus far, and the fact that the applicant had to agree to a 15' adjournment to Compulsory Acquisition Hearing 1 (CAH1) item 3c 'funds and land' in order to attempt to provide an answer to the ExA, CPC also especially welcomes PC002.</p>	The Applicant notes Cumnor Parish Council's position. See also Applicant's Response to the ExA's Schedule of Changes to the dDCO [REP6-051] .	acknowledgment response required
REP6-110	National Grid Electricity Transmission plc	<p>Introduction</p> <p>1. National Grid Electricity Transmission plc ("NGET") is a statutory undertaker for the purposes of the Planning Act 2008.</p> <p>2. NGET has assets which have been identified as being within, or within close proximity to, the proposed Order limits as particularised in NGET's Deadline 1 submissions dated 4 June 2025. As also particularised in NGET's Deadline 1 submissions, NGET has identified a direct interaction between the Project and the proposed NGET Farmoor substation.</p> <p>Comments on Change Request 2</p> <p>3. NGET has reviewed the documentation submitted by the Applicant in relation to Change Request 2. NGET notes that in particular Change 3 and Change 11 within Change Request 2 relate specifically to the proposed NGET Farmoor substation.</p> <p>4. NGET has reviewed the refinement of the Project layout and design to reposition the main Project substation and secondary substation as proposed by Change 3 and confirms that it has no comments on this change.</p> <p>5. Change 11 relates to the refinement of the Project layout and design to secure the latest design parameters for the NGET Farmoor substation. NGET has been in regular discussions with the Applicant in relation to what these parameters should be to ensure that there is sufficient flexibility in the siting and design of the substation in the new location noting that the NGET Farmoor substation has still not reached design freeze.</p> <p>6. NGET notes that as a result in the differing topography in new location of the NGET Farmoor substation, the access road will be different, as will tower locations and subsequent gantry and busbar layouts</p>	The Applicant notes these comments. The Applicant continues to work closely with the NGET Connections team. A final form Statement of Common Ground has been submitted at Deadline 7, showing all matters are agreed between the Applicant and NGET.	Grid_Connection

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		compared to the previous design however the parameters of the main substation buildings will remain unchanged. As a result, NGET confirms that it is happy with the parameters as set out within Change 11.		
REP6-110	National Grid Electricity Transmission plc	<p>Protective Provisions</p> <p>7. Further to NGET's relevant representations which were received by the Examining Authority on 6 February 2025, NGET's written representation in relation to Deadline 1 dated 4 June 2025, and NGET's response to written questions at Deadline 2 dated 1 July 2025, NGET continues to liaise with the Applicant in relation to the protective provisions that it requires to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards.</p> <p>8. NGET has provided comments on the draft protective provisions that the Applicant has provided however there are a number of points that still need to be resolved.</p> <p>9. NGET will continue to liaise with the Applicant with a view to concluding matters as soon as possible during the DCO Examination, keeping the Examining Authority updated in relation to these discussions.</p>	The Applicant has continued to engage with NGET on protective provisions and has included the agreed set of protective provisions for the benefit of NGET at Part 9 of Schedule 15 in the DCO submitted at Deadline 7.	DCO_Process
REP6-113	Oxford Aviation Services Limited	<p>Thermal Plume</p> <p>2.1 OASL has not yet received the report promised by the applicant (see REP3 -051 4.1.4 where the applicant confirms that the scope of the report was agreed on 16th July and was to be prepared). There is now less than 6 weeks left in the Examination and it will be extremely difficult to obtain a peer review. The delay is disappointing.</p> <p>2.2 It is important to note that in Aviation, airport safety does not deal with 'maybes' and 'don't think'. An airport must deal with absolutes. It must be demonstrated that there will be no effect, before OASL will be able to say that it will have no objection.</p> <p>2.3 The applicant's comparison with thermals over Central Oxford is not relevant, there is limited over-flying of the area. Conversely, there is flight activity to the west of the Airport, where the solar array is proposed. This includes lighter aircraft such as gliders, a low-profile fibre glass construction. These aircraft rely on primary radar returns, which is a weaker reflected return (not one sent back to the Airport via an onboard transponder). The radar reception is sensitive and limited. If it is upset in any way, there is a chance the radar will miss them.</p> <p>2.4 OASL cannot say any more until it receives the applicants report and it is peer reviewed. The report will need to provide empirical evidence that there will be no effect.</p>	<p>The Applicant submitted the reports referred to at Deadline 6, including the Thermal Impact Report [REP6-066] and Thermal Plume Primary Radar Refraction [REP6-067]. The reports were shared with Oxford Aviation Services Limited on the 17th October , in advance of Deadline 6.</p> <p>The Thermal Plume Primary Radar Refraction report [REP6-067] uses the calculations and formulae set out in ITU P.452 and ITU P.453 to quantitatively assess the potential effects upon primary radar returns at Oxford Airport, which would result in a small change in the perceived height of aircraft (approximately 2m for an aircraft 100km away from the radar). This is not considered to be significant relative to the size and speed of a typical aircraft.</p> <p>These results are based on a worst-case analysis of 100% humidity, 15°C ambient air temperature (rising to 16°C over the solar farm) and assumes that thermal effects apply to the whole path of propagation; the results are therefore likely to overstate the possible effects.</p> <p>Calculations undertaken suggest that impact significance is negligible, with the maximum change in perceived position of aircraft observed by radar at Oxford Airport expected to be no more than 2.27 metres for an aircraft 100km away from the radar and this is not deemed to be significant relative to the size and speed of a typical aircraft</p> <p>RAF Brize Norton initially raised concerns regarding the impact of thermal plume upon Primary Surveillance Radar but subsequently the Defence Infrastructure Organisation have written to the ExA to confirm that they have no objections to the project.</p> <p>For reference, the International Telecommunication Union (ITU) is the United Nations agency for digital technologies, including radar and communications networks, and develops technical standards to ensure that these technologies work effectively. ITU-R manages the radio-frequency spectrum and produces recommendations covering many uses, including tracking aircraft using radar. These recommendations provide the basis for operators and other parties to determine radar impacts.</p> <p>Documents produced by the ITU describe and explain the potential effects upon radio-frequency waves caused by changes in atmospheric conditions, including increases in air temperature as are predicted to occur over the Botley West Solar Farm. These ITU documents establish that the possible effects from</p>	Aviation

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			increased air temperature would be limited to low levels of refraction which would change the perceived height of aircraft.	
REP6-113	Oxford Aviation Services Limited	<p>Bird Strike</p> <p>2.5 The dangers associated with bird strike have been covered in previous hearing sessions and representations.</p> <p>2.6 The applicant claims that they have covered all necessary CAA guidance for development around airports. However, none of this work has considered or addressed the potential for displacement.</p> <p>2.7 OASL is required to control bird activity on the aerodrome where there are different issues at various times of the year. If you put 1,000 Ha of Oxfordshire's open land under solar panels, the birds that frequent these spaces will go elsewhere to retained green spaces. This includes the Airport and the areas retained as open space around the aerodrome, such as the undershoot.</p> <p>2.8 The applicant notes that the land to the south of the runway, now removed from the DCO, will be retained as agricultural land. The applicant also notes that agricultural land attracts birds. At the moment the land to the south of the airport has a bird population, but it shares them with other parcels of land. If the solar is built, this land will remain the primary available farmed land in the area, and there is no consideration as to whether birds from elsewhere will be displaced here, and what issue this could cause for the Airport.</p> <p>2.9 To assess risk, OASL must be able to understand the implications of displacement. There has been no report prepared to date which does this. Once it is built, it is too late and this could put unknown limitation on the operations of the business, which is not acceptable.</p> <p>2.10 As above, OASL cannot make do with assurances, it needs certainty. The CAA will expect that OASL have an evidenced hazard identification risk assessment.</p>	<p>The 'Ecology Strategy' of the Outline Landscape and Ecology Management Plan includes the following:</p> <p><i>"Recognising the proximity of Oxford Airport to the Central Site Area, landscape design within 1.5km of the airport, within the Order Limits, will be designed in general accordance with the principles set out in CAA CAP 772 Wildlife Hazard Management at Aerodromes. This will include ensuring that there are no water features present, no additional scrub/tree planting along hedgerows and grassland areas outside of the panel arrays managed according to a long grass policy, maintaining a sward height of circa 220-300mm. In addition, once operational, the Applicant will ensure on-going dialogue with the airport with respect to the management of wildlife risk, in line with CAST Renewable energy developments: solar photovoltaic developments CAST Aerodrome Safeguarding Guidance Note."</i></p> <p>The Applicant has included in the oLEMP the monitoring of Bird carcasses that are as a result of Birds colliding with the Panels.</p> <p>The Applicant has agreed to the removal of approximately 39 ha of Solar Panels from the project site closest to the Airport boundary. This freed-up land will continue to be used for agricultural purposes, managed by the landowner. The Applicant's position is that there will not be an increased population of birds in the area.</p> <p>For Deadline 6 (20 October 2025), the Applicant submitted "<i>The Applicant's Written Summary of its Oral Submissions at Issue Specific Hearing 2</i>". This submission includes the "Bird Strike Technical Note" as Appendix 3. Below is a summary of this Bird Strike Technical Note:</p> <ul style="list-style-type: none"> The Applicant's position with respect to the change in bird strike risk as a result of the Project is that the development of a solar site in this location would either not change or slightly decrease the overall risk in the area. The baseline within the Project site comprises agricultural land which is a specific land use type listed within the CAA CAP772 Guidance as being high risk with respect to bird strike. As such, removal of the arable land use and its replacement with a less intensive land management within the Project site in and around the panel areas will mean that similar flocks of birds (especially gulls) aren't attracted to the Project site in the same manner A feature of the Project site is the River Evenlode and the Flood area. The Corridor is approximately 84ha and will comprise restoration of flood meadow grassland and associated habitats. This restoration will create habitat that is highly suitable for foraging birds such as lapwing and curlew. As such, it is likely that this feature within the Project site will attract birds to forage. 	Aviation

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>Notwithstanding, as a precaution, the Applicant has agreed in principle—subject to reasonable costs—to fund the provision of an additional bird-scaring unit. At present, London Oxford Airport operates one such unit. See the statement of common ground with Oxford Aviation.</p> <p>The Applicant and Oxford Aviation Services Limited have agreed a Letter of Understanding on the provision of an additional bird-scaring unit</p>	
REP6-113	Oxford Aviation Services Limited	<p>Timing and engagement with LOAS</p> <p>2.11 There was a suggestion earlier in the hearing session that the removal of 40Ha of land south of the airport occurred during the examination, rather than before, because no safeguarding map was available in the Local Plan. Therefore, the issues associated with the Airport emerged over time, through discussion, and indeed grew post-submission.</p> <p>2.12 To be clear, a safeguarding map deals with vertical extents. It helps LPA's and developers understand if development will break notional slopes. It does not deal with changes of surfaces that occur below the slopes, and the change of use of land. As such, it would not have been a factor to discussions regards engine failure after take off.</p> <p>2.13 Furthermore, it is not the case that the concerns grew over the course of the application. OASL shared its concern with the applicant prior to submission. In previous representations, OASL evidenced this fact. Furthermore, the applicant, on page 134 of Rep4-013, states that the submission was made in response to discussions with OASL.</p> <p>2.14 OASL welcomes the removal of 40HA of land to the south of the Airport – however it is not the case that these concerns were unknown prior to submission or grew in scale during determination.</p>	<p>The Applicant can confirm that it has been engaged with the London Oxford Airport on these issues since pre-application. The Applicant also welcomes the support for the removal of the panel areas, which was encouraged following further discussion with the airport and as a result of the discussions at the first round of hearings in May.</p>	Aviation
REP6-113	Oxford Aviation Services Limited	<p>Summary</p> <p>During the hearing, the applicant acknowledged that they could not be entirely sure that the development would not increase bird population at the Airport. But it is for the Airport to manage that risk on their land.</p> <p>2.15 Para 5.5.41 of NPS EN1 states that “...<i>It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km</i>”. The applicant is not currently able to demonstrate that the scheme has been designed in such a way so as not to increase bird strike risk. Failing to align with the NPS.</p> <p>2.16 Furthermore, NPS EN1 para 5.5.50 states that “the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes”. Based on the evidence available in respect of bird strike and thermals, OASL is not convinced that the SOS could be satisfied on this point.</p>	<p>The Applicant's position with respect to the change in bird strike risk as a result of the Project is that the development of a solar site in this location would either not change or slightly decrease the overall risk in the area.</p> <p>The baseline within the Project site comprises agricultural land which is a specific land use type listed within the CAA CAP772 Guidance as being high risk with respect to bird strike. As such, removal of the arable land use and its replacement with a less intensive land management within the Project site in and around the panel areas will mean that similar flocks of birds (especially gulls) aren't attracted to the Project site in the same manner</p> <p>A feature of the Project site is the River Evenlode and the Flood area. The Corridor is approximately 84ha and will comprise restoration of flood meadow grassland and associated habitats. This restoration will create habitat that is highly suitable for foraging birds such as lapwing and curlew. As such, it is likely that this feature within the Project site will attract birds to forage.</p> <p>Notwithstanding, as a precaution, the Applicant has agreed in principle—subject to reasonable costs—to fund the provision of an additional bird-scaring unit. At present, London Oxford Airport operates one such unit. See the statement of common ground with Oxford Aviation.</p> <p>The Applicant has provided robust technical analysis of the potential impact upon radar returns from thermal plume, applying calculations and formulae produced by the ITU. This technical analysis shows that the impact on Primary Surveillance Radar</p>	Aviation

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			would be negligible. See the reports submitted at Deadline 6 [REP6-066] and [REP6-067].	
REP6-113 and REP6-114	Oxford Aviation Services Limited	OASL note that Rev 7 of the draft DCO (CR2-009), is not up to date. In particular, we note that in Schedule 13 Part 2 'Figures 2.1a - 2.4c - Illustrative Masterplan' are still 'January 2025' versions. The referenced plans should be updated, as they do not reflect the latest extent of the proposed Order. There are concerns that there may be further updates required and therefore OASL wish to request that the references in the draft consent order are checked thoroughly.	<p>Thank you for flagging this. To confirm, the draft DCO has been updated at Deadline 7 (Revision 9). This has included a full and final review of Schedule 13 (documents and plans to be certified) which has been updated to capture references to the final versions of documents submitted at Deadline 7.</p> <p>Please note, updated versions of the 'Figures 2.1a - 2.4c - Illustrative Masterplan' and 'Figure 1.2 Illustrative Masterplan Overview' (Revision 3) have been submitted at Deadline 7. This is reflected in Schedule 13.</p>	Aviation / Legal
REP6-115	Oxfordshire County Council	<p>Overall View of Oxfordshire County Council</p> <p>Oxfordshire County Council (OCC) note the duty of the Secretary of State under S104 of the Planning Act 2008 to have regard to any submitted Local Impact Report when determining an application for development consent. At the time of OFH3 (10.10.2025) OCC maintain that many of the issues raised within the joint Local Impact Report [REP1- 072] submitted by the Oxfordshire Host Authorities have yet to be addressed by the applicant. These include (but are not limited to):</p> <ol style="list-style-type: none"> 1) Significant impact on local landscape character and views. 2) Significant impact on heritage assets. 3) The lack of clarity around ecological impacts and concerns around the adequacy of the proposed mitigation 4) Insufficient landscape and Public Rights of Way (PRoW) mitigation for a scheme of this scale. 5) Sterilisation of mineral resources. 6) Amendments to the scheme and draft DCO are required. 7) Lack of clarity on National Grid substation / grid connections <p>The removal of panels around Bladon and Oxford Airfield is welcomed but further removal is needed to reduce the impact on landscape and heritage assets. In order to make the scheme more acceptable from a Landscape, Heritage and Visual Impact perspective it should be scaled back to the extent shown in the Landscape and Heritage Omission Maps submitted by the OHA at ExQ2 (Appendix 1) [REP4-075].</p> <p>In principle OCC support proposals for green energy providing there are no significant adverse environmental impacts. OCC recognises there is a climate emergency and that the expansion of solar generating capacity in Oxfordshire is needed as part of the transition to net zero. However, as outlined within the LIR, in its current form OCC cannot support the proposed development due to the significance of its impacts.</p>	<p>The Applicant notes the concerns of the OHAs and recognises that many of the items listed at points 1 to 7 are generic in nature, which the Applicant has of course addressed throughout Examination. In addition to the Applicant's Responses to Local Impact Reports Submitted at Deadline 1 [REP2-026], some notable documents to refer to in relation to each of the points 1-7 are set out below:</p> <ol style="list-style-type: none"> 1. The Applicant has dealt with various LVIA concerns, most recently in the Applicant's Response to ExA's Rule 17 (14 Oct 2025) [REP6-052] and the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025) (submitted at Deadline 7). Notably, the Deadline 6 submission includes a without prejudice offer that addresses the specific suggestions made by the OHAs in its Landscape and Heritage Omission Maps submitted by the OHA at ExQ2 (Appendix 1) [REP4-075]. This without prejudice offer is further explained in the Deadline 7 Rule 17 response. The Applicant's Closing Submissions – to be submitted at Deadline 8 – will set out how the Applicant has appropriately applied the mitigation hierarchy to deal with landscape and visual effects, along with references to national policy that recognise that NSIP scale development is unlikely to avoid LVIA impacts. 2. The Applicant disagrees that there are significant impacts on heritage assets. The most recent environmental assessment (Chapter 7: Historic Environment) was submitted as part of Change Request 2 [CR2-019], where the Applicant had responded to concerns on heritage impacts of Historic England (as key statutory body in relation to the historic environment). This concludes that overall, there will be no significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases. The SoCG with Historic England sets out the final position between those parties in respect of heritage assets. 3. The most recent environmental assessment (Chapter 9: Ecology) was submitted at Deadline 4 [REP4-010]. This sets out a clear position in respect of ecological impacts, including that the only likely significant adverse effects expected are in respect of temporary and permanent habitat loss during construction on wintering birds. In terms of mitigation, the outline Landscape and Ecology Management Plan has been updated across Examination in response to feedback from various consultees. Most recently, at Deadline 7, the oLEMP (Revision 7) has been updated to capture amendments proposed by Natural England, as key statutory consultee. The SoCG with 	Project_description_and_Design_parameters

