



BOTLEY WEST SOLAR FARM
OXFORDSHIRE HOST AUTHORITIES
RESPONSES FOR
DEADLINE 7 | MONDAY 10 NOVEMBER 2025

Oxfordshire Host Authorities (“OHAs”)

Botley West Solar Farm (EN01014)

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

Oxfordshire Host Authorities (“OHAs”)

Botley West Solar Farm (EN01014)

OXFORDSHIRE HOST AUTHORITIES

RESPONSES FOR DEADLINE 7

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

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

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

Purpose of this Submission

The purpose of this submission is to provide a written response to the ExA’s **Rule 17** Letter dated 23rd of October 2025 and responses on documents submitted at Deadline 6 (**D6**),

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

Rule 17 Letter

Question 2

OHA consider it would be unusual for any solar farm development to be subject to independent design review post consent. Should the proposed development be consented, harms will already be judged to be outweighed by the benefits.

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OHA are content to accept that the revisions made to the OLDP **[REP6-038]** at Deadline 6 providing detail about ‘other infrastructure’ negates the requirement for an independent design review.

Question 3

In the light of the OHA response above, OHA are of the view that the revised text is not necessary.

Question 5

In the absence of information to date on this matter, the OHA are content with the wording of this new requirement.

Question 11

The application has now submitted draft copies of the evaluation reports from Cotswold Archaeology **[REP6-055]-[REP6-062]**. This report has omissions and issues and would not be an acceptable report. This report will require substantial amendments before it can be considered acceptable.

The evaluation has shown however that the buffers proposed for the fields below would require amendments to fully preserve the full extent of the archaeological features as indicated by the submitted draft evaluation reports.

We are satisfied that no amendments would be required for the buffer areas proposed in field numbers - North Site: 1.1*; 1.2; 1.4*; 1.6; 1.7*; 1.8*; 1.12; 1.14; 1.18*. Central East Site: 2.1; 2.9; 2.13*; 2.14*; 2.18*; 2.24*; 2.30*; 2.37; 2.42; 2.45; 2.53*. Southern Site: 3.10*; 3.11*; 3.13*; 3.15*.

In addition to issues surrounding inclusion of specialist reports and the extent to which this information, where available, has been incorporated into the narrative there are also issues with the detail on the submitted plans. In many cases this makes it very difficult to fully understand the location and extent of many of the archaeological features, particularly for the Wessex report. This has made it difficult to accurately set out the full extent of the areas that would need to be removed from the scheme to preserve the archaeological deposits.

There will need to be minor extensions to the proposed buffers in field numbers 1.11; 2.3; 2.43; 2.9; 3.3.

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An indicative GIS file setting out our proposed buffers has been provided to the applicant’s archaeologist but given the delay in providing these reports and the quality of the reports, these cannot be accurately plotted and so will need to be revised based on the actual survey data. This will need to be plotted by the applicant based on the actual survey data and agreed at the detailed design phase.

In addition:

1.5 – The buffer proposed to cover the potential Banjo enclosure on the NW of the field would need to be extended to the south and east to cover the full extent of the feature. The buffer around the square enclosure would need to be extended to fully cover the likely associated features not targeted by the evaluation.

Sansom’s Platt – The proposed buffer for field 1.13 will need to be enlarged to cover the southern end of the site to cover the potential continuation of the NS trackway and associated features that were not able to be evaluated. The buffer will also need to be extended to the west to cover the feature identified from the geophysical survey and trench 132. We are satisfied that the buffers proposed for the southern end of field 1.11 and field 1.12 are appropriate.

1.17 – A more substantial buffer will be required for this field to include the trackway and associated enclosures recorded by the evaluation and geophysical survey to the east of this field as well as the enclosure in the current proposed buffer.

2.10, 2.12 – The small buffer areas proposed for the southern part of field 2.10 and the northern part of field 2.12 will need to be incorporated into a single larger buffer to appropriately protect the identified archaeological deposits from the evaluation. The buffer area for the Villa site to the south of 2.12 will need to be extended to protect the associated features identified from the geophysical survey but not subject to the archaeological evaluation.

A buffer area will need to be included to protect the enclosures identified from the geophysical survey and the evaluation in field 2.16.

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The panels within Field 2.20 have been removed for this field on the illustrative masterplan. If this field is to be part of the scheme however then a buffer area will need to be added to protect the features identified within the NE corner of this field as identified from the evaluation and geophysical survey.

Field 2.27 – a buffer zone around the circular enclosure will need to be added to this field to protect this feature.

Field 2.54 – the buffer zone around the circular enclosure will need to be extended to include the associated features identified from the geophysical survey to the east of this feature.

Field 3.1 A new buffer area will need to be located on the features identified from the evaluation within this field.

Question 12

The application has now submitted draft copies of the evaluation reports from Wessex Archaeology. This report is not however complete and omits specialist reports and details on plans and would not be an acceptable report. This report will require substantial amendments before it can be considered acceptable.

The evaluation has shown however that the proposed buffers proposed for the fields below would require amendments to fully cover the full extent of the archaeological features as indicated by the submitted draft evaluation reports.

We are satisfied that no amendments would be required for the buffer areas proposed in field numbers - 2.63*; 2.65*; 2.66*; 2.78; 2.80*; 2.84; 2.89*; 2.95*; 2.102*; 2.103*; 2.114; 2.115*; 2.118* and 2.57*.

The evaluation has shown however that the proposed buffers proposed for the fields below would require amendments to fully protect the full extent of the archaeological features as indicated by the submitted draft evaluation reports.

In addition to issues surrounding inclusion of specialist reports and the extent to which this information, where available, has been incorporated into the narrative there are also issues with the detail on the submitted plans. In many cases this makes it very difficult to fully understand the location and extent of many of the archaeological features. This has made it difficult to accurately set out the full extent of the areas that would need to be removed from the scheme in order to preserve the archaeological deposits.

