



**BOTLEY WEST SOLAR FARM
OXFORDSHIRE HOST AUTHORITIES
RESPONSE TO
ANTICIPATED APPLICATION AMENDMENTS TO BE
SUBMITTED TO THE SoS
THURSDAY 16 JULY 2026**

Oxfordshire Host Authorities (“OHAs”)

Botley West Solar Farm (EN01014)

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

Oxfordshire Host Authorities (“OHAs”)

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OXFORDSHIRE HOST AUTHORITIES

RESPONSE TO

AMENDMENTS TO THE APPLICATION ANTICIPATED TO BE SUBMITTED TO THE SOS

The Oxfordshire Host Authorities (the “**OHA**”) comprise the following host authorities who are working collaboratively to represent constituents on key issues during this Examination and assist the Examining Authority (“**ExA**”) in the smooth running of the examination and to assist the Secretary of State (“**SoS**”) in considering this proposed development:

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

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

Purpose of this Submission

The purpose of this submission is to provide a written response to documents that the OHA believe will be submitted to the SoS by the applicant on the 16th of July. This is based on discussions the OHA have had with the applicant in the period between the 9th of June and the 16th of July.

If the applicant submits these additional documents to the SoS, then there are no further procedural deadlines in which the OHA can provide the SoS with their feedback. As such, the OHA have taken the decision to provide the SoS with comments pre-emptively to ensure there is an opportunity for the SoS to consider Local Authority feedback on the proposed amendments.

It should be noted that this document is based on draft submissions sent to the OHA on the 9th and 14th of July 2026 and as such any version submitted by the applicant may differ from the version reviewed by the OHA.

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If the SoS is of a mind to accept the additional submissions by the applicant, the OHA believe that opportunity should be given to all interested parties to provide comments on the amended scheme.

Comments on Documentation sent to the OHA on the 9th of July 2026

Document: Botley West Solar Farm- Residential Visual Amenity- Design Evolution Assessment- July 2026 DRAFT

A document titled Botley West Solar Farm Ref: EN010147 RESIDENTIAL VISUAL AMENITY - DESIGN EVOLUTION ASSESSMENT | JULY 2026 has been provided by Icen Projects Ltd. Its purpose is stated as being to provide an independent assessment of the effects of the project on the residential visual amenity of nearby affected projects, although in practice the assessment information it provides appears to be limited to a brief comparison with the previous proposal, for each property or group of properties.

It states at paras 1.3-1.6 that: *“The Applicant (Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd) has introduced Requirement 15 to the draft Development Consent Order (DCO), which in summary would secure a minimum separation distance of 100 metres between dwellings and Work Nos. 1, 2 and 3. The Requirement also allows for additional offsets of up to 250 metres where necessary, with the location and extent of these offsets tailored to the circumstances of individual properties.”*

“For clarity Requirement 15 necessitates the production of a residential and visual amenity plan to be submitted and approved by the relevant planning authority.”

“This document presents potential additional offsets in relation to each residential property, with reference to a ‘Revised Masterplan’, derived through an iterative design evolution process. This is supported by an assessment of the likely level of effect and resultant residential experience arising from this design-led approach.”

“Agreement has been sought with the OHA regarding the appropriateness of the design strategy in reducing the potential for adverse effects to arise, having regard to NPS EN-1 paragraphs 5.10.6, 5.10.19 and 5.10.22.”

We note here that OHA has not agreed this strategy, albeit some positive changes have been suggested.

As such, the new RVAA appears to begin with the admission by the applicant that the mitigation which was previously proposed was considered by Iceni (as well as others) to be inadequate. It then goes on to suggest some ways to help address this by increasing set off buffers in certain places.

However, the proposal that is examined in the RVAA is not that which is considered in the EIA, the LVIA, or which is illustrated in any of the photomontages or wireline visualisations, and no up-to-date visualisations, Zone of Theoretical Visibility mapping, or assessment is provided beyond the limited material in the RVAA. It is unclear how the decision makers should use this information. It does not relate to the project details that are presently before them for consideration, or which have been examined through the required process, or to which all other assessment information pertains. If the changes are to be adopted, then all other relevant assessments, illustrative materials, analysis and calculations will also need to be updated, so that the EIA assesses the proposed project.

