



Botley West Solar Farm

STATEMENT OF COMMON GROUND –
Oxfordshire County Council

EN010147/APP/11.7/10

12 November 2025

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Statement of
Common Ground -
Oxfordshire
County Council
Rev 2
Nov 2025

Approval for issue

Jon Alsop

12 November 2025

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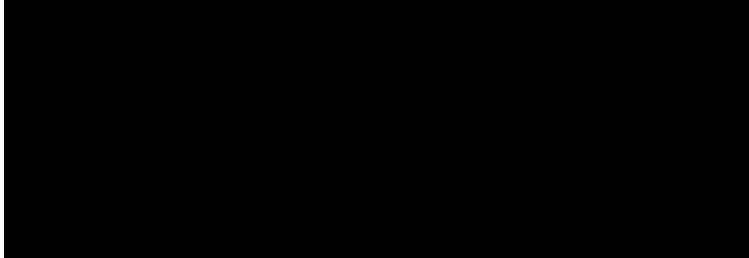
Appendix A Record of Relevant Correspondence

Appendix B Oxfordshire Minerals and Waste Local Plan Policies

SIGNATURES

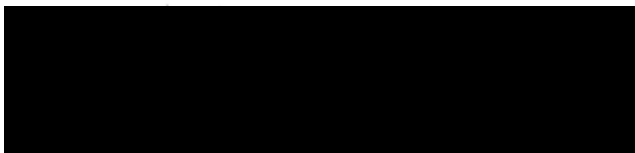
This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and Oxfordshire County Council.

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1 Introduction

1.1 DCO Reference

1.1.1 EN010147/APP/11.7/10

1.2 Date of Examination

1.2.1 May 2025 – November 2025

1.3 Proposed Development

1.3.1 The Applicant is seeking development consent for Botley West Solar Farm (the 'Project'), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic ('PV') solar farm and associated infrastructure with a total capacity exceeding 50 megawatts ('MW'), in parts of west Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.

1.3.2 The Project is classed as a 'nationally significant infrastructure project' ('NSIP') for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a Development Consent Order (DCO). The application for development consent is being submitted to the planning inspectorate ('PINS'), with the decision on whether to grant a DCO to be made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), as required under the PA 2008.

1.3.3 This Statement of Common Ground (SoCG) has been prepared to accompany the DCO application made to the Secretary of State under section 37 of the PA 2008 for the proposed Project. The Application has been submitted by SolarFive Ltd (the Applicant).

1.3.4 A Location Plan can be found in the Examination Library at **[AS-024]** and a full description of the Project can be found at ES Chapter 6 - Project Description **[APP-043]**.

1.4 Statement Overview

1.4.1 This Statement of Common Ground ('SoCG') comprises a record of consultation held with the relevant SoCG organisation to date as appropriate, and is designed to evolve, representing the ongoing nature of these discussions throughout the Examination period.

1.4.2 This SoCG has been prepared between (1) the Applicant and (2) Oxfordshire County Council (jointly referred to as the Parties).

1.4.3 An overarching Statement of Commonality **[EN01047/APP/11.6]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.

1.4.4 The Examining Authority has requested that the SoCGs include the following matters as set out in the Rule 6 Letter **[PD-006]**:

- Methodology for environmental assessments;

- Data collection methods;
- Baseline data;
- Data/statistical analysis, approach to modelling and presentation of results;
- Expert judgements, assumptions and worst case scenario;
- Assessment of alternatives;
- Design development;
- Identification and sensitivity of relevant features and receptors;
- Construction and operational effects;
- Embedded and additional mitigation;
- Cumulative effects and mitigation; and
- Relevant wording in the draft Development Consent Order (dDCO)

1.4.5 For the avoidance of doubt, this SoCG comprises contributions from the following environmental topic disciplines:

- Ecology
- Historic Environment
- Agricultural Land Use & Public Rights of Way
- Hydrology and Flood Risk
- Landscape and Visual Resources
- Noise and Vibration
- Traffic and Transport
- Planning Policy (including minerals and waste)
- Health
- Socio-economics

1.4.6 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with Oxfordshire County Council to date:

- a. Relevant submission documents and plans
- b. Record of relevant correspondence to date
- c. Matters that are agreed
- d. Matters yet to be agreed
- e. Matters that are not agreed

1.4.1 As referenced above, c, d, and e (sections 4), summarises issues that are 'agreed', 'yet to be agreed' or are 'not agreed'. 'Not agreed' indicates a final position where the parties have agreed to disagree. 'Agreed' indicates that an issue has been resolved.

1.5 Planning Policy Context

- 1.5.1 It is agreed that the following energy national policy statements (NPS) are applicable to the proposed development:
- NPS EN-1 Overarching National Policy Statement for Energy;
 - NPS EN-3 Renewable Energy Infrastructures; and
 - NPS EN-5 Electricity Networks Infrastructure.
- 1.5.2 It is accepted by the parties that from the planning authority's perspective, assessment of the proposed development against these statements is solely a matter for the Examining Authority and no further assessment on the degree of compliance is made by them in this statement.
- 1.5.3 It is agreed that the development plan documents maintained by OCC applicable to the development proposal comprises:
- Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy relevant policies and relevant 'saved' policies from the Minerals and Waste Local Plan (1996) (As submitted November 2024)

2 Relevant Submissions Documents and Plans

- 2.1.1 A list of DCO documents and plans of relevance to engagement with Oxfordshire County Council is identified in the tables below for ease of reference.

Table 2.1: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Ecology and Nature Conservation

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|--|-------------------------------|---------------------|
| EN010147/APP/2.2 | Streets, Access and Rights of Way Plans | CR2-004 | Rev2/September 2025 |
| EN010147/APP/2.6 | Statutory and Non-Statutory Sites - Features of Nature Conservation Plan | APP-009 | November 2024 |
| EN010147/APP/2.8 | Habitats of Protected Species Plan | APP-010 | November 2024 |
| EN010147/APP/2.9 | Statutory and Non-Statutory Features of Historic Environment Plan | APP-012 | November 2024 |
| EN010147/APP/2.10 | Hedgerow Removal Plans | AS-007 | February 2025 |
| EN010147/APP/3.1 | Final Draft Development Consent Order | TBC | Rev9/ November 2025 |
| EN010147/APP/6.2 | ES Volume 0, Non-Technical Summary | APP-037 | P0/ November 2024 |

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|---|-------------------------------|----------------------|
| EN010147/APP/6.3 | ES Volume 1, Chapter 9 Ecology and Nature Conservation | REP4-010 | Rev3/ August 2025 |
| EN010147/APP/6.4 | ES Volume 2, Figure 9.1 Statutory Designated Sites | APP-086 | November 2024 |
| EN010147/APP/6.4 | ES Volume 2, Figure 9.2 Non-Statutory Designated Sites | APP-087 | November 2024 |
| EN010147/APP/6.4 | ES Volume 2, Figure 9.3 a b & c Phase 1 Habitat Map | APP-088 | November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.1 Desk Study | APP-150 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.2 Phase 1 Habitat Survey Report | APP-151 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.3 Hedgerow Survey Report | APP-152 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.4 Bat Survey Report | REP5-039 | Rev 1/September 2025 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.5 Great Crested Newt (GCN) Survey Report | APP-154 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.6 Invertebrate Survey Report | APP-155 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.7 Reptile Survey Report | APP-156 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.8 Badger Survey Report [CONFIDENTIAL] | APP-157 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.9 Breeding Bird Survey Report | APP-158 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.10 Wintering Bird Survey Report | APP-159 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.11 Dormouse Survey Report | APP-160 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.12 Arable Weeds Survey Report | APP-161 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.13 Biodiversity Net Gain Assessment | REP6-019 | Rev2/September 2025 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.14 Habitats Regulations Assessment Report | REP6-022 | Rev1/October 2025 |

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|--|-------------------------------|---------------------|
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.15 Veterans Tree Survey Report | APP-164 | P0/ November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 9.16 Section 42 Consultation Responses | APP-165 | P0/ November 2024 |
| EN010147/APP/15.6 | Bat Technical Note | REP6-044 | Rev 1/October 2025 |
| EN010147/APP/7.3.3 | Landscape, Ecology and Amenities Plan | CR2-043 | Rev3/ September2025 |
| EN010147/APP/7.6.1 | Outline Code of Construction Practice – Part 1 | REP6-028 | Rev 5/October 2025 |
| EN010147/APP/7.6.1 | Outline Code of Construction Practice – Part 2 | REP6-030 | Rev 5/October 2025 |
| EN010147/APP/7.6.2 | Outline Operational Management Plan | REP6-032 | Rev 5/October 2025 |
| EN010147/APP/7.6.3 | Outline Landscape and Ecology Management Plan | REP6-034 | Rev 6/October 2025 |
| EN010147/APP/7.6.4 | Outline Decommissioning Plan | REP6-036 | Rev 2/October 2025 |

Table 2.2: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Historic Environment

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|--|-------------------------------|----------------------|
| EN010147/APP/6.2 | ES Non-Technical Summary | APP-037 | November 2024 |
| EN010147/APP/6.3 | ES Volume 1, Chapter 7: Historic Environment | CR2-019 | Rev 3/September 2025 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 7.1: Historic environment desk-based assessment | APP-131 | November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology | APP-132 | November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 7.3: Geophysical survey report, Parts 1-8 | APP-133 – APP-140 | November 2024 |
| EN010147/APP/6.5 | ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment | CR2-036 | Rev1/September 2025 |

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|---|-------------------------------|-----------------------|
| EN010147/APP/6.5 | ES Volume 3, Appendix 7.5: Settings Assessment | CR2-038 | Rev 3/ September 2025 |
| EN010147/APP/6.5 | ES Figures 2.1a – 2.4c – Illustrative Masterplan | CR2-026 | Rev 2/September2025 |
| EN010147/APP/6.5 | ES Figures 8.248 - 8.371 - Photomontages (Winter and Summer) | CR2-032 | Rev2/September 2025 |
| EN010147/APP/7.6.5 | Outline Written Scheme of Investigation | CR2-053 | Rev 3/September 2025 |
| EN010147/APP/12.7 | Additional Photomontages for Historic Environment Assessment | CR2-059 | Rev 1/ September 2025 |
| EN010147/APP/17.11 | Archaeological Evaluation Report by Cotswold Archaeology – Parts 1 to 8 | REP6-055 to REP6-062 | October 2025 |
| EN010147/APP/17.12 | Archaeological Evaluation Report by Wessex Archaeology | REP6-063 | October 2025 |

Table 2.3: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Agricultural Land Use and PRow

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|---|-------------------------------|----------------------|
| EN010147/APP/6.2 | ES Non-Technical Summary | APP-037 | Rev0/November 2024 |
| EN010147/APP/6.3 | ES Chapter 17 - Agricultural Land Use and Public Rights of Way | APP-054 | Rev0/November 2024 |
| EN010147/APP/6.4 | ES - Figures 17.1, 17.2 and 17.6 | APP-108, APP-109 and APP-113 | Rev0/November 2024 |
| EN010147/APP/6.4 | ES - Figures 17.3, 17.4 and 17.5 | CR2-033, CR2-034, and CR2-035 | Rev 1/September 2025 |
| EN010147/APP/6.5 | ES - Appendix 17.1 ALC and Soil Survey Report | APP-223 | Rev0/November 2024 |
| EN010147/APP/7.6.1 | Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan | REP6-028 | Rev5October 2025 |
| EN010147/APP/7.6.2 | Outline Operational Management Plan | REP6-032 | Rev5/October 2025 |

Table 2.4: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Hydrology and Flood Risk

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--|--|-------------------------------|-------------------|
| 6.3 - ES Chapter 10 - Hydrology and Flood Risk | Hydrology and Flood Risk | REP6-010 | October 2025 |
| 6.4 ES - Figure 10.1 | Study Area | APP-089 | November 2024 |
| 6.4 ES - Figure 10.2 | Hydrological Features | APP-090 | November 2024 |
| 6.4 ES - Figure 10.3 | WFD Catchments (surface water) | APP-091 | November 2024 |
| 6.4 ES - Figure 10.4 | Flood Warnings Alerts | APP-092 | November 2024 |
| 6.4 ES - Figure 10.5 | Drinking Water Protected Areas and Nitrogen Vulnerable Zones | APP-093 | November 2024 |
| 6.4 ES - Figure 10.6 | BGS 150k Bedrock Geology | APP-094 | November 2024 |
| 6.4 ES - Figure 10.7 | BGS 150k Superficial Geology | APP-095 | November 2024 |
| 6.4 ES - Figure 10.8 | WFD Catchments (groundwater) | APP-096 | November 2024 |
| 6.4 ES - Figure 10.9 | Designated Sites | APP-097 | November 2024 |
| 6.4 ES - Figure 10.10 | EA Flood Map for Planning | APP-098 | November 2024 |
| 6.4 ES - Figure 10.11 | Hydraulic Modelling Results | APP-099 | November 2024 |
| 6.4 ES - Figure 10.12 | Water Abstractions, Pollution Incidents and Discharge Consents | APP-100 | November 2024 |
| 6.5 ES - Appendix 10.1 | Flood Risk Assessment | REP6-024 | Rev2/October 2025 |
| 6.5 ES - Appendix 10.2 | Conceptual Drainage Strategy | APP-167 | November 2024 |
| 6.5 ES - Appendix 10.3 | Hydraulic Modelling Report | APP-168, APP-169 and APP-170 | November 2024 |
| 6.5 ES - Appendix 10.4 | Hydrology report | APP-171 | November 2024 |
| 6.5 ES - Appendix 10.5 | Surface Water Modelling Report | APP-172 | November 2024 |

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|------------------------|--|-------------------------------|---------------|
| 6.5 ES - Appendix 10.6 | Surface water and Groundwater abstractions, pollutions incidents and discharge consents Report | APP-173 | November 2024 |
| 6.5 ES - Appendix 10.7 | Water Framework Directive Assessment | APP-174 | November 2024 |

Table 2.5: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Landscape and Visual Resources

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|--|-------------------------------|---------------------|
| EN010147/APP/6.2 | ES Non-Technical Summary | APP-037 | Rev0/November 2024 |
| EN010147/APP/6.3 | 6.3 - ES Chapter 8 – Landscape and Visual Impact Assessment | REP6-012 | Rev4/October 2025 |
| EN010147/APP/6.4 | Figure 8.128 to 8.243: Representative Viewpoint Photographs (Summer) | CR2-032 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.12 to 8.127: Representative Viewpoint Photographs (Winter) | REP5-028 | Rev1/September 2025 |
| EN010147/APP/6.4 | Figure 8.1-8.3 Site Location | APP-067 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.244: National Character Areas | APP-068 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.245: Regional Landscape Character | APP-069 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.246: Local Landscape Character Areas | APP-070 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.247: District Landscape Character Areas (including ZTV) | APP-071 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.248 to 8.371: Photomontages (Winter and Summer) | CR2-032 | Rev2/September 2025 |

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|---|-------------------------------|---------------------|
| EN010147/APP/6.4 | Figure 8.4-8.6: Landscape Resources Plan | APP-081 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.7: ZTV and Representative Viewpoints (Whole Project Overview) | APP-082 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.8: ZTV Section Overlaps (Whole Project Overview) | APP-083 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.8a: ZTV Bare Earth | APP-084 | Rev0/November 2024 |
| EN010147/APP/6.4 | Figure 8.9-8.11: Representative Viewpoint and Photomontage Locations | APP-085 | Rev0/November 2024 |
| EN010147/APP/6.5 | Appendix 8.1: Landscape Character | APP-143 | Rev0/November 2024 |
| EN010147/APP/6.5 | Appendix 8.2: Landscape Value | APP-144 | Rev0/November 2024 |
| EN010147/APP/6.5 | Appendix 8.3: Strategic Arboricultural Impact Assessment & Method Statement | APP-145 to APP148 | Rev0/November 2024 |
| EN010147/APP/6.5 | Appendix 8.4: Photomontage Methodology | APP-149 | Rev0/November 2024 |
| EN010147/APP/6.5 | Appendix 8.5: Landscape Character Assessment | REP5-031 | September 2025 |
| EN010147/APP/6.5 | Appendix 8.6: Public Rights of Way and Recreational Routes Assessment | REP5-037 | September 2025 |
| EN010147/APP/6.5 | Appendix 8.7: Representative Viewpoint Assessment | REP5-038 | September 2025 |
| EN010147/APP/6.3 | Figure 2.1a to 2.4d: Illustrative Masterplan | CR2-026 | Rev2/September 2025 |
| EN010147/APP/7.3.3 | Landscape, Ecology and Amenities Plan | CR2-043 | Rev3/September 2025 |
| EN010147/APP/7.6.3 | Outline Landscape and Ecological Management Plan | REP6-034 | Rev 6/October 2025 |

Table 2.6: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Noise and Vibration

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|--|-------------------------------|--------------------|
| EN010147/APP/6.3 | 6.3 - ES Chapter 13 - Noise and Vibration | PDB-010 | Rev1/May 2025 |
| EN010147/APP/6.4 | 6.4 ES - Figure 13.1 - Construction Phase Noise Study Area | APP-103 | Rev0/November 2024 |
| EN010147/APP/6.4 | 6.4 ES - Figure 13.2 - Construction Phase Vibration Study Area | APP-104 | Rev0/November 2024 |
| EN010147/APP/6.4 | 6.4 ES - Figure 13.3 - Operational Phase Noise Study Area | APP-105 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 13.1 Baseline Sound Survey | APP-211 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 13.2 Construction Phase Noise and Vibration | APP-212 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 13.3 Operational Phase Noise | APP-213 | Rev0/November 2024 |
| EN010147/APP/7.6.1 | 7.6.1 - Outline Code of Construction Practice - Part 1 | REP6-028 | Rev5/October 2025 |
| EN010147/APP/7.6.1 | 7.6.1 - Outline Code of Construction Practice - Part 2 | REP6-030 | Rev5/October 2025 |
| EN010147/APP/7.6.2 | 7.6.2 - Outline Operational Management Plan | REP6--032 | Rev5/November 2025 |

