



**BOTLEY WEST SOLAR FARM
OXFORDSHIRE HOST AUTHORITIES
RESPONSE TO
4 SEPTEMBER 2026 CONSULTATION
DEADLINE: 4 OCTOBER 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

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OXFORDSHIRE HOST AUTHORITIES RESPONSES TO CONSULTATION 1 DOCUMENTS

The Oxfordshire Host Authorities (the “**OHA**”) comprised the following host authorities who are working collaboratively to represent constituents on key issues during the Examination and to 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 the **SoS Consultation Letter** dated 4 September 2026 inviting comments on applicant documents submitted following the request for further information in April 2026. The OHA were made aware by the applicant of the documents that they intended to submit before the previous deadline. As such the OHA submitted **[C1-218]** pre-emptively in relation to the documents now being consulted on. Unless otherwise indicated below, the OHA’s comments in **[C1-218]** remain valid.

In making their decision the OHA direct the SoS to both the Local Impact Report produced by the OHA **[REP1-072]** and the OHA’s closing statements **[REP7-191]** in which the OHA outlined all of the local impacts which had not been addressed by amendments to the application during the examination.

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

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Comments on applicant's documentation submitted in response to the information request of 14 April 2026 (re-issued 20 and 28 April 2026)

C1-094 - Response to Secretary of State Consultation 1 - 21.1 Cover Letter 16 07 2026

OHA note that the applicant has reduced the stated number of homes to be powered by the scheme from the originally quoted 330,000 homes to 275,000 homes. OHA also notes the new reference to the solar farm serving the energy needs of a data centre development at Frieze Farm.

Frieze Farm Data Centre is currently being considered by Cherwell District Council as part of a speculative planning application ref: 26/00720/OUT from Exeter College, University of Oxford. It seeks outline permission for an ‘Innovation District’ incorporating up to 34,000sqm gross external area of Data Centre Floorspace. The application has completed the first round of consultation, and it appears that additional information (e.g. highways modelling work) will be required. The SoS should be aware that as an outline application, detailed planning permission is unlikely to be imminent and, also, that the site is within the Oxford Green Belt and is not allocated for the proposed use in either the adopted or emerging Local Plans.

Furthermore, whilst PVDP’s proposal to supply energy to the proposed Frieze Farm Data Centre is corroborated by the Utility Statement provided by Exeter College in support of their application, there appears to be a difference of opinion about how advanced discussions are between the parties. PVDP state in their July letter that negotiations with Exeter Collage are "advanced" whereas Exeter College's Utility Statement of May 2026 describes discussions as "progressing on a preliminary basis".

Throughout the consideration of BWSF one of the key benefits which has been repeatedly highlighted is that the scheme would generate enough electricity to power 330,000 homes; all the homes in Oxfordshire. OHA would respectfully ask the SoS to consider the impact that this late-stage reduction to 275,000 homes would have on the weight to be given to the scheme benefits in the planning balance. Also, OHA observe that the powering of individual homes versus a data centre to serve a university are possibly quite different in terms of how it directly benefits the public.

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C1-095 - Response to Secretary of State Consultation 1 - 1.3 Guide to the Application (Clean) Rev 13

No comment.

C1-096 - Response to Secretary of State Consultation 1 - 1.3 Guide to the Application (Tracked) Rev 13

The changes to this document are noted. In relation to Paragraph 2.1.1 where the applicant indicates the number of homes being powered may be reduced, please see comments at C1-094 above

C1-098 - Response to Secretary of State Consultation 1 - 3.1 Draft Development Consent Order (Tracked) Rev 11

Requirement 15- updated drafting

The OHA note a drafting error in the draft requirement. 15 2(a) is incorrect, as there is no sub paragraph 6 in this track change document. 15(2)(a) should refer to "the works in sub-paragraph **(5)**" not 6 and 15(5) should refer to "sub-paragraph **(2)(a)**" and not (3)(a).

The OHA were aware of the proposed revisions to Requirement 15 prior to submission and have provided comments as part of both **[C2-200]** and **[C2-218]**. With the exception outlined below these comments remain valid and have not been resolved via the updated drafting.

