



Botley West Solar Farm

Consultation Report Appendix 5.1.10

Section 42 Applicant Response

November 2024

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APFP Regulation 5(2)(q); Planning Act 2008; and Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations

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Table 1: Section 42 Applicant Response Table

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Cumulative impact, Ecology, Landscape	When the proposal is looked at alongside proposals for a solar farm close to Otmoor, Manor Farm at Denchworth, Red House Farm near Botley and other solar farms in our area, given the lack of definitive research and evidence on the impact of solar farms on aquatic birds and invertebrates, it seems a colossal experiment is being carried out on our local nature. We want to see much more evidence on the potential impact of the plans on wildlife and the mitigation to be put in place.	Yes	The effects of the Project on ornithology and invertebrates are assessed in ES Chapter 9: Ecology & Nature Conservation [EN010147/APP/6.3] . The proposals are also supported by an Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] .
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Landscape and visual	In addition to the sites mentioned above, there are also a large number of local wildlife sites/SSSIs in the area, and Conservation Target Areas, such as Oxford Meadows and Farmoor CTA, Oxford Heights West CTA,	Yes	Impacts to statutory and non-statutory designated sites are assessed in the ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.

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		<p>Blenheim and Ditchley Parks CTA, Glyme and Dorn CTA and the Wychwood and Lower Evenlode CTA. See appendix 1 for more details. Detail must be given on how the proposal would impact on the ability to achieve the aims of the CTAs, and how impacts on designated sites such as SACs, SSSIs, LWSs and pLWSs will be avoided and mitigated.</p>		<p>Impacts to European sites (SAC, SPA) are assessed in the Habitat Regulations Assessment Report, provided in Volume 3 [EN010147/APP/6.5] Appendix 9.14.</p>
<p>Berkshire Buckinghamshire & Oxfordshire Wildlife Trust</p>	<p>Local ecology</p>	<p>Whilst there is a lot of information and detail available in relation to the surveys carried out, we consider there to be a concerning lack of detail on the potential impact of the proposals on wildlife and the proposed mitigation. We consider the plans lack ambition to improve the area for wildlife and there is a lack of evidence available on the large number of risks posed to the local natural environment. We are particularly</p>	<p>Yes</p>	<p>As set out in the oLEMP [EN010147/APP/7.6.3], the majority of the Project site will now be managed through conservation grazing to enhance the overall ecology of the area.</p> <p>Grassland habitat will be created underlying panels (this approach has been welcomed by Natural England) with Skylark plots</p>

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		disappointed in the lack of ambition to create habitats amongst the panels.		scattered throughout panelled areas. Panelled areas will be bounded by meadow grasslands and hedgerows (with and without trees). Invertebrate, bird and bat boxes will be included in these areas. The remainder of the landscaping scheme will see further suitable habitat creation and enhancements on a large scale.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	Whilst we understand the need for greater renewable energy, we have significant concerns over the scale of the plans and do not believe the information available demonstrates that the project can proceed without substantial risks to nature. It is important that the impacts of new solar farms on the local environment are properly assessed and areas of existing high wildlife value habitat are	No	The Applicant notes this comment.

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		avoided. We are concerned that given the scale of the proposed Botley West Solar Farm, the lack of comparable solar farms in terms of size and the limited research into the effects of solar farms of this scale on the local environment, the true nature of the potential impact of the proposals on the local environment cannot be adequately ascertained.		
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	As a wildlife conservation focused organisation, our comments refer specifically to impacts on species and their habitats which may occur as a result of the proposed development.	No	The Applicant notes this comment from BBOWT about their remit.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	We note that the surveys carried out show a large number of red-listed species. A number of these species would be adversely affected by the proposals and not co-exist in the same area as the panels. Covering such a large	Yes	Impacts to breeding and wintering birds are fully assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Wintering bird and breeding

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		<p>area in solar panels would have a significant negative impact on farmland birds. The impact of the change of management of the site on farmland birds must be fully assessed, particularly on ground-nesting birds such as skylark. We note that the proposals now include skylark plots but we have been unable to ascertain where they would be located. If the plots are to be located amongst the panels then we have serious reservations about their effectiveness as we consider that skylarks would avoid areas where solar panels would be present. The impact on wintering birds which tend to gather in large open arable fields such as lapwing and golden plover should be considered if they have been present in the fields concerned. Such a huge solar farm could potentially cause</p>		<p>bird surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.10 of the ES.</p> <p>Skylark plots are incorporated to provide additional foraging habitat. Additional areas of farmland have been removed from the scheme shown at PEIR, to be managed for farmland bird benefit.</p>