Table 2.7: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Traffic and Transport

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|---|-------------------------------|---------------------|
| EN010147/APP/6.3 | 6.3 - ES Chapter 12 - Traffic and Transport | REP5-016 | Rev1/September 2025 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.1 Description of Network Links and Sensitivity | APP-196 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.2 Traffic Survey Data Part 1 | APP-197 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.2 Traffic Survey Data Part 2 | APP-198 | Rev0/November 2024 |

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|---|-------------------------------|---------------------|
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.2 Traffic Survey Data Part 3 | APP-199 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.2 Traffic Survey Data Part 4 | APP-200 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.3 Base Traffic Flows | APP-201 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.4 Public Transport Networks | APP-202 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.5 Sensitive Receptors | APP-203 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.6 Construction Vehicle Trip Generation Assumptions | APP-204 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.7 Traffic Flows with Construction Traffic | REP5-032 | Rev1/September 2025 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.8 Accesses and highway drawings Part 1 of 4 | APP-206 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.8 Accesses and highway drawings Part 2 of 4 | APP-207 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.8 Accesses and highway drawings Part 3 of 4 | APP-208 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.8 Accesses and highway drawings Part 4 of 4 | APP-209 | Rev0/November 2024 |
| EN010147/APP/6.5 | 6.5 ES - Appendix 12.9 Personal Injury Accident Clusters | APP-210 | Rev0/November 2024 |
| EN010147/APP/7.6.1 | 7.6.1 - Outline Code of Construction Practice - Part 1 – Outline Construction Traffic Management Plan (Annex A) | REP6-028 | Rev5/October 2025 |

Table 2.8: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Planning Policy

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|--|-------------------------------|-----------------|
| EN010147/APP/7.1 | 7.1 Planning Supporting Statement inc. Green Belt Case | REP1-012 | Rev1/ June 2025 |

Table 2.9: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Health

| Document/Plan Ref. | Title | Examination Library reference | Rev./Dated |
|--------------------|--|-------------------------------|-----------------------|
| EN010147/APP/6.3 | ES Chapter 16 - Human Health | CR2-023 | September 2025 |
| EN010147/APP/6.5 | Figure 16.1 - Human Health Study Area | APP-106 | November 2024 Rev. 0 |
| EN010147/APP/6.4 | Figure 16.2: Illustrative 3D Views of Educational Facility | APP-107 | November 2024 Rev. 0 |
| EN010147/APP/6.5 | Appendix 16.1 Human Health Consultation and Engagement | APP-219 | November 2024 Rev. P0 |
| EN010147/APP/6.5 | Appendix 16.2 Oxfordshire HIA Toolkit Alignment Review | APP-220 | November 2024 Rev. P0 |
| EN010147/APP/6.5 | Appendix 16.3 Community Health Profile | APP-221 | November 2024 Rev. P0 |
| EN010147/APP/6.5 | Appendix 16.4 Human Health PRow Analysis | APP-222 | November 2024 Rev. P0 |
| N/A | Representation by Oxfordshire County Council Section 8: Public Health (pdf page 52 of 75) | RR-0793 | 27th February 2025 |
| EN010147/APP/11.3 | Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) Appendix 1: Response to PINS Action Point No. 22 (pdf pages 48 to 51 of 69) | REP1-019 | June 2025 Rev. P0 |
| EN010147/APP/11.4 | Applicant's Responses to Relevant Representations (pdf pages 72-96) | REP1-020 | June 2025 Rev. P0 |
| EN010147/APP/12.2 | Applicant's Response to the Examining Authority's First Written Questions (ExQ1) (notably pdf pages 148 to 153) | REP2-025 | July 2025 Rev.P0 |
| EN010147/APP/7.6.3 | Outline Landscape and Ecology Management Plan (notably section 6 'Public Health Elements' pdf page 21) | REP6-034 | Rev 6/ October 2025 |
| EN010147/APP/12.3 | Applicant's Responses to Local Impact Reports Submitted at Deadline 1 (notably pdf pages 27 to 29 and pdf pages 51 to 54) | REP2-026 | July 2025 Rev.P0 |
| N/A | Oxfordshire Host Authorities Responses to Examining Authority's First Written Questions (ExQ1) (notably pdf page 127) [Noting OCC reference the 2023 not 2024 health assessment, the latter includes JSNA evidence and references] | REP2-050 | 1st July 2025 |

3 Record of Relevant Correspondence

- 3.1.1 The Project has been the subject of pre-application engagement with Oxfordshire County Council, and both parties continue to engage throughout and beyond the submission of the DCO application for the Project.
- 3.1.2 **Appendix A** identifies the discussions and correspondence that have taken place between the Applicant's project team and Oxfordshire County Council to date.

4 Areas of Discussion between the Parties

Table 4.1: Areas of Discussion between the Parties – Ecology and Nature Conservation

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|---|--|---|---|-------------|
| 4.1.1 | 6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP4-010] | Survey methodology | Other than where noted below, survey scope and methodology agreed. | Agreed. | Agreed. |
| 4.1.2 | 6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP4-010] | Assessment approach, scope and methodology | Other than where noted below, assessment approach, scope and methodology agreed. | Agreed. | Agreed. |
| 4.1.3 | 6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP4-010] | Aquatic environment | <p>We also have concerns that the aquatic environment, both in terms of habitat and species it supports, has been somewhat overlooked in the assessment and project design.</p> <p>November 2025 update: [REP5-125] (Page 21) outlines that OCC still maintains its position that Otter surveys are required prior to a decision being made. Otter Surveys have not informed the design of the scheme and therefore it cannot be demonstrated that the mitigation hierarchy has been applied</p> | <p>Given that all watercourses will be protected with appropriate buffers, as committed within the project's embedded mitigation [REP4-010], during both construction, operation and decommissioning of the Project, impacts to the aquatic environment are not anticipated. Further, the delivery of the Evenlode Corridor will ensure a strategic, landscape-level enhancement with respect to the aquatic environment.</p> <p>November 2025 update: Both the oCoCP [REP6-028] (at section 1.10.13) and the oLEMP [REP6-034] (at section 8.2.6) have been updated to incorporate 10m buffers to all watercourses.</p> <p>In addition, the oCoCP [REP6-028] has been updated to incorporate explicitly that otter and water vole surveys would be undertaken pre-commencement, as necessary.</p> <p>The Project has applied the mitigation hierarchy to the issue of otters and water vole by avoiding impacts through scheme design via the implementation of 10m buffers to watercourses and the inclusion of the River Evenlode Corridor which protects and enhances the corridor known to be used by otter.</p> <p>The approach to otter and water vole surveys adopted by the Project, including their completion at pre-commencement stage, as necessary, has been agreed with the Environment Agency in the Statement of Common Ground (issue 4.2.4, [EN010147/APP/11.7/3], and Natural England in their response to ExQ1.8.14 [REP2-057].</p> | Not agreed. |
| 4.1.4 | 6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP4-010] | Otter and water vole assessment | 2.2 In our PEIR response we expressed concern about the lack of survey for otter and water vole; the Environmental Statement sets out the approach taken, indicating that there is no need to survey for water vole, as they are considered as a receptor by virtue of assessment of the effects on watercourses. Otters are considered as a receptor within the Environmental Statement (see paragraph 9.6.78 of Chapter 9 [REP4-010]), but no survey has been undertaken to determine their | Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity [REP4-010], otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including | Not agreed. |

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| | | | <p>presence or use of the watercourses. The Environmental Statement indicates that it is assumed that otter forage and commute within the project site, and that there may be holts along the river, but there has been no survey to confirm this (paragraph 9.9.195 of [REP4-010]). It is recognised that short term disturbance to otter could occur due to noise and vibration during construction(paragraph 9.12.180 of [REP4-010]); the assessment of the impact of such disturbance would be better informed if it were understood whether there were otter holts along the river as it passes through the project area. This needs to be considered in relation the protection otters receive under the Conservation of Habitats and Species Regulations 2017. Equally, noise and vibration during construction could disturb water vole, again this needs to be considered in relation to the protection water vole receive under the Wildlife and Countryside Act 1981. This is particularly relevant in terms of HDD crossings of watercourses but could also apply to the installation of solar panels in proximity to watercourses.</p> <p>November 2025 update: [REP5-125] (Page 21) outlines that OCC still maintains its position that Otter surveys are required prior to a decision being made. Otter Surveys have not informed the design of the scheme and therefore it cannot be demonstrated that the mitigation hierarchy has been applied</p> | <p>with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact.</p> <p>This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows.</p> <p>The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean et al 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided.</p> <p>The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced.</p> <p>November 2025 update: Both the oCoCP [REP6-028] (at section 1.10.13) and the oLEMP [REP6-034] (at section 8.2.6) have been updated to incorporate 10m buffers to all watercourses. This will help protect both species further, should they be present.</p> <p>In addition, the oCoCP [REP6-028] has been updated to incorporate explicitly that otter and</p> | |

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|-------|--|---|--|--|-----------------|
| | | | | water vole surveys would be undertaken pre-commencement, as necessary. The Project has applied the mitigation hierarchy to the issue of otters and water vole by avoiding impacts through scheme design via the implementation of 10m buffers to watercourses and the inclusion of the River Evenlode Corridor which protects and enhances the corridor known to be used by otter. The approach to otter and water vole surveys adopted by the Project, including their completion at pre-commencement stage, as necessary, has been agreed with the Environment Agency in the Statement of Common Ground (issue 4.2.4, [EN010147/APP/11.7/3], and Natural England in their response to ExQ1.8.14 [REP2-057]. | |
| 4.1.5 | 7.6.3 Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034] | Great crested newt enhancement and licensing, | 2.3 It is noted that only a low population of GCN was recorded in 2 ponds outside the project boundary. Given the presence of low populations nearby, it would be beneficial to improve the habitat for GCN in the scheme area through biodiversity enhancements including provision of more ponds and connected terrestrial habitat. 2.4 The oLEMP [REP6-034] refers to use of a Natural England mitigation licence for GCN (paragraph 8.3.1), but elsewhere within the application, use of the District Level Licencing scheme is suggested (commitment number 9.13 of Table 9.8.1 of [REP4-010]). Clarification is sought as to which approach will be taken forward. The County and Districts participate in the Nature Space District Licencing scheme which delivers a long-term, landscape scale conservation strategy for great crested newts, funded by development schemes, to mitigate and compensate impacts on great crested newts. To use the District Licence a requirement would need to be included within the DCO to link the consent to the District Licence; Oxfordshire County Council could authorise use of the licence if needed. We advise liaison with Nature Space with regards use of the District Licence for this scheme. November 2025 update: The Council notes that the applicant has updated the oLEMP to outline that a NE license will be used to secure GCN licensing. This is welcomed. | The Project will require a licence to address potential effects to GCN populations on and around the site. At this stage, it is anticipated that the Project will use a Natural England mitigation licence for GCN and discussions with NE in respect of this are on-going. However, the Project may make use of the DLL, if that is more appropriate, as per commitment 9.13. November 2025 update: The Applicant has submitted a draft GCN licence to Natural England and is anticipating receiving a Letter of No Impediment by the end of the Examination. The Project site is currently intensive arable and, in small areas, intensive sheep grazing, neither of which are suitable GCN terrestrial habitat. Post development, the Project site will be a matrix of different grasslands, scrub, hedgerows etc. meaning that the vast majority of the Project site will be suitable terrestrial habitat for GCN post construction. Although the scrapes within the Tier A bat buffers As such, the Project is providing | Agreed. |
| 4.1.6 | 6.5 ES - Appendix 9.4 Bat Survey Report Rev 1 [REP5-039] | Bat assemblages' assessment and mitigation | .5 The Bat Survey Report [REP5-039] concluded that the assemblage of bats present is of at least national importance, that two Annex II bat species (barbastelle and Bechstein's) use woodlands adjacent to the site for roosting and that the mosaic of habitats within the Zone of Influence is of at least national importance. | Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: | Not yet agreed. |

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| | | | <p>2.6 The Environmental Statement concludes that the impact on the local bat population will be negligible on the basis that all landscape features that are used by foraging, commuting and roosting bats will be retained and protected by buffers (paragraphs 9.9.131 to 9.9.135 of [REP4-010]). However, very little information has been presented regarding proposed avoidance or mitigation measures in relation to bats. Mention is made of provision of a suitable buffer to protect all important bat flightlines being incorporated into the ‘detailed masterplan’ (commitment 9.20 of Table 9.8.1 of [REP4-010]). However, important bat flightlines are not identified in the Illustrative Masterplan [CR2-026], or other documentation including the oLEMP [REP6-034], outline Operational Management Plan (oOMP) [REP2-017] or outline Code of Construction Practice [APP-232 and APP-233]. What would be considered a ‘suitable’ buffer in terms of size has not been defined.</p> <p>2.7 The Environmental Statement indicates that gaps to be created in hedgerows are mostly <5m and unlikely to cause change in foraging/commuting habitat (paragraph 9.9.132 of [REP4-010]). However, again no information is presented in terms of which hedgerows are important bat flightlines to justify this conclusion.</p> <p>2.8 It is noted that Table 1.1 (documents to support the implementation of the CoCP) of the outline Code of Construction Practice (oCoCP) [REP6-028] includes a commitment to produce a construction artificial light emissions plan, however no specific link is made between this and particularly sensitive features for bats, or bat flightlines.</p> <p>November 2025 update: It is noted that the applicant has produced a bat technical note and made provision within the oLEMP to secure a bat mitigation strategy that has been broadly agreed with Natural England.</p> <p>However, OCC still has outstanding concerns on the issue of bat mitigation. The Council requests 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>Para 8.5.7 of the oLEMP 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</p> | <ul style="list-style-type: none"> • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. <p>It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [REP5-039]) will be used to determine the extent of the ‘appropriate buffers’ for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [REP4-014] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.</p> <p>November 2025 update: A detailed Bat Technical Note [REP6-044] and updated ES Appendix 9.4 Bat Survey Report [REP5-039] have been submitted to the Examination and agreed with Natural England. The oLEMP [REP6-034] has been updated to ensure that the measures with respect to bat avoidance measures (i.e. buffers of key flight lines) are secured. It has been further updated at Deadline 7 to account for requests by the OHA with respect to the figures showing the locations of the Tier A bat buffers.</p> | |

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| 4.1.7 | 7.6.3 Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034] | Farmland birds | <p>It is understood that the applicant will be updating the oLEMP at D7 to address the Council's concerns raised at ISH2 [REP6-117]. The Council has reviewed the draft version of this D7 submission and is content that it now contains a plan showing the tier A buffers. This document however does not provide the justification of woodland buffer zones requested by the Council.</p> | | |
| | | | <p>2.9 The bird surveys [APP-158] and [APP-159] have identified significant numbers of breeding and wintering farmland birds; the breeding bird survey report indicates the breeding bird assemblage to be of County importance, although this is not correctly reflected in the Environmental Statement which assesses the assemblage as being of local importance only.</p> <p>2.10 As raised in the PEIR response, there is some question as to how successful skylark plots can be within a solar farm. Skylark plots are not designed to provide nesting sites, but to open up the sward in agricultural settings to increase accessibility to invertebrate prey. Skylarks require long, unbroken sightlines; solar panels reduce the openness of the landscape and therefore reduce the desirability of the area for nesting skylark due to perceived risk of predation. Post construction monitoring of over 100 solar farms in England and Wales found no evidence of nesting skylarks (In Practice, CIEEM Issue 117, Sept 22).</p> <p>2.11 As previously suggested, we recommend development of a farmland bird strategy for the proposed development, which should consider the need for off-site measures as well as incorporating features for birds within the scheme. There are existing successful local schemes working with landowners on improving habitats for farmland birds, which might be able to support in this. We would welcome discussion with the developer on this and will set out further detail of how this would work in the LIR.</p> <p>2.12 It is appreciated that areas left undeveloped due to archaeological interest will be used to provide wildflower areas for the benefit of a range of species, however these areas are not large enough to provide sufficient scope for nesting skylarks to offset the areas lost.</p> <p>November 2025 update: At D6 the applicant has still not committed to a Farmland Bird Strategy. The OHA have outlined why this is necessary in the LIR [REP1-072], [REP5-125] and [REP6-117]</p> <p>The Applicant at D6 had not agreed to the Examining Authority's proposed Requirement for</p> | <p>The Project site will be managed through conservation grazing to create grasslands of varied diversity and structure. Recent research on the impact of solar farms on farmland birds (Copping et al 2025) found that solar managed for mixed habitats (either ungrazed or grazing with an allowance for wildflowers to set seed, woody hedgerow features) had significantly higher numbers of both farmland birds and bird species than an intensive arable baseline. Given that, as set out in the oLEMP [REP6-034], the Project will be managed via conservation grazing with pauses in the grazing over the summer to allow plants to flower and set seed, it is anticipated that the Project will provide an overall enhancement for the bird assemblage present.</p> <p>November 2025 update: As agreed at ISH2, the primary concern of the OHAs, including West Oxfordshire District Council, was with respect to skylark mitigation. The Applicant's position with respect to skylark mitigation is set out in Annex 6 Skylark Technical Note of the Applicant's Response to ExQ2s [REP4-037] and expanded upon within the Applicant's response to the ExA's schedule of changes to the dDCO [REP6-051]. 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 skylark within the project site area 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 any off-site mitigation provision but which have similar impacts to the Project. As such, the Applicant considers the provision of grassland within the Project site to be suitable mitigation, in line with how other consented solar NSIPs have addressed this issue.</p> | Not agreed. |