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An indicative GIS file setting out our proposed buffers has been provided to the applicant’s archaeologist but given the delay in providing these reports and the quality of the reports these cannot be accurately plotted and so will need to be revised based on the actual survey data. This will need to be plotted by the applicant based on the actual survey data and agreed at the detailed design phase.

Field 2.62 has two areas of buffers overlain over the geophysical survey. This field however was not subject to archaeological trenching and so these areas may need to be amended once the evaluation has been undertaken. No detailed design for this field can therefore be agreed until this further trenching has been undertaken.

There will need to be minor extensions to the proposed buffers in field numbers 2.104; 2.110

Field 2.92 – there will need to be minor extensions to the buffer zones around trenches 745 and 750 and a further buffer added to protect the features identified from the geophysical survey and evaluation around trench 747.

Question 21

The land is included within the Biodiversity Net Gain Assessment submitted at Deadline 6 **[REP6-019]**; if it is excluded then the amount of BNG reported would reduce. Additionally, the applicant has relied on this area in calculating capacity for breeding skylark in their Skylark Technical note. However, as per the OHA’s comments on this under point 8.2.9 at Deadline 5 (**[REP5-125]** pages 21-22) the Councils still do not consider the provision of compensation for loss of skylark breeding habitat to be adequate, without this land it would be even less adequate.

Comments on Documentation submitted at Deadline 6

REP6-001 17.1 Cover Letter

Appendix 17.1.1 Accompanied Site Inspection (ASI) follow up note on landscape.

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It is difficult to follow what is being covered in this note, the text, such as para 1.2.4, refers to “*An extract from the Landscape, Ecology and Amenities Layer plan is also enclosed, showing the new landscaping proposed in this location.*” The OHA do not see where the extracts from the Landscape, Ecology and Amenities Layer plan are located. It also does not state which version of the Landscape, Ecology and Amenities Layer plan is being referred to. The OHA can only assume that it is the last version of this plan [CR2-043 REV 3]. However, this predates the accompanied site visits and therefore no changes to the site layout and associated Landscape, Ecology and Amenities Layer plan are being proposed in response to the site visit. The OHA also note that in many places there is some distance between the ‘*representative viewpoint*’ and the site locations visited, so that views from the visited locations are not always accurately reflected in the photomontages.

REP6-002 1.3 Guide to the Application (Clean) (Rev 10)

No comment.

REP6-004 3.1 Draft Development Consent Order (Clean) (Rev 8)

Schedule 16: The OHA maintain the position set out in the OHA LIR [REP1-072] and would make the additional comments –

No PPA has been entered into between the Applicant and OHA; instead, the OHA have amended paragraph 5 (fees) of Schedule 16 (procedure for discharge requirements) of the draft DCO [REP6-005] to include different application fees for different applications. The OHA do not consider these are satisfactory and the basis for including them in the draft Order is unclear.

If such an approach is to followed, the OHA consider the fees included in the table should be reasonable and proportionate and would propose the following text instead –

BWSF Planning Fees

Fees

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5. — (1) Where an application is made to the relevant local planning authority for agreement, endorsement or approval in respect of a requirement, a fee shall be paid to each discharging authority within whose administrative area the application falls and based upon the size of the site as follows —

Requirement	Fee
Category 1: reserved matters (major) Requirement 5: Detailed design approval	In accordance with subparagraphs (2), (3) and (4)
Category 2: minor reserved matter and other details Requirement 6: Landscape and ecology management plan Requirement 7: Biodiversity net gain Requirement 8: Fencing and other means of enclosure Requirement 9: Surface and foul water drainage Requirement 10: Archaeology Requirement 11: Code of Construction Practice Requirement 14: Decommissioning and Restoration	£2,535
Category 3: re-approvals	£578

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(i) In respect of any Category 1 or Category 2 requirement where an application is made for discharge in respect of which an application has been made previously; and (ii) Requirement 3: Approved details and amendments to them	
Category 4: Other Requirement 4: Community Liaison Group Requirement 8: Fencing and other means of enclosure Requirement 12: Operational Management Plan Requirement 13: Skills, Supply Chain and Employment Any approval required by a document referred to by any requirement or a document approved pursuant to any requirement	£462

Calculation of Category 1 fees

(2) Subject to sub-paragraph (3) and (4) below, applications for discharge of requirement 5 shall be calculated as follows

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(a) where the area of gross floor space / gross site area to be created by the development does not exceed 40 metres, £462;

(b) where the area of the gross floor space / gross site area to be created by the development exceeds 40 square metres, but does not exceed 75 square metres, £578;

(c) where the area of the gross floor space / gross site area to be created by the development exceeds 75 square metres, but does not exceed 3750 square metres, £578 for each 75 square metres of that area;

(d) where the area of gross floor space / gross site area to be created by the development exceeds 3750 square metres, £21,150; and an additional £127 for each 75 square metres.

(3) For the purpose of the calculation of fees pursuant to paragraph 5(2)—

(a) the gross site area shall be taken as consisting of the area of land to which the application relates;

(b) the area of gross floor space created by the development shall be ascertained by external measurement of the floor space, whether or not it is bounded (wholly or partly) by external walls of a building;

(c) the gross floor space / gross site area to be created by the development exceeds 75 square metres and is not an exact multiple of 75 square metres, the area remaining after division of the total number of square metres of gross floor space by the figure of 75 shall be treated as being 75 metres.

(4) The maximum total fee payable to each local planning authority for discharge of requirement 5 shall be £333,092.

Fee increase

(5) Where an application under sub-paragraph (1) is made and a fee payable on or after 1 April 2025, then regulation 18A of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits)(England) Regulations 2012(a) (as may be amended by the Town and Country Planning (Fees for Applications, Deemed Applications,

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Requests and Site Visits) (England) Amendment Regulations 2023) will apply as modified by this Order, so that “the relevant amount” means the fee payable under sub paragraph (1).

Monitoring fees

(6) Prior to commencement of development a fee of £35,000 shall be paid to each discharging authority towards enforcement monitoring during the lifetime of the application.