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			<p>Natural England sets out the final position between those parties in respect of ecology and the proposed mitigation.</p> <p>4. The Applicant has committed to on-site proposals (relied on as mitigation) and also engaged with the OHAs voluntarily to facilitate offsite proposals. Additional information on the indicative location of the proposed greenways were provided as part of the updated outline LEMP at Deadline, see Figure 7.6.3.2. The locations of these proposed greenways align with many of the enhancements that were included in additional requests for onsite measures from OCC. The measures being relied upon for mitigation are secured through the oLEMP under Requirement 6, including for new permissive routes and cycleway provision and greenways together with the Landscape, Ecologies and Amenities Plan; and the Outline Code of Construction Practice secured under Requirement 11, including the management of PRow during construction and decommissioning through the outline PRow management plan, which includes a commitment to the reinstatement and surfacing of routes affected during construction. The Applicant has carefully considered the request for additional offsite measures suggested by the OHAs on a voluntary basis in the Local Impact Report and following our discussions. These are not being relied on in the planning balance because they are not required to mitigate any effects arising from the Project. Hence, there is no need to secure a commitment to fund these works, and to do so would not be necessary or reasonable and ultra vires. However, the Applicant continues to engage with the OHAs to provide an additional substantial fund on top of its wider Community Benefit Fund to facilitate those offsite upgrades.</p> <p>5. This is an area of disagreement between the parties and is recorded in the SoCGs with the host authorities.</p> <p>6. The Applicant has reached out to the OHAs for final comments on the draft DCO and is awaiting a response on any outstanding concerns. The Schedule of Changes to the DCO [REP6-040] indicates where the DCO has been amended across Examination to meet some of the OHA's requests. Notably, a key concern raised during Examination from the OHAs has been the provision of fees in Schedule 16 (Discharge of Requirements). The Applicant updated the wording at Deadline 6 [REP6-004] to increase its fee recovery provisions, in line with recent solar DCO precedent.</p> <p>7. The Applicant has submitted an agreed Statement of Common Ground with NGET at Deadline 7. This confirms that both parties are working towards a connection date of 2029. The Applicant's Response to the ExA's Schedule of Changes to the dDCO [REP6-051] also explains how the inclusion of Work No. 2 (new NGET substation) in the draft DCO gives the certainty of delivery for NGET in line with that connection date.</p>	
REP6-115	Oxfordshire County Council	<p>Community Benefits</p> <ul style="list-style-type: none"> The OHA's have put considerable effort into working with the affected parishes and negotiating with the applicant to achieve the highest possible level of community benefits. Our position on Community Benefits is as set out in our response to ExQ2 [REP4-074] Q.2.15.1 and 2.15.2. 	<p>The Applicant is grateful to the OHAs for their work in arriving at a figure for the Community Benefit Fund. The Applicant acknowledges that discussions continue with the OHAs and with their adviser, Local Partnerships. The Applicant is a member of Solar Energy UK's NSIP Forum, which has been working with</p>	Community_Benefits_and_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<ul style="list-style-type: none"> A community benefit fund figure of £525 per M/W (equating to £441,000) per annum for the duration of the development (index linked) was agreed between the Applicant and the OHA (in consultation with the affected parishes) on 08/05/25. The applicant also submitted this figure in their response to ExQ2. By way of update, further discussions are continuing to refine details around the timing of payments (including whether they would cover the construction phase), scope for an additional funding mechanism from year 15, and a potential scheme that offers low cost solar panels to affected communities in the early stages of the development. Consideration is also being given to the future guidance that is likely to be published by DESNZ in relation to Community Benefits for low carbon energy infrastructure following consultation on their working paper in May 2025. 	<p>DESNZ for the last two years to define a community benefit fund figure that applies to all utility-scale solar farms and has contributed to the public consultations on this matter. The Applicant will sign a S.111 agreement with the OHAs, conditional upon the DCO being granted, to secure the provision of the voluntary fund.</p>	
REP6-116	Oxfordshire County Council	<p>Oxfordshire County Council is the Local Highways Authority and as such is in control of land within the Highway Network. This includes all the Highways Land within the order limits.</p> <p>Article 22 of the draft DCO allows for the acquisition of rights over land. The land plans and book of reference provide clarity as to which land parcels are proposed for the acquisition of new rights. OCC notes that at several places the applicant proposes the DCO to grant the power to acquire new rights over Highways Land such as (but not limited to) plots 1-01, 2-15, 2- 17, and 10-29.</p> <p>However, the council also notes that articles 8 to 15 of the draft DCO provide the applicant with all the necessary powers to enter the highway and undertake authorised works including maintenance. Given this, the council does not believe it is necessary for the applicant to be provided powers to acquire rights over Highways Land, when the draft DCO already provides the applicant with sufficient powers to undertake the authorised works without the need to acquire these rights.</p> <p>Furthermore, the highway authority's obligation is for the safety and smooth running of the highway network for all users, and this cannot be allowed to be compromised for this temporary development. The management of the highways network and planned future highway schemes will be impacted (e.g. a footway/cycleway which is imperative for active travel and reducing car use). Another potential impact of compulsory acquisition is the request by the applicant for the right for the extinguishment of easements. However, highway easements are often required to maintain drainage to the highway. The highway authority needs to retain full control of the highway network in order to ensure its smooth running and so would request that compulsory acquisition powers are not granted in relation to any highway land or in relation to the land to be safeguarded for footway/cycleway improvements (which have been highlighted in [REP1-072]).</p> <p>OCC recognises that a DCO is supposed to be a 'one stop shop' for powers and consenting but the council is satisfied that the powers granted to the applicant to undertake highways work are sufficiently robust to prevent the applicant ever needing to fall back on compulsory acquisition.</p> <p>The Council therefore does not see how the compulsory acquisition of rights over highways land is necessary in order to facilitate the proposed development in line with section 122 of the Planning Act 2008. The Council notes the applicant's response during CA1 outlining that they will provide case law justifying the inclusion of Highways Land within the scope compulsory acquisition within a DCO. OCC looks forward to receiving these and will provide a response at Deadline 7.</p>	<p>The Applicant's initial response on these matters within its Written Summary of its oral submissions at Compulsory Acquisition Hearing 1 [REP6-046].</p> <p>The Applicant's more detailed position is then set out in its response to question 22 of the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025), which includes reference to the case law referred to by the Applicant. To be clear, the approach to including compulsory acquisition powers for permanent new rights only is routine for solar DCOs and is necessary and essential to give certainty of delivery of the Project, as explained in the Rule 17 response.</p>	Traffic Transport and Access
REP6-130	Stop Botley West Limited	<p>Cultural Heritage (Issue 3d)</p> <p>a. Blenheim Palace</p> <p>12. SBW remain concerned that the Applicant has underestimated the detrimental impact of Botley West Solar Farm on Blenheim Palace by ignoring the full impact of the development on the setting of the World Heritage Site. As acknowledged by the NPPF, World Heritage Sites are irreplaceable assets of the highest significance and should be conserved accordingly. The conservation of a World Heritage Site includes conserving its setting.² Consequently, due to Blenheim Palace's internationally recognised status as a site of outstanding universal value, the importance of conserving Blenheim Palace's setting cannot be overstated.³ As was set out in the open floor hearings, the quality of evidence required to respond to this must similarly be commensurate.</p> <p>13. The Applicant reiterated at ISH2 their consistent position that it was appropriate and correct to only focus on visual aspects of setting in order to make an assessment as to the impact of the proposed development on the Blenheim Palace World Heritage Site (WHS). As set out in their response to D4 Submissions⁴, the Applicant highlights the criteria under which Blenheim Palace was inscribed as a WHS and the Integrity section of its Statement of Outstanding Universal Value (OUV) which refers to 'visual links'. Additionally, they reference the ICOMOS Operational Guidelines⁵ which states that boundaries of a WHS should be drawn to incorporate all the attributes that convey the OUV.</p> <p>14. SBW raised a number of concerns in relation to these points at ISH2. It is accepted professional best practice in the assessment of heritage assets that setting does not wholly relate to visual considerations. The PPG6 provides the following definition of setting which is consistent with that found in GPA37:</p>	<p>As a starting point and to be clear, the primary policy for determining the Project as an NSIP is the National Policy Statements (NPSs), not the NPPF. This is a legal requirement under s104 of the Planning Act 2008.</p> <p>In relation to cultural heritage, paragraph 2.10.107 of NPS EN-3 recognises that the impacts of solar PV developments on the historic environment "...may have effect both above and below ground". Paragraph 2.10.160 of NPS EN-3 – in respect of Secretary of State decision making – continues to say that "<i>Solar farms are generally consented on the basis that they will be time-limited in operation</i>" (our emphasis). This is the case for the Project, as the drafting of Requirement 14 (Decommissioning and restoration) means that decommissioning <u>must</u> occur within 37.5 years of commercial operation. As such, the impacts of any indirect effect on the historic environment will be time limited and 'generally consented' as a result.</p> <p>In any event, it is incorrect for SBW to assert that the Applicant's position as set out at ISH2 is that the assessment of impacts on</p>	Historic Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>"The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an in its setting is also influenced by other environmental factors such as noise, dust, smell, vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'."</p> <p>15. SBW is therefore disappointed that the Applicant continues to maintain their focus on visual elements of setting as the only aspect that requires consideration despite evidence presented by Interested Parties, including SBW and ICOMOS. As a result, the Applicant's baseline assessment from which the nature of any impacts is considered and thereby informs appropriate and proportionate mitigation measures continues to remain flawed.</p> <p>16. SBW also consider that the Applicant's comments on the Operational Guidelines presents a misleading and narrow approach to the guidelines themselves. It is not disputed that they set out the need for the defined area to contain all of the attributes as highlighted by the Applicant. However, this disregards other points within the Operational Guidelines which not only reinforce the importance of the setting of the WHS but describes elements of setting that should be considered. An extract from Paragraph 112 states the following:</p> <p>"An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s), as well as the wider setting. The wider setting may relate to the property's topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization, and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the wider setting is related to its role in supporting the Outstanding Universal Value." (emphasis added)</p> <p>17. It is therefore clear that the Applicant has focused on aspects of the Operational Guidelines which support their entrenched position to focus only on visual connections, rather than acknowledge that the guidelines require other aspects of setting to be considered which is consistent with accepted policy and guidance. SBW would also highlight that the updated Heritage Impact Assessment⁸ concludes that following the omission of panels, the Proposed Development would not result in any harm to the OUV of the WHS, or as set out in Chapter 7 Historic Environment, the Grade I Registered Park & Garden at Blenheim.⁹ This position is not credible given the nature of the contribution of the Application Site to these heritage assets in respect of the other non-visual aspects of their settings that should be considered. It is also inconsistent with the Applicant's own position within other sections of the Heritage Impact Assessment which acknowledge a minor negative impact on one aspect of one attribute (page 69), and that the changes in the WHS's setting from the development may negatively affect the experience and understanding of the WHS from those experiencing it from the air (page 42).</p> <p>18. The Applicant also claimed to have followed the mitigation hierarchy to avoid, minimise and then mitigate identified impacts on heritage assets. SBW note the Applicant's response to D4 submissions that 'even if it was concluded that some harm to the setting of the WHS would arise, this must be weighed against the significant public benefits of the Proposed Development to which substantial weight should be given in accordance with the relevant NPSs'.¹⁰</p> <p>19. Given the continued, and repeated, reliance on the NPSs to answer points, SBW is of the clear view that the mitigation hierarchy has not been properly engaged with as part of the early stages of the design development as well as throughout the Consultation and Examination phases. It implies that the Applicant considers a level of harm is acceptable rather than actively seek and explore all opportunities for harm to be avoided. The requirements of paragraph 212 of the NPPF are particularly relevant, which state that 'the more important the asset, the greater the weight that should be given to its conservation, irrespective of that level of harm' (our emphasis).</p> <p>20. It is SBW's view that the mitigation measures do not go far enough to reduce the harm to an acceptable level, the measures themselves are inherently harmful and that the Applicant's approach to the assessment of impacts on heritage assets is flawed. SBW would highlight the concerns they initially raised with regard to the Applicant's approach to the assessment of heritage impacts in their Relevant Representations.¹¹</p> <p>21. It is disappointing, to say the least, that this position continues to be maintained despite points made and evidence presented by other Interested Parties that the baseline approach and therefore the assessment of</p>	<p>the OUV of the WHS should focus only on visual aspects of setting. The Applicant's assessment is set out in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site (Rev 1) [CR2-036] and has been developed through an iterative process of consultation with Historic England. The assessment includes discussion of the non-visual aspects of setting such as the extent of land ownership and the development of the historic landscape.</p> <p>The assessment set out in ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site (Rev 1) [CR2-036] explains that although the proposed development would result in a minor negative impact on one of the attributes that convey the OUV of the WHS, that impact in itself is not great enough for any harm to occur to the OUV of the WHS. This position is supported by Historic England in their Deadline 6 response [REP6-092] where they confirm that the placement of solar PV panels would not harm the contribution that any land within the Order Limits makes to the attributes that convey the Outstanding Universal Value (OUV) of the Blenheim Palace World Heritage Site (WHS).</p> <p>With regard to the mitigation hierarchy, the Applicant has sought wherever possible to avoid harm to the significance of heritage assets. This has been achieved through the design process. For example, the inclusion of Work No. 5 (sensitive archaeological site protection and management) means that the embedded design of the Project inherently limits the scope of powers around significant heritage assets. The scope of Work No. 5 has been broadened at Deadline 7 (see the Works Plans, Revision 3), to increase the area of archaeological protection around Samson's Platt Scheduled Monument following feedback from Historic England.</p> <p>It is unrealistic to expect that nationally significant energy infrastructure projects in England can always be achieved without any harm to the significance of heritage assets. This is reflected in the wording of paragraphs 5.9.31 - 5.9.33 of NPS EN-1 and also paragraph 3.3.8 of NPS EN-3.</p>	