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| 4.1.8 | 6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP4-010] | Operational impacts on wetland birds and aquatic invertebrates | a Farmland Bird Strategy. Without this requirement OCC do not consider the impact on farmland birds, particularly skylarks, to have been sufficiently mitigated. | | |
| | | | <p>2.13 No assessment has been provided of the potential effects during operation of the solar farm on wetland birds and aquatic invertebrates, despite this having been raised in our EIA scoping consultation response. The Zone of Influence for the assessment should take this into account, particularly given the proximity of large waterbodies of value to birds in the wider area, including Farmoor Reservoir, Cassington Gravel Pits, Blenheim lakes, and in the wider area, Otmoor and the Lower Windrush Valley complex. An understanding of the use of the wider landscape by wetland birds and aquatic invertebrates is needed to assess how the solar panels might influence behaviour of these species (evidence suggests that the polarised light of solar panels can be confused by these species for open water) and consequent impacts on their populations through mortality or reduced breeding success.</p> <p>November 2025 update: At D6 the applicant had not made a commitment within the oLEMP to monitor for impacts on birds within the site associated with the lake effect as was requested in the LIR [REP1-072] and the OHA's response to ExQ1.7.27 [REP2-050]. As such the Council does not consider this issue resolved.</p> | <p>Operational impacts on all breeding and wintering birds, and invertebrates identified within the Botley West Solar Farm have been assessed in ES Volume 1, Chapter 9, Section 9.9 [REP4-010].</p> <p>The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [REP4-010]. Although the lake effect has been hypothesised as a possibility, a review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. Research in the United States found some evidence that such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations and no evidence has been published demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping et al. 2025).</p> <p>November 2025 update: the oLEMP has been updated at Deadline 7 to incorporate monitoring of Tier A bat buffers with respect to invertebrate abundance which include water features. This specifically references recording Odonata to support assessment of local abundance within the solar site.</p> | Not agreed. |
| 4.1.9 | 6.5 ES - Appendix 9.13 Biodiversity Net Gain Assessment [REP6-019] | Biodiversity Net Gain | <p>2.14 We welcome the commitment to deliver biodiversity net gain above the minimum mandatory requirement of 10% due to come into force in November 2025. We note that the statutory metric has been used to calculate biodiversity net gain in line with the recommendations in Section 4.6 of EN-1, reporting a predicted 80.80% net gain in habitat units and 57.93% net gain in hedgerow units. It is notable that no calculation has been made of baseline or post development watercourse units. According to the Statutory Metric User Guide, if the site boundary crosses into the riparian zone (as is the case for this scheme), all adjacent lengths of watercourses should be included in the watercourse module. It is noted that no delay in</p> | <p>Following discussions with Natural England, the watercourse section of the metric will be included in the BNG Assessment, following River Morph surveys.</p> <p>Although the total construction period is anticipated to be two years, as a staged approach to work areas will be undertaken (excluding temporary compounds), it is considered that the majority of the site will be constructed in less than one year from construction, as such the Project does not require temporal multipliers to be entered. This will be developed once further details of construction methodologies and timings become available.</p> | Not yet agreed. |

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| 4.1.10 | 7.6.3 Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034] | Local Nature Recovery Strategy | <p>starting habitat creation has been included within the temporal multiplier for the metric, although it is understood that the construction period is two years. Clarification is sought as to whether there will be any delays in habitat creation.</p> <p>November 2025 updates: It is noted that the applicant has updated Requirement 7 at D6 to include water course units. This is welcomed.</p> <p>The Council has reviewed the applicant's D7 BNG metric which shows a >20% gain in watercourse units. The Council has not been provided with, and will now not have the opportunity to review the survey data behind the metric to confirm that this uplift is achievable</p> | <p>November 2025 update: ES Appendix 9.13 Biodiversity Net Gain Assessment was updated at Deadline 6 [REP6-019] to incorporate the watercourse module of the BNG assessment and to provide the supporting surveys. The assessment showed that the Project would achieve at least 20% watercourse BNG.</p> | |
| | | | <p>We are content with the applicant's position on the temporal multiplier.</p> | | |
| 4.1.10 | | | <p>2.15 The Biodiversity Net Gain Assessment [APP-162] references (on pages 3 and 6) the Oxfordshire draft Nature Recovery Network in designing biodiversity net gain and calculating strategic significance. It should be noted that OCC, as Responsible Authority, is leading a partnership process to develop the Local Nature Recovery Strategy (LNRS) for Oxfordshire as mandated by the Environment Act 2021. The LNRS will be critical in delivering government targets for species abundance and habitat creation commitments, as well as wider environmental outcomes. The draft Oxfordshire LNRS was subject to public consultation in October 2024 and the draft documents are available on our consultation pages. We are aiming to publish the final Oxfordshire LNRS in Autumn 2025.</p> <p>2.16 The aim of the Applicant's scheme, to establish a landscape-scale wetland corridor along the River Evenlode (see page 6 of [APP-162]), is welcomed, and aligns with the priorities and mapping in Oxfordshire's emerging LNRS.</p> <p>2.17 It is noted that hedgerow planting is planned to provide connectivity between Tackley Wood and the Blenheim Estate, Bladon and Burleigh Woods. While this is welcomed, we would suggest that the potential to use hedgerow and woodland buffers for wood-pasture creation or natural woodland regeneration in this area is explored to provide greater woodland connectivity, aligning with mapped measures in the emerging LNRS, and supporting the important bat populations identified through the surveys.</p> <p>2.18 The species surveys flagged the presence of some very rare/under-recorded species for the County, notably the Bechstein and barbastelle</p> | <p>Noted re the broad alignment between the Ecology Strategy for the Project and the emerging LNRS.</p> <p>The Project has committed to providing appropriate buffers along key flightlines for bats (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [REP4-014] Commitment 9.20). The nature of the buffers with respect to management and habitat creation will be set out in more detail in the bat technical note to be published. However, it is intended that such buffers support the connectivity for bats and other wildlife between the ancient woodland blocks and ensure that the overall permeability of the landscape remains post development.</p> | Not yet agreed. |
| | | | | <p>November 2025 update: The oLEMP [REP6-034] includes reference to extensive habitat creation that will support dormice (hedgerows, scrub etc. in Section 8.2). In addition, it has been updated to include specific reference to scrub planting to benefit nightingale (section 8.2.2). With respect to Bechstein's bat the monitoring of bat populations (section 12) has been updated to include roost monitoring of this species.</p> <p>The oLEMP has been further updated at Deadline 7 (at section 8.5.7) to include for habitat creation within woodland buffers to allow for the expansion of woodland, where appropriate.</p> | |

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| | | | <p>bats at Bladon Heath, but the presence of nightingale and dormice is also significant with both species recorded in very low numbers in Oxfordshire. Identification of habitat creation measures specifically aimed at supporting these species would be welcomed.</p> <p>November 2025 Updates: The Council is content that some consideration has been given to improving habitats for Bechstein bats, dormice and nightingales.</p> <p>The Council is told that habitat creation within woodland buffers to allow for the expansion of woodland, where appropriate is being included within the D7 version of the oLEMP. The Council has reviewed a draft version of the D7 oLEMP and does not consider that the issue of woodland buffers as outlined within [REP6-117] to have been resolved</p> | | |
| 4.1.11 | 7.6.3 Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034] | Wider environmental benefits | <p>2.19 Paragraph 4.6.15 of EN-1 states that “applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wide environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design...” It is not immediately apparent that such a statement has been submitted with the application. Some information on wider environmental benefits is included with the draft Oxfordshire LNRS documents, and we are seeking to reflect this further in the Local Habitat Map prior to publication. Work undertaken by Oxford University has mapped natural capital baselines and natural capital opportunities across Oxfordshire and would provide a good starting point for considering priorities for delivery of wider environmental benefits through the scheme.</p> <p>November 2025 update: At D7 the Council doesn’t consider that this has been addressed. Wider environmental net gains would relate to the human health and wellbeing benefits arising from nature (ecosystem services) - considering what the development footprint currently provides in this regard, and how the proposals might change/improve this. There are 18 ecosystem services to be considered including things such as climate mitigation, flood management, food production, clean water, connection with nature etc. The applicant has not addressed this.</p> | <p>The benefits of the Project with respect to ecology are set out in Section 7 Ecology Strategy of the oLEMP [REP6-034]. This defines the ecological vision for the Project and is based on incorporating the aims of the Oxfordshire Nature Recovery Network, the forerunner of the emerging Oxfordshire LNRS.</p> <p>November 2025 update: With the publication of the final draft LNRS and it’s anticipated adoption on the 12/11/25, as a draft is in the public domain, the Applicant has reviewed the 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> | Not agreed. |

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
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| | | | | <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. 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. | |

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| | | | | 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, the Project it accords with the requirements to deliver environmental net gain of EN-1. | |
| 4.1.12 | 7.6.3 Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034] | OLEMP council funding | <p>2.22 It is set out that the intention is for multiple LEMPs (covering different zones of the scheme) to be approved by Districts prior to commencement. While this is a matter for the Districts, OCC considers it is essential the Districts are adequately resourced and funded to do this. The same point applies to any requirement which must be discharged by a local authority.</p> <p>November 2025 update: The OHA have outline at multiple deadlines throughout the examination that there is not clear provision within the DCO to ensure that Local Authorities are adequately resourced to discharge requirements, notably within the LIR [REP1-072] and OCC's responses to ExQ2 [REP4-074].</p> <p>It is noted that the applicant has updated Schedule 16 of the dDCO at D6 to include an updated fee schedule. Whilst the Council welcomes this as a step in the right direction this provision does not go far enough to ensure the LPA are adequately resourced to discharge requirements. The OHA will expand on this at D7.</p> <p>The Council has also maintained it's position throughout the examination that a monitoring fee is required to ensure that the council are adequately resourced to monitor the BNG improvements. It is noted that a commitment has been added to the oLEMP at D6 to ensure that annual monitoring reports are provided to the Authorities. However, this still effectively results in the applicant monitoring themselves. Without independent review it will not be possible to ascertain whether the applicant will be complying with the oLEMP.</p> <p>The applicant's commitment to extend the existing PPA to cover post consent costs is welcomed, however given the significance of this issue the Council does not believe this provision can be left to a voluntary agreement as this would not provide sufficient certainty.</p> | With respect to the funding of authorities, the Applicant is willing to discuss an extension to the existing Planning Performance Agreement (PPA) to cover reasonable resource requirements over and above that already appropriately secured in the DCO.. | Not yet agreed. |
| 4.1.13 | 7.6.3 Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034] | Invertebrate enhancements | 2.23 The oLEMP [REP6-034] refers to provision of bee hives (paragraph 10.2 (River Evenlode Corridor), fourth bullet; paragraph 10.2 (Wildflower Meadow Grasslands), third bullet; paragraph 10.2 (Woodlands), final bullet; and | The bee hives will be in accordance with those identified in Appendix A of the OLMEP [REP6-034], providing habitat for native invertebrate species. Project edges containing meadow | Agreed. |

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| | | | <p>paragraph 11.8.1); we would question whether this is an appropriate measure for biodiversity benefit. Honeybees are not native to the UK, and would potentially compete with native pollinators (such as bumble bees, solitary bees, butterflies and hoverflies) for nectar sources. However, the diagram of the 'bee hive' provided in Appendix A (figure 4) to the oLEMP would be better described as a 'insect hotel' than a bee hive. Clarification is therefore sought as to what the proposed provision is for pollinators. A more appropriate measure to support declining native pollinator species would be to include specific planting for pollinators in edge habitats, similar to measures to provide nectar species under Countryside Stewardship.</p> <p>November 2025 updates: The Council notes that the oLEMP has been updated to rename beehives 'Insect Hotels'. This is welcomed.</p> <p>The Council has reviewed draft version of D7 oLEMP and notes further measures for invertebrates have been included. On the provision that the submitted version of the oLEMP remains the same as the draft version OCC has reviewed this point is considered resolved.</p> | <p>grassland with wildflowers for invertebrates are outlined in the OLEMP [REP6-034].</p> <p>November 2025 update: the oLEMP [REP6-034] has been updated to refer to 'insect hotels' rather than bee hives, better reflecting the nature of the features to be installed.</p> <p>The D7 version of the oLEMP has been further updated to include reference to the creation of beetle banks in appropriate locations and nesting opportunities for native pollinators, as requested.</p> | |

Table 4.2: Areas of Discussion between the Parties – Historic Environment

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
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| 4.2.1 | ES Chapter 7: Historic environment (Rev 3) [CR2-019] | Assessment approach, scope and methodology. | Other than where noted below, assessment approach, scope and methodology agreed. | Other than where noted below, assessment approach, scope and methodology agreed. | Agreed. |
| 4.2.2 | ES Appendix 7.3: Geophysical Survey Report [APP-133 – APP-140] | Methodology for geophysical surveys. | The application of the geophysical survey methodology within the Project Site is acceptable. | The application of the geophysical survey methodology within the Project Site is acceptable. | Agreed. |
| 4.2.3 | ES Chapter 7: Historic environment (Rev 3) [CR2-019] | Mitigation of potential impacts on buried archaeological remains. | The proposed methodologies for the mitigation of potential impacts on buried archaeological remains are acceptable. | The proposed methodologies for the mitigation of potential impacts on buried archaeological remains are acceptable. | Agreed. |
| 4.2.4 | Outline Written Scheme of Investigation (Rev 3) [CR2-053] | The proposed programme of further archaeological work. | The proposed programme of further archaeological work is acceptable. | The proposed programme of further archaeological work is acceptable. | Agreed. |
| 4.2.5 | ES Chapter 7: Historic environment (Rev 3) [CR2-019] | Likely impacts and effects on buried archaeological remains. | The results of the trial trench evaluation will need to be submitted before a full assessment of the significance of the identified archaeological deposits can be assessed and the impact of this proposal on this significance understood. Once this has been completed, the areas removed from intrusive works may need to be revised to take into account the full extent of the areas of significance. | The reports on the results of the programme of archaeological trial trenching within the Order Limits were submitted into the Examination at Deadline 6 [REP6-055 – REP6-063] . The Applicant accepts that this late submission means that OCC has not had sufficient time to review the report and further advise on the significance of the identified archaeological remains. However, Requirement 5 in Schedule 2 of the draft Development Consent Order (Rev 8) [REP6-004] sets out the process in which the detailed design of the development, including the layout, must be agreed with the relevant planning | Not agreed. |

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| | | | <p>November 2025 update: Applicant submitted Evaluation Reports at D6 which gave the Council limited time to review and respond. OCC has identified further areas that would need to be protected from intrusive works. These have been submitted at D7.</p> <p>It is also noted that these are draft reports and so the Council will not be able to definitively provide an update on safeguarding areas until it has seen the final version. This will not be until after the Examination has concluded.</p> <p>Until the final Evaluation Reports have been provided to the Council and these additional areas required for archaeological safeguarding have been agreed and the application documentation updated to make it clear that these further areas are safeguarded against intrusive works the Council cannot agree that this issue has been resolved.</p> | <p>authority ahead of commencement. This provides the archaeological advisers to the planning authority with the opportunity to review the proposed archaeological protection zone for any identified area of significant archaeological remains and to advise on any adjustments that may be necessary in the light of the results of the programme of trial trenching.</p> | |
| 4.2.6 | Outline Written Scheme of Investigation (Rev 3) [CR2-053] | Likely impacts and effects on buried archaeological remains. | <p>There are a number of impacts for cable connection that have not been subject to archaeological evaluation as the specific locations have not yet been finalised. These works however could impact on currently unidentified archaeological deposits which could be of such significance to require physical preservation. This has the potential to have a considerable impact on the viability of the scheme. These areas will also need to be subject to archaeological evaluation to assess the significance of any archaeological heritage assets within these areas before the impact of this proposed scheme on this significance can be assessed.</p> | <p>A second phase of trial trenching will examine land within the proposed cable routes where these are outside the three main areas. The locations of these trenches will be agreed in advance with the Lead Archaeologist at Oxfordshire County Council.</p> <p>The Outline Written Scheme of Investigation (Rev 3) CR2-053 sets out a proposed programme of further archaeological investigation to be undertaken in the event of the DCO being granted. This programme would include completion of the second phase of trial trenching described above, if it has not been possible to complete this work before the Examination has concluded.</p> | Agreed. |

Table 4.3: Areas of Discussion between the Parties – Agricultural Land Use and Public Rights of Way

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
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| 4.3.1 | ES Chapter 17: Agricultural land use and Public Rights of Way [APP-054] . | Concern regarding the use of Best and Most Versatile (BMV) agricultural land for solar PV development, with a focus on the permanent loss of at least 4ha for the National Grid substation and the cumulative impacts of multiple solar projects on BMV land in Oxfordshire. | <p>Agricultural land use - (RR-0793-063): Approximately 40% (216ha) of the land proposed for solar PV would be sited on Best and Most Versatile (BMV) agricultural land. At least 4ha of this will be permanently lost through siting of the Nation Grid substation. It is also important to highlight the cumulative impacts of solar development on BMV agricultural land in Oxfordshire, as numerous smaller solar proposals are also currently under the consideration of the district councils. Further comments on cumulative impacts and impacts on BMV will be provided in the Local Impact Report.</p> <p>November 2025 update: LIR [REP1-072]: The applicant considers agricultural use will continue in the form of conservation grazing, primarily by sheep and some small-scale horticultural</p> | <p>The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6).</p> <p>Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is</p> | Not Agreed. |