The figure in sub-paragraph (4) is based on the sum included in Category 5 (the erection, alteration or replacement of plant or machinery) set out in “Fees for planning applications in England from 1 April 2025”, a link to which is below.

Planning fees: annual indexation from 1 April - GOV.UK

This is the sum that would apply if a TCPA application for a solar farm were made. While the OHA obviously appreciate this is not a TCPA application, they consider there is no reasonable justification for a lower sum to apply in respect of an NSIP application.

It will be noted the fee in Category 5 of “Fees for planning applications in England from 1 April 2025”, is a maximum in total of £411,885. Having considered other DCOs which include a similar fee schedule to the one proposed (including the Sizewell C Order) the OHAs have applied a lower figure than that included in Category 5, which is closer to precedent.

REP6-006 3.3 Explanatory Memorandum (Clean) (Rev 8)

No comment.

REP6-008 3.6 Land and Rights Negotiation Tracker (Clean) (Rev 8)

No comment.

REP6-010 6.3 - Environmental Statement Chapter 10 - Hydrology and Flood Risk (Clean) (Rev 2)

No Comment.

REP6-012 6.3 - Environmental Statement Chapter 8 - Landscape and Visual Impact Assessment (Clean) (Rev 4)

The OHA continue to disagree with the applicant on the level of impact of the development on the local landscape character and views and remain of the view that effects have been grossly underestimated.

The OHA representations [REP6-117] and [REP6-119] on the LVIA revisions and Change Request 2 raised concerns about the Landscape and Visual Impact Assessment (LVIA) with regards to inconsistency in the information, and the majority of the OHA’s concerns remain. We note that information has been added to viewpoints in table 8.22 on whether a *Medium* level of effect is *significant* or is *not significant*, however this information hasn’t been added to the rest of the table including landscape and other receptors such as PRow routes. There also still appears to be some inconsistency between table 8.22 and related appendices, which have not been corrected.

Section 8.4.1 of the LVIA states that ‘*The assessment methodology used within the Botley West Environmental Statement (ES) is based on the DMRB (National Highways, Standards for Highways) as set out in paragraph 4.2.9 of Chapter 4: Approach to Environmental assessment*’. However, in paragraph 8.5.29 it states that ‘*The Botley West Landscape and Visual Impact Assessment significance of effects matrix is based on this DMRB matrix, albeit adapted to reflect GLVIA3 terminology*.’ The OHA raised concerns about this in para 2.13.2 (page 46) in their response (ExQ2) to the ExA in [REP4-074], and these concerns remain. Notwithstanding that the OHA don’t consider the use of the DMRB appropriate for this type of development, the Design ‘Manual for Roads and Bridges (DMRB) LA104 (Highways England et al. 2020) guidance NOTE 3 states on page 15 ‘*Significant effects typically comprise residual effects that are within the moderate, large or very large categories*.’ Therefore, if the LVIA is based on DMRB guidance, and the assessment tables reflect those included in this guidance it is not clear why the setting of significance levels does not follow the DMRB guidance, which considers *moderate effects* as *significant*.’

Para 8.6.136 refers to the Residential Visual Amenity Assessment (RVAA), however, no information has been drawn into the LVIA from the RVAA to provide information on effects on residential properties and to inform mitigation.

The ‘Introduction’ section to Assessment of effects (paras. 8.9.1 - 8.9.9) adds additional text with regards to the site. The OHA is concerned about the assessment reported in these paragraphs, in particular where it states (para 8.9.9.):

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‘8.9.9 The Viewpoint Assessment general findings present the following:

- All close-proximity views illustrate a good setback of the low-lying development from the PRoWs;*
- Solar panels do not form a skyline feature. The existing landscape features take prominence;*
- The closest parts of the development would occupy a limited angle of the view;*
- Solar panels do not appear as prominent features.’*

The OHA consider this to be incorrect. The photomontages clearly illustrate that panels are located in close proximity to PRoWs, on rising or elevated land, and are in many areas of a scale that the existing landscape characteristics are being severely impacted upon. There are also numerous areas where the development rather than only occupying a limited extent of a view will expand in several directions and appear as prominent features in views in the open countryside. This summary does also not cover the impact of other elements of development including the substations, and in particular the main project substation and grid connection. The OHA also note that this section predominately focusses on representative viewpoints rather than the impact of the scheme on receptors such as users of the PRoW routes travelling through the landscape.

Para 8.9.2 states *‘Section 8.7 summarises the maximum design scenario against which each impact has been assessed,’* however, these maximum design scenarios have not been updated throughout the DCO process to reflect how the scheme has developed. There has also not been an update to the ZTV. As mentioned above the OHA consider that the LVIA insufficiently assesses the impacts of other elements of the scheme, such as compounds, substations, fencing, lighting and the main NGET substation.

REP6-014 to REP6-018 6.5 - Environmental Statement - Appendix 8.3 Strategic Arboricultural Impact Assessment & Method Statement (Rev 1) Parts 1-5

In the LIR [REP1-072] the OHA raised concerns around the lack of AIA and Method Statement. However, due to the late submission of this document at Deadline 6 the OHA have not had the ability to review this document in detail and therefore cannot clarify at this stage whether this addresses our concerns in the LIR. The OHA will be able to provide comments to the Secretary of State during the decision stage if required.

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REP6-019 6.5 - Environmental Statement - Appendix 9.13 Biodiversity Net Gain Assessment (Clean) (Rev 2)

We welcome the work done to demonstrate a biodiversity net gain in watercourse biodiversity units. However, we consider that the survey information which sits behind the assessment and metric needs to be submitted to demonstrate that the uplift to be delivered through riparian zone enhancement is realistic based on current land use. The detail of the habitat mapping in figures 2 and 3 is not at an appropriate scale to understand the current habitats present within the 10m riparian zone. This is needed to demonstrate the validity of the uplift reported through the metric through riparian zone enhancement by removal of agricultural practices.