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>the level of harm is flawed. This disappointment is particularly acute given the levels of harm which would arise to a heritage asset of the highest significance which should command the greatest respect. On the basis of the points raised above and on the evidence provided by other Interested Parties, SBW feels that the threat to the significance of the WHS of Blenheim Palace from the development cannot be overstated. The criteria for World Heritage in Danger¹² recognises potential dangers to WHSs which could have deleterious effects on its inherent characteristics, with examples of such threats including the threatening effects of regional and town planning projects.</p> <p>22. SBW welcome the opportunity to review Historic England's position as to whether they consider the omission of panels made as part of CR2 address the harm they previously identified to Attributes 1, 4, 5 and 7 of the WHS. SBW would also like to correct a point of process raised by Mr Yeates in ISH2 where he stated that the view of Historic England was the only Interested Party that the ExA would need to take account of in their decision making. All Interested Parties are entitled to present evidence which would be duly considered as part of the Examination process.</p>		
REP6-130	Stop Botley West Limited	<p>Archaeology including trial trenching and Samsons Platt</p> <p>23. In respect of Samson Platt (Scheduled Monument), SBW are concerned that the present exclusion zone shown around Samsons Platt is not sufficient to appropriately protect below-ground remains which may be associated with the Scheduled Monument. The Applicant stated at ISH2 that they were confident no further removal of panels would be required. SBW welcomes the Applicant's update that the results of the trial trenching will be available at Deadline 6 after lengthy delays and will comment further following review of the findings at Deadline 7. However, SBW would like to highlight to the ExA that Historic England identified potential options for the removal of panels to protect any below-ground remains in the absence of the results of the trial trenching (REF 5- 098). This included a number of fields around Samsons Platt of which Field 1.12 forms part of the grounds associated with Hordley House (Grade II* Listed Building).</p>	<p>Following the submission of the draft trial trenching reports at Deadline 6, the Applicant has held further discussions with Historic England regarding the extent of the proposed archaeological buffer zone around the Scheduled Monument at Sansom's Platt.</p> <p>The outcome of these discussions is that the Applicant has agreed to remove all solar pv panels and associated infrastructure from Field 1.13 which is to the south-west of the Scheduled Monument. The relevant part of Sheet 3 of the Works Plans has been updated for submission at Deadline 7. The whole of the field is marked solely as Works No. 5. There is no longer any requirement to place the 33kV cable in this field with the HDD crossing (into Field 1.14 at the south-east corner) – the 33kV cables can now go into the 275kV cable corridor, both options for this corridor are well to the east of the Scheduled Monument.</p> <p>The extent of the proposed archaeological buffer zones in Fields 1.11, 1.12 and 1.14 would remain unchanged.</p> <p>The Applicant and Historic England consider that the removal of solar pv panels and associated infrastructure from Field 1.13 ensure the protection of all buried archaeological remains associated with the Scheduled Monument at Sansom's Platt, and also further reduces any impact on the Scheduled Monument as a result of the change within its setting. This position is confirmed within the Statement of Common Ground agreed with Historic England.</p>	Historic_Environm ent
REP6-130	Stop Botley West Limited	<p>Hordley House</p> <p>24. A detailed assessment of the grounds and setting of Hordley House was submitted by the Applicant at Deadline 5 which responded to ExQ2.16.2.13 This requested that further assessment of the historic relationship between Hordley House and the land to the south-west was provided as the ExA had identified the potential for a wider, planned historic landscape. The Applicant concluded that 'on the basis that this study has not identified any conclusive evidence for any planned or designed landscape associated with Hordley House, the Applicant does not intend to make any reductions to the areas of solar PV panels proposed in this area'. However, SBW would contest this conclusion, with the Applicant's assessment including a series of maps which clearly indicate the presence of designed landscape features such as naturalistic tree planting, a walled garden, a 'model farm' and the gazebo (separately listed at Grade II). The architecture of Hordley House indicates it is a farmhouse of some status and it is highly likely that the landscaping to the south-west was deliberately laid out to reinforce this.</p> <p>25. It is the view of SBW that Field 1.12 therefore positively contributes to the appreciation of Hordley House's heritage significance as part of the planned grounds within which it was designed to be experienced in conjunction with. The proposed panels within Field 1.12 alongside mitigation measures would therefore be harmful to the significance of this Grade II* Listed Building through the loss of the present legibility of its formal grounds which remain largely intact. Furthermore, the existing exclusion zone around Samsons Platt means that only a narrow band of isolated</p>	<p>The Applicant agrees that the architecture of Hordley House indicates that it is a high-status building; this is reflected in its Grade II* listing. However, the remotely-placed walled garden, gazebo and external model farm are all elements that could be expected to be associated with a high-status farmhouse, and are not indicative of a formal designed landscape which is what had been suggested by the Examining Authority.</p> <p>The Applicant's assessment of the likely impacts and effects regarding the Grade II* listed Hordley House is set out in paragraphs 1.9.49 - 1.9.54 of ES Appendix 7.5: Settings Assessment (Rev 3) [CR2-038]. The assessment concludes that there would be a long-term, reversible minor adverse effect.</p> <p>It is notable that Historic England, as the principal consultee for matters affecting Grade II* listed buildings, has never commented negatively on the Applicant's assessment with regard to Hordley House. In the recent discussions regarding the proposed buffer zone around the Scheduled Monument at</p>	Historic_Environm ent

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		panels is proposed within Field 1.12 which appear operationally redundant and would have a disproportionate impact on the Listed Building. 26. SBW therefore considers that the remaining panels within Field 1.12 should be removed to alleviate the harm to Hordley House, a Grade II* Listed Building, with the additional potential benefit of protecting additional areas around Samsons Platt. 27. In sum, there is little, if any, comfort to be gained from what the Applicant has provided to the ExA. Not least because their whole approach has been one of downplaying impacts, undertaking poor assessments, repeating assertions that are unsupported, and consistently failing to respond appropriately to the ExA questions and feedback.	Sansom's Platt, Historic England did not raise the issue of the setting of Hordley House and did not request the removal of any area of solar pv panels from within Field 1.12. The Applicant refutes the suggestion by SBW that impacts have been downplayed, assessment have been poor, assertions have been unsupported or that there have been any failures in providing appropriate responses to the ExA or any other party.	
REP6-130	Stop Botley West Limited	<p>Landscape (Issue 3e)</p> <p>28. It is worth reflecting on the ExA's request for further information dated 14 October 2025, and in particular the section on landscape.14 We share the deep sentiment of frustration with the Applicant. The gist of the approach taken by the Applicant to date can be summarised as follows; first, a sub-par assessment that's both not serious to start with, but also dismissive of any challenge to the approach taken; second, when the ExA asks for further clarification or information, the response is to just repeat the unjustified and unevidenced previous positions taken, despite plenty of evidence to the contrary; and third, it will become evident that by Deadline 7 none of these points will be properly engaged with, still less actually answered. 29. It is almost as if the Applicant has run out of funds to pay consultants to do further (and necessary) works required to make this Order. We are sure that this is not lost on the ExA when listening to the answers to the questions raised. 30. Turning to the substance of the landscape issue, the applicant has judged in the LVIA that there will be no significant landscape effects as a result of the development proposals. They judge in table 8.2 that there will only be a Medium Magnitude of Impact. The criteria for Medium Magnitude of impact, as defined in their methodology is: "On the landscape resource – introduction of elements that may be prominent but may not necessarily be substantially uncharacteristic with the attributes of the receiving landscape." 31. High Magnitude of impact is described as "Introduction of dominant or uncharacteristic elements with the attributes of the receiving landscape"</p> <p>32. For all the reasons contained in the evidence before the ExA, the proposals firmly fit the criteria for the high Magnitude of impact, not the Medium by virtue of being dominant and uncharacteristic of the receiving landscape. The fact that the Applicant is unable to confront this fact is shocking and concerning.</p> <p>33. The LVIA is riddled with errors, new information has been compiled and submitted as Appendices yet the updated evidence has not been carried through to the ES Chapter, and fundamentally misses crucial elements. For example, in the Landscape Character Assessment they make numerous references to a High Magnitude of change occurring (1.3.7, 1.3.21, 1.3.44) and yet this hasn't translated to the LVIA. Similarly points have been raised by the ExA in their latest request for information.</p> <p>34. In questioning at the Hearing Specific Sessions, the applicants Landscape Architects conceded that they have based their judgements on the whole Project site rather than appreciating the nuances of the different areas, their setting, and the potentially different impacts upon them. An example of this being there are a number of visual receptors where the judgements are that there will be significant visual impacts – for example VP25, 23, 24 and 38. To think this through, the reference to the GLVIA3 and the assessed significant impacts on visual receptors – at 3.20 – it states that "it is also possible, although less common, that there may be likely significant effects on visual amenity without effects on the landscape resource." What the GLVIA3 is trying to direct us is that if the proposed development results in significant impacts on the visual receptors, it is very likely that there will be a significant impact on the landscape receptors. 35. For example, VP25, the baseline views show open, rolling countryside, long views to the higher ground, no industrial influences, all viewed from a specific PRoW. At a winter year it shows the implemented solar array, with no mitigation and the extent of the array across many of the fields in the view, changing the character of this landscape. Some long views will be lost when near the array, with the planting of the new hedge further curtailing, and in places fully restricting, the views and impacting the overall experience on the PRoW to a significant extent. There will be a significant impact on the landscape character in this location.</p> <p>36. Due to the lack of continuity and the piecemeal changes that have been made to the Environmental Statement Chapter, and the supporting evidence, it seems an impossible task to carry on making amendments as they are clearly resulting in errors. This puts the ExA in the impossible position of having to then make judgements by piecing together information that the Applicant was unable to explain at the hearings. There is absolutely no way that the ExA can have any confidence in this material to the standard</p>	<p>Please refer to the Applicant's response to the ExA's Rule 17 letter (14th October 2025) [REP6-052] which addresses many of these issues raised]. An updated landscape chapter was also submitted at Deadline 6 [REP6-012].</p> <p>Moderate Effects</p> <p>Dealing with Moderate Effects in more detail, the Applicant sets out how the Applicant's approach in line with the Landscape Institute's guidance on the matter in paragraphs 1.1.9 and 1.1.10 of Applicant's Response to Rule 17 Letter (17th June 2025) on Environmental Statement Landscape and Visual Impact Assessment [REP2-029].</p> <p>In the Applicant'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.</p> <p>However, in light of concerns raised by interested parties 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 first responded in [REP2-029] providing the justification and finding that on review some moderate effects were significant (see Tables 1.1 and 1.2 of that response document). 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 [REP6-012].</p> <p>Additional responses in respect of landscape are also set out in the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025), submitted at Deadline 7.</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>required to report back to the Secretary of State.</p> <p>Visual Impacts</p> <p>37. The basis for the visual impact is set out in ExQ2 Q2.13.9, where the overarching approach to the visual assessment is set out; The LVIA has taken the stance of a person who would rather see the landscape mitigation (rather) than elements of the project."</p> <p>38. This utterly bizarre approach has contaminated the whole assessment of visual effects and resulted in the confusion evident in the overall visual assessment, including the position taken that there is an improvement in visual amenity because of the mitigation, particularly the hedgerows along the boundaries of PRoWs. On a proper approach, change is assessed on size, scale, geographical extent, and then on the duration and reversibility of such a change. This is not based on how one might imagine the ideal individual (receptor) viewing the proposal.</p> <p>39. There has been much discussion about the introduction of the hedges into landscapes where it is a new feature, uncharacteristic of the existing open agricultural landscape and creating a tunnelling effect. We disagree that in the 15 VPs which have been identified as receiving significant effects at YR1 that only 4 of them will be unchanged at Yr 15. (VP32 has had the panels pulled back from the viewpoint but this is an example of where the ES Chapter hasn't been updated to recognise this)</p> <p>40. There are a number of views where we consider there is no change in the visual impact with the embedded mitigation, including but not exclusively 04,05b, 08, 13,17,18,23,24,25,38,40,41,48 and 54</p> <p>Moderate and Significant</p> <p>41. We are aware of the GLVIA advice on the assessment of significance. By categorically setting out that Moderate is 'not significant' the Applicant leaves themselves no room to justify their position, landscape by landscape and view by view. It appears that they have, reluctantly, now changed their stance however this now needs to be consistently assessed through the VPs at DL6. Notwithstanding this, we note that it is apparent that the intent was always to ensure that there were limited significant effects arising from the project with reference to applicants comment in REP1-020 where they explicitly state that position at RR-870-006:</p> <p>For the purposes of the Project, those effects of Moderate adverse or below are considered to be not significant. Taking the proportionality approach to the assessment, it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors.</p> <p>42. We still maintain that it is uncommon for developments of this scale to not have significant landscape and visual effects. The fact that the Applicant still resists this basic point speaks to their lack of credibility and the little weight to attach to their 'evidence'.</p>		
REP6-130	Stop Botley West Limited	<p>Residential Visual Amenity Assessment</p> <p>43. The applicant has yet to submit a Residential Visual Amenity Assessment and has been further pressed by the ExA in the latest request for information. In the Open Hearing Sessions they stated that they have now completed an assessment however there has been no confirmation that they have visited any private properties (Mrs Lewis for SBW said at the hearings that nobody she knows has been approached for access).</p> <p>44. This means that they have yet to complete this work, or have not even began the process, or it is currently only a desktop based exercise, or a combination of the aforementioned. For SBW this is the biggest and most shocking omission on the part of the Applicant. The frustrations of the Chair of the ExA were palpable at the hearings and they pale in comparison to those held by the SBW community who have been at the receiving end of this dismissive attitude from the very start. For completeness, we know that the Applicant stated their LVIA ES Chapter that they have not visited any private properties, so we are unsure of how the RVAA has been completed.</p> <p>45. From the perspective of SBW, who have undertaken this work, and updated since the last open floor hearing, circa 300 properties are likely to fall in the range of 50 - 250m from the panels. We have attached</p>	The Applicant has completed and submitted a Residential Visual Amenity Assessment (RVAA) [REP6-064] and [REP6-065] . This document has been updated and re-submitted at Deadline 7, alongside the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025).	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>an updated xl. Spreadsheet to demonstrate the same.</p> <p>46. Despite the Applicant's oral submissions at Issue Specific Hearing 2, it is not sufficient to rely on general policy as a shield to protect the Applicant from the need to complete RVAAs. RVAAs should have been undertaken before finding that any visual impact was residual. In general, while it is accepted that policy supports achieving net zero emissions, this does not mean that proper procedures should be abandoned; to suggest otherwise is an abuse of policy.</p> <p>47. Again, this points to the lack of consultation with the local community despite the significant visual impact of the proposed development. Moving forward, there is inadequate time for any form of meaningful consultation on this point. Consequently, the ExA cannot be satisfied that detrimental visual impact has been appropriately identified and avoided or mitigated.</p>		

2.4 Public / Landowner

Table 2.3: Applicant's Responses to Representations provided at Deadline 6 – Public / Landowner