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| | | | <p>production areas for use by community food growing groups ([APP-043] paragraph 6.1.4) – this is not considered a viable replacement for loss of arable by the OHA to mitigate the loss of BMV</p> <p>All agricultural land which is Grade 2 and 3a quality should be removed from the scheme.</p> <p>Failing this the loss of this BMV needs to be weighed in the planning balance.</p> <p>It should be noted that the list of unresolved issues contained within [REP6-115] was not an exhaustive list as was clearly indicated by the phrase ‘These include (but are not limited to)’</p> <p>For clarity, OCC do not consider this issue to be resolved.</p> | <p>maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8).</p> <p>The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). This agrivoltaic approach has been adopted in other DCO applications, such as Cleeve Hill Solar Park (2020), Little Crow Solar Park (2022), and Sunnica Energy Farm (2024). The commitment to retain agricultural land use is included in the Outline Landscape and Ecology Management Plan [REP6-034], secured under Requirement 6 of the Final Draft DCO [TBC].</p> <p>Table 17.23 of ES Chapter 17 [APP-054] sets out the other projects, plans and activities considered in the CEA for agricultural land use and PRow, which include other solar developments within the cumulative study area. The cumulative impacts between the Project and other proposed developments, including nearby solar developments on agricultural land quality and land use are considered in section 17.11 of ES Chapter 17 [APP-054].</p> <p>In addition, areas of BMV land now been removed from the Order Limits through Change Request 2, including 10.48ha of Grade 2 land and 38.81ha of Subgrade 3a land.</p> <p>In the OCC written submission of oral hearings at Deadline 6 [REP6-115] the impact of the project on bmv is no longer raised as an issue that is yet to be addressed within the LIR.</p> <p>The project would not lead to a permanent significant loss of bmv and has proposed appropriate mitigation through the outline SMP [REP6-028] to ensure that soils resources can be protected through the construction phase.</p> | |
| 4.3.2 | ES Chapter 8 - Landscape and Visual Impact Assessment [REP6-012] | The development's scale and location will impact local land use, landscape attractiveness, access, and the countryside experience for local residents and PRow users, both during construction and operation, necessitating appropriate mitigation and design amendments to preserve the countryside feel. | Visual amenity of PRow (RR-0793-033): The scale and location of this development and the impact on local land use, landscape attractiveness, access and amenity for local residents, the countryside ‘feel’ of the area and PRow users across the area is significant and unprecedented. The impacts will be felt during construction as well as in the operational period. By enclosing many PRow with fencing and constructing large fields of solar panels and supporting large infrastructure, it needs to be | <p>Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [AS-020] and the Landscape, Ecology and Amenities Plan [CR2-043]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays.</p> <p>All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows</p> | Not Agreed. |

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| | | | <p>understood that the feel of the local environment from the paths, and the quality of the paths themselves, will be significantly affected. Through appropriate mitigation and amendments to the design, the development needs to ensure that, both onsite and offsite, people still feel a connection to the countryside and can enjoy a countryside experience when using PRoW for active travel, leisure and recreational journeys.</p> <p>November 2025 update: The Council has raised the issue of the visual impact of the development on users of the PRoW at various points throughout the examination: LIR [REP1-072], Rule 17 Letter [REP2-049], Comments on D2 Submissions [REP3-072] (page 36-37), and Responses to ExQ2 [REP4-074] (page 35).</p> <p>The Council disagrees with the applicant's statement that 'Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape'. As has been pointed out by the Examining Authority, whilst there are examples of hedge flanked PRoW, these are the exception and not the rule. As such by applying a widespread 'Green way' approach the applicant is fundamentally changing the way in which users of the PRoW network appreciate the character of the landscape.</p> | <p>planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured.</p> <p>Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape, such as much of Dornford Lane (PRoW 416/11/30) which oases through the middle of the northern section of the Project.</p> <p>Proposed mitigation would be retained, post decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW corridors, it is anticipated that views to the wider landscape and key features such as church spires would remain visible and available to users.</p> | |
| 4.3.3 | ES Chapter 17: Agricultural land use and Public Rights of Way [APP-054] . | A comprehensive package of onsite and offsite measures is needed to minimise negative impacts and mitigate changes in the local landscape and environment throughout all project phases, ensuring that additional public access is maintained. | <p>Access to PRoW (RR-0793-033): A comprehensive package of onsite measures and offsite mitigation is required to minimise negative impacts and to mitigate the changes in the local landscape and environment before construction commences, during construction and operation, and in the decommissioning and reversion phases when the additional public access provision must not be lost.</p> <p>1.Onsite PRoW Mitigation:</p> <p>At Appendix 3 of the LIR [REP1-072] OCC outlines several onsite improvements, in addition to those proposed by the applicant, that it considers necessary to ensure connectivity within the scheme and prevent perceived severance due to the industrial character of the proposed development. These consisted of 18 improvements which are shown over 8 figures.</p> <p>The applicant at figures 7.6.3.2 of the oLEMP [REP6-034] shows their onsite PRoW improvements. When the applicant's figures are compared to the LIR figures the following improvements remain outstanding:</p> | <p>Following discussions with OCC about PRoW provision and the requests made in the OHA Local Impact Report, the Applicants proposed on-site mitigation PRoW measures and off-site position as follows:</p> <p>In terms of the on-site proposals, additional information on the indicative location of the proposed greenways were provided as part of the updated outline LEMP [REP6-034] at Deadline at 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 in the Local Impact Report. The measures being relied upon for mitigation are therefore 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</p> | <p>Point 1. Onsite PRoW Mitigation, Not Agreed.</p> <p>Point 2a Offsite PRoW Mitigation contribution, Agreed.</p> <p>Point 2b Means of securing offsite PRoW improvements contribution (Legal Agreement), Not Yet Agreed.</p> <p>Point 3 Active Travel Improvements, Agreed.</p> |

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| | | | <p>Improvement 1: Onsite footpath connection between 379/11/10 and 416/22/10</p> <p>Improvement 2: Onsite bridleway connection between 416/2/50 and 416/20/10</p> <p>Improvement 3: onsite bridlepath connection between 413/5/10 and 416/2/30</p> <p>Improvements 4 and 5: onsite footpath connection between 413/5/30 and 342/13/10</p> <p>Improvement 9: Onsite footpath linking into 152/7/10</p> <p>Improvement 11: Footpath upgraded to bridleway to Cassington (with the exception of upgrade to 238/5/20)</p> <p>Improvement 12 and 13: Linked Bridleways to 152/6/10 and between 206/11/40 and the Lower Road.</p> <p>Given this, the applicant has not committed to the comprehensive and well connected PRow improvements that the Council maintains are required to mitigate the negative impact the change in landscape character and change in perceptions of connectivity the scheme will have on users of the PRow. The issues of onsite mitigation is therefore not agreed.</p> <p>2a Offsite PRow Mitigation / Improvements:</p> <p>In the LIR [REP1-072] OCC outlined that the proposed development, due to the impact on the character of the landscape would have a negative impact on users of the PRow beyond the boundaries of the site. As such at Appendix 3, the Council outlined a series of offsite improvements to mitigate this and requested a £350,000 to enable these improvements.</p> <p>The Council has engaged with the applicant on this issue throughout the examination and accepts their offer of a £310,000 contribution towards offsite improvements.</p> <p>2b)</p> <p>Whilst the council maintain that these offsite improvements are in fact required as mitigation and therefore that this contribution should be secured via a S.106 agreement, the council is willing to accept the contribution via a S.111 agreement.</p> <p>However, this will need to be a separate agreement to that concerning the annual community benefits fund payments because:</p> <p>a) there will be different signatories (not all councils will need to sign the PRow mitigation); b) the timescales are different: the S111 for the annual community benefit payment needs to be</p> | <p>routes affected during construction. Measures that may be required in relation of the potential for an overlay between the future cycle path between Eynsham and Hanborough and the cable route can be addressed through the development of the detailed PRow plans, which would be subject to consultation and approval by OCC.</p> <p>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 <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 ultra vires.</p> <p>The Applicant proposes that the level of appropriate funding to be agreed as part of the wider Community Benefit offering (along with the Community Benefit Fund being offered by the Applicant). would be £310,000 of the £350,000 requested. This excludes two of the upgrade amounts requested at locations A and L. At location L, the Applicant would not propose to include a new permissive linking bridleway route from here to run through the low lying wet corridor of the Evenlode.</p> <p>The appropriate mechanism to secure both funds – the Community Benefit Fund and any funding for offsite PRow measures – is through a Section 111 agreement. For example, see the Deed of Obligation [REP11-011] submitted on Sunnica Energy Farm. 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 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 reasonable for this to be a planning obligation. The Applicant is keen to continue to progress discussions with the OHAs 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> <p>This combined package of on-site measures and off-site voluntary contribution provides a comprehensive set of proposals.</p> | |

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| | | | <p>signed in advance of issue of the decision from the Secretary of State; and</p> <p>c) it must not affect negotiations around the annual community benefits payment</p> <p>3.Active Travel Improvements</p> <p>In the LIR [REP1-072] at section 7 the Council indicated several active travel improvements were required both inside and outside the site boundary. These are indicated on Transport figures 1-4 within the LIR.</p> <p>Transport Figure 1 shows on improved bridle way connection which is the same as improvement 2 suggested by the PRow team within appendix 3 of the LIR. This improvement has not been facilitated by the applicant.</p> <p>Transport Figure 2 shows an offsite link between the proposed Bladon-Begbroke cycle path and the Begbroke. Whilst the applicant has not made the provision shown within Transport Figure 2, they have included an offsite connection as one of the improvements they are willing to provide an offsite contribution towards. This is therefore resolved.</p> <p>Transport Figure 3 shows upgrade to 238/5/20 to a cyclable route. The Council notes that this section of the PRow is included in figure 7.6.3.2 of the oLEMP. This is therefore resolved.</p> <p>Transport Figure 4 shows OCC's planned cycle connection from Botley to Hanborough along the B4044 and Lower Road. The council is content that the applicant has safeguarded the land adjacent to the highway required for this scheme. The Council is also content that details of the applicant's cable routing will be agreed at detailed design stage along with the details of the reinstatement following the installation of the cables. This is therefore resolved. However, the councils would welcome a commitment within the CTMP to share any utilities survey data they acquire along the proposed route to help facilitate the councils delivery of the scheme.</p> | | |
| 4.3.4 | ES Chapter 17: Agricultural land use and Public Rights of Way [APP-054]. | All PRow adjacent to solar fields should be landscaped as 'greenway' PRow with a 15m wide corridor, appropriate planting, and stone surfacing to minimise visual impact and ensure wide, clear, and accessible paths, with permanent protection. | Greenway proposals (RR-0793-033): All PRow across the sites that pass through/adjacent to solar fields need to be provided as landscaped 'greenway' PRow – with a minimum 15m overall 'corridor' width (additional width to be dedicated), access for small PRow maintenance vehicles, planted with an appropriate non Jinjurious/thorny hedge, shrub & tree planting palette. The reason for this provision is so the visual impact and proximity of fencing and built infrastructure is softened whilst still providing wide, clear and accessible paths for people. | Please see response to 4.3.3. | Agreed. |

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| | | | All fenced-in PRow need to be stone surfaced to 3m width with 3-4m clear grass verges each side of this, with graded landscaped edges between the path and the fencing. The full width of the PRow needs to be dedicated as PRow to ensure permanent protection. | | |
| 4.3.5 | ES Chapter 17: Agricultural land use and Public Rights of Way [APP-054]. | Some PRow on each site need to be connected to create a high-quality, coherent network with excellent path provision, signage, and accessible infrastructure, and further details will be discussed with the developer and outlined in the LIR. | <p>Connecting PRow (RR-0793-033): Some PRow on each of the sites need connecting up within the site where possible to provide a high quality, coherent and connected network with high quality path provision, good signing and accessible infrastructure (gates, seating, water crossings etc). We would welcome discussion with the developer on this and will set out further detail in the LIR.</p> <p>Onsite PRow Mitigation:</p> <p>At Appendix 3 of the LIR [REP1-072] OCC outlines several onsite improvements, in addition to those proposed by the applicant, that it considers necessary to ensure connectivity within the scheme and prevent perceived severance due to the industrial character of the proposed development. These consisted of 18 improvements which are shown over 8 figures.</p> <p>The applicant at figures 7.6.3.2 of the oLEMP [REP6-034] shows their onsite PRow improvements. When the applicant's figures are compared to the LIR figures the following improvements remain outstanding:</p> <p>Improvement 1: Onsite footpath connection between 379/11/10 and 416/22/10</p> <p>Improvement 2: Onsite bridleway connection between 416/2/50 and 416/20/10</p> <p>Improvement 3: onsite bridlepath connection between 413/5/10 and 416/2/30</p> <p>Improvements 4 and 5: onsite footpath connection between 413/5/30 and 342/13/10</p> <p>Improvement 9: Onsite footpath linking into 152/7/10</p> <p>Improvement 11: Footpath upgraded to bridleway to Cassington (with the exception of upgrade to 238/5/20)</p> <p>Improvement 12 and 13: Linked Bridleways to 152/6/10 and between 206/11/40 and the Lower Road.</p> <p>Given this, the applicant has not committed to the comprehensive and well connected PRow improvements that the Council maintains are required to mitigate the negative impact the change in landscape character and change in perceptions of connectivity the scheme will have on users of the PRow. The issues of onsite mitigation is therefore not agreed.</p> | Please see response to 4.3.3 | Not agreed. |

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| 4.3.7 | ES Chapter 17: Agricultural land use and Public Rights of Way [APP-054] | PRoW crossed by underground cables and other infrastructure should be minimally disturbed, with horizontal digging preferred, and any necessary disturbances should be brief and promptly restored, while vehicle crossing points should be monitored and protected to ensure user safety. | <p>Crossing PRoW (RR-0793-033): PRoW crossed by underground HV and other cables, ditches and ducts etc need to be disturbed as little as possible, if at all. Pipes and cables should be horizontally dug/bored so that the PRoW isn't disturbed. Where this isn't possible, disturbance must be kept to a minimum and the safety of users maximised. This could be achieved by excavating each side of the PRoW and only excavating the PRoW just prior to duct work or the cable being laid. The ditch must not be left open/exposed and should be filled in, compacted/consolidated and path made good immediately after cables laid, in order to reduce disturbance to the path and user.</p> <p>No use of PRoW for development purposes other than if essential as a crossing point between fields. All vehicle crossing points to be monitored when active. Crossing point PRoW must be protected from HGV by weight spreading mats, appropriate stone reinforcement, and making good within 24 hours.</p> <p>November 2025 update: The Council is content that the measures contained within the outline PRoW management Strategy would minimise impacts from construction infrastructure on users of the PRoW during construction.</p> | The Applicant has aimed to avoid impacts on the PRoW network through project design and trenchless techniques, preventing the need for stopping up or diversion of routes. Where avoidance is not possible, management measures are proposed in the Outline PRoW Management Strategy (Annex B of the Outline Code of Construction Practice [REP6-028]), secured under Requirement 11 of the Final Draft DCO. | Agreed. |

Table 4.4: Areas of Discussion between the Parties – Hydrology and Flood Risk

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|--|----------------------------------|---|----------------------------|-----------------|
| 4.4.1 | Chapter 10 – Hydrology and Flood Risk [REP6-010], Appendix 10.1 Flood Risk Assessment [REP6-024] and 10.2 Conceptual Drainage Strategy [REP4-019]. | Flood Risk and Drainage | The scope of 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] has been developed with reference to comments received following submission of the Scoping Report and the PEIR, and is acceptable. | No response required | Agreed. |
| 4.4.2 | Chapter 10 – Hydrology and Flood Risk [REP6-010], Appendix 10.1 Flood Risk Assessment [REP6-024] and 10.2 Conceptual Drainage Strategy [REP4-019]. | Flood Risk and Drainage | <p>Approach to solar panel drainage.</p> <p>November update 2025: The Council has raised on several occasions that there has been no ground investigation and without it the applicant cannot demonstrate that their surface water drainage strategy would be effective mitigation (see LIR [REP1-072] and D6 response to actions arising from ISH2 [REP6-117])</p> <p>As such we cannot agree the approach to solar panel drainage.</p> <p>However the council can agree that:</p> <p>1) The applicant will work with the LLFA to design the detailed drainage strategy (As outlined within the updated Conceptual Drainage Strategy at D4- this is welcomed.</p> | No response required | Not yet agreed. |

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| | | | <p>2) A Surface Water Drainage Strategy will be secured as part of the CoCP (as updated at D2)- agreed.</p> <p>3) Monitoring of ground conditions beneath panels is secured as part of the OMP (as updated at D2)- agreed.</p> | | |
| 4.4.3 | Chapter 10 – Hydrology and Flood Risk [REP6-010], Appendix 10.1 Flood Risk Assessment [REP6-024] and 10.2 Conceptual Drainage Strategy [REP4-019] . | Flood Risk and Drainage | The suite of technical guidance adhered to is acceptable. | No response required | Agreed. |

Table 4.5: Areas of Discussion between the Parties – Landscape and Visual Resources

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|--------|--|----------------------------------|--|---|-------------|
| 4.5.1a | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment | LVIA Methodology | <p>OCC agree that GLVIA3 and the LI Technical guidance notes and clarifications documents form the industry standard guidance that should be used to inform scope and methodology when preparing LVIA's. This was agreed at a meeting with the OHAs dated 10th June 2025. This was further clarified at the meeting with the OHAs held on 16th October 2025.</p> <p>However, OCC remains concerned that the applicant has not used these documents in preparing their LVIA, but is also relying on the use of Design 'Manual for Roads and Bridges (DMRB) LA104 and LA107 instead. This is elaborated on below.</p> | The key (industry standard) guidance documents used to inform scope and methodology used in Landscape and Visual Impact Assessment (LVIA) by landscape professionals are the Guidelines for Landscape and Visual Impact Assessment: Third Edition (LI and IEMA, 2013) GLVIA3 and Landscape Institute Technical Guidance Notes, including Landscape Institute Technical Guidance Note 2024-01: Notes and Clarifications of the Guidelines for Landscape and Visual Impact Assessment: Third edition (GLVIA3) (LI TGN2024-01), was agreed at a meeting with the OHAs dated 10 th June 2025. This was further clarified at the meeting with the OHAs held on 16 th October 2025. | Agreed. |
| 4.5.1b | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment | LVIA Methodology | <p>OCC agree that GLVIA3, as clarified in LI TGN 2024 01 is the accepted best practice guidance, that should be used when carrying out an LVIA. OCC does not agree that the DMRB template modified to accommodate the LI guidance is appropriate for solar development. As such OCC don't agree with the applicant's methodology.</p> <p>In paragraph 1.2.29 of the applicant's response to the OHA's response to the Rule 17 Letter [REP3-066] the applicant states '<i>The Applicant's Position – The use of the National Highways Standard significance of effects matrix (DMRB LA104, Table 3.8.1) adapted to reflect LVIA terminology (Table 8.12 of APP-045) is appropriate for the Botley West Solar Farm project.</i>'</p> <p>The Council remains concerned not only about the use of the Design 'Manual for Roads and Bridges (DMRB) LA104 and LA107 for a solar</p> | The Applicant believes that the DMRB template, used in the ES by other topics (as a preferred approach to ES chapters – promoted by the OHAs) modified to accommodate the LI guidance, as the Landscape Institute requires is appropriate for the assessment of solar farms. | Not agreed. |