In its section on ‘Approach’, the RVAA summarises and quotes directly from the Landscape Institute guidance – TGN 1/19.

At para 2.11 it states that *“All dwellings within 250m of the Order Limits were identified (the measurement taken from the edge of the domestic curtilage). The list of dwellings to be considered in the RVAA was then refined with regards to (i) omitting those properties where potential likely effects solely relate to the construction of the cable route; and (ii) grouping dwellings where the visual amenity experience is likely to be remarkably similar.”* It does not explain in detail where this 250m is drawn from, except to say it was based on professional judgement and informed by TGN 2/19. It does not say how the 250m distance was measured when properties are grouped, when the distance of where to measure from and to is likely to be ambiguous.

TGN 2/19 states at para 4.7 that *“When assessing relatively conspicuous structures such as wind turbines, and depending on local landscape characteristics, a preliminary study area of approximately 1.5 - 2 km radius may initially be appropriate in order to begin identifying properties to include in a RVAA. However, other development types including potentially very large but lower profile structures and developments such as road schemes and housing are unlikely to require RVAA, except potentially of properties in very close proximity (50-250m) to the development. For example, when assessing effects of overhead transmissions lines, generally only those properties within 100 – 150 metres of the finalised route are potentially considered for inclusion in a RVAA.”*

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The LI guidance is silent on the requirements for solar PV, and as such one would expect to see some further justification of this distance in the assessment, including reference to site-specific information and perhaps also relevant case law. In any event, the level of effect in each instance will depend on factors beyond the distance from the property, such as slope angle and direction, topography, aspect, orientation, the arrangement of the proposed development in relation to the view, the availability of views from upstairs versus downstairs windows, or the garden or driveway, the nature of the view – open, focused etc, availability of views without the development which are seen in other directions, and whether the development would be seen in more than one direction from each of the properties in question (which will often be the case for this project), resulting in issues such as surrounding or encirclement.

Whilst Section 2 of the RVAA mentions some of these points, they do not appear to be brought out in any detail the assessment information which follows in Section 3, which is very brief for each property, and mainly comprises a series of plans showing the changes to the layout which are – or may be – proposed. These plans are in themselves helpful, but more information is required to help understand the nature of the likely impact. For example, existing photographs of each of the views from the properties are sometimes included, and a selection of photomontages is also usually provided. Cross reference could be made to the existing set of visualisations, and explanation provided as to how the views would change, for example, or new visualisations could be prepared.

A bespoke and site-specific approach to the assessment should be devised and clearly explained in the RVAA, to capture all of these and other relevant considerations, and agreed with the LPA, typically in advance of undertaking the work, to ensure it provides all the information that the local authorities require.

The methodology set out in the ‘Approach’ and then the assessment which follows is light in various respects, in that it introduces concepts, but then does not satisfactorily go on to explain how they are addressed, or demonstrate that they have been addressed in Section 3, for example:

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- No further information is provided by the applicant as to why 250m from the edge of the domestic curtilage of the property was selected as the limit of the study area; how the area of the domestic curtilage was identified; and how the measurement was undertaken when properties were grouped.
- It is unclear if some or all the properties were visited, and if this was done from within the property curtilage (which may in some instances have included checking views from upstairs windows, where residents were in agreement), or instead from the nearest publicly accessible location. If the latter, then it would be usual to recognise the limitations of the field work where exact details could not be verified. There is no information given as to how the assessment was undertaken, and why ultimately, as Step 4 assessment was not carried out. Was all the work based on examination of air photos, or were other sources used? Were wireline visualisations used to help the assessors make their judgements? Did they refer to updated ZTV drawings and how did they make judgements for properties they could not get near or enter.
- Seasonal changes should be considered. With respect to this point, it is unclear when the assessment work was undertaken but given the date of the report it seems likely that trees and other deciduous vegetation would have been in full leaf. As such it is expected that the assessment does not capture the worst-case scenario of winter views, and it is unclear how it would have done so, given the season during which the work was done. The difference between winter and summer views is very considerable in this part of England, given most of the vegetation is deciduous.
- The concept of Step 4 (Threshold Assessment) is set out in a grey box on page 7, but it does not appear to have been covered within the actual assessment undertaken. Denman’s Farm is mentioned as the only property experiencing a High magnitude of effect (presumably a landowner’s property, and which will be surrounded on all sides), but it appears to be being discounted on the basis of the agreement reached with the applicant, albeit that this should not be part of the consideration of environmental impact. It would appear, for example, that field visits may indicate that the removal of Fields 3.12 and 3.17, or the southerly triangle of Field 3.11 may help reduce this encirclement for any future occupiers of the farm. Has anything been done to help improve the situation here, as well as that for users of the adjacent PROW?