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP6-078	Bojan Ivanovic	<p>Dear Sir/Madam,</p> <p>I am writing yet again to raise serious concerns regarding the recent changes in Oxfordshire County Council's (OCC) approach to highway and drainage maintenance, and the potential impact these changes may have on flood risk assessments for the proposed Botley West Solar Farm.</p> <p>OCC has inexplicably and very recently adopted a new approach to verge and drainage maintenance.</p> <p>A new set of lines now appears to define the limits of cutting, leaving areas that were historically maintained to become overgrown and unmanaged.</p> <p>Culverts along Yarnton Road remain uncleared, drainage ditches are increasingly silted, and in some cases vegetation is now obscuring traffic signs — even after “cleaning works” have only just been completed. This not only poses a hazard for road users but also significantly increases the likelihood of flooding in Worton.</p> <p>The situation is of particular concern given the developer's claim in the planning consultation documents that solar panels do not increase surface water run-off. The most recent technical evidence consistently shows the opposite: solar panels increase peak run-off, total flows and erosion. The developer's flood risk assessment therefore appears to have significantly underestimated the true risks.</p> <p>In addition, there is a growing perception among local residents that OCC is deliberately allowing unchecked vegetation growth to obscure the fields which are earmarked to become a vast expanse of solar panels and associated electrical and industrial infrastructure.</p> <p>This uncontrolled vegetation growth risks concealing the true visual impact of the proposed development from the Planning Inspectorate during its visit.</p> <p>It is also worth noting that the absence of flooding this year is not evidence of safety but simply a result of unusually prolonged dry periods.</p> <p>The change in drainage and verge maintenance represents a concealed ticking time bomb: once sustained rainfall returns, Worton and its surrounding roads will face an even higher risk of surface water flooding due to uncleared culverts, blocked channels, and unmanaged vegetation.</p> <p>Taken together, these factors suggest that:</p> <ol style="list-style-type: none"> 1. Flood risk to Worton and the surrounding area has been underestimated in the developer's proposals. 2. OCC's newly adopted maintenance regime exacerbates that flood risk. 3. The unchecked growth of vegetation may be intentionally obscuring the true scale and visual/other impact of the proposed development. <p>I therefore respectfully urge the Inspectorate to ensure that a full and independent review of surface water management, flood risk, and maintenance practices along Yarnton Road in Worton is undertaken as part of its consideration of this application.</p>	<p>We would like to clarify that the issues raised regarding verge and drainage maintenance, culvert clearance, and vegetation management are not attributable to the Applicant or the development proposal itself. These matters fall under the jurisdiction and operational responsibilities of Oxfordshire County Council (OCC) as the comment relates to pre-existing concerns for areas outside of the Project boundary. The issue of uncontrolled vegetation again falls outside of the responsibilities of the applicant, and is a question for OCC.</p>	Hydrology_and_Flood_risk
REP6-082	CPRE Oxfordshire	<p>1. Best and Most Versatile Agricultural Land – and Food Security</p> <p>Food security is a growing national issue, particularly in light of global instability such as the war in Ukraine. CPRE Oxfordshire strongly believes that the use of productive farmland – especially BMV land grades 1&2, should not be used for solar panels and instead farmed to feed the nation.</p> <p>The applicant has not demonstrated compliance with the requirements of National Policy Statement for renewable energy infrastructure (NPS) EN-3, which clearly states that developers must justify:</p> <p>“Why the use of BMV land is necessary, and whether it is feasible to locate the scheme on lower-grade agricultural land.”</p> <p>Despite repeated requests, the applicant has still not provided adequate soil sampling or evidence to support their claim that the land is de graded or of low productivity. In fact, the proportion of BMV land has increased– from 38 to 42%. This is deeply concerning and contradicts the applicant's claim that lower-grade land has been prioritised.</p>	<p>The Applicants response to the Rule 17 letter at Deadline 6 [REP6-052], Point 7 explains how the Applicant has complied with (NPS) EN-3.</p>	Agricultural_Land_Use

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>I refer you to my letter dated 11th September of which we asked for detailed data on soil quality. These requests have not been met. We also referenced DEFRA standards stating that land with a phosphorus level of 2 cannot be classified as degraded.</p> <p>The partial data presented does not provide a complete or accurate picture. This is a crucial evidence gap and makes it impossible for the examining authority to make a fully informed decision. At worst, it appears deliberately misleading.</p> <p>Worse still, this selective presentation of data downplays the land's true value. We believe that any degradation of the land is due NOT to underlying geology, but to poor land management practices. Neighbouring tenant farmers have demonstrated strong yields well above the national average. Describing this land as "low productivity" is simply inaccurate and misleading.</p> <p>With appropriate regenerative farming methods, this land could be restored to full productivity and continue playing a role in feeding the nation.</p> <p>It's also worth noting that growing political concern around the loss of BMV land is emerging. In my letter dated 11th September, I attached a letter from 30 Ministers and Lords, sent to the Prime Minister in July 2025, calling for a ban on large-scale solar installations on BMV land.</p>		
REP6-082	CPRE Oxfordshire	<p>2. Green Belt – A Major Encroachment</p> <p>Another fundamental concern is that 75% of the proposed site lies within the Oxford Green Belt. This represents the largest single loss of Oxford's Green Belt.</p> <p>To date, no existing solar development has been permitted on this scale within the Green Belt. This proposal sets a dangerous precedent, undermining a core principle of planning policy that has protected Oxford's setting and surrounding countryside for generations.</p> <p>The applicant has yet to justify why this site is suitable for a solar development of this scale, especially given the significant loss of Green Belt and BMV land — both strong reasons to conclude that Very Special Circumstances do not apply.</p>	<p>The Applicant has set out its reasoning for site selection, including placing part of the Project on Green Belt land in its Planning Supporting Statement (PSS) (REP1-012, Appendix 8), in its Chapter on Alternatives [APP-042], and in other earlier submission to IP's on this subject. The suitability of large scale solar development in the green belt is in principle supported by national policy, as set out in paragraph 4.2.17 of NPS EN-1 which confirms that "<i>the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests... where development within a Green Belt requires very special circumstances to justify development</i>". The Applicant appreciates that this is a starting point only and has therefore provided evidence of why very special circumstances otherwise applies, in Appendix 8 of its PSS.</p> <p>More detail is set out below.</p> <p>Various percentages have been quoted about land take from the Green Belt, but the Applicants' assessment is as follows. The Oxfordshire Green Belt in total occupies an area of approximately 34,464 ha. The above ground development of the Project (prior to subsequent change requests to reduce the area of solar further) occupied an area of approximately 497 ha. or 1.4% of the total Oxfordshire Green Belt. This is a small percentage. When previously calculated, 69% of the development fell within the Green Belt (now slightly less than this following removal of various areas of solar arrays). Also, unlike most other forms of development that the OHA's have consented in the Green Belt, the Applicants' development is temporary. There will, therefore, be no enduring 'loss' of the Green Belt. The significant benefits of this renewable energy development are considered to outweigh any harm to the Green Belt and any other harm.</p> <p>The Applicant would characterise this Project as not as the 'single largest loss', but the single largest gain in the production of urgently needed renewable energy. If a precedent has been set, it is a positive one.</p> <p>That VSC case made by the Applicant and weight to be attached to relevant factors accords with the requirements of NPS EN-1 section 5.11 and in particular, para 5.11.37.</p> <p>The overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test.</p> <p>Arguably, because of this policy, the Applicant need not have made a VSC case. However, in the event that the ExA did not take that view, the Applicant has submitted a VSC case to support that the test has been met in line with policy in any event. The IP and ExA should also note too that this policy test i.e. that the VSC case has been met, was confirmed as</p>	Green_Belt

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			being correct even by Mr Mohammed, KC, representing Stop Botley West at the ISH (Part 1) held on 9 th October, 2025 (see EV7-004, Mr Mohammed comment at 01:04:35:15 – 01:05:08:15 and Mr Yeates response at 01:05:46:18 – 01:06:21:16, and the video recording of the same at [EV7-003]).	
REP6-082	CPRE Oxfordshire	<p>3. Public Engagement – A Missed Opportunity</p> <p>Finally, I want to address the serious lack of meaningful public consultation. This project had the potential to be a positive example of how the UK can transition to renewable energy in a way that respects local communities and landscapes. Unfortunately, that opportunity has been squandered. From the outset, local residents have felt excluded and ignored. The large number of change requests are clear evidence of this. As one senior member of the Blenheim Estate once told me: “It’s amazing how quickly a community can turn on you.” Sadly this is so true. Instead of considering land more sensitively — prioritising areas with lower landscape and community impact — the applicant has pursued a “land grab” approach, backed by unscrupulous foreign investment, rather than by strategic, community led planning. Yes, some small improvements have been made – such as the removal of panels at Bladon and Begbroke – but these are not enough. To make this scheme even remotely palatable, a far more significant reduction in scale is needed, particularly in respect to BMV and Green Belt Land.</p>	The Applicant acknowledges this comment but confirms that the level of consultation undertaken, and information presented throughout the preapplication stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in the Consultation Report [APP-024] and confirmed in the Acceptance checklist (s55) [PD-001] and Notification of Decision to Accept Application [PD-002], which was submitted to the Planning Inspectorate and accepted for examination.	Consultation_Process
REP6-088	Frances Stevenson	<p>Re Change Request 2: Change Report, Sept 2025 (PINS Ref: EN010147):</p> <p>In response to feedback from Historic England and other Interested Parties, the Applicant has removed solar installation area, fence, maintenance roads and gates from field numbers 2.1, 2.2, 2.5 and 2.20-2.26 to the east of Bladon to protect the visual setting of the Blenheim Palace World Heritage Site (2.4 Change 1). However they propose to retain the land within the Order Limits in order to create a ‘Community Food Growing Area’.</p> <p>I have the following questions about this:</p> <p>1. In what sense would it be a ‘community’ food growing area? Having initially mentioned the idea of providing allotments for local residents, the Applicant’s latest proposal is that the land will not be for the use of the local community. Neither of the food growers mentioned by the Applicant (OxFarmtoFork and Cherwell Collective) are local to Bladon. The food they would produce would not be for the local community. The local community has not even been consulted on the location or any other aspects of the plans for the ‘community food growing area’ except in the vaguest of terms, as I detailed in my submission for Deadline 5, Submission ID: 37611.</p> <p>2. OxFarmtoFork is a commercial food grower, producing food that it sells to institutional buyers. The fields earmarked for the ‘Community Food Growing Area’ are already a commercial food growing area. The area is being productively farmed, as it has for generations, forming part of the traditional agricultural setting of Blenheim Palace described in the Blenheim Palace World Heritage Site Management Plan, 2017. Why would a change from the existing form of commercial food production to a new form of commercial food production be considered a planning benefit?</p> <p>3. The Applicant’s reason for removing solar infrastructure from these particular fields is to protect the setting of Blenheim Palace. Can the Applicant guarantee that commercial food production by OxFarmtoFork and the ‘food forests’ proposed by Cherwell Collective would not harm the setting of Blenheim Palace through an accumulation of polytunnels, sheds and storage facilities, access roads, security fences etc.?</p>	<p>The intention is to provide up to 30 ha of land for food growing initiatives. The Applicant has entered into an understanding of how and where these might operate with various organisations. The details of these however, will be submitted for approval via the outline Operational Management Plan, to be agreed by the relevant OHAs when issuing the detailed version of this plan pursuant to Requirement 12 of the draft DCO. That is the check that will be applied to ensure these proposals are acceptable from a land use planning perspective.</p> <p>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. The Applicant will use OxFarmToFork to help identify potential occupiers of the food growing areas. The Applicant will work with the parish councils to engage with local growers or those who are thinking of starting to grow their own food. Access to this formerly closed land will be a remarkable opportunity for local residents to grow food for their own consumption or for sale to the colleges or at farmers’ markets, to the benefit of their physical and mental health, while helping the soil to recover from years of intensive farming.</p>	Community_Food_growing_Location
REP6-090	Graham Raymond Brown	Size of BWSF - it is clear that the world needs the installation of large-scale solar projects to generate clean electricity that is increasingly required to keep our current way of life but without the burning of fossil fuels. Does Botley West have to be so large? PVDP and Blenheim have continually stressed that the National Grid require 840 MW in order to build their substation at Botley. From the focussed hearings held on 8th -10th October this year (I attended 9th and 10th), it was not clear to me what had been agreed between the applicant and the National Grid. For such a key point I was surprised, and surprised the National Grid were not present. As the inspectors noted this is key to the whole application. It also raises	The Applicant notes the IP’s observation. The case for development is set out in full, including the need, in the Applicants Planning Supporting Statement and Supplementary Statement of Need [REP1-012 and PDB-014]. Policy references to need for deployment at scale can be found at NPS EN-1 paras. 4.2.2 to 4.2.4. Also see Chapter 5, Alternatives, para 5.5.7 [APP-042]. Other references to scale are found in Table 5.1, page 13 and 17.	Needs_Case

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		the question of what size can the project be? I have spoken to many local residents about this – the Stop campaigners generally do not have a position other than Stop. Other folk would like to see it smaller – including Oxfordshire County Council. This would go some way to satisfying several objections including proximity to housing, use of green belt and use of good agricultural land. Panels have just been removed from land near Bladon and land near the airport. This does not seem to have made an impact on what the developers are offering the National Grid.	<p>The connection agreement with National Grid was a judgement made at the time by national grid (assessing their ability to provide a connection at scale – in this case 840MW) and the Applicants judgement as to the likelihood of them being able to deliver a project of sufficient size to deliver that amount of renewable energy to the grid. Details of the Bilateral Connection Agreement between NGET and SolarFive Ltd can be found in the Grid Connection Statement [APP-019].</p> <p>The DCO consenting process is the final arbiter as to what the size is acceptable and therefore what power can be delivered to the Grid. However, that judgement is to be made in accordance with the suite of National Policy Statements relevant to this type of project. National policy is very supportive of such projects, and policy makes clear that is that there is no upper limit per se to the size or number of such projects, and that there is an urgent need for these types of Projects.</p>	
REP6-090	Graham Raymond Brown	Consultation - it was also clear from the hearings that the developers are leaning heavily on the DESNEZ guidelines that the climate crisis outweighs many of the existing planning guidelines. I believe that due diligence still needs to be carried out, especially with regard to proximity to homes and talking to residents that are impacted. This was very disappointing and questions the consultation process. This had been highlighted from the start of the project and only now were some concessions being made. Similarly with the airport – why are panels being removed now instead of before?	<p>The Applicant acknowledges this comment but reaffirms its commitment to an iterative consultation process. The Applicant has carefully considered comments received throughout multiple stages of consultation prior to submitting the Application. A summary of comments received, and changes made as a result of comments received, are presented in the Consultation Report [APP-024]. As a result, the Applicant has updated the proposals to address concerns and minimise impact where feasible.</p> <p>The Environmental Statement [APP-036 to APP-224] that accompanies the Application has been supplemented with the Environmental Statement Addendum [CR2-071] which the Applicant submitted in September 2025 in support of a request of changes to the Application, which came from ongoing engagement with technical and statutory stakeholders.</p> <p>In summary, the Consultation Report [APP-024] details how the Applicant updated its proposals following each stage of consultation. This was displayed through the updated proposals presented in the Preliminary Environmental Information Report (PEIR) at phase two, the two subsequent rounds of Targeted Consultation which sought feedback on specific changes arising as a result of previous phases of consultation.</p> <p>The Applicant also consulted on the proposed changes which occurred as a result of ongoing engagement throughout the examination process, this consultation is further detailed in the Change Request Consultation Report [CR2-071] submitted as part of the Change Request.</p> <p>Both the Application, including the Consultation Report [APP-024], and the Change Request Consultation Report [CR2-071], were accepted by the ExA for examination.</p> <p>For completeness, the Applicant intentionally relies strongly on the national policy statements published by DESNEZ. This is because the application is brought under s104 of the Planning Act 2008 and therefore it is a legal requirement that the Secretary of State, as the decision maker, “<i>must have regard to any national policy statement which has effect in relation to development of the description to which the application relates (a “relevant national policy statement”)</i>” (s104(2)(a) PA 2008).</p>	Consultation_Process
REP6-090	Graham Raymond Brown	Battery Storage – this was mentioned at the hearings but acknowledged as a separate application. It does raise the point about storage though and this would be feedback to the DESNEZ. Due to the very nature of solar power, to have a large battery facility linked to BWSF would make the project far more efficient, providing power for Oxford during the summer nights.	<p>This is noted. There is strong policy support in favour of solar development and whilst there is also support for associated battery development, there is no obligation for a developer to also co-locate batteries as part of its Project. The Applicant's grid connection agreement with National Grid does not include export capacity and therefore battery storage is not included as part of this Project.</p>	Project_description_and_Design_parameters