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| | | | development by the applicant, but also how the applicant has applied this methodology by not setting the significance threshold in line with DMRB guidance Page 15 of the Design 'Manual for Roads and Bridges (DMRB) LA104 (Highways England et al. 2020) guidance, which states in NOTE 3 ' <i>Significant effects typically comprise residual effects that are within the moderate, large or very large categories.</i> | | |
| 4.5.1c | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment | LVIA Methodology | OCC agree that this is what the text of GLVIA3 states. However, as outlined above and below the Council does not agree to the applicant's interpretation and implementation of this guidance in their methodology. | <p>The Applicant notes that GLVIA3, is the acronym for Guidelines for Landscape and Visual Impact Assessment: Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013). The whole guidance is about Landscape and Visual Impact Assessment (LVIA).</p> <p>The Applicant has included the complete paragraphs from GLVIA3, below.</p> <p>GLVIA3 states in the 'Preface to the third edition' (of GLVIA3) "<i>This edition concentrates on principles and process. It does not provide a detailed or formulaic 'recipe' that can be followed in every situation – it remains the responsibility of the professional to ensure that the approach and methodology adopted are appropriate to the task in hand. The aim has been to make the advice specific enough to meet the needs of UK practitioners but also to avoid too much detail about specific legislation which will make it of less value elsewhere.</i>" (preface to GLVIA3, Roman numeral page x).</p> <p>On determining significance GLVIA3 explains that "<i>The Regulations require that a final judgement is made about whether or not each effect is likely to be significant. There are no hard and fast rules about what effects should be deemed 'significant' but LVIA should always distinguish clearly between what are considered to be the significant and non-significant effects. Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations (IEMA, 2011b: 61 (GLVIA3, paragraph 3.32).</i></p> <p>Paragraph 3.33 explains that "<i>It is not essential to establish a series of thresholds for different levels of significance of landscape and visual effects, provided that it is made clear whether or not they are considered significant. The final overall judgement of the likely significance of the predicted landscape and visual effects is, however, often summarised in a series of categories of significance reflecting combinations of sensitivity and magnitude. These tend to vary from project to project but they should be appropriate to the nature, size and location of the proposed development and should as far as possible be consistent across the different topic areas in the EIA</i>"</p> | Agreed. |
| 4.5.1d | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment | LVIA Methodology | It is agreed by the OHAs that the with respect to significance EIA Regulations do not set out methodologies, thresholds or state what effects should be considered significant or not. | It is agreed that the EIA Regulations do not set out methodologies, thresholds or state what effects should be considered significant or not | Agreed |
| 4.5.1e | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment | LVIA Methodology | The OHA agree that GLVIA3 and subsequent technical notes is the accepted best practice guidance. The reference in para.3.32 discusses significant thresholds and refers to page 61 of IEMA 2011 in this context. GLVIA3 is from 2013 and is, together with subsequent | <p>It is agreed that the IEMA document 'The state of environmental impact assessment in the UK' (Institute of Environmental Management and Assessment, 2011) (IEMA 2011) explains that there is no legal requirement to follow a set approach – in fact it is common for certain topics not to follow a set approach.</p> <p>LVIA is not a scientific discipline – it deals with perceptual qualities and relies on professional judgement.</p> | There is no legal requirement to follow a set approach – Agreed. |

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| | | | <p>guidance notes, the accepted guidance that should be used.</p> <p>However, it should be noted that the IEMA document at page 61 also states ‘<i>Problems arise in practice when the ES fails to either: justify the use of different methods to evaluate significance between topic chapters, or present the significance of effects related to a particular environmental issue</i>’ and ‘<i>As such, there is a clear need to ensure that all the findings set out in the ES are evaluated in terms of their significance; ideally this would be in a format that allows them to be readily compared with the EIA’s other findings.</i>’</p> <p>As such whilst the IEMA 2011 document does indeed include the quote provided by the applicant, The Council’s interpretation of section 6.3 when read as a whole promotes a consistent approach to assessments of significance throughout the ES. The document specifically identifies that the downside of not doing so is that consenting authorities do not feel like they have sufficient information on a development’s likely environmental effect.</p> <p>As such, whilst the Council agree that the IEMA 2011 documents outlines there is no <i>legal</i> requirement to follow a set approach within an ES, when read in the full context of the document supports a consistent approach amongst ES chapters to aid consenting authorities.</p> <p>OCC do not consider the methodology used for the Mona offshore wind farm, Morgan offshore wind farm and Gatwick Genesis are comparable to this NSIP solar development.</p> | <p>IEMA 2011 notes that “<i>In reporting the EIA’s findings, ESs often set out a generic methodology at the start of the document indicating that significance has been assessed using a standard matrix style approach, with magnitude on one axis and receptor sensitivity on the other</i>” ... “<i>Despite this, it remains relatively common for one or more ES chapters to use an alternative approach. This is not a legal concern, as there is no regulatory requirement to apply the same methodological approach to significance evaluation across an EIA. In some cases significance may be linked to whether the predicted effect passes a quantified threshold established in a relevant standard.</i>” (IEMA 2011, page 60, section 6.3).</p> <p>On consistency of significance, “<i>IEMA’s Guidelines on EIA indicate:</i></p> <p>‘<i>There is often not a single, definitive, correct answer as to whether an impact is significant or not. Significance is influenced by the values of the individual, how the changes to the environment affect them and whether they have a stake in the project or not</i>’ The evaluation of significance in EIA is often subjective. In order to provide justifiable results, EIA practitioners gather evidence to inform and explain the evaluation of the individual effect. Effective EIA practice ensures that the methods used can be readily understood by those reading the ES. EIA does not tend to discuss significance in absolute terms. Instead, the assessment’s findings are regularly set out as different levels of significance (e.g. major, moderate, minor, etc).</p> <p><i>This approach is considered good practice; whilst recognising the inherent subjectivity of the assessment, it attempts to aid communication of the scale of the impact by introducing a classification. This approach also allows the practitioner to identify and discuss effects that some groups may consider significant, whilst others would not. For example, a negative landscape effect described as being of ‘minor significance’ might be considered to indicate that a majority of people would not consider the effect to be significant; however, a smaller group, perhaps within the local community, may disagree and consider the effect to be significant. It also allows for the comparison of impacts across seemingly incomparable topics by providing a consistent basis for the assessment’s terminology.</i>” (Section 6.3, page 60).</p> <p>On determining the significance thresholds of effects IEMA 2011 notes that “... <i>the EIA regulations do not set out terms for evaluating whether the assessment’s findings are significant or not</i>” (IEMA 2011, page 61, section 6.3).</p> <p>REP2-029 notes that the IEMA 2011 document above is referred to in GLVIA3, paragraph 3.32 and has not been superseded, and the points made in it remain relevant.</p> <p>The Applicant’s position is that it has justified the methodology used in the LVIA throughout the Examination. It is a methodology that has not been challenged at (most recently) three consented DCOs, Mona offshore wind farm, Morgan offshore wind farm and Gatwick Genesis.</p> | Methodology - Not Agreed. |
| 4.5.1f | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment | LVIA Methodology | <p>As mentioned above OCC consider that GLVIA3 and LI Technical Guidance Notes are the accepted industry standard and should be used. OCC don’t consider the use of DMRB for this solar farm development appropriate.</p> <p>The applicant bases their assessment methodology and tables on Design Manual for Roads and Bridges LA107 but does not reflect levels of significance as covered by LA104, i.e</p> | <p>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 [APP-041].</p> <p>The two relevant documents published as part of the National Highways Standards are LA104 – Environmental assessment and monitoring (revision 1) (August 2020) and LA107 – Landscape and visual effects (revision 2) (February 2020).</p> <p>The DMRB notes that significance of effects is judged on the effects that remain after the mitigation has taken place, i.e. the residual effects.</p> | Not agreed. |

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| | | | that Significant effects typically comprise residual effects that are within the moderate, large or very large categories. It is noted that the applicant has been guided by the latest Landscape Institute guidance LI TGN 2024-01, and has judged moderate effects to be significant and not significant. | <p>The Botley West Landscape and Visual Impact Assessment significance of effects matrix is based on the DMRB matrix used in other chapters of the ES, albeit adapted to reflect more recent GLVIA3 guidance (the DMRB matrix and guidance has been superseded by LI TGN 2024-01 issue 3(5), which states that moderate effects can be significant or not significant. Also, 'No Change' column has also been removed, as LVIA assessment concentrates on potential significant effects.</p> <p>The Applicant's Position – The use of the National Highways Standard significance of effects matrix (DMRB LA104, Table 3.8.1) adapted to reflect LVIA terminology (Table 8.12 of APP-045) is appropriate for the Botley West Solar Farm project.</p> <p>The applicant has been guided by the latest Landscape Institute guidance LI TGN 2024-01, and has judged moderate effects to be significant and not significant, this is reflected in paragraph 8.3.1 of the text of Rev 4 of Chapter 8 [REP6-012].</p> | |
| 4.5.2a | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment | Assignment of significance | <p>OCC agree that the latest revision of the LVIA [REP6-012] includes in table 8.22 additional information to viewpoints on whether <i>moderate effects</i> are considered significant or not significant. However, this information has not been added to the rest of the table to provide that information for landscape and PRow receptors. There also still appears to be some inconsistency between table 8.22 and related appendices, which have not been corrected.</p> <p>OHAs do not consider that the subsequent changes to the LVIA during the examination have addressed these issues raised in the OHA's LIR [REP1-072].</p> <p>Although additional paragraphs, sections and additional appendices have been added to the LVIA since submission, these do not satisfactory address 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.</p> <p>There have been very limited changes in the assessment outcomes, and OCC 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. It should also be noted that the assessment of the same receptors differs between different sections of the LVIA and appendices.</p> <p>OHAs do not consider that the subsequent changes to the LVIA during the examination have addressed these issues raised in the OHA's LIR [REP1-072].</p> <p>As per the points on methodology above, OCC don't only disagree with how the methodology has been applied but with the methodology itself.</p> | <p>The latest version of Chapter 8 (Rev 4) [REP6-012] includes the updates of the Applicant's Rule 17 Response [REP2-029] Which reconsidered the significance of effects, providing a detailed explanation within each resource/receptor as to why some Moderate effects are now considered significant and some remain as not significant. The Applicant agrees that the summary table has not been fully updated, but points OCC to the text in the body of the chapter, which has been - this is not an impediment to the assessment, merely a typological omission.</p> <p>The Applicant firmly disagrees that their LVIA is deficient on 'quality' as the LPA allege, as it was undertaken by experienced, competent professionals. The Applicant accept that there is disagreement between the parties with how the LVIA methodology was applied and their assessment of effects (as those aspects depend upon opinion), but that should not be interpreted as in any way deficient or not in accordance with best practice.</p> | <p>Changes have been made to the text in the latest revision of the LVIA [REP6-012] – Agreed.</p> <p>Changes made address the Council's concerns on assessments of significance - Not Agreed.</p> |

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| | | | OCC don't consider the assignment of significance to be satisfactorily addressed. | | |
| 4.5.2b | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment | Assignment of significance | <p>The OHA raised a number of issues with the methodology including the significant threshold in their Joint LIR [REP1-072] and OCC do not consider that the subsequent changes to the LVIA during the examination have sufficiently addressed these issues.</p> <p>OCC believe that the LVIA [REP6-012] has in many cases underplayed the level of significance for a number of Representative Viewpoints and on the local landscape character.</p> <p>Although additional paragraphs, sections and additional appendices have been added to the LVIA since submission, 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.</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.</p> <p>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, they still don't provide clarity or justification on how these aspects have been considered and weighed in the assessment. The LVIA methodology is also still not clear how 'size', 'scale' and 'geographical extent' inform the Magnitude judgement within the impact assessment.</p> | <p>The Applicant's current position remains as follows:</p> <p>The LVIA follows Landscape Institute and IEMA guidance. The assessment within Chapter 8: Landscape and Visual Impact Assessment [REP6-012] uses the methodology set out at sections 8.4 and 8.5 of the submitted LVIA [REP6-012]. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24).</p> | Not agreed. |
| 4.5.3 | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment. | Suitability of representative viewpoint selection and photomontages | <p>Neither methodology nor viewpoints were agreed with OCC prior to the assessment being carried out. The OHA have questioned the number of Representative Viewpoints and photomontages used within the LVIA [REP6-012] throughout the process.</p> <p>See Section 7.3 as well as Appendix 1 of the LIR [REP1-072]. OCC does not consider that the subsequent changes to the LVIA during the examination have addressed these issues.</p> <p>As outlined within paragraph 2.2.2 of [REP1-068] OCC's Landscape Officer was not</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 with OCC on the 26.10.2022. No response was received or is on file. Details of alternative / additional viewpoints included in Table 8.5 of LVIA [REP6-012].</p> <p>The Applicant notes that the local planning authorities, who have jurisdiction on landscape and visual matters did respond on the suitability of the candidate and alternative representative viewpoints.</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</p> | <p>Position on representative viewpoints - Not agreed.</p> <p>Position on photomontage selection – Not agreed.</p> <p>Position on aerial</p> |

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| | | | <p>consulted on viewpoints and as such these were not agreed with OCC in advance of the applicant undertaking their LVIA.</p> <p>The applicant requested confirmation of agreement to viewpoints from an Infrastructure Lead within the Place Making Department who had no links to the Environmental Specialist Teams. The applicant made no attempts to follow this email up and took a lack of response as agreement to the viewpoints. OCC contend that this does not constitute agreement to the viewpoints.</p> <p>Oxfordshire County Council contends the applicant's position that OCC is not a Local Planning Authority. OCC is a Local Planning Authority as the Minerals and Wastes Authority. No attempt was made to contact the Development Management Team at OCC.</p> <p>Equally, the Planning Act at Section 43 makes no distinction between Local Planning Authorities and County Authorities. For the purposes of consultation Section 43(3) makes it clear that all County Authorities are considered 'Local Authorities'.</p> <p>Feedback was provided at the ES scoping stage (June 2023) in OCC's consultation response where the Landscape Officer states (pages 3-4): "...in line with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) the assessment methodology, ZTV creation, receptors, viewpoint locations and visualisations (method, type, number, locations) should also be agreed with landscape officers of the affected local authorities."</p> <p>Given that the applicant made no attempt to follow up their initial email seeking to agree viewpoints on the 26.10.2022, and that OCC did not reply and explicitly agree to viewpoints as well as the fact that OCC explicitly pointed out that agreement to viewpoints was required in 2023, OCC categorically did not agree to any representative viewpoints at any time during the pre-application phase.</p> <p>The Host Authorities have outlined their concerns around viewpoints throughout the examination including at [REP2-049].[REP3-072] (page 17-18 and 37), [REP4-041] (page 6-9), [REP6-117] (page 23).</p> <p>Aerial viewpoints</p> <p>At no point were aerial viewpoints suggested, by the OHAs.</p> | <p>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 [REP6-012].</p> <p>Aerial viewpoints</p> <p>At no point were aerial viewpoints suggested, either by the Applicant or by the OHAs. GLVIA3 only mentions aerial imagery twice, in the context computer-generated 3D models (paragraphs 8.28 and 8.29). Moreover, GLVIA3 explains that such <i>models "do not necessarily represent the way that people would experience the change [in view] and so can be misleading in an assessment context"</i> (GLVIA3, paragraph 8.29). This is especially true of people within vehicles including aircraft, travelling at speed on the approach to, or taking off from airports.</p> <p>The transient nature of potential views available from the air and the enclosed nature of the aircraft would reduce the sensitivity of the visual receptor to such a degree that there is no potential for significant effects. Land-based dynamic receptors are considered at paragraphs 8.6.44 to 8.6.65 of the LVIA [REP6-012].</p> | viewpoints – Agreed. |