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Document: Botley West Solar Farm- Outline Landscape and Ecology Management Plan Supplement Design Response to Local Landscape Character July 2026 DRAFT

At para 1.5 it states that *“Agreement has been sought with the OHA regarding the appropriateness of the design strategy in reducing the potential for adverse effects to arise, having regard to NPS EN-1 paragraphs 5.10.6, 5.10.19 and 5.10.22.”* Although the document was provided to OHA a few days in advance of the deadline, it is not accurate to suggest that any sort of agreement has been reached.

This document contains additional information with regards to the landscape character of the site but there are still concerns about the detail of the information, and the fact that this information is not reflected, referred to or used in any way to inform the LVIA which was included as part of the EIA. Why was this information not considered in the impact assessment, and how can it genuinely have informed appropriate design development if it has only been produced at the very end of the examination process. It is the sort of activity which should be done at a very early stage in the EIA, to offer genuine improvements.

For example, LLCA5 – Tumbledown Ridge, covers the long panoramic views across the lower lying landscape towards the Thames and the wooded Wytham Hill, with woodland blocks contributing to the sense of remoteness and the landscapes’ good recreational opportunities. However, the ‘Key Qualities at Risk’ section only mentions avoiding conspicuous development structures, from being exposed on the ridge, and conserving the blocks of ancient woodland, and including an appropriate offset.

This list of key qualities at risk does not therefore cover the main feature of the area, which are the long panoramic views, the limited detractors and the recreational opportunities the landscape provides. These features are highlighted in the VWHDC District Council’s and Cumnor Neighbourhood Plan evidence base. The OHA consider the LLCA5 – Tumbledown Ridge to be unsuitable for solar development at this scale. This includes the fact that it is a very widely visible and rural area. It is a highly distinctive slope and is widely visible from Hill End and Wytham, as well as from the Eynsham Road, and the ProW and properties scattered across the vale beneath the rising slopes.

Similar issues apply for many of the other areas considered, albeit the OHA do not respond to each one of them here.

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The document also appears to be largely a review of existing LCAs offering limited information on perceptual qualities of the landscape areas, such as tranquillity, associations, recreational value, which are important elements when considering landscape character.

From a legibility perspective, it is unclear which the light green areas of “Proposed mitigation planting” are. If, for example, it is proposed across LLCA4 Evenlode Valley, then it would not be appropriate, given the open character of the edge of the hills, and their distinctive small scale field pattern, which would be masked by woodland planting. The openness of the easterly escarpment of this area is key to the wider views and landscape character of the region, and it is not appropriate to use it for the construction of solar panels, or to plant it up with woodland, as the drawing on page 15 may suggest. The relatively steep slopes dropping west from Purwell Farm are highly visible, including from the ridgeline and village of Church Hanborough, and their use as part of the development would be wholly inappropriate and damaging to landscape character and visual amenity. These hill slopes are an extremely attractive element of the landscape and are highly sensitive to the blanketing nature of the development proposed. The proposed amendments go some way to reducing effects in places but, in this case for example, altering the plans so as to remove some, but not all of the panels across this particularly sensitive hill slope means that the attractive vistas this landscape feature provides as a backdrop to views will be fragmented, and its legibility in the wider landscape will be diminished.