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REP6-090	Graham Raymond Brown	Community Benefit – I appreciate that this is not part of the DCO, as is the applicant who made no offer at the beginning of the consultation. I would like to thank the inspectors for their patience allowing community benefit to be presented and discussed on several occasions during the hearings. I hope this will be a useful contribution to the Government's working paper on community benefit, setting a fair level for renewable energy installations. The suggestion of £500/installed MW made by the forum of local parishes and then by Oxfordshire County Council is still far too low in my opinion. Due to the size of the project, the proximity to houses, the use of green belt and good arable land, I think this figure should be £1000/MW. As the projected is expected to have an income of £50-100 million per annum this would represent between 1-2% of income and make a huge contribution to the local areas.	The Applicant is a member of Solar Energy UK's NSIP Forum, a body which has been working with DESNZ for the last eighteen months to agree a figure per MW for community benefit funds. After negotiations with the OHAs a figure of £525/MW was agreed for this project to be paid annually for the operational life of the fund, indexed to inflation. This is higher than any solar DCO yet consented. The sum of £441,000 will be paid annually for 39 years - a very significant commitment which the community can rely on - unlike many other sources of funding. Together with the capital investment and annual business rates contribution, this'll result in growth in the local economy. The Socio Economics chapter of the application [APP-052] sets this out in detail.	Community_Benefits_and_Impacts
REP6-091	Hill Grove Family Farm Ltd	Good morning everyone My name is Tony Brown and I own the 50ha block of land called Sandford Brake Farm, surrounding the Thames Water Sewage treatment plant at Worton near Cassington. I have farmed this land since April 2011 As a farmer I consider global warming to be the greatest threat to my business because it disrupts every part of crop production. Rising temperatures, unpredictable rainfall, and extreme weather events are damaging yields, eroding soil, impeding crop establishment and making planning harder each year. To build resilience, I'm hoping to use a portion of my poorer farmland for solar production. This will give my business a steady, reliable source of income offsetting variable crop yields and reduced income as government support is removed from food production. This will allow me to support my business, family and workforce. Solar will cut my farm's carbon footprint, helping to tackle the very problem contributing to global warming by generating clean energy. I can then grow food on more productive land protecting my business and contributing to the UK's net-zero goals. I have listened to the debate that suggests farmland should not be lost to solar panels. I would agree that this would apply to productive ground but this land is not, it is heavy clay, requiring considerable mechanical effort to produce arable crops. Our yields at Sandford Brake are poor. Wheat is our primary crop. The average UK wheat yield across 50 hectares would be 380t. In 2025, 2024 and 2022 we produced 57t, 163t and 226t respectively. I would therefore advocate the proposed system of capturing green energy whilst establishing grazing below the panels must be one of the most resilient forms of energy capture and farming combined. I believe this will improve wildlife habitats whilst the ground under the panels will continue to sequest carbon over the duration of the scheme. I appreciate I hope to benefit financially from this project but I also believe that my children and their children are at serious risk from climate change. This project will on its own will not resolve global warming but it is perhaps one small building block in the construction of a greener and more resilient world. Thank you.	The Applicant is grateful for the support for the Project.	Positive comment Public /Land Owner
REP6-094	James Price	Their response has some merit in that " <i>Leaving land fallow is a practice which has formed part of agricultural rotations for centuries as it enhances soil quality through natural restoration processes</i> " but the key word in this statement is "rotations" As a regenerative farmer I practise a wide crop rotation and indeed nearly all farmers in the world have a crop rotation whereby we grow different crops in the same field in each subsequent year. Wikipedia states "Ancient Near Eastern farmers practiced crop rotation in 6000 BC, alternately planting legumes and cereals" and gardeners will do the same, it is one of the most basic practices when it comes to crop or land husbandry. But this all relies on growing different crops each year, if you grow the same crop year after year then this is a monoculture. The solar panels cannot have anything other than the same crop underneath them year after year so the ground will not be fallow as stated but will become a monoculture. This is the exact opposite of what is being claimed and is extremely detrimental to soil health and quality.	We thank Mr Price for his comments and know that he has been a key partner for Blenheim Estate over the past 20 years, farming a number of sections of the land within the order limits for anything from two years to twenty years. He is a respected arable farmer who cares deeply about growing food. That said, there is a growing body of research which supports the benefits to soil health we have outlined within the Botley West proposal and we must respectfully disagree that rotations are the only method of restoring soil health.	Agricultural_Land_Use
REP6-094	James Price	The other major issue which is being ignored is the damage that the installation of the panels will do to both the soil structure but also to the drainage schemes that are established under the surface. In the post war period the government recognised the importance of food security in the Uk and grant funded the installation of hundreds of thousands of miles of drainage deep under the soil to allow the ground to be used to grow	The establishment and development of the conservation grassland will be monitored through the implementation of the Landscape and Ecological Management Plan. In relation to the maintenance of field drainage the outline Code of Construction Practice [REP6-028] paragraph 1.10.41 states that before	Agricultural_Land_Use

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		<p>crops. Most of the land that is being put forward by PVDP for the solar development has these land drains underneath the surface and by driving their piles into the ground to support the panels they will destroy these systems. Not only will this make the ground unfarmable when, and if, the panels are removed in 40 years but for the duration of the project the soil will sit waterlogged and anaerobic over the winter months. Pioneering work by the Allerton Project in Leicestershire has shown that compacted wet soils emit elevated levels of nitrous oxide, a greenhouse gas 300 times more potent than carbon dioxide. They are currently funding a research project to update land drains in a field to monitor not only yield but also weed burden, soil health and environmental metrics.</p> <p>I cannot emphasise enough how detrimental this project is to the soils and biodiversity of this area. Under my care I have transformed this farmland and it is now both productive and biodiverse whilst being resilient to our current weather patterns. We have grey partridge, brown hares and numerous butterflies, birds and insects that thrive alongside our productive fields which produce food year after year for the UK. This will be destroyed by this solar development, it is nothing but a money making scheme, despite claims to the contrary.</p>	<p>commencement of construction, visual inspections will be undertaken of existing functioning field drainage, with drainage plans also consulted (where available). The requirement for the restoration of functioning field drainage is secured through the protective provisions for the benefit of the drainage authorities (Part 3 of Schedule 15) and the Environment Agency (Part 7 of Schedule 15) of the draft DCO.</p>	
REP6-097	Josephine Christine Coy	<p>Submission ID: 37817</p> <p>Response to submissions made at D5</p> <p>With a proposed development of this magnitude and the far reaching consequences for thousands of households as well as the Oxfordshire landscape significant concerns remain: The number of incomplete plans and the delay in providing important details requested by the Inspectorate (some until after the DCO decision)</p> <p>The delay in publication of the "Change 2 request" document</p> <p>Inadequate consideration of flood risk especially in light of increased rainfall expected as a result of changes in the climate.</p> <p>The refusal to make changes in areas most significant to landscape character.</p> <p>The continuing issue of "one size fits all" solution to hedging.</p> <p>Concerns remain regarding lack of provision for management of PRoW and their maintenance.</p> <p>The absence of detail on waste types and the management route required for replacement of panels.</p> <p>There remains concern regarding minerals safeguarding.</p> <p>Only minimal removal of panels in areas most affected: roads, residences, PRoW, the character of the landscape.</p> <p>In light of environmental concerns, the Applicant appears to be relying on the temporary nature of the scheme. However, a major concern remains the likelihood of the supposedly temporary site becoming permanent, derelict and the soil contaminated. There does not appear to be detailed assurance of sufficient funds to enable safe decommissioning at the end of the operational lifespan of the scheme.</p> <p>Regarding biodiversity, claims are made that are not substantiated, therefore not verifiable, concerning protection of arboriculture and archaeological sites and heritage assets, flora, fauna, bat and skylark populations.</p> <p>No one can doubt that we need to source alternative energy solutions, but a balance is essential to ensure the advantages are not outweighed by the cost.</p>	<p>The Applicant has produced additional and updated plans throughout the examination period, in response to a significant number of areas of discussion and debate, including the ExA's own questions. Whilst the IP's comment was made in response to submissions made at Deadline 5, it is not explicitly clear what areas are felt to be incomplete or delayed; although there were delays in providing the Archaeological Trial Trench reports, these were provided at Deadline 6. Additional work on the RVAA was also provided following the October hearings at Deadline 6, and this has been further updated at this Deadline 7. Moreover, the 'DCO decision' will not be made until 2026.</p> <p>Change Request 2 was consulted on for one month in July and August, and the Change Request submitted in September, including a consultation report relating to that process, [CR2-072] as required in line with guidance. The reasons for removal of panels, and removal of land from the Order Limits, were clearly explained in the Change Request, and assessed in the ES Addendum [CR2-071].</p> <p>The application documents include environmental assessment of matters relating to, inter alia, flood risk, climate change, heritage assets, ecology, biodiversity net gain, landscape character and landscape treatment. This includes details of hedgerow planting and maintenance, land and habitat management, and the management and maintenance of Public Rights of Way, linked to management plans which are bound into the DCO as requirements.</p> <p>The draft Decommissioning Plan [REP6-036] and outline Operational Management Plan [REP6-032] include details of the proposed approach to repair and replacement, and the overall strategy for recycling of waste, through a decommissioning waste management plan.</p> <p>The Applicant has produced a Minerals Resource Assessment [APP-195] and expanded on the position with regards to not permanently sterilising resource in the safeguarded areas in further responses to the OHA representations and ExA questions.</p> <p>The development is temporary, albeit for 42 years, and the Applicant provided comment in responses to relevant representations [REP1-020] Section 11 confirming that Solar farms are generally consented on the basis that they will be time limited in their operation and, pursuant to NPS EN-3 paragraph 2.10.65, are therefore "described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed." NPS EN-3 also recognises that an upper limit of 40 years is typical, but that applicants may seek consent without a time-period or for differing time-periods of operation (paragraph 2.10.66). The Botley West DCO seeks a time-limited permission of 42 years, and the Applicant does not consider that there is a need for a decommissioning bond, as set out in REP1-020.</p>	Various issues

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REP6-098	Karen Squibb Williams on behalf of Dustin Dryden	<p>* Easement secondary access; Lower Road, APP-007/2.4/Sheet10, ASP-7 & PA-3 & SCT-58; re; 10-06, 10-07, 10-08.</p> <p>To date, there have been no discussions or negotiations with the Applicants regarding the rights they seek to acquire and the consequent effects on M Dryden's access to and from his home and farm. In the absence of negotiations, I would like clarity around identification of the proposed mitigation by the applicants to ensure that (even if for safety reasons alone) his access and egress remains continuously and freely available throughout the duration of all and any works, as well as future operations.</p> <p>I would hope that the ExA can assist to ensure that any information regarding Compulsory Acquisition of the rights sought (to lie cabling at ASP-7 & PA-3 & SCT-58 (APP-007/2.4/Sheet10) is actively provided by the Applicants – directly to Mr Dryden, so that he has an opportunity to comment.</p> <p>Waiting for the Construction Traffic Management Plan, would be unfair to Mr Dryden in terms of the necessary forward planning required for the family and the farming activities of his company, Oxfordshire Estates.</p>	<p>Post hearing the Applicant has engaged with Ms Squibb-Williams regarding the proposed cable which runs along the existing access track at Plot 10-07 to understand the implication of the proposed works in the area on her client. Through Land Referencing diligent enquiry, Mr Dryden was consulted as both an Occupier of the Plot given the rights of access he holds, as well as Freeholder with sub-soil interest in relation to Goose Eye Farm. As Mr Dryden is not a Freeholder within the Order Limits, there is no requirement to secure a voluntary agreement with him, and thus has not been included within the Land and Rights Negotiation Tracker for that reason.</p> <p>The Applicant has proposed to re-locate the 33kV cable to the south side of the access track to mitigate the concerns Mr Dryden has about using the track during construction. While it is noted that there will still be a need to cross the track with the cable, the Applicant has confirmed the track will be plated at those locations where the cables need to cross the road to ensure unencumbered access at all times. Prior to the commencement of the works, Mr Dryden will be notified as a consultee with an interest in land of the start of the works. It is anticipated the works in the area will take around 1 week to complete, with the works to site the cable under the road taking 1-2 days.</p>	Land_Agreements
REP6-099	Karen Squibb-Williams on behalf of Dustin Dryden	<p>On behalf of Mr DRYDEN, I wish simply to highlight the following elements which directly – and uniquely – affect his home at APP-007, 2.4, sheets 8 & 10.</p> <p>He lives there with my family and operates a modest regenerative and biodiverse smallholding called Oxfordshire Estates Ltd. is wholly encircled by the 'red line'. The summary points I want to highlight touch on Agenda Issues 3b,c,e,h: I cannot add technically to the specialist expertise behind submissions already given to yourselves.</p> <p>However, you have all visited I ask you to evaluate the impact upon this home and family specifically in terms of:</p> <ul style="list-style-type: none"> a. Residential amenity; b. Residents' safety and security; c. Profound and intense visual impact; d. Significant noise impact upon his property and home amenities; e. Loss of best and most versatile agricultural land; f. Heritage and archaeological impacts; g. Existing or re-positioned public and private rights of way; h. Safe emergency services access to my home; i. The maintenance and continuity of water supply to his home; j. Ecology and biodiversity, particularly the breeding, overwintering and nesting of birds / wetland habitat; k. I have been unable to identify the Applicant's assessment regarding operational effects of solar arrays on wetland birds and other creatures (dragonflies etc.); I believe the area of such an assessment should include the pond area of Mr Dryden's land. l. As his land already regularly floods to a significant level – despite Goose Eye land falling outside the development boundary – and as his land would be encircled – I seek specific details from the Applicants regarding the additional flood, run-off and contamination risks and mitigation, should the development go ahead; I appreciate that the specific data will be affected by the final buffer zone sought by the Applicants – which we do not yet know. <p>I accept this list is essentially repeating points Mr Dryden has made in the previous three years – particularly during the consultation phases; I raise them again as a substantive response has never been received from the Applicants.</p> <p>I continue to seek very specific mitigation (and / or Enhancement) information regarding these issues. I respectfully echo the Lead Inspector's point made this morning about the Applicant's responsibility to apply the Mitigation Hierarchy.</p>	<p>a – i The Applicant has continued to engage with Ms Squibb-Williams on behalf of Dustin Dryden, notably at a meeting on 21 October 2025 following the hearings. The Applicant notes that many of the points raised in this submission are general in nature, and the Applicant points Ms Squibb-Williams to the various environmental assessments and supporting documents that have been submitted across the Examination that deals with each of those topics. A response to the more specific queries is provided below.</p> <p>h. – Safe emergency services access was noted in discussions with Ms Squibb-Williams around the secondary access to Mr Dryden's property and mitigation provided in The Applicants Response above [REP6-098]</p> <p>i.- The Applicant answered this query in DL1. "The Applicant is aware that Mr Dryden has an easement over this water pipe. The design of the installation area for panels has taken the the water pipe into consideration"</p> <p>j. – The survey work completed to inform the Project with respect to birds is presented in ES Appendix 9.9 Breeding Bird Survey Report [APP-158] and ES Appendix 9.10 Wintering Bird Survey Report [APP-159]. Assessment of effects on birds is presented in section 9 of ES Chapter 9 Ecology and Biodiversity [REP4-010]. The provision of the Evenlode Corridor (as described in section 7 of the oLEMP [REP6-034]) will be directly adjacent to Goose Eye Farm and will provide a significant benefit for many of the bird species found on the Project site and in the wider area, in particular birds requiring wetland habitat such as lapwing and curlew.</p> <p>k. – Wetland birds are not assessed as a specific group within the ES. The individual species that might be classed as wetland birds (such as lapwing etc.) are included within the assemblages for both breeding and wintering periods in so far as they use the Project site during these periods (covering October to March and February to July). The assessment of effects on wetland birds is therefore set out in section 9 of ES Chapter 9 [REP4-010] under the headings of breeding and wintering birds. This includes consideration of the 'lake effect' (section 9.9.762). With respect to the pond on Goose Eye Farm, that was assessed with respect to the potential to support great crested newt (it had a Habitat Suitability Index score of 'poor' (Figure 2 of ES Appendix 9.5 Great Crested Newt Survey Report [APP-154] and, as such no further survey work was undertaken on it. As it falls outwith the Project site boundary, it</p>	Various Issues