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		huge damage to local bird populations so the risks need to be fully assessed.		
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	A further area of concern is the "lake effect", particularly for birds and insects. Natural England information note (Natural England Technical Information Note TIN101 Solar parks: maximising environmental benefits) states: "Solar parks can affect wildlife where they are near sites of high wildlife value.....There are some indications that very large, unbroken expanses of uniform solar panels may mimic water surfaces on which insects may attempt to settle and breed.....Some birds and invertebrates are also likely to be affected by solar parks developed close to areas of high wildlife value. Where a solar park is proposed within or close to such sensitive sites, the planning	Yes	Natural England's Technical Information Note TIN101 Solar parks was considered in the assessment of impacts on wintering and breeding birds. Impacts on wintering and breeding birds are addressed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation of the ES. Impacts due to the 'lake effect' on ecology receptors have been considered within the ES.

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		application should include a detailed assessment of the likely impacts on the ecological interest of the sites and contain practical measures which avoid or minimise any adverse effects on their features of interest. Any solar park close to a designated site will need to demonstrate that it would not compromise the objectives of the designation.”		
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	The potential risk to birds and invertebrates is increased by the close proximity of the proposed solar farm to water bodies such as Cassington Gravel Pits (200m), Farmoor Reservoir (adjacent), and several rivers, such as the Evenlode and Thames. We do not believe it is possible to install panels in such close proximity to Farmoor without harm being caused to certain species. If, despite this, the proposal does go ahead so	Yes	Impacts due to the 'lake effect' on ecology receptors have been considered within Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation of the ES.

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		<p>close to Farmoor Reservoir and Cassington Gravel Pits then much more buffering would be needed between the panels themselves and these sites. There is particular risk with the southern site, as it almost touches Farmoor Reservoir, that the fields of panels and reservoir could look like one large lake to birds.</p> <p>Additionally, steps would need to be put in place to prevent the "lake effect" within the fields such as adequately spacing out the panels and researching the effectiveness of panel coatings at preventing collisions with the panels and invertebrates laying eggs on them leading to mortality. However, at the moment we have no confidence that a solar farm of this scale could be developed in such close proximity to the water</p>		

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		<p>bodies identified above without risking wildlife at the sites. We raised this point in our first response and it does not appear to have been addressed. The developer should publish their evidence as to why the lake island effect is not a risk with the current proposals or what mitigation they will put in place to address the risk.</p> <p>Possible impacts of the 'lake effect' include:</p> <ul style="list-style-type: none"> a)birds mistaking a large area of solar panels to be a lake and attempting to land on them. For some water birds this could be critical since they struggle or are unable to take off from non-water surfaces; b)birds and bats that feed on the wing mistakenly attempting to feed from the panels, with possible collisions and mortality; c)low-flying birds colliding with the 		

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		<p>panels or being confused by reflections in the same way as birds are confused by reflections from windows of buildings, and colliding with the panels, resulting in mortality;</p> <p>d)attraction of aquatic insects to the panels.</p> <p>a. A Natural England (2017) evidence review states: “Photovoltaic panels have been shown to reflect polarised light that is attractive to polarotactic aquatic insects, which confuse solar panels with water and attempt to lay eggs on the surface, resulting in mortality and reproductive failure”;</p> <p>b. A review by BSG Ecology (2019) describes in paragraphs 2.8 – 2.10 research into the possible impact of solar farms on aquatic invertebrates. It concludes by saying that: “The authors suggest that, until more</p>		