Again, had the assessment been undertaken, informed by a proper understanding and analysis of baseline landscape character and visual amenity, then solar panels would not have been proposed along this escarpment. As such, the claims made in Section 3: Summary and Conclusions, do not hold true.

Document: Botley West Solar Farm- Masterplan Development Rationale- July 2026

Cultural heritage response

The indicated design development is clearly presented primarily as a response to residential amenity considerations. The Applicant notes that the changes would also create additional opportunities for landscape enhancement, biodiversity gain and ecological connectivity. Changes do not appear to have been made specifically to avoid or reduce potential for harm to the significance of heritage assets. Additional opportunities to reduce such potential are not mentioned.

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Supporting LVA evidence, such as photomontages illustrating the differences between the submitted and amended schemes, or updated impact assessment, have not been provided. As a result, the impact of the changes cannot be readily quantified. No comment can therefore be made on the potential betterment represented by the amended scheme or its likely acceptability.

Landscape response

The Draft Document is incomplete with the cropped sections of the Masterplan missing, making it hard to follow. It is not clear exactly what the proposed changes are, and so limited comment can be provided.

The changes which are proposed are understood to predominantly related to Residential Amenity. These changes are likely to reduce the Landscape Character and Visual effects of the scheme locally, and to a degree, however there is no updated EIA or LVIA, no new photomontages, no revised ZTVs etc. Without this information it is impossible for the OHA, and the decision makers, to assess the extent and effectiveness of the proposed changes. Essentially the EIA information and the scheme which has been examined over the past year is different from that which may – or may not – now be proposed, and too much uncertainty remains to be able to make accurate judgements regarding the effects of the project.

There are still considerable differences between the OHA **[REP6-118]** and the applicants Masterplan, and the OHA consider the revised Masterplan does not adequately address all their concerns. Explanation is required as to why suggestions are rejected.

Some of the design development issues have already been discussed, as examples, in the response regarding the oLEMP, above. Whist not repeated they also apply here. Essentially the design development was not informed by a detailed understanding of landscape and visual sensitivities, and seeking to do this retrospectively appears to only be offering some partial improvements. There has been a lack of rationalisation to present a logical scheme with a good landscape and visual fit, and which reduces likely effects to an acceptable level.

Document: Draft Development Consent Order (tracked) Rev11 (received by the OHA on 14 July 2026)

Requirement 15- updated drafting

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Through the ongoing dialogue between the OHA and the applicant it is understood that the applicant will be proposing amended drafting to Requirement 15 to attempt to address some of the OHA’s concerns outlined above. The OHA have been presented with the draft amendments proposed by the applicant and the following comments are based on this drafting.

15.— (1) No part of the authorised development may commence until a written residential and visual amenity plan has been submitted to and approved by the relevant planning authority for that part, or where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities.

(2) The residential and visual amenity plan must be substantially in accordance with the outline residential and visual amenity plan.

(3) The residential and visual amenity plan must set out:

(a) the minimum distances proposed between Work No.1, Work No.2 or Work No.3, as applicable, of the authorised development and the title boundary of the adjacent residential dwellings as shown on title plans filed at the Land Registry for the relevant residential dwellings;

(b) the justification for the inclusion in, or exclusion from, the plan, as the case may be, of residential dwellings adjacent to the authorised development; and

(c) the justification for the minimum distance proposed.

(4) The minimum distance referred to in sub-paragraph (3) must be no less than 100 metres and must not exceed 250 metres, unless otherwise stated in a written agreement between the undertaker and ~~agreed with~~ the owners of residential dwellings.

(5) The residential and visual amenity plan must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates.”