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			<p>was not considered within the impact assessment specifically but was considered under the IEF of 'Waterbodies'. This concluded that, with appropriate avoidance measures secured via the oCoCP [REP6-028] such as pollution control mechanisms, there would be no significant adverse effect on this IEF. Dragonflies are not specifically considered as an IEF within the assessment since the species that would be found around the Project site in Oxfordshire are not specifically protected nor are they local/S41 Species of Principal Importance. Further, the arable landscape of the Project site would not support an assemblage of dragonflies that would be of particular conservation importance of itself. Notwithstanding this the oLEMP has been updated at Deadline 7 to include additional invertebrate walkovers of the Tier A bat buffers that will include waterbodies (scrapes) that are likely to support Odonata to record the invertebrate assemblage present within the completed solar farm.</p> <p>I. – The concern of flooding at Goose Eye Farm was raised at the issue-specific hearing on the 9th October 2025 about "3b Flood Risk and Drainage Management." RPS, on behalf of the applicant provided a response specific to Goose Eye Farm. This is included in 17.3 The Applicant's Written Summary of its oral submissions at Issue Specific Hearing 2 [REP6-047].</p>	
REP6-103	Martin Oldfield	<p>I watched last week's hearings and feel strongly that the issue of aviation safety was not addressed sufficiently in ISH2 issue 3f. As we live under the flight path south of London Oxford Airport and in a potential crash area, we submit that the aviation safety issues are more serious than has been conveyed. I speak as a pilot who used to fly gliders and motor gliders locally and who knows the area well from the air.</p> <p>1. Engine Failure After Take Off Although we are grateful that the fields next to us have been partially cleared of solar panels, (Change Request 2, 12 September 2025) the applicant appears to have removed panels from the minimum area they can get away with. We observe from our house that Aircraft taking off and landing south of the airport do not just fly in a straight line from the runway. They often deviate to either side and, of course, fly circuits over the surrounding fields which would be dangerously covered by panels. In the event of a crash, which indeed could be fatal, rescue and fire crews would have severely limited access. How would they get in and how would the electricity be turned off?</p> <p>2. Glint and Glare The recent Schiphol airport fiasco, where glint and glare from a nearby solar farm shut down flights at great expense, shows that the problem is real, not minimal as suggested by the applicant. The Pager Power analysis submitted by the applicant persists in assuming that aircraft fly in a dead straight line after leaving the runway and the pilots only look ahead over a limited angle. From my own flying experience, pilots are trained to look over a much wider angle and hence would suffer from glint and glare.</p> <p>3. Birdstrike The applicant minimizes the birdstrike dangers. We often see, from our house, flocks of jackdaws, crows and seagulls, with geese and swans passing over and red kites soaring above. If, as seems likely, the solar panel arrays displace these birds towards the limited grassland left, such as the airport, then there is an increase of danger to aircraft.</p> <p>4. Thermal Plumes It is possible that the heat plumes from the solar panels could disrupt the primary radar reflections from aircraft. Primary radars from Brize Norton and LOA could be affected, and the precautionary principle should be applied, in that very large areas of solar panels should be limited near nationally important sites such as Brize, which is the home base for the RAF flight refuelling fleet. Not all aircraft have transponders, and illegal or invading aircraft are unlikely to turn them on. Gliders, in particular, are not required to carry transponders and, because of their composite structure, are difficult to see on primary radar. This is a real danger!</p> <p>5. Conclusion. For aircraft safety, solar panels should be removed from the fields near London Oxford Airport, and, at the very least, from all the fields between Bladon and Begbroke. Overall, the</p>	<p>All aviation matters have now been substantially agreed with Oxford Aviation Services Limited (OASL) and the Ministry of Defence (MOD), who are responsible for safeguarding Oxford Airport and RAF Brize Norton respectively.</p> <p>Engine Failure After Take-Off has been addressed through the removal of panels in a wide cone relative to the approach, as set out in change 2 of the Change Request Report [CR2-073]. This area was defined by OASL based on feedback from training organisations who operate at the airport. Take-off and landing are the most sensitive activities, as pilots are low to the ground and may have limited options in the case of a forced landing; conversely, pilots in circuits will be significantly higher and have additional time and options in the event of an incident, which may include landing elsewhere or returning to the airport.</p> <p>A Glint and Glare Assessment [REP4-012] has been produced which considers receptors associated with Oxford Airport in line with industry best practice and guidelines. Glint and Glare is not predicted to exceed a 'low impact for temporary after image', which is deemed acceptable in line with the guidance. The situation at Amsterdam Schiphol Airport is not directly comparable, as the glare scenario must be modelled and considered for each individual site.</p> <p>A bird management scheme has been agreed with OASL which will provide additional bird scaring capacity and monitor potential bird displacement for a period of three years. This will then be reviewed to determine whether birds have been displaced to the airfield and whether the resource is required to continue.</p> <p>The Applicant has conducted analysis of the potential effects of thermal plume upon primary radar returns and concludes that the effects will be negligible. The Defence Infrastructure Organisation have written to the ExA to confirm that they have no objections to the project, including regarding their radar.</p>	Aviation

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		Botley West Solar farm proposal is the wrong project in the wrong place, and you should recommend that it is NOT approved.		
REP6-104	Michael Brown	<p>Compulsory Acquisition- Land retention at Church Hanborough – Q2.5.5</p> <p>I responded to the ExA's four-part question at D4 (REP4-071), and commented at D5 (REP5- 115) that the Applicants had not even attempted to answer the four parts individually. They did not address the question: "...is there a compelling case for compulsory acquisition".</p> <p>During the subsequent CAH1 the Applicants appeared to begin to contend that any reduction in the Order limits might endanger their BNG assurances. However so far as the northern section of field 2.115 referred to in Q.2.5.5 is concerned this is a relatively minute area, the removal of which should have no measurable effect on BNG claimed. If nevertheless the Applicant believes that there might be a measurable effect could not a corresponding adjustment be made to the BNG assessment ?</p> <p>As currently drawn the Order Limit comes right up to our garden southern boundary wall. Both the Order Limit and the northern boundary of panels and fencing in field 2.115 should as an absolute minimum be moved further away from our home, and the Order Limit similarly. In my Nomination for locations for an ASI (REP2-121) I tried to show by photomontage how dominating the panels currently proposed would be.</p>	<p>The BNG calculations set out in ES Appendix 9.13 Biodiversity Net Gain Assessment [REP6-020] rely upon the area of the Project which includes field 2.115. This particular field, along with field 2.116, is one of the larger areas of open grassland created within the Project site and, as such, supports the delivery of the habitat BNG committed to by the Project. In addition, it also plays an important role in the delivery of bird mitigation, skylark in particular.</p> <p>The Applicant has submitted a Residential Visual Amenity Assessment (RVAA) [REP6-064] and [REP6-065]. This document has been updated at Deadline 7 [EN010147/APP/17.13]. This includes an assessment of effect upon the residential property referred to by Mr Brown in [REP2-121]. The ZTV included within the RVAA (Figure 2.25) indicates that there would be no potential for intervisibility with the property itself and its' main living areas. Although it is acknowledged that there would be potential intervisibility within the wider curtilage (back garden).</p> <p>New hedgerow and tree planting is proposed to the northern edge of the Project, to the south of Church Hanborough [EN010147_APP_7.3.3 - Landscape, Ecology and Amenities Plan - Rev 4]. This would minimise effects of the Project from this property in views indicated in [REP2-121].</p>	Local_Ecology_and_Nature
REP6-104	Michael Brown	<p>Photomontages – Q.2.13.5</p> <p>At REP5-005, page 27 the Applicant purports to respond to the OHA at REP4-074. The issue being raised relates to the openness of views when the proposed new deciduous hedging is not in leaf between October and April, and the need therefore to include photomontages in winter as well as in the summer at year 15. Yet again the Applicant makes little attempt to answer the question, and merely reasserts its 'experience and professional opinion' that the new hedgerows would render the effects as being not significant.</p> <p>In my Relevant Representation (RR-0998) I went to some length to explain not only why further photomontages were necessary but also why the Applicant had failed to comply with the photomontage requirements of the Scoping Opinion as well as misleading the reader about what the Local Authorities had agreed. So far as I have been able to ascertain the Applicant has made no attempt to address these issues despite my having raised them a number of times since. (e.g. REP1-153, 154, 155; REP3-106; and REP5-115 in the context of Q2.13.14)</p> <p>Also in the context of a lack of photomontages is an example of the Applicant's failure to offer any explanation as to why it says one thing and does another. This example is the assertion at APP-034, page 779 that it would keep off 'high ground'. I referred to this at REP1-155, para.6 but to no avail. The panels as still proposed would remain for example on the high ground along the ridge between Burleigh Wood and Purwell Farm. These panels on high ground would have been shown if the Applicant had included viewpoint 24 in its selected photomontages. Despite repeated requests for this and others this has been ignored or perhaps deliberately avoided by the Applicant. Regarding viewpoint 24 this is said to have been reassessed by the Applicant. (REP-005 at page 12) but is still said to be 'not significant....due to the transient oblique nature of the view and the small proportion of the view that would be changed'. I have to wonder if anyone from the Applicants team has been to have a look for themselves. The viewpoint 24 photographs of winter and summer speak for themselves – a wide panorama across the Evenlode valley and up to the said ridge. (winter REP5-028 at Fig. 8.62 and summer REP5-029 at Fig 8.178)</p> <p>So the Applicants confirm that there would be views of panels both in the foreground and on the rising ground across the valley. The rising ground is the said ridge. That is 'high ground' where they said they would 'keep off'. It is unclear what is meant by 'existing layered vegetation would have limited screening effect'. And finally they suggest that the closest panels themselves would act as screens to the 'wider Project site' resulting in</p>	<p>The Applicant's current position remains as follows:</p> <p>The candidate representative viewpoints were presented on a ZTV at Scoping. The viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [REP6-012]).</p> <p>It should be noted that WODC did not comment on viewpoints within their Scoping response and there were no specific comments received at the PEIR stage.</p> <p>Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to APP-080]. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA as updated at Deadline 6 [REP6-012].</p> <p>In addition, the Applicant added the following commitment into the outline Landscape and Ecology Management Plan at Deadline 6 [REP6-034] to balance appropriate screening with the retention of open views:</p> <p><i>"Proposed new and reinforced hedgerows, which will be managed to a height of approximately 3m during operation, managed annually, accepting that hedgerows may be managed to a lower height (the locations and heights of which to be agreed in consultation with the Oxfordshire Host Authorities) in order to support important and / or more open views, provided such maintenance falls within the scope of the environmental assessment"</i></p>	Landscape_and_Visual_Impacts

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		'moderate significance of effect, which is not significant'. Are they really still trying to say that the first few lines of panels block (or screen) the views behind them and that that is acceptable mitigation ?		
REP6-108	Mr Dustin Dryden	It is important to incorporate the voices of the children of IPs as they have not been able to contribute directly, and it is they who will be most affected by granting a DCO for BWSF; Mr Dryden's children will be profoundly affected if the development is permitted to encircle their home. The construction phase will occupy their remaining childhood and most oppressively the installation is presently just a few metres from their bedrooms and play areas. As a minimum, a buffer zone of 200 metres will at least reduce the overwhelming noise and presence of machinery and site operatives.	<p>This is noted by the applicant, who appreciates the oral submissions made on this point at the hearings in October. For reference, the Applicant has provided a detailed submission in respect of appropriate buffer zones from properties in its Response to ExA's Rule 17 Letter (23 Oct 2025).</p> <p>On a wider note, the Applicant agrees that protecting future generations is vital — and this is a key benefit of the Project. Climate change poses serious risks to young people, from health impacts to environmental instability. By investing in clean energy like solar, the Applicant is seeking to deliver in accordance with national policy to actively reduce carbon emissions and help to secure a safer, healthier future for the next generation.</p>	acknowledgment response required
REP6-111	Nigel Pearce	<p>1. Best and Most Versatile (BMV) agricultural land</p> <p>The latest changes made by the Applicant are notable for completely ignoring the issue of BMV land. No surprise there: at no stage of the process has the Applicant taken the issue seriously or attempted to avoid BMV land. The latest changes have all been made for other reasons. If there is any reduction in the area of BMV land being used – and there isn't much – it is purely incidental.</p> <p>There is no significant change to the Northern Site. In the Southern Site, the area covered by solar panels will actually increase slightly, which is a real kick in the teeth for those who live in or near that area, and are dismayed by the Project's intrusive plans. They might also have to accept a further area of industrialisation if the main substation ends up being outside the Order Limits.</p> <p>There is an important question to be asked about the Central Site. Here the reduction in the installation area is about one-sixth. Could the ExA please check whether there will be a comparable reduction in the number of panels? Or will some or all of the panels be relocated and squeezed into the other five-sixths of the Central Site (or elsewhere)? If the latter, there will clearly be a significant impact on other issues, such as biodiversity, flood risk (run-off), visual impact, etc.</p>	<p>The Applicants response to the Rule 17 letter at Deadline 6 [REP6-052], Point 7 explains how the Applicant has taken the presence of BMV into account and have complied with (NPS) EN-3.</p> <p>The Applicants has provided an update on the areas of BMV within the order limits following CR2. This has been submitted at Deadline 7 in response to Rule 17 letter of 23rd October 2025.</p>	Agricultural_Land_Use
REP6-111	Nigel Pearce	<p>2. The Vanbrugh Unit Trust: what will happen to the money?</p> <p>If the money from Botley West Solar Farm will go to the Vanbrugh Unit Trust, where will it go thereafter? What guarantee is there that it will become charitable revenue rather than corporate income and profit?</p>	The Applicant cannot comment on Vanbrugh Unit Trust financial matters as this is a matter for Blenheim which is a separate organization to the Applicant.	Funding_and_PPA
REP6-112	Nigel Pearce	<p>Flood risk</p> <p>It was very interesting to hear, on Day 2, the continuing debate about flood risk, and whether or not the Applicant's proposals are sufficient to avoid exacerbating it in Cassington and elsewhere in the project site. The Applicant has been forced to address this major issue, and to make adjustments to help counter the risk, and has finally acknowledged the increased kinetic energy in runoff from solar panels. This is all a far cry from what one of their representatives said to me when I raised the issue at one of the public consultation meetings in late 2022. Responding to my question about runoff, the RPS man who, as a former planning officer with WODC should have known better, said that the solar panels would make "very little difference" to water flows, although they might create "a few runnels". This dismissive response is indicative of a seam of dishonesty that has run right through the Application from the very start. The issue of BMV land and is another example (one of many).</p>	A formal follow up response regarding the discussions regarding Cassington at the hearing was provided at D6 in the Applicant's Written Summary of its oral submissions at Issue Specific Hearing 2 [REP6-047] .	Hydrology_and_Flood_risk
REP6-112	Nigel Pearce	<p>Best and most versatile (BMV) agricultural land</p> <p>On Day 2, the Applicant's legal representative said that the reduction of the installation area in the Central Site would not affect the ability of Botley West to meet its 840MW target. So why did the Applicant propose such a large area? Was it a cynical negotiating tactic in anticipation of being forced to make some reduction, which could then be presented as a concession that proved that the Applicant had been listening responsibly to the local</p>	<p>The design area was defined to ensure the project could reliably deliver 840 MW AC under real operating conditions while meeting all environmental, technical, and grid connection requirements.</p> <p>The overall land envelope allows flexibility to accommodate variations in ground conditions, biodiversity buffers, drainage features, heritage constraints, and access routes.</p>	Agricultural_Land_Use