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		research on a variety of species has been carried out, a more sensible approach would be the strategic deployment of solar panels away from water-bodies in temperate regions.”		
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	The site currently outlined for development as the Botley West Solar Farm is 1,400 hectares. 400 hectares have been set aside as a mitigation and enhancement area, which means the biggest impact of the development will come from the 1,000 hectares to be covered in solar panels and other infrastructure. For this reason it is important that if the solar farm does proceed, the biodiversity enhancements are not limited to the “mitigation and enhancement area” but are also embedded in the design of the 1,000 hectare panelled area.	Yes	<p>Biodiversity enhancements are embedded in the Project masterplan, including the panelled area.</p> <p>The Biodiversity Net Gain (BNG) plans for the Project are outlined in the Biodiversity Net Gain Assessment provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13.</p> <p>BNG is implemented and managed under the outline Landscape and Ecology Management Plan is</p>

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				provided in [EN010147/APP/7.6.3]
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	For example, we note that wildflower grassland is to be planted under existing power lines. However, there is no detail on how the panelled fields which make up the majority of the site will be planted. We understand there is currently no intention to plant species-rich wildflower grassland amongst the panels. The developer should revisit this position. The community leaflet says the intention is to keep the panels as low as possible whilst allowing opportunities for sheep grazing. Whilst we support the mixed use of land, the developer should research the successes of other solar farms in planting wildflowers alongside solar	Yes	<p>The Applicant has engaged Natural England on this position, and intends for grassland habitats to be created within panel arrays.</p> <p>The Project Description at Chapter 6 of the ES [EN010147/APP/6.3] also explains the Applicant's intention to operate conservation grazing across much of the Project Site.</p> <p>The Applicant notes the remaining points made, and the approach to meadow management, including a planting palette, is set out in the Outline Landscape and</p>

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		<p>panels. Research should be carried out so that the height of the panels and the spacing between them allows sufficient light underneath to support species rich grassland. Conservation grazing in large parts of the site should also be explored to provide varied habitats.</p>		<p>Ecology Management Plan [EN010147/APP/7.6.3].</p>
<p>Berkshire Buckinghamshire & Oxfordshire Wildlife Trust</p>	<p>Local ecology</p>	<p>The Preliminary Environmental Information Report states that “areas under and around the panels will develop vegetation that is fit for grazing by sheep or can be cut back to produce compost. In areas not affecting power generation vegetation growth will be facilitated to improve biodiversity.” More detail needs to be provided on what is meant by “vegetation growth” and the areas that will not affect power generation. The developer should explore methods of</p>	<p>Yes</p>	<p>More detail on the objectives and specifications of created and enhanced habitats, including meadow and hedgerow management, within the Project site are presented in the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] and the Outline Operational Management Plan [EN010147/APP/7.6.2].</p>

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		<p>facilitating grassland to increase biodiversity under and around the panels in a way that will not affect power generation, rather than disregarding the option for biodiversity enhancements under and around the panels.</p> <p>As the largest (as far as we know) solar proposal in the UK, if the proposal does go ahead, it must be exemplary in terms of doing everything possible to achieve the most species-rich grassland it can amongst the panels. At the moment the proposals fail to do this. Numerous ponds should also be provided in the margins around the panels to encourage colonisation by amphibians, reptiles and invertebrates. Hedgerows around the panels should be managed so as to maximise their benefits for wildlife, with rotational trimming at</p>		

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		not less than a three-year interval, and also trimming further out so as to allow the hedgerows to slowly grow out in size. This management in and around the 1,000 ha of panels should all be additional to the biodiversity provision proposed on the other 400ha of land.		
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	As well as managing the space under and around the panels in a way to promote biodiversity, it is vital that all existing trees, hedgerows and woodlands are protected and the impacts of a solar farm on such features and habitats are known. We understand there is published concern around the impacts of solar farms on bat populations. As the area neighbours ancient woodland (see map) ¹ which often supports bat populations, we are particularly concerned about the	Yes	Trees, hedgerows and woodlands have been protected with the exception of some limited areas of hedgerow removal required for vehicular access points and visibility safety splays. The impacts of the project on bats are assessed in ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.