Since the OHA last saw the drafting of Requirement 15, sub paragraph (5) has been added to clarify the works for which the requirement applies. This list includes all the works the OHA indicated should be included in **[C2-218]**. This is welcomed.

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.

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Schedule 16- Fees

Since the end of the examination the OHA have made positive progress in negotiating a post consent PPA with the applicant.

However, whilst it is noted that the new requirement 15 is now included in the fee schedule in Schedule 16 of the dDCO, the OHA's comments at page 57 of the Closing Statement **[REP7-191]** with regard to the adequacy of the fee schedule in Schedule 16 have yet to be addressed.

C1-099 - Response to Secretary of State Consultation 1 - 3.3 Explanatory Memorandum (Clean) Rev 11

No comment.

C1-100 - Response to Secretary of State Consultation 1 - 3.3 Explanatory Memorandum (Tracked) Rev 11

The OHA have no comments to make on the changes in this document.

C1-101 - Response to Secretary of State Consultation 1 - 7.6.3 Botley West Outline Landscape and Ecology Management Plan Rev 9 (Clean)

No comment.

C1-102 - Response to Secretary of State Consultation 1 - 7.6.3 Botley West Outline Landscape and Ecology Management Plan Rev 9 (Tracked)

It is welcomed that the applicant is retaining its commitment to 70% and noted that anything more than this may be made available to other projects. Consideration is required as to how this will be managed through legal agreements to enable registration on the biodiversity gain sites register.

The OHA note the new Appendix D: Outline Landscape and Ecology Management Plan Supplement - Design Response to local landscape character added to this document. Early drafts of this Appendix were shared with the OHA in advance of their

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submission in July. Whilst there are some minor changes between the versions that were shared with the OHA and those submitted, the Councils consider that their comments within submission **[CR1-218]** on these documents remain valid.

C1-103 - Response to Secretary of State Consultation 1 - 8.3 Schedule of Changes to the dDCO Rev 10

The changes to this document are noted.

C1-104 - Response to Secretary of State Consultation 1 - 20.4 Botley West Outline Skylark Compensation Strategy Rev 1 (Clean)

No comment.

C1-105 - Response to Secretary of State Consultation 1 - 20.4 Botley West Outline Skylark Compensation Strategy Rev 1 (Tracked)

It is noted that the document indicates that a 3rd year of breeding skylark surveys were due to be completed in July 2026. Assuming that these surveys are now complete, it would be helpful to report the average number of territories the site has supported over the last 3 years to confirm the baseline of the skylark population in the Outline Skylark Compensation Strategy. However, it is accepted that these will be included in the detailed Skylark Compensation Strategy to be secured via Requirement 16. The changes to this document are as discussed with the applicant and are accepted.

C1-106 - Response to Secretary of State Consultation 1 - 21.2 Botley West ES Addendum July 2026

The changes to this document are noted.

C1-107 - Response to Secretary of State Consultation 1 - 21.3- Application of the Mitigation Hierarchy

The OHA have no new comments on the issue of the Mitigation Hierarchy other than those contained in their closing statement **[REP7-191]**

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C1-108 - Response to Secretary of State Consultation 1 - 21.4 - Outline Residential and Visual Amenity Plan

Earlier drafts of this document were shared with the OHA in advance of their submission in July. Whilst there are some minor changes between the versions that were shared with the OHA and those submitted, the Councils consider that their comments within submission **[CR1-218]** on these documents remain valid.

In addition, please see the OHA's comments on Requirement 15 above.

C1-109 - Response to Secretary of State Consultation 1 - 21.5 - Botley West Position Statement between Applicant and OHA

No comment.

C1-110 - Response to Secretary of State Consultation 1 - 21.6 - Landscape Parameter Plan

The changes to the parameter plans are noted.

C1-111 - Response to Secretary of State Consultation 1 - 21.7 - Masterplan Development & Rationale

Please see the OHA comments on this topic within both **[C2-200]** and **[C2-218]**.

C1-112 - Response to Secretary of State Consultation 1 - 6.5 ES - Appendix 7.5 Settings Assessment Rev 5 (Clean)

No comment.