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		community? Or was it just greed? The 'necessity' for the disproportionate size of the project has never been fully explained. In my submission of 2 October, I asked the ExA to check whether there will be a comparable reduction in the number of panels. Would some or all of the panels be relocated and squeezed into the other five-sixths of the Central Site (or elsewhere)? If the latter, there would be a significant impact on other issues, such as biodiversity, flood risk (runoff), visual impact, etc. The legal representative's 840MW admission makes this question even more relevant.	It was not set for negotiation but to provide a realistic and policy-compliant design envelope within which refinement could occur. The recent area reduction does not affect the 840 MW target because adjustments were made within the consented parameters slightly increasing panel density in suitable zones while maintaining compliance with the Environmental Statement and avoiding additional impacts on biodiversity, flood risk, or visual effects. This approach of overplanting is recognised and supported at paragraph 2.10.55 of NPS EN-3, which states: " <i>The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays</i> ".	
REP6-123	Richard Devereux-Cooke for Hanborough Parish Council	<p>I am Richard Devereux-Cooke, Chair of Hanborough Parish Council ("HPC"), and I submit this Note on behalf of HPC in support of what I said in the OFH3 for the record in this examination.</p> <p>1. The parish of Hanborough includes the community of Church Hanborough. There is no separate parish council of "Church Hanborough".</p> <p>2. HPC very strongly objects to the suggestion by the Applicant that land immediately to the east of Church Hanborough could be used for "community food growing" as some form of "community benefit" or in some way helping to achieve the biodiversity net gain ("BNG") which the Applicant ("PVDP on behalf of SolarFive UK Limited") claims for the overall BWSF project in the fields numbered 2.116 and 2.115 (see our REP5-093).</p> <p>3. It is difficult to see how the use of this land in the way asserted can add any value to the application put forward by the Applicant. It has been said that the use of the land will be for the growing of onions under the umbrella of the OxFarmToFork scheme. Nothing has been presented to the Examination to show what, if any, additional BNG will be provided by growing onions, as opposed to simply continuing to use the land for the conventional agricultural use to which it has been put for many years.</p> <p>4. It seems to us that this is simply exchanging one form of crop production for another. There is no history of any commercial growing of onions in the vicinity of Church Hanborough. In the absence of any more detailed information at all from the Applicant, HPC has to conclude that there is no particular benefit to either the local community or to local biodiversity to justify keeping this particular land within the Application red line boundary. We believe that it should be removed from the BWSF application.</p> <p>5. We note the questions now being asked of the Applicant by way of the Rule 17 letter dated 14/10/2025. In respect of question 3, no formal consultation about the or any community food growing areas took place in respect of any of the land within the footprint of Hanborough Parish, including Church Hanborough.</p> <p>6. In relation to question 4, HPC cannot see that any benefit would accrue to any part of the community within Hanborough Parish if the obviously commercial enterprise of the OxFarmtoFork were to be established within the ambit of the BWSF application. If Blenheim Estate, as by far the majority landowner of the land proposed to be committed to the BWSF project, wishes to provide some part of its overall landholding to such organisations as the Cherwell Collective or Sustainable Woodstock, then it does not need to do so within the red line boundary of the BWSF proposal or in any way under the aegis of the Applicant's project.</p> <p>7. As to question 5, HPC, as the parish council, is not aware of any relationship with Cherwell Collective so far as the Hanborough community is concerned. Individual residents within the parish of Hanborough may be involved with the Cherwell Collective, but that would then presumably be as individuals and not in any more formal or established sense. HPC is not involved in any way with Cherwell Collective.</p> <p>8. We therefore submit these additional points in addition to those made at the OFH3 on 10/10/2025.</p>	<p>The Applicant understands HPC's concern about how the community food growing areas will be managed and will work closely with all parish councils as the plans for the areas evolve. There is no plan to erect any structure in the field to the south-east of Church Hanborough and access will be from Lower Road. The activities of food growers will be carefully managed and all will be subject to the terms of their licence to occupy. The field will be kept in a state that befits its proximity to the church and conservation area – unlike the field to the east of the church, Farthings Lea Farm, which is being used as a collection ground for derelict farm machinery. The Applicant will seek growers who will grow food using agro-ecological methods and will cooperate with local bodies to source these growers – including OxFarmToFork and Good Food Oxford. 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. The Applicant will use OxFarmToFork to help identify potential occupiers of the food growing areas. The Applicant will work with the parish councils to engage with local growers or those who are thinking of starting growing their own food. Access to this formerly closed land will be a remarkable opportunity for local residents to grow food for their own consumption or for sale to the colleges or at farmers' markets, to the benefit of their physical and mental health, while helping the soil to recover from years of intensive farming. The Applicant understands the parish council's concern over how the food growing areas will be operated and will consult and work with them to ensure that the initiative benefits the whole community.</p> <p>Cherwell Collective has clients in each of the villages within the project's consultation zone. Estimated to be over 100 in number, they need mental health and /or food poverty support. If there is demand for a food forest from Church Hanborough residents, then Cherwell Collective will establish one. 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</p>	Community_Food_growing_Location

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			<p>with multiple households helping to maintain the sites. Cherwell Collective will support with the planning and set-up of the sites to maximise success.</p> <p>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.</p>	
REP6-124	Rosemary E Lewis	<p>1. The Applicant's reliance on the mantra "NPPF Net Zero targets trumps all".</p> <p>1.1. I note that the NPPF long term goal is net zero by 2050 and legally binding Government target is 81% reduction by 2035.</p> <p>1.2. It should be noted that, in ES Chp 14, Climate Change the Applicant states that "the earliest payback period is 6 years" (Table 14.6). It is curious that this has changed from the statement in Chp 14 of the PEIR (Table 14.4) which gave 10 years and, conveniently, almost exactly compensates for the delay in connection date to at least Oct 2029 (subject to a Grampian condition) since the date originally provided by Nat Grid (now NESO) of 2026.</p> <p>1.3. Whilst not technically qualified to comment on the accuracy of their calculations, I do have 2 comments to make:</p> <p>1.3.1. The carbon cost of replacing all 2.2 million panels over the lifetime of the project - possible starting as early as year 5 - has been played down by saying "<i>it is anticipated that emissions related to manufacturing and transport will be significantly decarbonised by the time replacement is required as such this provides a conservative assumption.</i>" They provide no evidence.</p> <p>1.3.2. A study by Cranfield University for the Stop Sunnica campaign states that the Sunnica Scheme (albeit with some different parameters including battery storage and no panel replacement) "<i>does not reach net-zero in its lifetime and can be considered a carbon emitter</i>". Ref: EN010106-004294-DL2 - SNTS Written Representation Annex F - Carbon - Cranfield University - 11Nov22.pdf. The ExA recommended not to grant a DCO for the Sunnica proposal.</p> <p>1.4. It starts to look that it is not correct to sacrifice all other considerations on the altar of "Net Zero". If the Applicant is serious about saving the planet, they should cancel the project altogether.</p>	<p>1.2 The information presented in the PEIR for construction stage emissions, in particular GHG emissions associated with the photovoltaic panels were based on average values from publicly available data. Through the EIA process the Applicant has sought to rationalise the design and identify specific panel systems likely to be used. As such, the emissions reported in the ES and associated payback period has changed due to more site specific information.</p> <p>1.3 The emissions reported in the chapter 14 concerning replacement assumes no decarbonisation in the GHG emissions presented in the assessment. As decarbonisation cannot be accurately presented this is provided for commentary purposes only.</p> <p>The Applicant has presented a detailed whole life carbon assessment which has presented a detailed assessment of net emissions for the Project. The Applicant would note that the Sunnica Solar Farm included BESS facility which would have an impact on payback period.</p> <p>1.4 The Applicant has demonstrated the need for renewable development to support the UK's transition towards a net zero economy and abating fossil fuel in the UK electricity Grid. As such, it is concluded that the development is indeed supporting Net Zero. This is reflected in the various solar DCOs made recently, including Sunnica Energy Farm 2024 as well as the more recent the Tillbridge Solar Project Order 2025; the Stonestreet Green Solar Order 2025; Byers Gill Solar Order 2025; the Heckington Fen Solar Park Order 2025; the West Burton Solar Project Order 2025; and the Cottam Solar Project Order 2025. These sorts of Projects are critical national priority, as supported by the national policy statements which are the principal applicable policy for the Project.</p>	Climate_Change
REP6-124	Rosemary E Lewis	<p>2. Food Growing Areas. (ref ISH2 Agenda item 3G Socioeconomics, omitted from ISH2 due to lack of time)</p> <p>2.1. Cherwell Collective told us a lot about the merits of "Food Forests" at OH3 but there is no indication on their website - or indeed in the few "gardens" they do operate that they have any experience of actually growing Food Forests. They rely heavily on volunteers and it is not clear how well managed their existing projects are. What happens if they abandon the areas "given" to them on BWSF? What obligations do they have to maintain the site and avoid leaving an unsightly mess?</p> <p>2.2. We are told that most of the 30 hectares are to be put to commercial use not for the Community. Residents of CH have already objected to this (REP5-072). We have since then spoken to the farmer, who currently gets excellent agricultural crops from field 2.116. His opinion, based on years of experience farming in the area, is that the plan for commercial growing of onions on this field will simply not work.</p> <p>2.3. Therefore, with the backing of Hanborough Parish Council, we reiterate our call to</p>	<p>The All food growers will sign a licence to occupy their plot before access is granted. The licence will contain conditions of operation which will be enforced by the operational management of the site. These conditions will be designed to ensure tidy, efficient, well-ordered food growing operations. The Applicant will work with the parish councils to ensure the plots are well managed and to deal with any complaints that local residents may have. Cherwell Collective will establish a food forest if there is demand from residents of the village - it will be in their interest to keep the plot in good condition.</p> <p>The Applicant does not wish to continue intensive agriculture on fields within the site boundary. It will seek food growers using agro-ecological methods to grow food for personal consumption, for sale, or for supplying social enterprises such as Cutteslowe Larder, Banbury Larder and</p>	Community_Food_growin g_Location

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		remove field 2.116 and northern half of 2.115 from the order limits. As well as field 2.34 on the grounds of unsuitability on flooding issues and dangerous access.	Cherwell Collective. All will be subject to the conditions of their licence and will be expected to operate according to the guidelines set by the Applicant. The Applicant will seek parish council input when publishing these guidelines.	
REP6-124	Rosemary E Lewis	3. Views from Purwell farm 3.1. During the ASI on Tuesday 8 October, the ExA saw for themselves the view towards St Peter & St Paul grade 1*, Church Hanborough from viewpoint 38. The photomontage of this viewpoint at year 15 shows a narrow corridor of 3m hedging but with the spire still visible at the end of the tunnel. Chris Lecointe, who was present, was keen to point out a band of trees planned for half way down the hill - it was not clear how this would mitigate the view - but failed to mention that the PRow from Purwell that we followed along the edge of the field containing sheep, would also be entirely screened on its western side by a 3m hedge "in mitigation" - obliterating the view of the spire (or, indeed the band of trees!) for the whole length of this path until a 90deg turn was made at viewpoint 38.	Please refer to the Applicant's response to Point 11 of the ExA's Rule 17 letter (14 th October 2025) [REP6-052] which addresses mitigation and hedgerow maintenance. See also the Applicant's Response to ExA's Rule 17 Letter (23 Oct 2025) – submitted at Deadline 7 – which also explains how buffer zones from Purwell Farm are embedded into scheme design. This is explained by reference to Appendix B of the RVAA [REP6-065] .	Landscape_and_Visual_Impacts
REP6-124	Rosemary E Lewis	4. Noise. (ref ISH2 Agenda item 3h omitted from ISH2 due to lack of time) 4.1. At issue specific hearing 1 on the 15th of May, I asked the applicant to explain why there is no assessment of noise during construction on residential receptors. Richard Calvert for the applicant claimed that there is such an assessment covered in appendix 13.2 which is app 212 so that is considered fully at all residential receptors - he then corrected himself and said "the affected residential receptors. For the operational phase noise he said they selected receptors based on those which are located closest to the redline boundary and those most likely to be affected by noise. That's how they were chosen. 4.2. I have checked appendix 13.2 again and can confirm that there is NO assessment of noise on any individual residential receptors in the construction phase. 4.3. I once again question their unsubstantiated claims in 1.5.10 and 1.5.11 of this appendix that noise from pile driving will be transient, lasting only 1-2 minutes for each receptor - even though admitting it will be audible from outside the site. At 1-2 minutes per pile, the noise would last for whole days at a time in the densely covered panel area of all 3 sites - especially in the highly contoured central and south sites where a bowl effect will cause the noise to reverberate around the valleys. Where is the Applicant's evidence that this construction noise will only be "minor adverse"? 4.4. SBW's community Impact Report included a sound recording of pile driving at Blenheim's small solar farm north of Woodstock. A loud sound could be heard for days on end from Shipton Slade - over 1km away.	4.1 – This is agreed. 4.2 – The construction phase noise assessment in Appendix 13.2 [APP-212] identifies the likely construction phase noise and vibration impacts and assesses this impact at the receptors. This approach has been taken to aid the reader in understanding the potential impact of the scheme on existing sensitive receptors. 4.3 – The piling activities associated with the stations for the solar panel are inserted into the ground quickly and efficiently. As a result, the equipment associated with the activity will quickly move away from any one receptor, with the resultant sound level from the process diminishing due to the increased distance from the receptor. Therefore, any noise from the installation of the solar panel stations will be transient when considered at any individual receptor. 4.4 – Noise from piling activities can vary significantly depending upon the methodology used. It is therefore not appropriate to compare the noise emissions from the '...pile driving at Blenheim's small solar farm north of Woodstock...' without full details of the piling methodology which has been utilised for the scheme identified as <i>North of Woodstock</i> .	Noise_and_Vibration_Impact
REP6-124	Rosemary E Lewis	5. Bird surveys (ref ISH2 Agenda item 3c Bird Strike) 5.1. The applicant claimed that bird surveys over the past two years showed no flocks of large birds. 5.2. Local residents have provided photographic and video evidence to the contrary. Flocks have been observed summer and winter in fields due to contain solar panels. The evidence comes from several different sources. 5.2.1. Swans in field 2.60 near Worton/Cassington dated Dec 2023 5.2.2. Canada Geese in field 2.60 near Worton/Cassington dated Sept 2024 5.2.3. Swans in field 2.110 near Cassington dated 11 Aug 2024 5.2.4. Canada Geese in field 2.01 near Bladon dated 28 July 2025 5.2.5. Video of Canada Geese in field 2.01 near Bladon dated 27 Feb 2025 is submitted at D6 under separate cover. 5.2.6. Video of Canada Geese in field 2.01 near Bladon dated 25 July 2025 is submitted at D6 under separate cover.	The overwinter population of birds identified during the surveys to inform the assessment is described in ES Appendix 9.10 Wintering Bird Survey Report [APP-159] . In agreement with the Interested Party, this shows that there are flocks of various species recorded across the Project site during the winter months. The point made at the ISH2 was not that there were no flocks at all, but that there were no large flocks of species that might pose a risk to aviation that occurred consistently throughout the survey period.	Local_Ecology_and_Nature
REP6-128	Siemens Healthcare Limited	Concerns regarding the DCO <u>Lack of Certainty Regarding Road Closure</u> 16. The wording of the DCO as currently drafted identifies Wharf Road as an area where work can be undertaken. Therefore, this already introduces a risk to the road network which could lead to it being consequentially closed. 17. In addition, this risk is further amplified by the current Part 3 of the draft DCO which contains powers to close roads, demonstrating that this is a possible eventuality. Whilst the Applicant believes they can manage the works such that Wharf Road stays open, there is nothing currently in the draft DCO that secures this position. The Applicant agreed with the position.	At Deadline 6, the Applicant made the following updates to its application documents following discussions with Siemens: (a) A set of protective provisions for the benefit of Siemens Healthcare Limited were added into Part 8 of Schedule 15 of the draft DCO [REP6-004] to secure an indemnity. This has been amended slightly at Deadline 7 to reflect an agreed position with Siemens. (b) The outline Construction Traffic Management Plan (oCTMP) in the outline Code of Construction Practice [REP6-028] was updated to secure the following provisions:	DCO_Process