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		impact of the proposals on bat populations.		<p>Bat surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.4 of the ES.</p> <p>Following discussions with Natural England, appropriate buffers will be incorporated into the final design either side of any important bat commuting routes.</p>
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	We are seriously concerned that important bat habitats and populations will be fragmented and that the solar panels themselves will also deter bats from using their natural habitat. New research by Tinsley et al (2023) has shown that the activity level of bats is substantially lower at solar farm sites compared to control sites. Furthermore, Barré and Baudouin et al (2023) report	Yes	<p>The Applicant notes this comment.</p> <p>The implications of this research and the implications for the Project have been considered in detail during both pre-application consultation with Natural England and subsequently in the Project design commitments.</p>

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		<p>on a reduction in feeding behaviour and therefore likely reduced feeding habitat quality for bats at solar farms. The causes for this are unknown and further research must be carried out. It is possible this could be related to loss of suitable habitat, fewer insect prey available, impacts on echolocation, and collision risk with the panels.</p>		<p>Appropriate buffers will be included within the final design along all important bat foraging/commuting corridors. Such corridors are being identified through the use of project-level radio tracking. Data are reported in ES Appendix 9.4 Bat Surveys [EN010147/APP/6.5].</p>
<p>Berkshire Buckinghamshire & Oxfordshire Wildlife Trust</p>	<p>Local ecology</p>	<p>We are concerned that the middle section in particular of the proposed solar farm will create a break between areas of ancient woodland which could otherwise be improved for connectivity. Areas of ancient woodland should be connected with large areas of mosaic habitat of woodland, scrub, species rich grasslands and ponds. The two main groups of ancient woodlands (South of Bladon and East of Farmoor)</p>	<p>Yes</p>	<p>Ancient woodland will have a minimum 15m buffer and following discussions with Natural England, appropriate buffers will be incorporated into the final design either side of any important bat commuting routes. These buffer distances, shown on the Illustrative Masterplans [EN010147/APP/6.4] are considered minimum</p>

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		<p>should be connected and managed for nature. The panelled areas appear to go within 15m of the edge of ancient woodland which is unacceptable. Buffers for ancient woodland must be greatly increased or panels simply not put in the proximity of ancient woodland. As a minimum we suggest buffers of 50m around ancient woodland to minimise detrimental impacts on species present in such woodlands, such as bats.</p>		<p>distance sufficient to ensure impacts to such features are avoided.</p>
<p>Berkshire Buckinghamshire & Oxfordshire Wildlife Trust</p>	<p>Local ecology</p>	<p>We also propose that larger wildlife corridors are placed around the fields so that bats can forage along such corridors.</p>	<p>Yes</p>	<p>Noted. The implications of this research and the implications for the Project have been considered in detail during both pre-application consultation with Natural England and subsequently in the Project design commitments. Appropriate buffers will be included within the final</p>

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				<p>design along all important bat foraging/commuting corridors. Such corridors are being identified through the use of project-level radio tracking. Data are reported in ES Appendix 9.4 Bat Surveys [EN010147/APP/6.5].</p>
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	<p>In terms of the mitigation and enhancement areas, we will review proposals for such areas when more detail is published. However, we trust the developer will consult with local conservation organisations and ensure proper management plans are put in place. The larger mitigation area should be managed as a nature reserve by an organisation with considerable experience in nature reserve management. It should be managed with the aim of becoming initially an LWS, and</p>	Yes	<p>The Applicant notes this comment from BBOWT about their intention to further review the DCO submission proposals.</p> <p>The Applicant will continue to liaise with Natural England and local conservation organisations, and notes the request for the opportunity to create a LWS to manage components of the site, including the opportunity for managed public access.</p>

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		ultimately with the aim of becoming a SSSI. It should therefore be given over in perpetuity for wildlife management with the aim of creating one of the largest and most wildlife rich nature reserves in Oxfordshire. Managed public access should be permitted along some footpaths and viewing areas, to encourage people to connect with nature, but large areas should be off-limits to access to allow species that do not tolerate recreational disturbance, such as the curlew, to thrive.		This will be reviewed further during the examination period, including liaison with the land owners.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	We also note that the community leaflet states that “following the end of Botley West’s operation, the solar equipment will be removed, and the site will be returned to agricultural use.” Biodiversity enhancements and new habitats created in the	Yes	The Applicant notes this comment. The Project is seeking approval for a 42 year period during which time the solar farm will be

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		<p>mitigation and enhancement areas must be maintained and long term funding provided to ensure they are managed in perpetuity.</p>		<p>constructed, operated and decommissioned.</p> <p>As such, following the operational lifetime of the Project, the land would be reinstated to its original use. Reinstatement would be undertaken in accordance with procedures set out in the Outline Soil Management Plan [EN010147/APP/7.6.1].</p> <p>However, the Applicant acknowledges the importance of the biodiversity and landscape enhancements which will endure beyond the decommissioning of the Project, and does not intend to remove the landscape mitigation planting, which</p>