REP6-021 6.5 - Environmental Statement - Appendix 9.13 Biodiversity Net Gain Metric V2 (with watercourse)

No comment.

REP6-022 6.5 - Environmental Statement - Appendix 9.14 Habitats Regulations Assessment Report (Clean) (Rev 1)

No comment.

REP6-024 6.5 Environmental Statement Appendix 10.1 Flood Risk Assessment (Clean) (Rev 2)

Page 45, Paragraph 3.5.5: The applicant uses a double negative in this paragraph, and it is unclear what they are trying to say. It seems to suggest that solar panels will not be installed in areas with a known surface water flood extent of 300mm and yet in the next sentence it says that they will locate panels there but with a minimum height to the leading edge of 800mm. The applicant needs to clarify their position.

REP6-026 6.5 Environmental Statement Appendix 15.2 Outline Skills, Supply Chain & Employment Plan (Clean) (Rev 3)

No comment.

REP6-028 7.6.1 Botley West Outline Code of Construction Practice (Clean) (Rev 5) - Part 1

1.8.2 - OHA continue to disagree with the applicant on core working hours.

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Annex A-Outline Construction Traffic Management Plans pages 13-14- OCC notes the inclusion of a commitment from the applicant to reimburse the highway authority for reasonable and proper costs in determining if any temporary or permanent alteration to streets have been completed to the reasonable satisfaction of the Highways Authority in line with costs for similar S278 or S184 applications. Whilst this goes some way to alleviating our concerns with regards to side agreements, and is welcomed, several issues which were raised in OHA’s D6 submission [REP6-117] at pages 13-17 remain outstanding.

OCC’s standards S.278 template and S184 does secure reasonable and proper fees for determining the suitability of road re-surfacing however, it also provides the framework by which OCC will review and approve the applicant's designs prior to the commencement of work and will monitor the progress of works being carried out. As such, with the exception of the issue of the Eynsham Roundabout (below), OCC still maintains that the amendments proposed to the CTMP in [REP6-117] are the only acceptable solution to this issue.

Annex A - Outline Construction Traffic Management Plan, pages 22-23 - OCC is content with the fallback position secured within the outline CTMP ensuring that, in the event the applicant’s cabling works are untaken following the OCC planned improvements to the Eynsham Roundabout, the applicant will resurface the entirety of the A40 roundabout to a suitable standard and will enter into a Highways Side Agreement to ensure the works are undertaken to a suitable standard.

REP6-030 7.6.1 Botley West Outline Code of Construction Practice (Clean) (Rev 5) - Part 2

No comment.

REP6-032 7.6.2 Botley West Outline Operational Management Plan (Clean) (Rev 5)

Page 4- The applicant commits to not replacing more than 30% of panels within a single site area within one year. OCC welcomes this commitment and the commitment to provide the Authorities with an annual planned maintenance schedule which would include details of transport requirements. Oxfordshire County Council is content that this has resolved this issue.

Page 13 – Table 3.1 Noise and Vibration. The applicant states “Operational noise will be limited to a rating level which is up to 4dB greater than the background sound level at the nearest receptor”. The OHA consider development should be designed to achieve a

rating level of 5dB (LAeq) below the typical background (LA90) level at the nearest noise sensitive location. Where this can't be achieved, the various noise control measures considered as part of the assessment should then be fully explained (i.e. relocation of noise sources, use of quieter equipment, enclosures, screening, restriction of the hours of operation) and the achievable noise level should be identified.

REP6-034 7.6.3 Botley West Outline Landscape and Ecology Management Plan (Clean) (Rev 6)

Para 1.1.12 refers to the Illustrative Masterplan being provided as part of the wider project submission (ES Volume 2, Figures 2.1a - 2.4d [AS-020]). However, this plan has been updated [CR2-026], and the OHA is therefore not clear whether this plan is still valid.

Para 1.1.13 refers to '*as updated at this Deadline 3*', but there have been several iterations since that date (the document is a Deadline 6 revision).

In para 3.2.1 the applicant has included a commitment to maintain hedges to a height of 3m unless a lower height is agreed with the OHA to enable important and / or more open views. Although the OHA would support this approach, it does not address the OHA's concerns that the choice of mitigation measures, and the design and management of the hedgerows should go hand in hand with the design of the areas in which solar panels are proposed. Agreeing hedge heights is also likely to be a difficult process since the applicant's LVIA includes very limited information that can help inform where hedgerows should be reduced, (as referred to in the OHA response to para 8.9.9 of the LVIA above).

Throughout the consultation and examination processes the OHA have retained the view that it is important that the mitigation hierarchy of avoid, minimise, mitigate and compensate is followed and that effects should be avoided or minimized in the first instance. Where mitigation is the most appropriate action to be taken it should be informed by the local landscape characteristics rather than adopting a standard approach throughout. This is not an issue that can be covered retrospectively once the Operational Development Areas have been agreed. There are also other constraints that need be designed into the scheme, such as the bat mitigation areas where the heights of hedgerows may need to be adjusted. As mentioned in the OHA's Joint LIR [REP1-072] and subsequent representations there appears to be no or little coordination between the different disciplines to ensure that mitigation is appropriate and coordinated.

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Para 5.6.1 refers to ‘*Advance Planting of vegetation to the south of PRow 184/22/20, within field 3.11, at the access to Denman’s Farm. Providing visual screening along the section of the PRow closest to the solar panels.*’ This does not address the impact on other PRows that would also benefit in having advanced planting, such as the proposed Greenways. The use of hedgerows to restrict views of the proposed development can also only be applied to those hedgerows within the redline area of the site. There are many PRows outside the redline area, which will not have any mitigation treatment, therefore views towards to site are likely to be unchanged, especially when solar is located on slopes.