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| 4.5.4a | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment. | Mitigation | <p>OHAs and other RRs have questioned the suitability of mitigation proposals.</p> <p>The OHA's concerns around mitigation are outlined in Section 7.3 as well as Appendix 1 of the LIR [REP1-072].</p> <p>The OHA's concerns around mitigation are best summarised in the Councils' response to ExQ2.9.4 [REP4-074] (page 35). OCC remain of the view that the LVIA approach does not follow the EIA mitigation hierarchy of avoid, reduce, mitigate, compensate.</p> <p>The OHA's have indicated what they would consider to be acceptable landscape mitigation in the form of their omissions maps as updated at D6 [REP6-118].</p> | <p>The Applicant's current position remains as follows:</p> <p>Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [CR2-026] and the Landscape, Ecology and Amenities Plan CR2-043. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays.</p> <p>The Project's main elements, the solar panels, would be low in height, at a maximum of 2.3m, and follow the natural contours of the landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located.</p> <p>Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that <i>"infrastructure to achieve our energy objectives national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation"</i> (NPS EN-1, paragraph 3.3.63). The NPS explains further that with <i>"projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero"</i> (NPS EN-1, paragraph 4.1.7). The residual landscape and visual effects, after the proposed mitigation do not present an unacceptable risk to the matters listed.</p> | Adequacy /suitability of mitigation proposals - Not agreed. |
| 4.5.4b | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment. | Mitigation/Design Review Panel | It is agreed by the OHAs that a meeting/ review by an independent Design Review Panel post-Examination (a suggestion proposed by the ExA) would not be of assistance to developing the project. | It is agreed with the OHAs that a meeting/ review by a Design Review Panel post-Examination (a suggestion proposed by the ExA at ExAQ1.1.12) would not be of assistance to developing the project | Agreed. |
| 4.5.4c | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment. | Mitigation | OCC has indicated what they would consider to be acceptable landscape mitigation in the form of the omissions maps as updated a D6 [REP6-118] . The Council outlined it's views on the 'without prejudice' offer within its D7 submission | <p>The Applicant's position remains that the design process that took place before submission was an iterative one, one example of this is the PVDP Buffer Zone Analysis, Appendix B of REP6-065. The panels have been located less sensitive landscape areas as explained in [REP6-052]. The mitigation hierarchy has also been addressed by the Applicant throughout the Examination in various responses, e.g at the Applicant's Response to the Rule 17 Letter [REP2-029].</p> <p>Throughout the Examination concerns were raised by the OHAs and Interested Parties regarding potential adverse effects. The Applicant has listened to those concerns and has submitted and has submitted a set of 'Without Prejudice LVIA Offer' plans in Appendix 2 of The Applicant's response to the Rule 17 Letter REP6-052 in response to ExA's Points 9 and 10. While not acceding to all of the OHAs' requests for areas of panel removal, due to their requests not complying with National Policy and making the project unviable, these plans go some way to removing panels from more sensitive areas. These plans also show increased mitigation, particularly along the Evenlode Valley, which shows the introduction of areas of wet woodland.</p> | Not agreed. |
| 4.5.5 | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment. | Representative Viewpoints | The OHA's position is outlined in section 7.3 as well as Appendix 1 of the LIR [REP1-072] . OCC does not consider that the subsequent changes to the LVIA during the examination have addressed these issues. | The candidate representative viewpoints were presented on a ZTV at Scoping. The viewpoints were consulted on with OCC on the 26.10.2022. No response was received or is on file. Details of alternative / additional viewpoints included in Table 8.5 of LVIA [REP6-012] . | Not Agreed. |

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
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| | | | <p>As outlined within paragraph 2.2.2 of [REP1-068] OCC's Landscape Officer was not consulted on viewpoints and as such these were not agreed with OCC in advance of the applicant undertaking their LVIA. The number and locations of viewpoints have not been updated throughout the process to reflect consultation responses.</p> <p>The applicant requested confirmation of agreement to viewpoints from an Infrastructure Lead within the Place Making Department who had no links to the Environmental Specialist Teams. The applicant made no attempts to follow this email up and took a lack of response as agreement to the viewpoints. OCC contend that this does not constitute agreement to the viewpoints.</p> <p>Oxfordshire County Council contends the applicant's position that OCC is not a Local Planning Authority. OCC is a Local Planning Authority as the Minerals and Wastes Authority. No attempt was made to contact the Development Management Team at OCC.</p> <p>Equally, the Planning Act at Section 43 makes no distinction between Local Planning Authorities and County Authorities. For the purposes of consultation Section 43(3) makes it clear that all County Authorities are considered 'Local Authorities'.</p> <p>Feedback was provided at the ES scoping stage (June 2023) in OCC's consultation response where the Landscape Officer states (pages 3-4): "...in line with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) the assessment methodology, ZTV creation, receptors, viewpoint locations and visualisations (method, type, number, locations) should also be agreed with landscape officers of the affected local authorities."</p> <p>Given that the applicant made no attempt to follow up their initial email seeking to agree viewpoints on the 26.10.2022, and that OCC did not reply and explicitly agree to viewpoints as well as the fact that OCC explicitly pointed out that agreement to viewpoints was required in 2023, OCC categorically did not agree to any representative viewpoints at any time during the pre-application phase.</p> <p>This issue is also addressed in [REP4-041] (page 6-9). The Council did not agree the</p> | <p>The Applicant notes that the local planning authorities, who have jurisdiction on landscape and visual matters, did respond on the suitability of the candidate and alternative representative viewpoints.</p> | |

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| | | | viewpoints with the applicant and does not consider that they provide an accurate assessment of the impacts on many PRoW. | | |
| 4.5.6 | [REP6-012] Chapter 8: Landscape and Visual Impact Assessment. | Local Plan evidence base | <p>The OHAs agreed, at the meeting held on 16th October 2025, that the following documents formed part of the evidence base for the West Oxfordshire District Council and the South Oxfordshire and the Vale of the White Horse District Council local plans:</p> <ul style="list-style-type: none">Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire (LDA, 2016)South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment (LUC, 2024). | <p>The OHAs agreed, at the meeting held on 16th October 2025, that the following documents formed part of the evidence base for the West Oxfordshire District and South Oxfordshire and the Vale of the White Horse District Councils local plans:</p> <ul style="list-style-type: none">Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire (LDA, 2016)South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment (LUC, 2024). | Agreed. |
| 4.5.7 | The Applicant's Response to ExA Q2.1.4 [Annex 3 to REP4-037] | Regarding The Special Qualities of the Cotswolds National Landscape (CNL) | <p>The Cotswolds National Landscape Board state in their latest response [REP2-068] that they have done their own assessment in the absence of an assessment by the applicant, despite this having been requested by the Cotswolds NL Board.</p> <p>The OHA agree that the CNL response reads as stated and that it concludes: “As such the Board considers that the impacts of the proposal would not represent an impediment in respect of relevant authorities’ adequate discharge of the s.85 CROW Act duty.”</p> | <p>The OHAs agreed at the meeting held on the 16th October 2025 that the Cotswold National Landscape Board in its Response to Examining Authority’s First Written Questions [REP2-068] states:</p> <p><i>“Having reviewed the applicant’s DCO submission and visited the site and surrounding area, the Board concluded in our response dated 24 February 2025 that the proposed solar farm would have, at worst, a temporary negligible to minor adverse significance of effect at all stages of the project (i.e. construction, operation and decommissioning) on the landscape character and special qualities of the CNL and a temporary negligible adverse effect on views to and from the CNL. Our response dated 24 February 2025 provides further details on the relationship between the site and the CNL and, in particular, an assessment of the potential effects of the development on views from within, and back towards, the CNL.</i></p> <p><i>“The Board also considers that the ‘new planting/areas for enhancement’ on land between the solar PV arrays and the CNL have the potential to provide landscape enhancements which could be considered to contribute to furthering the purpose of CNL designation and should be secured as part of the Development Consent Order should, without prejudice, the Secretary of State be minded to grant such an order. As such the Board considers that the impacts of the proposal would not represent an impediment in respect of relevant authorities’ adequate discharge of the s.85 CROW Act duty.”</i></p> <p>Nevertheless, the ExA requested the Applicant to undertake a study to assess the effects on the Cotswolds National which the Applicant did [Annex 3 of REP4-037] which confirmed what the Cotswold National Landscape Board had stated in its REP2-068 and what the Applicant had reported within Chapter 8 – that the Project would have no significant effects upon the 14 Special Qualities of the Cotswolds National Landscape, and that the proposed landscape proposals may provide enhancements to furthering the purposes of the National Landscape.</p> | Agreed. |
| 4.5.8 | | Documents secured by Requirements | The OHAs agree that the documents secured in the requirements are set out in the Project Mitigation Measures and Commitments Schedule [REP4-014]. | <p>The documents secured in the requirements are set out in the Project Mitigation Measures and Commitments Schedule [REP4-014].</p> <p>Specifically in relation to Requirements 5, 6 and 8 and Schedule 16 of the draft DCO, the Applicant provides the following information:</p> <p>Requirement 5 covers detailed design. The detail design of the development that must be submitted to the relevant planning authority pre-commencement pursuant</p> | Documents secured in the requirements are set out in the Project Mitigation Measures and |

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| | | | <p>OCC does not agree with the mitigation proposed in the outline control documents, nor the methodology used to assess the adequacy of the mitigation.</p> <p>Detailed design documents need to be substantially in accordance with the outline control documents. Therefore OCC has no confidence that we will be satisfied by the future detailed submissions; whilst OCC will have some level of control over discharging the final versions of the control documents this provides no comfort with regards to impacts on the Landscape.</p> | <p>to Requirement 5 of the DCO must 'accord with the outline layout and design principles'. This ensures that the final design must be within those parameters that are now clearly secured. This gives certainty as the scope of the design parameters within which the final development will be brought.</p> <p>Requirement 6 covers the oLEMP/LEMP. It secures that no part of the authorised development may commence until a written landscape and ecology management plan has been submitted to and approved by the relevant planning authority. This retains control for the relevant planning authority by ensuring that it has a right of approval over the final landscape and ecological mitigation to be given. The requirement secures that the final plan 'must be substantially in accordance with the outline plan' to give certainty to the Applicant that approval will be achieved whilst giving certainty to the relevant planning authority as to the measures that are to be proposed at detailed design.</p> <p>Requirement 8 covers fencing and other means of enclosure. provides that no part of the authorised development may commence until written details of all proposed temporary and permanent fences, walls or other means of enclosure have been submitted to and approved by the relevant planning authority. This ensures that to the extent there is any flexibility in respect of fencing (etc.) which is not captured in the Outline Layout & Design Principles (on the basis that not all design detail is known at this stage), the relevant planning authority retains a right of approval which will apply at the time of discharge of requirements. This ensures that there is the necessary control on that flexibility, secured within the DCO.</p> <p>Schedule 16 of the draft DCO states that to the extent there is a disagreement or uncertainty at detailed design stage, Schedule 16 of the draft DCO sets out the process that will apply in discharging the requirements. This allows the Council to request further information (see paragraph 3 of Schedule 16) to ensure that any approval is appropriately informed, whilst offering the Applicant a route of appeal (see paragraph 4) in the event that approval is denied. This ensures certainty as to the delivery of the Nationally Significant Infrastructure Project in the event that the Council disagrees with the mitigation that effectively the SoS would have considered to be appropriate.</p> | <p>Commitments Schedule [REP4-014] – Not agreed.</p> <p>Mitigation proposed - Not agreed.</p> |

Table 4.6: Areas of Discussion between the Parties – Noise and Vibration

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|---|--|--|--|-------------------------------|
| 4.6.1 | 6.3 - ES Chapter 13 - Noise and Vibration [PDB-010] | Assessment approach, scope and methodology | No concerns have been raised. | The scope and methodology utilised for the noise and vibration assessment has been OCC and we have not received confirmation. The assessment has been undertaken in line with best practice. | No concerns have been raised |
| 4.6.1 | 6.3 - ES Chapter 13 - Noise and Vibration [PDB-010] | Baseline noise survey methodology | No concerns have been raised. | The scope and methodology utilised for the baseline noise survey has been issued to OCC and we have not received confirmation. The assessment has been undertaken in line with best practice. | No concerns have been raised. |
| 4.6. | 6.3 - ES Chapter 13 - Noise and Vibration [PDB-010] | Assessment findings. | <p>OCC as a member of the OHA has raised numerous concerns around the operating hours currently listed in the outline Code of Construction Practice ([REP1-071] page 7-8, [REP1-072] Page 140, [REP2-050] page 11-12, [REP5-125] page 4-5 and [REP6-117] page 10-11).</p> <p>The Council's position is in line with the other OHA's in that operating hours during construction should not be outside of 07.30H-18.00H Monday to Friday, 07.30H-12.30H on Saturdays and no time on Sundays, Bank and</p> | The findings of the noise and vibration assessment have been issued to OCC during the DCO process, and we have not received confirmation. The assessment has been undertaken in line with best practice. | Not agreed. |

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| | | | Public Holidays due to the impact of the associated noise and vibrations on residential amenity | | |

Table 4.7: Areas of Discussion between the Parties – Traffic and Transport (excluding recreation and PRow, which is set out in Table 4.3)

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|--|---|--|--|---------|
| 4.7.1 | ES Volume 1, Chapter 12 Traffic and Transport [REP5-016] | Transport Assessment, methodology and conclusions | Oxfordshire County Council agrees with the methodology of ES Volume 1, Chapter 12 Traffic and Transport [REP5-016] and the conclusions reached including the requirement for the construction traffic impact to be mitigated through Construction Traffic Management Plans (CTMP). | <p>The Application has identified and considered the most up-to-date plans and policies as relevant to traffic and transport (excluding recreation and PRow, which is set out in Table 4.3), within ES Volume 1, Chapter 12 [REP5-016].</p> <p>The traffic and transport study area is appropriate for the receptors, sites and impacts assessed within ES Volume 1, Chapter 12 [REP5-016].</p> <p>The baseline environment for traffic and transport has been appropriately characterised within ES Volume 1, Chapter 12 [REP5-016].</p> <p>The sensitivity and significance of the traffic and transport receptors has been appropriately and adequately described within ES Volume 1, Chapter 12 [REP5-016].</p> <p>The methodologies used in within ES Volume 1, Chapter 12 [REP5-016] are appropriate for assessing the potential impacts of the Project.</p> <p>The appropriate Maximum Design Scenario has been used to identify, describe and assess the construction vehicle trip generation, distribution and assignment within ES Volume 1, Chapter 12 [REP5-016].</p> <p>An assessment of the impact of construction traffic upon traffic and transport receptors due to the laying of cables under the carriageway and increases in traffic on key routes and junctions is set out in section 12.10 of ES Volume 1, Chapter 12 [REP5-016], which has been prepared in accordance with industry standard guidance and good practice and aligns with the approach adopted for similar infrastructure projects. It assesses the impact of construction traffic upon driver delay (congestion, including the impact upon driver delay from installing cables within roads and from increases in traffic on key routes and junctions), non-motorised user delay, non-motorised user amenity, severance, public transport delay, road safety and the impact of Abnormal Indivisible Loads on the safety of users of the road network. It concludes that the construction traffic would not create any significant effects upon traffic and transport receptors.</p> | Agreed. |
| 4.7.2 | Outline Construction Traffic Management Plan [REP6-028] | Mitigation (construction phase) | <p>Impacts will need to be mitigated via the Construction Traffic Management Plan (CTMP) which will specify the routes and times that construction vehicles related to the development are permitted to use.</p> <p>OCC is content that Route Plans, GPS tracking, delivery hours, compliance procedures, wheel washing and enforcement measures are secured in the oCTMP and will therefore be included in the final CTMPs secured by Requirement 11 of the DCO</p> | An access strategy that specifies construction vehicle routes is set out in section 12.7 of ES Volume 1, Chapter 12 [REP5-016] and Appendix 12.6 Construction Vehicle Trip Generation Assumptions [APP-204]. The access strategy and its construction vehicle routes and timings is contained as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [REP6-028] and is secured at Schedule 13 of the Development Consent Order [REP2-004]. | Agreed |
| 4.7.3 | Outline Construction Traffic Management Plan [REP6-028] | Mitigation (construction phase) | Paragraphs 12.7.13 – 12.7.16 of [REP5-016] concern the origin of construction staff movements. Measures to restrict movements on rural roads to reduce the possibility of rat running must be included in the Construction Traffic Management Plan to be submitted as part of the Code of Construction Practice. A bullet point should be added to paragraph 1.5.2 of the Outline Construction Traffic Management Plan (Annex A of the | The movement of construction staff is controlled at Section 1.5 of the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 [REP6-028] and is secured at Schedule 13 of the Final Draft Development Consent Order [TBC]. This sets out that the Principal Contractor will be responsible for providing a minibus service to pick up / drop off all construction staff to / from identified locations such as park and ride sites, public transport hubs etc. Thus, the movement of construction staff will be controlled such that it restricts movements on rural roads to reduce the possibility of rat running and also directly addresses | Agreed |