The OHA have the following comments to make on this new drafting:

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- 15(2) it is understood that the applicant will be preparing an outline residential visual amenity plan based on site visits to the affected properties (these visits do not include entering the properties to consider views from internal windows, including windows that may be upstairs). Initial drafting details of the outline plan and its methodology have been shared with the OHA, who have provided comments back to the applicant. Necessarily the work to inform this is likely to have been undertaken during summer months when trees and hedgerows are in full leaf. It seems unlikely that sufficient cognisance will have been taken of the much more open winter views when deciduous vegetation is leafless.
- Without an updated RVAA to inform the need for, effectiveness and basis of this mitigation plan, the OHA cannot confirm that any of the mitigation proposed in the outline plan would be sufficient to prevent significant effects on visual amenity.
- 15(3)(a) it is acknowledged that this drafting removes the ambiguity within the originally proposed requirement 15 in relation to where the buffer will be measured from. Notwithstanding, the OHA considers the requirement needs to also include Work no 5 (c) and (d), Work no 6 (c) and (d), Work no 8 (g) and Ancillary Work (a) (d) and (h) alongside Work no 1, Work no 2 and Work no 3.
- 15(4) The revised drafting accounts for the ambiguity relating to evidence of agreement between the owner and the undertaker. However, the issue of the LPA not being able to corroborate ownership, nor the issue of multiple owners or tenants outlined in the OHA’s other submission in relation to the original drafting of 15(3) have been addressed by this amendment.

Overall, the OHA still do not consider that requirement 15 is suitable to secure mitigation against residential visual amenity impacts. Insufficient evidence of the assessment methodology behind the proposed mitigation has been submitted to allow the SoS to determine whether the mitigation would prevent or sufficiently reduce a significant impact. Furthermore, the drafting of the requirement leaves too much ambiguity and is potentially unenforceable.

Schedule 16

Paragraph 2(2):

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The revision to allow 12 weeks for the determination of the discharge of requirements is welcomed by the OHA and overcomes one of the outstanding issues contained within the OHA’s closing statements [REP7-191].

Paragraph 5(1):

Whilst it is noted that the new Requirement 15 has been added to the fee Schedule, the concerns relating to the inadequacy of the fees to cover the OHA’s reasonable costs of discharging requirements outlined in [REP7-191] have yet to be overcome.

The OHA sent the applicant a draft post consent PPA on 17th of April. However, the OHA were told the focus would be on responding to the RFI and that negotiations on a PPA would be delayed. On 3 July 2026 a draft post consent PPA was submitted to the OHA by the applicant. Given the short time scale between the 3 July and the date of submission to the SoS on the 16th of July, the OHA could not prioritise negotiation of this PPA over and above submissions to the SoS. However, an initial review of the applicant’s draft PPA noted that the identified resourcing proposed by the applicant was not sufficient to provide the OHA with the ability to discharge the requirements of the draft DCO.

Notwithstanding the above, the OHA also note that the Infrastructure Planning (Fees)(amendments) Regulations 2026 came into effect on the 9th of June which allow host authorities to recover reasonable costs for relevant services in relation to NSIP applications. The OHA consider all work undertaken to discharge requirements as a ‘relevant service’ which is supported by Government guidance on the matter (**Planning Act 2008: Infrastructure Planning (Fees) Regulations 2010 - cost recovery by the Planning Inspectorate and public authorities**) which clearly states that ‘services provided to the applicant, the Secretary of State or any other person (for example, the Local Planning Authority), after the decision is made by the Secretary of State or in relation to implementation of the decision, such as the discharge of requirements’ is to be considered a relevant service in relation to the Regulations.

The Council will therefore be able to recover the full reasonable cost of discharging requirements from the applicant and any future PPA will need to reflect this.

Position Statement between the OHA and the Applicant

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The OHA and the Applicant have worked on a joint position statement to be submitted to the SoS in relation to the amendments proposed by the suite of documents discussed above. Whilst this position statement is not signed by the OHA, the OHA are comfortable that this statement reflects the OHA’s position on the proposed amendments and as such should be considered by the SoS alongside this submission.

The Position Statement is appended to this response

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Appendix 1- Position Statement agreed between the Applicant and OHA in relation to documents submitted by the applicant on the 16th of July.

Botley West Solar Farm: Landscape and Visual Position Statement

Purpose

This Position Statement has been prepared by SolarFive Limited (the “Applicant”) and reviewed by Cherwell District Council, Vale of White Horse District Council, West Oxfordshire District Council and Oxfordshire County Council, together referred to as the Oxfordshire Host Authorities (the “OHA”).