Para 12.1.2 refers to a commitment to report to LPAs on monitoring ‘*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.*’ The OHA suggest that monitoring will be equivalent of monitoring Biodiversity Offsetting for a Major Planning Application and therefore that independent review of the applicant's BNG monitoring throughout the operational phase is required to ensure that Requirement 7 is being complied with. This will require resourcing for the LPAs to be able to review the BNG reports submitted by the applicant and for the LPAs to undertake site visits to independently verify the applicant’s BNG report. Without this verification, the applicant may fail to achieve their BNG commitments in breach of Requirement 7 of the DCO.

Appendix B Typical Planting Schedule contains two lists, a ‘Typical Planting Palette’ and a ‘Typical Tree and Shrub Palette’ for the Project Plas Power Solar Park. As this refers to a different project the OHA question the appropriateness and relevance of these lists.

OHA note some additions to the oLEMP but do not consider these to have fully addressed all the issues flagged at Deadline 6 **[REP6-117]** including regarding:

- an integrated monitoring approach to BNG and species,
- reference to securing details of monitoring within each LEMP for each phase,
- identifying who will approve monitoring reports and any subsequent changes to management,
- monitoring of otter and water vole,
- mink control,

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- management of grassland around panels to increase invertebrate prey for skylark, rather than use of skylark plots which are designed for an arable setting
- provision and management of natural features for invertebrates

Para 8.5 describes the proposed buffers to bat flight lines; we 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.

We request that Tier A buffers are identified on a plan within in the oLEMP and/or the Masterplan (this is currently provided only in an Appendix to the Bat Technical Note and needs to be more prominent within core documents to ensure it is fully integrated into detailed design and future LEMPs for each phase).

Para 8.5.7 sets out 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.

REP6-036 7.6.4 Botley West Outline Decommissioning Plan (Clean) (Rev 2)

Paragraph 2.1.3 is updated to say '*All piles are to be removed. In the extremely unlikely case that a pile gets stuck it will be cut to 1m below the surface, but the Applicant will seek to remove all foundations.*'

The proposed solar panels extend across the minerals safeguarding area and the installation of associated support structures for require extensive piling within the safeguarded minerals area.

Despite being request by OCC, no evidence has been provided to demonstrate that the piles, installed using hydraulic pressure, can be practicably extracted. Consequently, the assertion that it is “extremely unlikely that a pile gets stuck” remains unsubstantiated.

As previously set out in our response to the Examining Authorities First Written Questions [**REP2-50**], the lack of clarity and commitment regarding the full withdrawal of all piles, could have a significant impact on the safeguarded mineral resource. If

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substantial quantities of 2-3m steel piles are left in situ, given that each panel is understood to require four piles, this could significantly compromise any future mineral resource extraction viability, thereby potentially sterilising the resource.

Removal of the piling is also expected to substantially damage the ground conditions, by turning up the ground and mixing subsoils and topsoil.

REP6-038 7.7 Outline Layout and Design Principles (Clean) (Rev 5)

The OHA support the inclusion of Lighting, Fencing and CCTV within the Outline Layout and Design Principles Document. This will ensure the relevant LA consent is obtained (via Requirement 5) for the discharge of detailed design in relation to these elements of the scheme.

However, Table 1.2 ‘Other Infrastructure Parameters Lighting is still referring to the use of PIR motion sensor activated security/emergency lighting at Transformers. The use of PIR lighting is not appropriate as wildlife can set-off the sensors. Emergency lighting only should be used. Lighting is not required for security purposes and infrared cameras should be used for security purposes instead of lighting.

REP6-040 8.3 Schedule of Changes to the dDCO (Rev 7)

No comment.

REP6-041 11.5 Compulsory Acquisition (CA) Schedule and Land Rights Tracker (Clean) (Rev 7)

No comment.

REP6-042 11.7 Statement of Common Ground –The Environment Agency (Clean) (Rev 2)

No comment.

REP6-044 15.6 Botley West Bat Technical Note (Clean) (Rev 1)

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OHA welcome the additional data and analysis provided within the Bat Technical Note, including the identification on plans in Appendix 4 of the Tier A buffers. We still consider that a justification for the width of the buffers should be 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.

The Tier A buffers should be included either on plans within the oLEMP or on the Masterplan.

The additions to monitoring methodologies set out in this note are welcome, we request that these are also incorporated into the oLEMP. Para 4.25 identifies that any remedial actions will be agreed with ‘relevant parties’, we request that these parties are defined.

REP6-046 17.2 The Applicant's Written Summary of its oral submissions at Compulsory Acquisition Hearing 1

The applicant has failed to provide the case law references which were promised to OCC to justify the need to CA Highways Land. It is noted that this has been picked up by the ExA and requested in the Latest Rule 17 letter. Unfortunately, this will mean the evidence for this justification will be submitted at D7 and as such OCC will have only 3 days in which to review and respond to this and as such it is likely that the Council will be able to provide a detailed response.

Given this and being as OCC have never been approached by the applicant for negotiations on CA matters, OCC maintains the objection raised to CA of Highways Land as outlined in [REP6-116]. Other than vague assertions on potential difficulties when it comes to subsoil rights the applicant has not robustly justified how the CA of Highways Land is necessary in order to facilitate the proposed development in line with section 122 of the Planning Act. The Council therefore objects in the strongest manner to the inclusion of Highways Land within the powers of CA contained within the draft DCO.

REP6-047 17.3 The Applicant's Written Summary of its oral submissions at Issue Specific Hearing 2

No comment.

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REP6-048 17.4 The Applicant's Written Summary of its oral submissions at Open Floor Hearing 3

No comment.

REP6-09 17.5 Applicant's Responses to other D5 Submissions

Unresolved issues between the applicant and OHA are reported elsewhere in this submission.

REP6-050 17.6 Letter of No Impediment (LONI) Caveats

Natural England's advice is noted.

REP6-051 17.7 Applicant's Response to the ExA's Schedule of Changes to the dDCO

OHA comments on the ExA's schedule of changes remain as set out in [REP6-117].