C1-113 - Response to Secretary of State Consultation 1 - 6.5 ES - Appendix 7.5 Settings Assessment Rev 5 (Tracked)

The applicant has submitted an updated settings assessment, with revised assessments reflecting the applicant's updated scheme design. The settings assessment has been updated to refer to the 'refined layout' rather than the 'proposed layout' and cross refers to the Illustrative Masterplan Rev 5 and updated photomontages that take account of the changes to the design of the Project set out in the Applicant's Change Request 2 Report.

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Photomontages have not been updated to reflect the refined layout, so in cross referring to photomontages, the report refers to visualisations which showed how the project would appear from selected Viewpoints. The viewpoints in the photomontages do not reflect the refined layout, so it is difficult for the OHA to ascertain how the proposed changes affect the setting of heritage assets.

It is not helpful that the settings assessment refers to visualisations that **showed** how the project **would have appeared** if the scheme that was submitted for examination was implemented. It would be more helpful to see visualisations of the refined layout, so that OHA has a clearer view as to how the proposed development would affect the setting of these heritage assets.

This is particularly the case for viewpoints where the refined layout results in some but not all panels to be removed. The project will be visible within the setting of certain heritage assets such as the Church of St Peter and St Paul, Church Hanborough and the Church of St Peter at Cassington.

The OHA confirmed in their last representation **[C2-200]** that the reduction in panel coverage was likely to result in a betterment compared to the scheme submitted for examination, but the panel reductions do not go far enough in delivering a scheme that minimises landscape and visual impacts to a more acceptable level. This is directly relevant to assessing the impacts on the setting of heritage assets and in the absence of updated photomontages and visualisations, it is difficult for the OHA to reach a position that is in anyway different to the views expressed throughout the examination and decision-making stages.

**C1-114 - Response to Secretary of State Consultation 1 - 6.5 ES - Appendix 9.13 Biodiversity Net Gain Assessment (Clean)
Rev 3**

No comment.

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C1-115 - Response to Secretary of State Consultation 1 - 6.5 ES - Appendix 9.13 Biodiversity Net Gain Assessment (Tracked) Rev 3

It is noted that there is a proposal for future excess BNG units to be made available to other developments to purchase at some point in the future. It is currently unclear whether this would need to follow statutory BNG requirements to allow the excess units to be registered, i.e. secured by legal agreement, or if it could proceed in an agreed, non-statutory, manner.

C1-116 - Response to Secretary of State Consultation 1 - 6.5 ES Botley West Solar Farm BNG Metric V3 (Rev 5 Masterplan)

The metric has been submitted with errors – it must be clarified if irreplaceable habitats are present in the baseline on the Start page (Yes or No) and the A-2 onsite habitat creation tab highlights an error related to the area created not matching the area lost. These should be rectified for formal submission.

C1-117 - Response to Secretary of State Consultation 1 - 6.4 ES - Figure 1.2 Illustrative Masterplan Overview - Rev 5

No comment.

C1-118 - Response to Secretary of State Consultation 1 - 6.4 ES - Figures 2.1a - 2.4c - Illustrative Masterplan - Rev 5

The OHA wishes to draw the Secretary of State's attention to previous comments OHA provide in their response [REP6-118] for panel removal on a field-by-field basis. Whilst Rev 5 is a betterment on the Rev 4 plan, the changes in the OHA's view do not go far enough in delivering a scheme that minimises landscape and visual impacts to a more acceptable level.

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Closing Statement

The Oxfordshire Host Authorities maintain that the Applicant has not provided sufficient evidence to demonstrate that significant landscape, visual and residential amenity impacts have been avoided, minimised, or mitigated. While proposed residential buffers and some panel removals are welcomed as modest improvements, the OHA consider that the scheme remains development-led rather than landscape-led, and that the Secretary of State lacks a robust evidence base on the actual landscape and visual effects of the scheme.

The OHA note that the updates submitted by the applicant in July seek to address outstanding concerns in relation to ecology and landscape and visual impacts. However, the authorities consider that many concerns relating to other environmental impacts remain unresolved. The OHA point to SoS to both the joint Local Impact Report **[REP1-072]** and the OHA closing statement **[REP7-191]**.