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		<p><u>Absence of Adequate Survey Information</u></p> <p>18. From the information provided by the Applicant, it is understood that there are currently no surveys of Wharf Road and therefore, no complete understanding of what will be encountered during the works or precisely how the project will be undertaken, which could subsequently lead to the need for road closures.</p> <p>19. Whilst the Applicant's intention might be to keep Wharf Road open, if something is found during the works that means they have to close more of the road, this will create a significant issue for Siemens.</p> <p><u>Risk and Impact of Road Closure</u></p> <p>20. There is a real risk that Wharf Road might have to be closed during the works, even a closure of a few days would have a big impact on Siemens' operations.</p> <p>21. Based on current rough estimates, a closure of three weeks of the facility could result in losses of £100 million or more. The impact would be significant both financially and locally, given the 600 employees, the majority of whom are local residents.</p> <p>22. The risk posed is extremely significant on a global level, given the facility's role in the worldwide supply chain.</p>	<p>(i) "A traffic management scheme will be adopted along Wharf Road for the purpose of maintaining operational vehicular access to the Siemens Healthcare Limited facility at Wharf Rd, Eynsham, Witney OX29 4BP over the construction period for the Project. The traffic management scheme may include some of the example layouts shown on Figure 1.1 to Figure 1.3. The traffic management scheme along Wharf Road would be discussed and agreed with OCC in consultation with Siemens Healthcare Limited prior to its implementation."</p> <p>(ii) "Operational vehicular access to the Siemens Healthcare Limited facility at Wharf Rd, Eynsham, Witney OX29 4BP along Wharf Road will be maintained at all times during the construction period of the Project without closure of Wharf Road." (our emphasis)</p> <p>(c) At Requirement 11(5)(e) of Schedule 2 of the draft DCO [REP6-004], Siemens Healthcare Limited has been added as a consultee in respect of any parts of the construction traffic management plan that relates to Wharf Road.</p> <p>The amendments to the oCTMP gives certainty that there will be no road closure along Wharf Road. This will ensure Siemens maintains its operational access for Siemens. The protective provisions then deal with the financial concerns and risk of impact, by providing an indemnity in favour of Siemens to cover "all reasonable loss, damage, liability, costs and expenses reasonably suffered or incurred by Siemens".</p> <p>The amendments above have resulted from discussions with Siemens and are agreed on the assumption Wharf Road is to be required for the final cable route. The Applicant understands that Siemens maintains its preference for Cassington Road and will not withdraw its objection on that basis. The Cable Optionality Report [REP4-039] sets out why it is necessary for the Applicant to seek powers for each route alternative.</p>	
REP6-128	Siemens Healthcare Limited	<p><u>Engagement with the Applicant</u></p> <p>23. Siemens has been raising its concerns and the associated risks since approximately June 2024.</p> <p>24. Siemens requested an optionality report to understand whether and how its concerns had been weighed in the balance.</p> <p>25. The optionality report was eventually provided at Deadline 4, however, there are concerns with the report which we have raised both in Siemens Deadline 5 submission and at CAH1.</p> <p>26. It is understood that the optionality report is interim in nature and that a final decision on routing has not yet been made. The reasons for the Applicant's request for flexibility are understood. However, Siemens has real concerns regarding the content and conclusions of the optionality report.</p>	<p>The Applicant made extensive efforts to engage with Siemens Healthcare Limited in respect of its land interests in the Project, as set out in the land and rights negotiations tracker (Revision 9, submitted at Deadline 7). This included sharing proposed mitigation to demonstrate the controls that are proposed over Wharf Road, in the event that this route option is to be used. Siemens was reluctant to engage with the Applicant in relation to the Wharf Road route unless detail was provided on the alternative route options. This was subsequently provided by the Applicant. To be clear, the ability of Siemens to negotiate the Wharf Road route was in no way restricted by the absence of information regarding Cassington Road. In any event, the parties have now engaged as set out above and an agreed position is now reached in the event that Wharf Road is required to be used for the delivery of the final cable route.</p>	Consultation_Process
REP6-128	Siemens Healthcare Limited	<p><u>Flood Risk</u></p> <p>27. The report states that the proposed route 'avoids flood zone 3 for the most part'. However, at least 50% of the route is within Flood Zone 3 and at least 10% is within Flood Zone 2.</p> <p>28. The relevant Environment Agency Flood Maps are appended to this submission at Appendix 1.</p>	<p>The project avoids area of Flood Zone 2 and 3 for above-ground development. However, as the comment notes, areas of the cable route (below ground) are required to cross Flood Zone 2 and 3.</p> <p>Section 6.3.5 of the Flood Risk Assessment [REP6-025] sets out that given the development at this location is subject to the exception test due to its location in Flood Zone 3. The exception test is provided in Section 6.3.6- 6.3.11 and demonstrates that the development passes this.</p>	Hydrology_and_Flood_risk
REP6-129	Southill Community Energy	<p><u>Appropriate Levels Of Community Benefit</u></p> <p>A further statement from Southill Community Energy</p> <p>The Botley West Solar Farm NSIP hearings were held during May in Oxford and just days</p>	<p>The Applicant is a member of Solar Energy UK's NSIP Forum, a body which has been working with DESNZ for the last eighteen months to</p>	Community_Benefits_and_Impacts

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		<p>after the hearings, the Botley West developers (PVDP) doubled their community benefit offer to £440,000 per annum. This appears to have been in a process that was not transparent and which did not reflect either government proposals, nor examples of community benefit levels nearby.</p> <p>The recent Government Working Paper 'Community Benefits and Shared Ownership for Low Carbon Infrastructure' compares with other projects and proposes a figure based on £5000 per MW (for Botley West 840 MW) - this would be the equivalent of £4.2 million per annum.</p> <p>Consequently, settling for £440,000 per annum would mean that local communities may miss out on millions of £s over the 40-year lifetime of the project.</p> <p>A reminder that Southill Community Energy pays out a minimum of £10,000 per MW per year. Compared to that the proposed level of , PVDP's community fund is not proportionate or fair. Over 40 years, the community fund at £5,000per MW per year would amount to £168 million compared to just £17.6 million on offer from PVDP.</p> <p>A fair community benefit would be one that reflects the scale, impact and profits of the project. While community benefits are well established for renewable energy projects, there is no legal requirement in England for developers to offer a community fund and so communities have to rely on voluntary offers from developers, PVDP in this case.</p> <p>If the proposed government level of community benefit is used, Oxfordshire would have an annual sum that could be used strategically to lower emissions and energy costs by, for example, training a cohort of builders and engineers to deliver high quality home energy retrofit.</p>	<p>agree a figure per MW for community benefit funds. After negotiations with the OHAs a figure of £525/MW was agreed for this project. to be paid annually for the operational life of the fund, indexed to inflation. The sum of £441,000 will be paid annually for 39 years - a very significant commitment which the community can rely on - unlike many other sources of funding. Together with the capital investment and annual business rates contribution, this'll result in growth in the local economy. The Socio Economics chapter of the application [APP-052] sets this out in detail.</p>	
REP6-132	Tim Sumner	<p>I am still unsure which of the following is accurate. At deadline 3 (REP 3 -065) it is stated "<i>The developer will be granted leases of land</i>" (owned by the Blenheim parties pursuant to the option. The land will not be acquired through the exercise of CPO powers".) However, in PVDP's book of reference, nearly every piece of Blenheim land is listed as being subject to "permanent acquisition." What I am now about to say lies at the heart of the Blenheim Estate and any proposed development. This is the matter of Land and Land Rights.</p>	<p>The Applicant has entered into voluntary lease agreements with all of the main site landowners, including Blenheim. This enables the property rights to be acquired voluntarily and without the exercise of Compulsory Acquisition powers. However, Compulsory Acquisition powers are necessary as a fallback – even where voluntary agreements are reached – in the event that the freeholder owners of the land within the Order land (where agreement has been reached) do not grant a lease of the land in accordance with the terms of the completed option agreements; or the contracting party dies, is subject to divorce proceedings, or is declared insolvent. This is a standard approach to consenting large scale infrastructure Projects, to give certainty of delivery of the Project without sole reliance on private arrangements.</p> <p>The DCO therefore includes Compulsory Acquisition powers over the full extent of the Order Land, including powers of freehold acquisition over the Blenheim Land. Notwithstanding, the voluntary lease agreement with Blenheim limits the extent to which the Applicant can exercise those CA powers, so that they can only be exercised over other third-party interests in the Blenheim Land which is why all land is noted in the Book of Reference [CR2-017].</p>	Land_Agreements
REP6-132	Tim Sumner	<p>Heritage in the Northern sector</p> <p>So, that's the wider picture – Now highlighting the Northern Sector. The applicant's response (Q2.6.19. Aug 2025) is to affirm "the Applicant has committed to avoiding impacts on all areas of significant archaeological remains through the design of the Project."</p> <p>I disagree. My September submission to the Inspector details the extent of the Roman Town at Sansom's Platt in the Northern Sector.</p> <p>Blenheim's own Ground Radar map shows more of the Roman Town lies unprotected alongside field 1.11 and Dornford Lane than is currently protected as a National Monument. Despite consistently calling the Roman Town at Sansom's Platt " a possible small settlement with a villa" Ground Radar, Satellite Imagery and Trenching shows an extensive Town on the main Cirencester to St Albans Trade route and a days march from Bicester Fort meaning overnight stays for troops, their chariots, weapons of war and horses and traders with their supplies.</p> <p>Protected Archaeological Sites have the protection of an undisturbed setting around them and yet in Field 1.11 we find proposed solar panels immediately surrounding a small section of the field in the top right hand corner where Roman buildings have been discovered – no protected surrounds or setting here ; and the plans to run cabling along Dornford Lane</p>	<p>The Applicant's agrees with the statement by Mr Sumner that '<i>Blenheim's own ground radar map shows more of the Roman town lies unprotected alongside Field 1.11 than is currently protected as a National Monument</i>'. At Deadline 6 the Applicant submitted its Written Summary of its Oral Submissions it Issue Specific Hearing 2 [REP6-047]. Appendix 1 of that document is a drawing which presents the results of a magnetometer survey undertaken on behalf of Blenheim Estates in advance of a programme of new woodland planting. Note: this was not a ground radar survey as suggested by Mr Sumner in his Deadline 6 response [REP6-132] or a LiDAR survey as suggested by Mr Sumner in his oral submission at ISH2.</p> <p>The Blenheim survey indicates extensive activity to the east and north-east of the Scheduled Monument (the area of red hatching on the drawing presented as Appendix 1). This activity extends to either side of the Roman road known as Akeman Street and along the eastern side of Dornford Lane. Although the buried archaeological remains identified by the survey have not been further examined by way of intrusive</p>	Historic_Environment

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		<p>means digging straight through a known area of the Roman Town.</p> <p>Trial trenching has been undertaken in field 1.11 which has indeed discovered more of the Town. I suggest trial trenching in a huge field is akin to, at night, holding a candle in the doorway of an unlit aircraft hanger to determine its size – it's a beginning – the aircraft hanger has been established now better investigations are required.</p> <p>Indeed Historians, Archaeologists, OCC, Historic England and writers on this historic area all agree – more investigation is needed around this significant trading town area including Hordley House, Dornford Farm and Cottage, The Oxford School of Drama, Sansom's Cottage and Dornford Lane also known as The Drovers road or Green Lane.</p> <p>The Northern Sector is a big area which, inconveniently for the developer is situated around a protected Historic Monument and its surrounds and setting, which, it is being discovered, extend right across the sector and should be subject to its full protection which UNESCO were assured of in the 2017 Blenheim Palace World Heritage Site Revised Management Plan.</p> <p>Protecting the surrounds of this whole Monument area, as more of the Town is discovered, means the Northern Sector along with its cable runs must be taken out of the developers plans.</p>	<p>investigation in the form of trial trenches or similar, it is logical to conclude that this represents activity associated with the Roman settlement centred on the Scheduled Monument.</p> <p>However, the geophysical survey undertaken by the Applicant found that the archaeological activity recorded by the Blenheim survey on the eastern side of Dornford Lane does not extend into the land west of Dornford Lane (i.e. into the Order Limits). The results of the Applicant's survey are presented in ES Appendix 7.3: Geophysical Survey Report Part 2 (Field 1.11) [APP-134]. The Applicant's geophysical survey results in this area have been confirmed through trial trenching, in which trial trenches placed within Field 1.11 close to the western side of Dornford Lane did not identify any buried archaeological remains commensurate with those indicated to the east of Dornford Lane by the Blenheim survey. The results of the trial trenching are presented in the report submitted at Deadline 6 (Cotswold Archaeology – Evaluation Report Part 2 [REP6-056]) with Trenches T105, T111 and T116 being the most relevant. It must be concluded that Dornford Lane represents the western boundary of the activity recorded in the Blenheim survey. This is reinforced by examination of the results of the Blenheim survey in which the recorded activity is closely aligned with Dornford Lane.</p> <p>Mr Sumner refers to a small section in the top right-hand corner of Field 1.11 '<i>where Roman buildings have been discovered</i>'. This is erroneous – the Applicant's review of aerial photographs identified a possible small enclosure in the north-eastern part of Field 1.11 - see APS_50 on Figure 09 of the Mapbook in ES Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology [APP-132]. This was confirmed by the Applicant's geophysical survey which showed the site to be a small irregular enclosure with an entrance on the eastern side and a number of internal features likely to represent small pits (see ES Appendix 7.3: Geophysical Survey Report Part 2 (Field 1.11) [APP-134]. Enclosures of this type are likely to be of later prehistoric date, usually later Iron Age with use sometimes continuing on into the Roman period. The trial trenching undertaken by the Applicant at this location confirmed the presence of the enclosure and associated features, and also confirmed that the enclosure was likely to be of Late Iron Age date with activity continuing into the early part of the Roman period. The results of the trial trenching are presented in the report submitted at Deadline 6 (Cotswold Archaeology – Evaluation Report Part 2 [REP6-056]) with the relevant trenches being T94 and T95. Contrary to the assertion made by Mr Sumner, no Roman buildings have been identified in this area. The Late Iron Age enclosure would be protected by being within an archaeological protection zone. This is indicated on Figure 2.1b in ES Figures 2.1a-2.4c - Illustrative Masterplan (Rev 2) [CR2-026] and also in Figure 1a in the Outline Written Scheme of Investigation (Rev 3) [CR2-053].</p> <p>Mr Sumner also states that '<i>plans to run cabling along Dornford Lane means digging straight through a known area of the Roman Town</i>'. The Applicant can confirm that no cables would run along Dornford Lane or within any part of the Roman settlement around Sansom's Platt – proposed cable route options in this area are indicated on ES Figure 5.2: Illustrative Masterplan Cable Corridor Plan Overview – Northern Site (Rev 1) [CR2-028] and in ES Figures 2.1a-2.4c - Illustrative Masterplan (Rev 2) [CR2-026].</p> <p>The Applicant can confirm that they have engaged with Historic England regarding the trial trenching results in the vicinity of the Scheduled Monument at Sansom's Platt. Adjustments have been made to the Works Plans which respond to concerns raised by Historic England, and these adjustments are indicated on the Works Plans submitted at Deadline 7. These adjustments ensure the adequate protection of buried</p>	

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			archaeological remains associated with the Scheduled Monument in light of the additional survey data that has become available, and also ensure that the change within the setting of the Scheduled Monument does not result in substantial harm to its heritage significance.	
REP6-133	Tom Lewis	<p>Dear Examining Authority,</p> <p>Pursuant to Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010, we respectfully request that the Applicant (PVDF) be required to provide further information regarding the financial arrangements underpinning the Botley West Solar Farm proposal (EN010147).</p> <p>Given the scale, strategic significance, and long-term implications of the proposed development, the funding structure is of material relevance to the Examination. Specifically, we request that the Applicant disclose:</p> <ul style="list-style-type: none"> • The identity and nature of all entities providing capital or financial guarantees for the project • The ownership structure of PVDF and any associated special purpose vehicles (SPVs) • Any agreements or arrangements with infrastructure funds, private equity firms, or sovereign entities • Details of any contingent liabilities, debt instruments, or financial risks associated with the delivery and operation of the solar farm • Any financial commitments made to local authorities, landowners, or community benefit schemes <p>This information is essential to assess the robustness of the Applicant's delivery model, the potential for long-term stewardship, and the implications for land use and community engagement. It is also relevant in the context of public interest, transparency, and national infrastructure governance.</p> <p>Yours faithfully, Tom Lewis Church Hanborough, Oxfordshire</p>	<ul style="list-style-type: none"> • The entities providing funds for the project are Photovolt Developement Partners, Peter Gerstmann, Yulia Lezhen, Cransseta Investment Ltd. and Mulledmont Solar Ltd. • The ownership structure is summarised in the Funding Statement [APP-022] (see section 4 and Appendix 1). • Arrangements with infrastructure funds, private equity firms, or sovereign entities are subject to non-disclosure agreements and can thus not be made public. • Contingent liabilities, debt instruments, or financial risks associated with the delivery and operation of the solar farm are post consent commercial matters related to the construction of the project. The Applicant has publicly stated its intentions in relation to the construction. It is not Applicant's business practice to enter legally binding contracts before planning permission is granted. It is not necessary or relevant for contingent liabilities, debt instruments, or financial risks associated with the delivery and operation of the project to be of concern at this stage of the application process. This is standard practice for large scale solar farm developments, as explained in more detail at the Compulsory Acquisition Hearing 1 (see the Applicant's Written Summary of its oral submissions at Compulsory Acquisition Hearing (specifically agenda item 3c) [REP6-046]. • The Applicant has already stated its voluntary commitment to community funding and the Applicant is in discussions with the local authorities to enter a s111 agreement to secure the Community Benefit Fund and funding in respect of off-site public rights of way upgrade works. The stewardship of the land remains with the landowners. Commitments made to landowners are subject to confidentiality. 	Funding_and_PPA