REP6-052 17.8 Applicant's Response to ExA's Rule 17 (14 Oct 2025)

Point 9 – Part 1

The first paragraph of the response states '*However, the iterative design of the Project is a balancing act between minimising the potential harm with maintaining the maximum benefit of the Project in light of the urgent need for the Project to deliver 840MW to the National Grid.*' The 840MW is the size of the solar farm that the applicant has set, there is no operational need for this scale.

It is noted that none of the proposed changes listed by the applicant are in response to landscape or visual impacts. While the OHA accepts that there are likely be some significant residual adverse impacts from solar development as stated in NPS EN-1 paragraph 3.1.2, the OHA has pointed out numerous times that the layout of the scheme has not been landscape-led or followed the mitigation hierarchy. The masterplan has also not been sense-checked and adjusted to minimise landscape and visual impacts. The OHA considers that the LVIA has not been prepared in a way that identifies those areas that are more sensitive in landscape character terms and/or in views to help guide development to the least sensitive areas. It also not helped to inform the layout of the site to balance the potential harm against the maximum benefit of the project.

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The applicant's states *While the main drivers for Change Request 2 were to reduce effects on the Historic Environment (Change 1) and safety concerns at Oxford airport (Change 2), there have been additional environmental benefits in LVIA terms.* This confirms the OHA's view that panel removal has at no point been informed or undertaken for landscape or visual reasons as required.

Point 9 - Part 2

The applicant states that the scheme would not be viable if all the areas proposed by the OHA were to be removed. However, the remaining solar after the removal of the areas proposed by the OHA would still be of a resultant MW to remain an NSIP and would still address the national need for solar energy.

The applicant refers to the OHA evidence base documents, which have been created to allow the Councils to identify broad areas for renewable energy development and establish a local policy framework for such development in their Local Plans, in line with the National Planning Policy Framework. However, Appendix A - User Guide of the South and Vale Joint Landscape Sensitivity Renewable studies includes guidance on how LVIA should be approached to assess the effect of the proposed renewable energy development. The Applicant has not used its own LVIA to support its argument of how their assessment relates to landscape values and sensitivity but simply refers to the OHA's Renewable studies. The first mention of these studies is in the LVIA submitted at deadline 5 [REP5-025]. Given this, the OHA are unclear how these studies have been used to inform the LVIA and the master planning of the Botley West solar development.

For example, Table 1.1 'Design Principles' in the Outline Layout and Design Principles document Rev 5 [REP6-038] states for the Southern Area the total installation area for solar areas as 46-50ha. This is at the higher end of the range of the South and Vale Joint Landscape Sensitivity Renewable studies thresholds, which states that large solar is 20-50 ha. The VWHDC Landscape Sensitivity Renewable study states that the sensitivity level for both the local character areas LCA 9F and LCA 14A is *High* for Large solar (20-50ha), and not *moderate* (LCA 14A) and *moderate-high* (LCA 9G) as stated in the applicant's response. The OHA note the correct levels '*high*' are stated in the LVIA para 8.6.54.

Point 9 - Part 3: Without Prejudice Offer

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The applicant states in their ‘Without prejudice offer’ three reasons for panel removal – a reduction of effects on landscape character, a reduction of effects on visual receptors at publicly accessible locations and a reduction of effects on visual receptors at private properties. These reasons chime with what the OHA have asked for throughout the process and the OHA are not clear why the applicant has not considered these aspects from the outset of the project, or earlier on in the examination process, considering that the ExA and the OHA have requested these aspects to be considered throughout the examination.

While the proposed removal of areas by the applicant is welcomed, these do not go far enough to address the OHA’s concerns around significant landscape impacts. Changes to the Illustrative Masterplan plans are not sense-checked, resulting in isolated areas of solar such as in fields 1.13 (on elevated land), 2.15 (a narrow outlying area) and 3.1 and 3.2 (small areas, adjacent to PRow). It therefore does not fully address the OHA concerns about solar on highly visible slopes and land clearly visible, as outlined in the OHA’s response to Issue Specific Hearing 2 Action Point 16 - Clarification note on solar installation reduction [**REP6-118**].

Unlike the applicant, the OHA provide in their response [**REP6-118**] reasoning for panel removal on a field-by-field basis. This explains why the OHA consider the without prejudice offer not to go far in delivering a scheme that minimises landscape and visual impacts to a more acceptable level.

Point 10

Part 1 – Explanation of and justification for the approach taken by the Applicant

The applicant refers to the Mona Offshore Wind Farm DCO and that the methodology used for that scheme was considered acceptable. However, it should be noted that the Mona application references the use of Offshore Wind Guidance which is different to that in the *‘Manual for Roads and Bridges (DMRB)’* guidance which has been used by the applicant for the Botley LVIA.

The applicant states in Part 1 *‘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

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OHA are not clear how these have informed the LVIA or the applicant’s judgements since the assessment findings have changed little since the DCO application was made, and the studies have not been mentioned prior to Deadline 5 of the LVIA [REP5-027].

The OHA have no additional comments to make with regards to approach and methodology. The OHA concerns have been expressed numerous times at all stages of the project including in their responses to scoping, PEIR, LIR [REP1-072] and Examining Authority Written Questions ([REP2-050] and [REP4-074]).

Part 2 – Explanation of the more detailed assessment undertaken and confirmation as to how that aligns with approach taken to date and national policy

The OHA have questioned the use of a standard 25m buffer to residential properties and villages from the outset as this is considered far too close and it is not clear what evidence this distance is based on. The OHA remains of the view that a more bespoke approach to avoiding effects on residential visual amenity is required and that impacts should be assessed on a site-by-site basis to inform the most appropriate buffer.

Related to this the OHA and others raised the need for a Residential Visual Amenity Assessment (RVAA) throughout the process, and it is very disappointing that this evidence was not provided earlier in the examination process to inform responses and judgements of how to reduce impacts on residential properties earlier in the process. Due to the late submission the OHA have not been able to review this study in any detail but note there are omissions and inconsistencies in assessment.