The purpose of this Position Statement is to provide the Secretary of State (“SoS”) with a clear summary of:

- the engagement that has taken place between the Applicant and the OHA in relation to landscape and visual matters since the Request for Information dated 14 April 2026, as updated on 20 April 2026 and 28 April 2026;
- the additional information submitted to the SoS on 16 July 2026;
- the matters agreed between the Applicant and the OHA relating to landscape and visual considerations, together with a summary of the parties’ final positions where agreement has not been reached.

Summary of landscape and visual engagement

The following timeline provides an agreed overview of engagement between the Applicant and the OHA since 14 April 2026.

1. 14 May 2026: Meeting 1.
 - Discussion of the landscape and visual information submitted into the Examination Library, the OHA’s position on the approach to the Landscape and Visual Impact Assessment, the design response to landscape and visual matters, and the Applicant’s intended approach to providing updated information.
2. 09 June 2026: Correspondence
 - The OHA wrote to the Applicant and provided them with the submission they provided to the SoS as well as a summary of key concerns relating to the proposed Requirement 15
3. 12 June 2026: Correspondence.
 - The Applicant wrote to the OHA summarising the proposed approach and meeting schedule following the submissions made to the SoS on 9 June 2026. The proposed approach focused on the implementation of Requirement 15.
4. 16 June 2026: Meeting 2.

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- Discussion focused on the implementation of Requirement 15, the suitability of the proposed 100–250 m buffer, and the implementation of design changes made in specific response to landscape character considerations.
- 5. 23 June 2026: Correspondence.
 - A marked-up version of the masterplan, embedding changes proposed by the Applicant intended to better respond to landscape and visual considerations, was shared by the Applicant for preliminary review.
- 6. 24 June 2026: Correspondence.
 - Updated drafting of Requirement 15 was shared with the OHA.
- 7. 24 June 2026: Meeting 3.
 - Discussion focused on the wording of Requirement 15 and a review of each proposed change intended to minimise visual effects from residential dwellings.
- 8. 3 July 2026: Correspondence.
 - The Applicant sent an updated masterplan to the OHA for further review, formalising changes that had been previously discussed.
- 9. 6 July 2026: Correspondence.
 - An extract of the emerging outline Residential Visual Amenity Plan was shared by the Applicant to brief the OHA on the approach to securing offsets from residential dwellings.
- 10. 7 July 2026: Meeting 4.
 - The Applicant presented to the OHA the final proposed approach to:
 - the wording of Requirement 15;
 - the procedure for discharging Requirement 15;
 - the proposed addendum to the Outline Landscape and Ecology Management Plan; and
 - the final masterplan.
- 11. 9 July 2026: Correspondence.
 - Draft submission documents were shared by the Applicant with the OHA.
- 12. 14 July 2026: Correspondence.
 - The draft Position Statement was shared by the Applicant with the OHA for review and comment.
- 13. 14 July 2026: Correspondence
 - The applicant provided the OHA with a Draft DCO containing amendments to Requirement 15 and Schedule 16

The Applicant and the OHA agree that the summary of engagement set out above is accurate.

Landscape and visual documents shared by the Applicant with the OHA

The Applicant and the OHA confirm that the following landscape and visual documents were shared for review in advance of submission to the SoS on 16 July 2026:

- 9 July: Outline Landscape and Ecology Management Plan Supplement- Design Response to Local Character: July 2026- DRAFT
- 9 July: Residential Visual Amenity-Design Evolution Assessment: July 2026- DRAFT; and
- 9 July: Masterplan Development and Rationale: July 2026.
- 14 July: Draft Development Consent Order (tracked) Rev 11

The Applicant made minor refinements to the documents shared prior to submission to the SoS on 16 July, including updating the title of the ‘Residential Visual Amenity Design Evolution Assessment’ to be the ‘Outline Residential Visual Amenity Plan’.