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| | | | <p>Outline Code of Construction Practice [REP6-028] to address this.</p> <p>November 2025 update: OCC is content that Section 1.5 of the oCTMP broadly includes measures to restrict movement on rural roads and as such is content to agree the outline document. However OCC will expect further dialogue with the applicant on this issue when they are preparing their final CTMP(s)</p> | OCC's travel behaviour ambition stated in their LTCP to replace/remove 1 in 4 car trips by 2030. | |
| 4.7.4 | ES Volume 1, Chapter 12 Traffic and Transport and Outline Construction Traffic Management Plan [REP5-016 and REP6-028] | Mitigation (construction phase): B4017 Cumnor Road speed limit change | <p>The B4017 between Farmoor and Cumnor is indicated as the route of underground cables and the access for a construction compound serving the solar farm. This is a proposed strategic route within Oxfordshire's SATN. Additional heavy goods vehicles on this route caused by the solar farm will pose a road safety risk for people cycling on this road. Accordingly, the Applicant proposes a speed limit change within Part 1 of Schedule 8 to the draft DCO – "B4017 Cumnor Road between a point 83 metres to the south of Farmoor Court and a point 170 metres to the north of Leys Road as shown on sheets 12 and 13 of the traffic regulation measures plans". In the location mentioned above, Part 1 proposes a "temporary change in speed limit to 40 miles per hour". OCC would want this as a permanent change to the speed limit and seek £5,000 (index linked) for the erection of signage to support the speed limit change. If a Traffic Regulation Order variation is required for a permanent change in speed limit, the cost would be £4,224 (RPIX index linked at April 2025 price base).</p> | The Applicant agrees to the proposed permanent change to the speed limit and this together with associated costs will be secured as part of the highways side agreement for the construction compound access on the B4017 Cumnor Road. | Agreed |
| 4.7.5 | Outline Construction Traffic Management Plan [REP6-028] | Mitigation (construction phase) | <p>OCC is content with the mitigation proposed during construction within the CTMP. OCC will need the applicant to maintain a dialogue with OCC whilst the detailed CTMP(s) are being prepared to ensure that it reflects LTCP policies.</p> <p>However, the applicant has still failed to demonstrate to the satisfaction of the Highways Authority that the Highways Authority will have sufficient ability to consent to what the applicant has described in meetings as 'minor works'. Please see [REP6-117] (pages 14-17) for OCC's view on how this issue could be overcome.</p> | The measures and content of the Outline Construction Traffic Management Plan provide suitable mitigation for construction vehicles. | Not yet agreed. |
| 4.7.6 | ES Volume 1, Chapter 12 Traffic and Transport, Outline Construction Traffic Management Plan and Appendix 12.8 Accesses and highway drawings [REP5-016, REP6-028 and APP-209] | Highway works mitigation (construction phase) | <p>Proposed alterations to the highway will need to consider all users in line with LTCP policy 1 – Transport User Hierarchy and 15 – Vision Zero to ensure the most vulnerable road users are prioritised. This would include such proposals highlighted in paragraph 12.7.18 – B4044 Eynsham Road/B4017 Cumnor Road and paragraph 12.7.18 – Widening works on Cumnor Road, B4027 / Banbury Road, Burleigh Road / Yarnton Road junction of the ES [REP5-016].</p> <p>It is essential that highway side agreements are entered into before commencement of the authorised</p> | <p>The proposals at the B4044 Eynsham Road / B4017 Cumnor Road junction, along Cumnor Road, at the B4027 / Banbury Road junction and at the Burleigh Road / Yarnton Road junction as set out in paragraph 12.7.18 of ES Volume 1, Chapter 12 [REP5-016] and at Appendix 12.8 Accesses and highway drawings Part 4 of 4 [APP-209] provide suitable mitigation for construction vehicles.</p> <p>The proposals have taken account of LTCP policy 1 – Transport User Hierarchy and policy 15 – Vision Zero to ensure the most vulnerable road users are prioritised. Pedestrian facilities at these locations are unaffected whilst there would be improvement to the turning and safe movement of vehicles thus offering highway safety improvements to all road users including cyclists and the transport user hierarchy set out in the LTCP.</p> <p>The Applicant has updated paragraphs 1.6.7 and 1.7.3 of the CTMP at Deadline 7, save that the obligation to enter into the highways side agreement(s) shall apply before the</p> | Not yet agreed. |

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| | | | <p>development and OCC consider the language of paragraphs 1.6.7 and 1.7.3 should be amended to reflect this.</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>November 2025 update: The applicant has still failed to demonstrate to the satisfaction of the Highways Authority that the Highways Authority will have sufficient ability to consent to what the applicant has described in meetings as ‘minor works’. Please see [REP6-117] (pages 14-17) for OCC’s view on how this issue could be overcome.</p> | <p>commencement of the relevant highway works to be subject of the highways side agreement(s) and not 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).</p> <p>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> | |
| 4.7.7 | ES Volume 1, Chapter 12 Traffic and Transport and ES Volume 1 Chapter 6 Project Description [REP5-016 and APP-043] | Cable laying across the A40 at the B4449 | <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 to enter into a side agreement with OCC with regards to the resurfacing of the Enysham Roundabout</p> <p>November 2025 update: Dialogue has been ongoing between OCC and the applicant on this issue. A S.278 agreement is being finalised which would allow OCC to lay the ducting required by the applicant beneath the roundabout whilst OCC are undertaking their planned works.</p> <p>In order to account for the ducting in the A40 works programme, the S278 agreement (which would provide for the funding of the works and the and final design) would need to be completed by March 2026. OCC’s project delivery team is awaiting further details from the</p> | <p>The Applicant is committed to working with OCC whereby OCC would lay the Applicant’s cable ducting beneath the A40 Eynsham Roundabout whilst undertaking the A40 improvement works in advance of the Applicant commencing works on the Project. The Applicant is in ongoing discussion with OCC on a legal agreement which would secure those works and ensure that OCC is funded by the Applicant to undertake works on the Applicant’s behalf.</p> <p>In the event that the ducting is not able to be delivered during OCC’s planned works on the A40, the Applicant has secured a fall-back commitment to the resurfacing of the roundabout as requested by OCC at paragraphs 1.9.7 to 1.9.9 of the CTMP in the outline Code of Construction Practice [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.</p> | Agreed. |

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|--------|--|--|--|---|---------|
| | | | <p>applicant to allow them to work on the design of the proposed infrastructure and how this can be incorporated within OCC's designs.</p> <p>In addition, at Deadline 6 the applicant included a fall back position within the CTMP which committed them to resurfacing the entirety of the Eynsham Roundabout in the event that OCC are unable to deliver the applicant's ducting as part of their planned works.</p> | | |
| 4.7.8 | ES Volume 1, Chapter 12 Traffic and Transport [REP5-016] | Assessment of effects (operational phase) | The permanent impacts of the proposed development on the highway network are likely to be neutral. | The Applicant agrees that the permanent impacts of the proposed development on the highway network are likely to be neutral | Agreed. |
| 4.7.9 | Outline Operational Management Plan [REP2-017] | Assessment of effects and mitigation (operational phase) | <p>OHA request that an additional CTMP would be necessary should more than 30% of panels in the northern, central or southern site need to be replaced at the same time. For clarity this meant 30% of panels within the northern site or 30% of panels in the central site, or 30% of panels in the southern site (not 30% of the total panels across the scheme).</p> <p>November 2025 update:In the latest version of the oOMP at D6 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</p> | <p>Paragraph 6.4.1 of ES Chapter 6 Project Description [APP-043] sets out that during the operational phase, activity on the Site will be minimal and will be restricted principally to continued agricultural use, landscape and ecology management, equipment/infrastructure maintenance and servicing, including cleaning and replacement of any components that fail.</p> <p>Paragraph 6.4.9 of ES Chapter 6 Project Description [APP-043] sets out that it is not anticipated that wholesale maintenance or replacement would be required. Table 12.7 of ES Chapter 12 [REP5-016] sets out that maintenance activities would generate a light vehicle daily / weekly.</p> <p>As part of that maintenance, upon identification of a module failure / deterioration, modules and components would either be contained within the maintenance vehicle and replaced as required or would be brought to site the next day / visit as part of their regular and ongoing maintenance process and replaced.</p> <p>The Applicant has updated the outline Operational Management Plan [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> (the Applicant's emphasis) at paragraph 2.3.2. 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. In addition, the outline Operational Management Plan [REP6-032] has been updated to include a requirement to submit an annual maintenance schedule to the relevant local planning authority or authorities. These measures are secured under the DCO through Requirement 11 (Code of Construction Practice), specifically Requirement 11(2)(a) construction traffic management plan.</p> | Agreed. |
| 4.7.10 | ES Volume 1, Chapter 12 Traffic and Transport [REP5-016] | Mitigation (decommissioning phase) | <p>Localised impacts can be expected at the decommissioning stage.</p> <p>A similar requirement for a CTMP needs to be included in the Outline Decommissioning Plan [APP-236] to cover the traffic impact of this phase.</p> <p>The OHA believe this revision to the outline document is required at this stage as the wording of sub paragraph (4) of requirement 14 (Decommissioning and Restoration) [APP-015] [now REP2-004] outlines that the Decommissioning Plan to be submitted to OHA for approval must be substantially in accordance with the outline documents.</p> <p>November 2025 update: OCC is content that the outline decommissioning plan at Page 6 makes provision for a decommissioning traffic management plan.</p> | An Outline Decommissioning Plan [APP-236] has been submitted in support of the application for development consent from which a Decommissioning Plan will be prepared as secured in Requirement 14 of the Development Consent Order [REP2-004]. This includes a requirement for a Decommissioning Traffic Management Plan to be submitted and agreed with the relevant highway authorities prior to any decommissioning works commencing which will identify and set out appropriate mitigation measures for decommissioning generated vehicle movements that are identified and required at that time. | Agreed. |

Table 4.8: Areas of Discussion between the Parties – Planning Policy

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|-------------------------------|---|---|----------------------------|---------|
| 4.8.1 | Planning Supporting Statement | <p>Application of Planning Policy to Decision Making for NSIP's</p> <p>Section 104 of the Act contains the most pertinent policy outlining the decision-making process for NSIPs and providing guidance on how the Secretary of State (SoS) should approach their decisions. In this respect, Section 104 (3) provides that the SoS must decide applications for development consent in accordance with any National Policy Statement (NPS) except to the extent that the SoS is satisfied that one or more of the following exceptions apply:</p> <ul style="list-style-type: none">• that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations;• that deciding the application in accordance with any relevant national policy statement would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under enactment;• That deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment; and• That the Secretary of State is satisfied that the adverse impact of the proposed development outweighs its benefits. <p>A such, it is agreed that the following NPSs make up the relevant primary policy, against which the SoS must make their decision and to the extent that Section 104 allows, the following national, regional and local policy may also be relevant.</p> | Agreed | Agreed | Agreed. |
| 4.8.2 | Planning Supporting Statement | <p>Overview</p> <p>The statutory framework for preparing, examining and determining application for DCOs for NSIPs is provided by the Act. As discussed in section 2, the Act sets out the consenting system for all NSIPs, including those in the energy sector, and provides the legislative context that has guided the below considerations.</p> <p>The relevant NPSs to which the SoS must have regard in accordance with Section 104 (2) and 104 (3) of the Act are considered to be:</p> | Agreed | Agreed | Agreed. |

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|-------------------------------|---|---|----------------------------|---------|
| | | <ul style="list-style-type: none"> National Policy Statement for Energy (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and National Planning Statement for Electricity Networks Infrastructure (NPS EN-5). Other policies of relevance identified below include: National Planning Policy Framework NPPF and the Local Development Plan documents for the host authorities West Oxfordshire District Council, Cherwell District Council, the Vale of Horse District Council and Oxford City Council. As well as the Minerals and Wastes Local Plan maintained by Oxfordshire County Council. <p>Appendix B attached details local planning policy against which the project will be judged. These appendices are described as 'Compliance Tables', and details the applicants position in respect of degree on compliance with these policy statements well as the host authorities position with respect to compliance. Together they represent matters agreed and not agreed.</p> | | | |
| 4.8.3 | Planning Supporting Statement | <p>Oxfordshire Minerals and Waste Local Plan (2017) (adopted)</p> <p>The adopted Minerals and Waste Local Plan covering Oxfordshire is the Part 1: Core Strategy, adopted by OCC in September 2017. Additionally, 16 'saved' policies from the Minerals and Waste Local Plan (1996), adopted in July 1996 also remain in use for the purposes of development management. The most relevant policies of the Part 1: Core Strategy of the adopted Minerals and Waste Local Plan and the 'saved' policies of the Minerals and Waste Local Plan (1996) are detailed below.</p> | Agreed | Agreed | Agreed. |
| 4.8.4 | Planning Supporting Statement | <p>Oxfordshire Minerals and Waste Local Plan (emerging)</p> <p>The Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy was adopted in 2017 and is part of the Development Plan for Oxfordshire and must be considered with this DCO application.</p> <p>Oxfordshire County Council had agreed to produce a new Minerals and Waste Local Plan, which upon adoption, would replace the Core Strategy. However, in July 2025, Oxfordshire County Council ceased in their production of this new Plan under the current plan-making system and agreed to produce a</p> | Agreed | Agreed | Agreed. |

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|-------------------------------|--|---|----------------------------|-----------------|
| | | new Plan under the new plan-making system, proposed by the Levelling Up and Regeneration Act 2023, once it is brought into effect. As the new plan making system has not been brought into effect, there is currently no timetable for the production of a new Minerals and Waste Local Plan. The Core Strategy remains the Minerals and Waste Local Plan for Oxfordshire, and therefore weight should be given to this | | | |
| 4.8.5 | Planning Supporting Statement | Compliance with Development Plan policies: Please see Appendix BB. | See Appendix B | See Appendix B | See Appendix B. |

Table 4.9: Areas of Discussion between the Parties – Health

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|--|--|--|--|---------|
| 4.9.1 | ES Chapter 16 - Human Health Appendix 16.2 Oxfordshire HIA Toolkit Alignment Review Oxfordshire Host Authorities Responses to Examining Authority's First Written Questions (ExQ1) | Methodology, including data collection, and approach to cumulative assessment. | OCC Public Health accept the proposed approach as discussed in a meeting of 04/08/2025. | The Applicant believes this is agreed and was agreed in principle at a meeting in April 2024. Appropriate methods have been followed, including IEMA 2022 guidance on Human Health in EIA and the Oxfordshire HIA Toolkit. This includes that ES Chapter 16 appropriately integrating a Health Impact Assessment. [Noting OCC reference the 2023 not 2024 health assessment in their July 2025 response to ExA Q1.13.7, the 2024 ES Chapter 16 - Human Health assessment does include JSNA evidence and references]. The applicant also supports the OCC public health teams involvement in developing mitigation to support young people in relation to physical activity. (D3 SOCG 22/07/2025) | Agreed. |
| 4.9.2 | ES Chapter 16 - Human Health Figure 16.1 - Human Health Study Area Appendix 16.3 Community Health Profile Applicant's Response to the Examining Authority's First Written Questions (ExQ1) (notably pdf pages 148 to 153) | Baseline data and study area. | OCC Public Health accept the proposed approach as discussed in a meeting of 04/08/2025. | The Applicant believes this is agreed and was agreed in principle at a meeting in April 2024, with follow-up clarifications during the Examination. Appropriate and proportionate study areas have been identified to determine the population health sensitivity, including of vulnerable groups. Clarifications have been provided to the ExA (ExAQ1.13.1) and OCC in relation to Launton and Otmoor ward not being included within baseline data collection (being less representative of vulnerable groups) but that relevant populations and communities within this area have been included in the health assessment (D3 SOCG 22/07/2025). | Agreed. |
| 4.9.3 | ES Chapter 16 - Human Health Appendix 16.3 Community Health Profile Appendix 16.4 Human Health PRoW Analysis | Data, analysis and presentation of results. | OCC Public Health accept the proposed approach as discussed in a meeting of 04/08/2025 | The Applicant believes this is agreed and was agreed in principle at a meeting in April 2024, with follow-up clarifications during the Examination. Appropriate and proportionate data has been used, including from the local JSNA and public health indicators (D3 SOCG 22/07/2025). | Agreed. |
| 4.9.4 | ES Chapter 16 - Human Health | Expert judgements, assumptions and worst case scenario. | OCC Public Health note that provided length of project and public concern about the project affecting behavioural change are captured within the assessment then OCC | Appropriate and reasonable judgments, assumption and scenarios have been used, including informed by other ES assessment. Limitations are set out in the health assessment (D3 SOCG 22/07/2025). ES Chapter 16 - Human Health [CR2-023] paragraphs 16.9.78 to 16.9.85 (pdf page 84 of 145) specifically link the significant PRoW effect finding to issues of duration and of | Agreed. |

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-------|---|--|---|---|---------|
| | | | Public Health accept the proposed approach (meeting of 04/08/2025). | community concern. Wider issues of concern are also discussed for other health determinants, including 'public understanding of EMF risk'. ES Chapter 6 - Project Description [APP-043] Table 6.1 sets out the project duration details (clarification following meeting of 04/08/2025). | |
| 4.9.5 | ES Chapter 16 - Human Health Appendix 16.3 Community Health Profile Applicant's Response to the Examining Authority's First Written Questions (ExQ1) (notably pdf pages 148 to 153) | Identification and sensitivity of relevant features and receptors. | OCC Public Health agree that vulnerable groups are important, including children in relation to wherever they might be, which is the approach taken in the assessment. OCC Public Health accept the proposed approach (meeting of 04/08/2025). OCC confirms that they are satisfied that all impacted schools are covered in the list of receptors | The Applicant believes this is agreed and was agreed in principle at a meeting in April 2024, with follow-up clarifications during the Examination. Relevant receptors are identified, which are confirmed in guidance as being populations of people, including vulnerable groups populations. This includes community level baseline and analysis, which confirms that vulnerable groups are present and are allocated a high sensitivity, which it the highest level within the methodology. The identification of schools as receptors for the health assessment is discussed and clarified in the Applicant's Response to the Examining Authority's First Written Questions (ExQ1.13.2) (D3 SOCG 22/07/2025). | Agreed. |
| 4.9.6 | ES Chapter 16 - Human Health (section 16.9) Applicant's Responses to Relevant Representations | Construction and operational effects. | OCC Public Health are in agreement with the conclusions reached on the basis that agreed mitigations are carried out (i.e. implementation of the PRow wayfinding promotion measures during the start of the operational period when there is a significant adverse effect to mitigate) (meeting of 04/08/2025). | The conclusions reached are reasonable and reflect evidence-based professional judgments as to the likely significant public health effects of the project, including for vulnerable groups (D3 SOCG 22/07/2025) (D3 SOCG 22/07/2025). The assessment identifies one significant adverse effect at the start of the operational period (see summary discussion in Applicant's Responses to Relevant Representations REP1-020 row titled 'Access to open space, public rights of way, recreation, and physical activity' issue (pdf page 74)) (D3 SOCG 22/07/2025). Significant benefits are also noted, including in relation to access to employment and educational opportunities targeted to vulnerable groups, as well as the wider protective effect on public health that arises from the project's large scale contribution to renewable energy security (D3 SOCG 22/07/2025). | Agreed. |
| 4.9.7 | ES Chapter 16 - Human Health (Table 16.23) | Embedded and additional mitigation. | OCC Public Health note the importance of robust health promotion mitigation that promotes the PRow routes, particularly for children. Detail to be developed on the wayfinding actual materials post consent. Commitment to involve OCC Public Health in the design of wayfinding materials on the PRow network to be included as part of the outline Operational Management Plan (meeting of 04/08/2025). | Mitigation measures are considered appropriate and proportionate. The health assessment sets out mitigation and enhancement measures. Mitigation includes the project design in relation to green ways connecting communities to reduce adverse effects on physical activity (including monitoring). Other measures include responding to public health opportunities for an educational facility and targeting access to employment and training opportunities to vulnerable groups (D3 SOCG 22/07/2025). Outline Layout and Design Principles (Rev 5) [REP6-038] refers to the Outline Operational Management Plan and the Outline Landscape and Ecological Management Plans. Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034] section 6 'Public Health Elements' (pdf page 21 of 77) has the key commitment to greenways including trails, signage and information boards (wayfinding). Including that detail would be developed in the detailed Landscape and Ecology Management Plan. Outline Operational Management Plan (Rev 5) [REP6-032] Table 3.1 (pdf page 15 of 17) sets out a section on Human Health measures. Following the meeting on the 4 th August 2025 a row was added to the Outline Operational Management Plan, under the potential impact of ' <i>Public health implications of behavioural change in use of the public right of way network</i> ', with the additional mitigation commitment: OCC Public Health to be involved in the design of the Project's operational wayfinding materials for the PRow network. | Agreed. |
| 4.9.8 | ES Chapter 16 - Human Health (sections 16.11 and 16.13) | Cumulative effects and mitigation. | OCC Public Health are in agreement with the existing cumulative conclusions (meeting of 04/08/2025). | A robust and proportionate cumulative assessment has been undertaken, including considering the interaction effects of different health determinants on the same populations (D3 SOCG 22/07/2025). | Agreed. |
| 4.9.9 | ES Chapter 16 - Human Health | Cumulative effects and mitigation. | New Perdiswell Farm development (500 homes) to be reflected in | An updated cumulative assessment, including the Perdiswell Farm outline application, was provided during Examination at Deadline 5 on 12 th September 2025. | Agreed. |

| Ref | Relevant Application Document | Summary of Description of Matter | Oxfordshire County Council Current Position | Applicant Current Position | Status |
|-----|-------------------------------|----------------------------------|--|----------------------------|--------|
| | (sections 16.11 and 16.13 | | updated cumulative assessment (meeting of 04/08/2025). | | |