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				will generate long term ecological benefits.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	<p>Security fencing, or tall fencing such as deer fencing, and security lighting if included in the proposal would also be a great concern. Fences can have an impact on connectivity, since many mammals will not be able to pass them, and lighting should not be permitted at all as the impact in a rural area on wildlife would be significant.</p> <p>The proposed solar farm must also not restrict people's access to nature or their enjoyment of the countryside. Walking along footpaths through farmland with hedgerows is an entirely different experience to walking alongside security fences, security lights (themselves a threat to nature),</p>	Yes	<p>All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained.</p> <p>A lighting strategy, to minimise the impacts of lighting in accordance with the Institute of Lighting Professionals / Bat Conservation Trust guidelines, will implemented, as set out under the Outline Code of Construction Practice [(EN010147/APP/7.6.1)].</p>

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		<p>security cameras, and panels and people's engagement with and appreciation of nature must be factored in to plans. From the information that has currently been made available to us, we understand that deer fencing around 2.1m high might be erected around all the panels. Such fencing would significantly alter the character of the area in terms of people's experience of walking in the area. It would also pose a collision risk for birds and damage connectivity of habitats for wildlife. As well as the fences resulting in the loss of ecological connectivity, the presence of solar panels over such a large area creates a barrier in itself. Some species would avoid areas of solar panels and therefore the fields would become barriers to them. This matter must be addressed and wide corridors (of</p>		<p>Furthermore, no lighting will be permanently switched on. Emergency lighting will only be used, and operated manually.</p> <p>The impacts of habitat severance, connectivity between habitat areas, and the effects of lighting are assessed for all Important Ecological Features in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.</p> <p>Consideration of people's access to nature, in terms of the experience and enjoyment of the countryside, is assessed in Chapter 16 Human Health, and in the Socio Economic Chapter 15, including</p>

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		<p>much greater width than the already proposed field margin areas) of mosaic habitat (woodland, scrub, species rich grasslands and ponds) put in at numerous locations to break up the panelled area and thus reduce this impact on connectivity.</p>		<p>effects on tourism and visitors. [EN010147/APP/6.3] Footpath user surveys were also conducted in the summer 2024, and are reported on in the ES in these Chapters and Chapter 17 on the use of Public Rights of Way.</p>
<p>Berkshire Buckinghamshire & Oxfordshire Wildlife Trust</p>	<p>Site selection and alternatives</p>	<p>Green spaces should not be the first choice location for solar panels. Our region is under huge development pressure with a never ending stream of proposals for new housing or the industrialisation of areas. New developments, and particularly warehouses with huge roofs, should be seen as the first choice for new solar panels. It seems peculiar that enormous warehouses are permitted with huge bare roofs that could have solar panels on them when we</p>	<p>No</p>	<p>The development pressures in the region are also a key driver for renewable energy generation to meet both existing and future needs. Solar panels on roofs are a very important contributor, as recognised in the Government's British Energy Strategy, but will not in their own right provide sufficient energy generation to meet demands, even if they can be connected to the grid or provide a 'private wire'</p>

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		<p>have such a need for renewable energy. Solar farms on green fields represent a semi-industrialisation of part of our countryside, so covering our already industrialised areas with panels where possible, should be the first choice. The more solar there is on buildings the less need for land take there is for solar farms.</p>		<p>connection to a local off-taker. The target for solar ground-mounted energy will continue to be a significant part of the renewable development mix in order to meet targets. The Site Selection and Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3].</p>

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Bladon Parish Council	Land use and agriculture	The predominant land use around Bladon village is for arable farming and a significant amount of this land is classed as Best and Most Versatile Agricultural Land. The use of such land goes against the NPPF principles of protecting high quality agricultural land from development. BPC is also concerned with the loss of arable production at a time when food security is an issue.	Yes	<p>The Applicant notes this comment and appreciates the importance of agricultural land, including best and most versatile soils.</p> <p>Justification for the location of the Project, including the design and environmental constraints considered is provided in ES Volume 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3].</p> <p>Soil surveys have been undertaken to identify the quality of agricultural land within the Project site, which are reported in ES Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information [EN010147/APP/6.5].</p>