Matters agreed between the parties

The Applicant and the OHA agree that engagement has taken place on the landscape and visual matters identified above; that the documents listed in this Position Statement were shared with the OHA in advance of submission; and that the documents submitted on 16 July 2026 represent the Applicant’s final landscape and visual response for consideration by the SoS.

The Applicant and the OHA agree that the design secured via Requirement 15 is a betterment, in respect of landscape and visual matters, to that proposed at the end of examination.

Summary of the Applicant’s final position

The Applicant’s final position on landscape and visual matters is as follows:

- The wording of Requirement 15 has been refined through discussion with the OHA to secure the updated layout for Works No. 1, Works No. 2 and Works No. 3. Work No. 6(c), Work No. 6(d), Work No. 8(g) and any further ancillary or related development under sub-paragraphs (a) (works for the provision of fencing and security measures such as CCTV, columns, lighting, communication boxes, lightning protection masts and weather stations), (d) (bunds, embankments, trenching and swales;) or (h) (surface water drainage systems, storm water attenuation systems including storage basins, oil water separators, including channelling and culverting and works to existing drainage systems) (the “Relevant Works”).
- An updated masterplan has been prepared which responds directly to the landscape character exhibited across the Order Limits and to residential visual

amenity. The changes were informed by desktop review and fieldwork and are intended to avoid and minimise landscape and visual effects. The changes and supporting rationale are set out in the documents listed above.

- The updated masterplan is provided within the outline Residential Visual Amenity Plan and secures control over the extent of the Relevant Works through Requirement 15, which confirms that the Authorised Development must be carried out substantially in accordance with the plan provided.
- Discussions have taken place regarding the provision of a Planning Performance Agreement to resource the OHA in relation to the discharge of Requirement 15.
- Schedule 16 of the draft Development Consent Order (as submitted by the Applicant alongside this Position Statement) has been updated to extend the timeframe for discharging all requirements to 12 weeks.
- The extent of works secured through the Outline Residential Visual Amenity Plan represents a betterment compared with the extent of works proposed at the close of the Examination because it:
 - (a) restricts the extent of land to be occupied by the Relevant Works, thereby reducing the spatial footprint of above-ground infrastructure proposed as part of the Authorised Development;
 - (b) reflects and is directly influenced by updated landscape and visual considerations, including the technical note on visual effects on visual receptors contained in the Outline Residential Visual Amenity Plan and the refined characterisation of landscape character contained in the Addendum to the Outline Landscape and Ecology Management Plan; and
 - (c) gives greater effect to the mitigation hierarchy referenced in paragraphs 5.10.6, 5.10.19 and 5.10.22 of NPS EN-1 by avoiding and reducing at source adverse landscape and visual effects.

Summary of the OHA’s final position

- The OHA retain concerns around the drafting of Requirement 15. The details of these concerns are contained with the OHA’s submissions to the SoS. These concerns relate to both the effectiveness of the requirement and challenges with the implementation of the requirement. The proposed amendments to Schedule 16 of the dDCO are welcomed but would not go far enough to overcome the OHA’s concerns on the discharge of the requirement.
- Whilst the OHA consider the scheme proposed in the ‘Master Plan Development and Rationale’ document is a betterment from the scheme proposed at the end of the examination, this scheme falls short of addressing the concerns raised by

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the OHA throughout the examination. In **[REP6-118]** the OHA outlined the reductions in the scheme that the Host Authorities consider would reduce the landscape and visual impacts below a significant level of impact. The revised scheme proposed by the applicant falls short of the reductions required by the OHA as outline in **[REP6-118]** and as such this matter remains unresolved.

- The OHA also note that the revised scheme proposed by the applicant has not been assessed by a revised Environmental Impact Assessment.
- The comments made throughout the examination in relation to the assessment methodology of the applicant’s LVIA have yet to be satisfactorily addressed.
- If the SoS is of a mind to accept the proposed revisions, the OHA believe there should be an opportunity for all interested parties to review the submission and comment as these revisions constitute a significant amendment to the design of the scheme.

Submission to the Secretary of State

The parties agree that this Position Statement may be submitted by the Applicant and/or the OHA to the SoS for consideration in determining the application for the Development Consent Order.