Appendix A

Record of Relevant Correspondence

| Date | Form of Correspondence | Topics Discussed | Outcomes |
|-----------------------------|-------------------------|---|--|
| Historic Environment | | | |
| | e.g email / meeting etc | | |
| Ecology | | | |
| 14/03/2023 | Meeting | Identified biodiversity and approach to Net Gain methodology as a key topic. | Nil. |
| 3/05/2023 | Meeting | Overview of ongoing surveys, designated sites and Biodiversity Net Gain. | Nil. |
| 3/12/2024 | Meeting | Protected species licensing. | Letters of no impediment to be sought with Natural England for relevant species. |
| 19/09/2024 | Meeting | Set out project update including ongoing design and progress update, Statement of Common Ground, key survey results, Biodiversity Net Gain, ecology strategy and next steps. | Nil. |
| 11/07/2025 | Meeting | Minutes to be agreed by areas covered included: <ul style="list-style-type: none"> • Overview of all bat survey work including that from May 2025 and activity data analysed to date. • Overview of Change Request 2 submitted at D2. • Proposed 25m buffer locations on key bat flightlines plus discussion on location and extent of other buffers. • Provision of bat technical note including contents. | Nil |

| Date | Form of Correspondence | Topics Discussed | Outcomes |
|---|--|--|--|
| | | <ul style="list-style-type: none"> • Scope of potential air quality assessment in respect of Oxford Meadows SAC. • Discussion on Local Impact Report Responses. • Discussion on proposed skylark mitigation. • Discussion on nightingale enhancements to OLEMP. <p>Discussion on monitoring programs and approval process.</p> | |
| Agricultural Land Use & Public Rights of Way | | | |
| November 2024 and two other meeting during 2025 | Online meeting via Microsoft Teams | Meeting with PRow Officer from OCC to discuss the proposed management of PRow within the Project site, including temporary and permanent diversions. | Responses received during the meeting were used to inform the assessment reported in ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054] and measures included in the Outline PRow Management Strategy, which forms Annex B of the - Outline Code of Construction Practice - Part 1 [REP6-028]. |
| Hydrology and Flood Risk | | | |
| July 2024 | RPS presented the proposed sustainable drainage strategy for the site which was agreed in principle by the LLFA. The LLFA raised no concerns to the presented information. | The approach was verbally agreed and followed up with meeting notes. | Agreed. |
| July 2024 | RPS followed up from the meeting with meeting | No response was recieved. | - |

| Date | Form of Correspondence | Topics Discussed | Outcomes |
|---------------------------------------|---|--|------------|
| | notes and the presentation. | | |
| Landscape and Visual Resources | | | |
| October / November 2022 | <p>Correspondences (by email) with all local authorities regarding the selection of Representative Viewpoints.</p> <p>OCC November 2025 notes: The applicant requested confirmation of agreement to viewpoints from an Infrastructure Lead within the Place Making Department who had no links to the Environmental Specialist Teams. The applicant made no attempts to follow this email up and took a lack of response as agreement to the viewpoints. OCC contend that this does not constitute agreement to the viewpoints. Likewise, OCC outlined their disagreement over viewpoints within the scoping response in 2023.</p> <p>OCC's PEIR Response also raises the issue of viewpoints; at paragraph 1.23 reads: "The Representative Viewpoints plans indicate the location of 55 viewpoints, which is a rather limited number for a</p> | A detailed log was kept of the responses and any requested for additional/alternative viewpoints. Any changes were incorporated into the PEIR and subsequent ES chapter. There is no evidence that the OHA's rejected any of the viewpoints suggested. | Progressed |

| Date | Form of Correspondence | Topics Discussed | Outcomes |
|----------------|---|---|------------|
| | <p>project of this extent and scale. Often only one viewpoint is chosen to assess the impact of a large area of solar, and it only assesses the impact of the scheme from one direction. Further viewpoints should be considered, eg from travelling in both directions on Public Rights of Way (PRoW), near settlements, and at key PRoW junctions to allow a better understanding of the scale impact. Suggestions for additional viewpoints from the District councils, parish councils and stakeholder groups should also be taken into account.”</p> <p>See also paragraph 2.2.2 of [REP1-068]</p> | | |
| January 2023 | Meeting held with OCC (including Landscape Officer) to discuss matters arising on Project, including Landscape | Minutes of meeting issued and actioned where necessary. | Progressed |
| June 2023 | Submission of Scoping Report, including LVIA section outlining approach to the assessment, including methodology | Comments received from the Scoping report are detailed within the LVIA [REP6-012] Table 8.5, with details of how they have been addressed. | Progressed |
| September 2024 | Meeting with local authority landscape officers | Outcome of meeting actioned as part of the PEIR / ES | Progressed |

| Date | Form of Correspondence | Topics Discussed | Outcomes |
|--------------------------------|---|--|--|
| | to discuss LVIA specific matters. | | |
| 10th June 2025 | Online meeting with local authority landscape officers to discuss LVIA specific matters | Topics of specific discussion were focused around the OHAs Joint Local Impact Report submitted at Deadline 1. With a particular focus on the LVIA methodology and application of significance of effect. | A detailed response to the OHAs Joint LIR (and appended LUC report) would be responded to at Deadline 2. Agreement was reached on the LVIA methodology. |
| 16th October 2025 | Online meeting with local authority landscape officers to discuss LVIA specific matters | Topics of specific discussion were focused on the wording of the SoCG(s), issues arising from ISH2 and continued discussions on the LVIA methodology and application of significance of effect. | SoCG(s) have been updated in response to discussions had. Minutes of the meeting completed and issued. |
| 10 th November 2025 | Email | Topic of email(s) was consultation on Representative Viewpoints. | <p>the Applicant contends that they did consult on the Representative Viewpoint locations on the 26.10.2022 and no response was received / is on file.</p> <p>The viewpoints expressly agreed is disputed. The applicant contended that there is no evidence to that OCC disagree with the viewpoints proposed.</p> <p>OCC November 2025 update: By the time this email was sent to OCC, OCC had already provided a version of the SoCG back to the applicant that did contend the issue of viewpoints.</p> <p>The applicant requested confirmation of agreement to viewpoints from an Infrastructure Lead</p> |

| Date | Form of Correspondence | Topics Discussed | Outcomes |
|--|--|---|--|
| | | | <p>within the Place Making Department who had no links to the Environmental Specialist Teams. The applicant made no attempts to follow this email up and took a lack of response as agreement to the viewpoints. OCC contend that this does not constitute agreement to the viewpoints. Likewise, OCC outlined their disagreement over view points within the scoping response in 2023</p> <p>As such, at no point did OCC either directly, or indirectly agree to viewpoints.</p> |
| Noise and Vibration | | | |
| April 2023 | Email | Consultation was sought via email to agree upon the proposed baseline sound survey and noise impact | OCC advised acceptability of the proposed approach. |
| May 2024 | Email | Consultation was sought via email to agree upon the proposed baseline sound survey and noise impact assessment methodologies. | No Response Received |
| Traffic and Transport | | | |
| December 2024 and several meetings during 2025 | Teams and email | Discussions including matters relating to the A40. | County and Applicant reviewed various matters including ducting across the A40. |
| Planning Policy | | | |
| Ongoing | Email | See Appendix B | See Appendix B |
| Health | | | |
| 13 July 2023 | Letter appended to the Scoping Opinion | OCC Public Health team responded to the June 2023 Scoping Report [APP-125] as part of the appendix to the OCC letter that was appended to the | The comments received were agreed and actioned and are |

| Date | Form of Correspondence | Topics Discussed | Outcomes |
|----------------------|-------------------------|--|---|
| | | July 2023 Scoping Opinion [APP-126] (pdf page 178 of 239). | set out in ES Appendix 16.1 Human Health Consultation and Engagement [APP-219] Table 1-1, section for 'Oxfordshire County Council' (pdf page 12 of 35). |
| March 2024 | Email | Offer of a meeting to the OCC Director of Public Health and further correspondence to arranging the meeting with the public health team. Emails included setting out the proposed approach to undertaking a full HIA as part of the EIA Human Health chapter. | Dialogue established and meeting arranged. |
| April 2024 | Meeting | Discussion of the public health baseline context, the scope, methods and reporting of the assessment, including the HIA being delivered through an integrated EIA chapter. Also OCC public health team discussion of the concept of greenways and how these could be included by the assessment. | The OCC Public Health Team agreed in principle with: the Human Health study area; the scope of the assessment; and the methods, including use of IEMA guidance, IPH guidance and the OCC HIA Toolkit. Details in ES Appendix 16.1 Human Health Consultation and Engagement [APP-219] Table 1-2 and Table 1-4. |
| November 2024 | Email | Update ahead of ES submission on the health assessment findings and approach to mitigating PRoW effects, including through use of greenways. | OCC Public Health response welcomed the update and noted that the HIA process appeared useful in designing mitigation. Noted that further comments would follow after reviewing the submitted assessment. |
| February – June 2025 | Relevant Representation | Section 8 of the OCC RR discussed Public Health. | Response to issues raised addressed in |

| Date | Form of Correspondence | Topics Discussed | Outcomes |
|-------------|---|--|---|
| | [RR-0793] and respective ExAQ responses relating to public health and the Health Impact Assessment. | Issues included HIA approach, study area clarification, support for transport mitigation measures raised in section 3 of the OCC RR. | Applicant's Responses to Relevant Representations [REP1-020] row titled 'RR-0793-055 Oxfordshire County Council' (pdf page 93-545). |
| July 2025 | Email | Update on the Examination elements relevant to public health and arranging of a meeting to develop SOCG | Updates noted and meeting arranged. |
| August 2025 | Meeting | To develop SOCG with regard to public health matters. | Amendments made to SoCG to reflect outcomes from 4th August meeting. |

Appendix B

Oxfordshire Minerals and Waste Local Plan Policies

Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy relevant policies and relevant 'saved' policies from the Minerals and Waste Local Plan (1996) (As submitted November 2024)

| Policy | Description | Applicant Comment | Local Authority Comment | Status |
|--|---|---|--|-----------------------|
| Policy M8 – Safeguarding Mineral Resources | <p>Mineral resources in the Mineral Safeguarding Areas shown on the Policies Map are safeguarded for possible future use. Development that would prevent or otherwise hinder the possible future working of the mineral will not be permitted unless it can be shown that:</p> <ul style="list-style-type: none"> The site has been allocated for development in an adopted local plan or neighbourhood plan; or The need for the development outweighs the economic and sustainability considerations relating to the mineral resource; or The mineral will be extracted prior to the development taking place. <p>Mineral Consultation Areas, based on the Mineral Safeguarding Areas, are shown on the Policies Map. Within these areas the District Councils will consult the County Council on planning</p> | <p>A Mineral Safeguarding Area for sharp sand and gravels has been identified within the Project area. In accordance with local planning policy a Mineral Resource Assessment (MRA) has been undertaken that demonstrates that although sand and gravel deposits of potential commercial interest are present sporadically beneath part of the Central Site area, the Project will not result in the permanent sterilisation of these resources. The MRA is presented as Chapter 11, Appendix 11.14 [EN010147/APP/6.5]. Notwithstanding, the Applicant considers the Project to be substantially in accordance with Policy M8</p> | <p>OCC's position on compliance with policy M8 was laid out within the Joint Local Impact Report [REP1-072]</p> <p>The Applicant has submitted a Mineral Resource Assessment (MRA) [APP-195] with the intention of showing that the need for the development outweighs the economic and sustainability considerations relating to the mineral resource.</p> <p>The Applicant's MRA calculates the lost mineral to be 3.58 million cubic metres which at a conversion rate of 1.5 tonnes per cubic metre would be 6.87 million tonnes.</p> <p>The latest Local Aggregate Assessment has an Annual Provision Rate (APR) of 0.986 million tonnes. This means that the mineral lost would be equivalent to 6.97 years of supply for Oxfordshire which would be almost equivalent to a 7-</p> | Compliance Not Agreed |

| Policy | Description | Applicant Comment | Local Authority Comment | Status |
|--------|---|-------------------|--|--------|
| | applications for non-mineral development. | | <p>year landbank requirement set out in the NPPF. The amount of sand and gravel that would be prevented from being worked therefore is considered significant and would conflict with the Governments current prioritisation of house building and growth which will require significant amounts of sand and gravel.</p> <p>Furthermore, OCC has outlined in various submissions ([REP1-072], [REP2-050], [REP3-072], [REP4-074]) that the council does not believe that the temporary nature of the project is sufficient to overcome the issue of sterilising minerals resources. The NPPF outlines at paragraph 168 that preference should be given to the re-use of solar farm sites which could result in the minerals resource being sterilised for a greater length of time than the length of the proposed development.</p> <p>In addition OCC does not believe that the infrastructure associated with the proposed development could</p> | |

| Policy | Description | Applicant Comment | Local Authority Comment | Status |
|----------------------------|--|--|--|-----------------|
| | | | <p>be removed without damaging the mineral resource. The removal of piles from within the Minerals Safeguarding area is likely to result in harm to the minerals resource and if their removal is not possible then these piles will need to be left in situ which will prohibitively impact the viability of their extraction.</p> <p>Given this OCC does not consider the proposed development to be in accordance with Policy M8.</p> | |
| Policy C11 – Rights of Way | <p>The integrity and amenity value of the rights of way network shall be maintained and if possible it shall be retained in situ in safe and useable condition. Diversions should be safe, attractive and convenient and, if temporary, shall be reinstated as soon as possible. If permanent diversions are required, these should seek to enhance and improve the public rights of way network. Improvements and enhancements to the rights of way network will generally be encouraged and public access sought to restored mineral workings, especially if this can be linked to wider provision of green infrastructure. Where appropriate,</p> | <p>Chapter 17, Agriculture, Land Use and Public Rights of Way assess effects upon footpaths and bridleways. [EN010147/APP/6.3]</p> <p>It describes the temporary diversions necessary during construction and permanent diversions. The permanent diversions are limited in length and realign the statutory route to the existing 'desire line' of the right of way actually used by the public.</p> <p>Existing footpaths are protected, and most enhanced with new planting. New permissive paths are proposed.</p> <p>No significant adverse effects are predicted.</p> | <p>The purpose of the Minerals and Waste Local Plan and policy C11 within it, is to guide Minerals and Waste Development. The proposed development does not consist of Minerals and Waste development and as such it is not the intention of the policies within to guide non minerals and waste development.</p> <p>Given this, in this instance OCC does not believe that policy C11 is applicable to the proposed development.</p> <p>Rights of Way policy for solar farm</p> | Not Applicable. |

| Policy | Description | Applicant Comment | Local Authority Comment | Status |
|-------------------------|--|---|--|-----------------|
| | operators and landowners will be expected to make provision for this as part of the restoration and aftercare scheme. | The Project accords with Policy C11. | development is considered within the relevant District Council Local Plans. | |
| Policy C12 – Green Belt | Proposals that constitute inappropriate development in the Green Belt, will not be permitted except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Conditions may be imposed on any permission granted to ensure that the development only serves to meet a need that comprises or forms an ‘other consideration’ in the Green Belt balance leading to the demonstration of very special circumstances. | <p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS (Appendix 8). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt, and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p> <p>The Project does not conflict with Policy C12.</p> | <p>The purpose of the Minerals and Waste Local Plan Policy C12 within it, is to guide Minerals and Waste Development.</p> <p>The proposed development does not consist of Minerals and Waste development and as such it is not the intention of the policies within to guide non minerals and waste development.</p> <p>As such in this instance OCC does not believe that policy C12 is applicable to the proposed development.</p> <p>Impacts of Solar Farm Development on the Green Belt is considered by the relevant policies within the District Council Local Plans</p> | Not Applicable. |