The OHA also notes that the applicant’s response seems to focus on justifying why things have not been done rather than trying to achieve the best possible outcome in landscape and visual terms. As part of this, the applicant refers to paras 5.10.35 & 5.10.36 of NPS EN1, which cover judgements on benefits of the project vs adverse impacts on landscape, temporality and reversibility. NPS EN1 states:

“In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.”

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As outlined in the OHA’s LIR [REP1-072] and subsequent responses, the OHA consider the argument of the project being temporary and reversible flawed on the basis that it is to last 40+ years and some of the elements will not be reversed even after decommissioning including the NGET substation. The OHA also considers it important to take note of references to ‘*such as during construction*’ and ‘*reasonable timescale*’ when considering this policy.

Part 3 – Without Prejudice Offer

Whilst the OHA consider a 75m buffer to significantly affected properties is an improvement compared to the 25 m buffer currently proposed, it is not clear how this distance has been determined. As outlined previously the OHA consider that a bespoke approach is required to avoid effects on residential visual amenity. This includes ensuring that the deletions the OHA have recommended are carried out as these ensure that properties are not surrounded by development and will not have very close views of panels and associated infrastructure from their key or important outlooks. This includes views from upstairs habitable windows. This requires detailed work to be done to determine the exact requirements at each house or groups of houses where they have the same outlook. This is an extremely important piece of work that should inform the design and that should not be done retrospectively.

The OHA therefore remain of the view that the approach of using a standard buffer is not appropriate and that the distance of the development to residential properties should be informed by a on a site-by-site basis in accordance with LITGN 02-2019. The methodology for assessment should be agreed prior to the assessment being carried out. Notwithstanding this, if a standard buffer was to be considered it would have to be substantially larger than 75m to take account of different topographical and site contexts, and to be ensure that there is no conflict with LITGN 02-2019.

Point 11

Hedgerow Maintenance – Although the OHA would support this approach, it does not address that 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. There are other constraints that need be designed into the scheme, such as the bat mitigation areas which may impact on where the heights of hedgerows can be adjusted. It is likely to be a difficult process to agree where hedge heights should be reduced as the applicant’s

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LVIA does not include information to help inform where hedgerows should be reduced, this is illustrated in the OHA response to para 8.9.9 of the LVIA (covered above).

Landscape Character

The applicant’s response in this section does not include anything new or of substance that provides further information on landscape character. The OHA have commented on the applicant’s approach to considering landscape character in their design, and previous comments still apply.

Mitigation hierarchy

The applicant’s response in this section does not include anything new or of substance that provides greater clarity but tends to repeat statements from previous responses. Much of the information provided in the section is vague and of little relevance to the mitigation hierarchy. The response only confirms the OHA’s view that the mitigation hierarchy has not been followed when considering landscape and visual effects.

The applicant states that the mitigation hierarchy has been followed. It states under ‘avoid’ that panels have been removed in flood areas, because of archaeological constraints, South and West of Bladon, a field in the conservation area of Church Hanborough and in response to assessing individual residential properties. Whilst removals in panels are welcomed, it should be noted that many of these changes are late in the process and only occurred because of questions and pressure from consultees rather than the applicant taking a proactive and comprehensive approach on the outset and the OHA asked for design evolution in their LIR. As per the response to Deadline 6 **[REP6-118]**, the OHA do not consider these changes to go far enough.

Point 12

As the ExA has pointed out OCC requested a full corridor with of 15m. A minimum accessible width (not surfaced width) commitment is necessary for greenway corridors. This needs to be clear of hedges and tree growth and canopy coverage. Given that the representative Greenway plans and sections contained within the oLEMP show trees within the 3-4m buffer requested by the OHA on either side of the trackway, it is considered that the appropriate buffer is not being maintained on either side of the

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PRoW to prevent canopy overhang, shading and other issues which negatively impacts users of the PRoW. However, OCC accepts that these drawings are illustrative and hope to work these details out with the applicant at detailed design stage.

Point 13

As outlined in the LIR [**REP1-072**] section 7.10 the OHA’s key concerns related to the resilience of the development to the impacts of climate change, and the adequacy of the climate risk assessment given the availability of specific local information on climate risk, such as Oxfordshire’s Climate Vulnerability Assessment and Extreme Value Analysis.

While it is accepted that the risks from climate change had been assessed (Appendix 2 [**REP1-019**]) and scoped out (Table 14.6 [**APP-051**]), the OHA feels that the Applicant’s response does not sufficiently take into account any extreme value analysis which would include a review of the potential impacts of the increased likelihood of extreme weather in the future as stated in [**REP5-125**]. It focuses on “average conditions during 2040 to 2069 and 2070 to 2099 to ensure consideration of likely conservative extremes in climate change projections”. Our position is that it is not the average conditions that are likely to cause damage to the solar farm, but occasional extreme events, as outlined the Climate Vulnerability Assessment, which will become more likely over the period.

In the Joint Local Impact Report [**REP1-072**] paragraph 7.10.25 the OHA requested that the Applicant provides a Climate Change Resilience Assessment that responds to the risks outlined in OCC’s Council Climate Risk Assessment, and meets the requirements of NPS EN-1, and shows a broader understanding of potential future climatic risks that could disrupt the solar farm.

The Applicant has failed to provide a justification for the lack of extreme value analysis (over and above the initial Climate Change Risk Assessment) and it is unclear whether the mitigations referenced in the application are the same as, or in excess of, the mitigations taken by solar farms across the UK which have experienced damage and negative impacts from extreme weather events.

Appendix 1

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As raised in our previous comments, the OHA are still concerned that the applicant has underplayed the impact of their scheme. This continues in this Appendix. While the proposed removal of areas by the applicant is welcomed, these do not go far enough for the OHA.

It is also noted the applicant refers to identified historic assets (Hinton Manor and Buckland House) within Northern Vale Edge Slopes LCA 9G but outside the study area, along with the presence of pylons and Farmoor Reservoir as a justification that the ‘High’ landscape sensitivity should not be taken into account in the areas in which the Botley Solar Farm is proposed. Reference should also be made to the Summary of overall landscape sensitivity of the Vale Edge Slopes LCT 9, which in the last paragraph of this section states “*This LCT generally has ‘high’ landscape sensitivity to solar energy development greater than the ‘medium scale’ development scenario. There may be opportunities to accommodate carefully sited ‘very small’ and ‘small’ scale solar PV development in areas where existing hedgerows, hedgerow trees and woodland blocks could be used to screen development to reduce landscape and visual impact. Solar PV development should be avoided on the steep slopes and local hills, which are often highly visible from the lower lying vales*”. The proposed Solar development in the southern section of the site is not screened by vegetation and are located on steep slopes and local hills.

REP6-053 17.9 NPPF Compliance Table with updated local policy context

Appendices 1 to 3 – additional local plan policies

The ExA is signposted to OHA commentary regarding compliance of relevant development plan policies within the SoCGs.

Appendix 4 – NPPF

No comment.

Appendix 5 – Green Belt update

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The applicant’s commentary is over reliant on the temporary element of the proposal in justifying inappropriate development in the Oxford Green Belt. The update note fails to consider those permanent elements which will remain, such as the NGET substation. OHA remain of the view that Very Special Circumstances have not been adequately demonstrated to set aside the harm to the Green Belt by its inappropriateness.

REP6-054 17.10 Botley West Swinford HDD Crossing Technical Note

No Comment

REP6-055 to REP6-62 17.11 Cotswold Archaeology - Archaeological Evaluation Parts 1 to 8

Oxfordshire County Archaeological Services has reviewed the draft evaluation reports submitted at D6 and has provided comments on the adequacy of the applicant’s proposed mitigation in answer to the ExA’s Rule 17 letter above.

The Council would like to re-iterate its disappointment at the late submission of this documentation and the fact that these reports remain unfinished. Given the time constraints presented by the applicant’s late submission the Council has focussed its attention on addressing the Examining Authority’s Rule 17 letter, rather than reviewing these documents in full.

OCC cannot commit to fully assessing the significance of any archaeological remains until the final version of these evaluation reports are submitted to OCAS.

The evaluation reports that have been submitted are incomplete and not of the standard we would have expected. The report from Wessex Archaeology is clearly not finished at this stage and the specialist reports, which are essential for understanding the significance of what has been found, have not been included. The plans contained within this report lack the level of detail we would have expected them to contain to fully understand the extent of the recorded archaeology and in most cases have not even included the geophysical survey results. This will require substantial amendment before the report can be considered to be appropriate.

The report from Cotswold Archaeology is more complete but has clearly been produced in a very short timeframe and although the specialist reports have been included it is clear that these have not been carried back across into the trench descriptions and overall narrative of the report. In the majority of cases the trench descriptions simply referring to Roman pottery or Roman coins with little or no attempt to define the period to more than just these very broad periods. This report will also require amending before it can be considered as appropriate.

These reports do however highlight that there will need to be revisions to the proposed buffers in order to protect the identified archaeological deposits.

As such we would recommend an amendment to our proposed recommendations to require these reports to be completed and agreed with the Local Planning Authority before any development commences or the detailed written specifications for further work to be agreed. There will also need to be a requirement for these buffer areas to be agreed before any development can commence or detailed specifications agreed.

We would therefore recommend the following requirements should planning permission be granted for this development.

- 10.—(1) No part of the authorised development may commence and no part of the permitted preliminary works for that part comprising the intrusive archaeological surveys may start until;
 - b) the evaluation reports and buffer zones have been amended and approved by the local planning authority and;
 - b) following the agreement of the buffer zones and evaluation reports an archaeological written scheme of investigation for that part has been submitted to and approved in writing by the relevant planning authority.
- (2) For the purposes of sub-paragraph 10(1), “commence” includes part (a) of the permitted preliminary works insofar as the works relate to intrusive archaeological surveys.
- (3) The archaeological written scheme of investigation must be substantially in accordance with an outline written scheme of investigation, approved in advance by the relevant planning authority, and must be implemented as approved.

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(4) within two years of the completion of the archaeological mitigation fieldwork an updated project design and post excavation assessment detailing all processing, research and analysis necessary to produce and secure the delivery of an accessible and useable archive and a full report for publication must be submitted to and approved in writing by the relevant planning authority.

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. Being as these documents have been submitted in draft and that OCAS will not be able to review the final documents in prior to the end of the examination, OCC contends that Paragraph 5.9.12 of NPS EN-1 has not been complied with.

REP6-063 17.12 Wessex Archaeology Report - Central West Botley West Solar Farm Archaeological Evaluation (Draft Only)

See comments above.

REP6-064 17.13 Residential Visual Amenity Assessment (Part 1)

The OHA consider there are omissions in the assessment and not all properties that have views available have been identified. This appears contrary to the statement [in **REP6-047**, page 34] “330 residential properties have been identified as falling within 250m of the Project and within the ZTV (Figure 1.1 to 1.66 of the RVAA). It should be noted that not all these properties would have views of the Project. Those that would have views available have been identified within the RVAA and assessed accordingly.”

As an example, VWHDC can find no assessment for Upper Whitley Farm, where it has been established views are available and within 250m, as shown on figure 1.32 rev 04 of the RVAA assessment.

REP6-065 17.13 Residential Visual Amenity Assessment (Part 2)

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See above.

REP6-066 17.14 Botley West Solar Farm - Thermal Impact Report

The OHA observe the report’s conclusion that turbulence effects would be minor but defer to the expertise of the Civil Aviation Authority and Oxford Aviation Services.

REP6-067 17.15 Thermal Plume Primary Radar Refraction

The OHA observe the report’s conclusion that radar interference would be negligible but defer to the expertise of the Civil Aviation Authority and Oxford Aviation Services.

Statement of progress on SoCG

Signed Statements will be submitted by the applicant by Deadline 8 (D8).