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				<p>The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of a Soil</p>

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				<p>Management Plan in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the Development Consent Order (DCO) application.</p> <p>The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p> <p>The Project Description in Chapter 6 of the ES [EN010147/APP/6.3] also explains the Applicant's intention to continue agricultural use in the form of conservation grazing across the majority of the</p>

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				site, and to make areas available for local food growing groups.
Bladon Parish Council	Community Benefit	BPC believes that the development will have a significant impact on the surrounding communities and, should the development be granted permission, the current suggested community benefits are far from adequate to	Yes	The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit that can be provided by the Applicant. The Environmental Statement

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		<p>compensate for such impacts and should be significantly increased.</p> <p>The £50,000 per annum (£59 per MW based on 840MW's) community fund suggested is not comparable to the community funds that other renewable energy projects have provided.</p> <p>For example Tower Hill Solar Farm agreed with Tytherington Parish Council a community fund of £875 index linked per MW per annum for their considerably smaller 6.46MW development. For reference £875 uplifted to Dec 23 price base is approximately £1,189.</p> <p>Research has shown that the average £'000 per MW for solar developments is £3,000 and it should be noted that £3,000 is an average and there are</p>		<p>[EN010147/APP/6.3] and the overall planning balance in the Planning Supporting Statement</p> <p>[EN010147/APP/7.1] has therefore not attached any weight to this fund when assessing the impact of the development.</p> <p>Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES</p> <p>[EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community</p>

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		<p>developments that have agreed £5,000 per MW per annum.</p> <p>Also, due to the extreme size of this development, it will affect significantly more communities than the just one or two villages affected by the Tower Hill Solar Farm, and to expect £50,000 to be shared between approximately 10 other parishes makes the usefulness of the fund redundant.</p> <p>The suggested value of the community fund is considerably lower than funds created from other renewable energy developments. Also, to expect such a low sum to be shared with so many parishes makes the fund redundant and worthless.</p>		Benefit Fund from £50,000 to £200,000 per annum.
Bladon Parish Council	Community Benefit	From the information available at this time, it is not clear how any benefits provided by the creation of solar power under this proposal	Yes	The Very Special Circumstances, in terms of the justification for inappropriate development

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>can outweigh the detrimental impact on the Green Belt and biodiversity, the permanent physical and visible changes to the landscape, the loss of amenity for the public and the loss of BMV agricultural land from arable production.</p>		<p>in the Green Belt, are set out in Appendix 8 of the Planning Supporting Statement. The Planning Supporting Statement also sets out the planning balance of benefits against harm. [EN010147/APP/7.1]</p> <p>A thorough environmental impact assessment has been undertaken, the results of which are presented in the Environmental Statement [EN010147/APP/6.3].</p> <p>Justification for the location of the Project, including the design and environmental constraints considered is provided in ES Volume 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Chapter 20 provides the Summary of Significant Effects and Cumulative Effects and Inter-relationships [EN010147/APP/6.3] .
Bladon Parish Council	Community Benefit	<p>It is not clear which groups have been approached for input into possible community projects or the outcomes of those discussions. For example, have local allotment groups or parish councils been contacted to see if there is a demand for more allotments in their areas?</p> <p>It is not clear why Cherwell Collective and Cutteslowe Community Larder have been approached and not similar charities in West Oxfordshire. The Cherwell Collective and the Cutteslowe Community Larder do not currently serve residents in West Oxfordshire.</p>	Yes	<p>The Applicant has undertaken an iterative and open pre-application consultation and engagement process, which is described in the Consultation Report [EN010147/APP/5.1].</p> <p>This has included considering feedback on potential forms of community benefit, opportunities to explore, and local organisations to engage with. Cherwell Collective operates across the whole of Oxfordshire and supports</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>those suffering from food insecurity across West Oxfordshire, running a cafe in Witney. Cutteslowe Larder will expand across West Oxfordshire with the increased output they will have from our land. Applications from other growers are welcome and a number have been received. We have 30 hectares available for growers. We are working with Good Food Oxford to find additional growers. Proposals for allotments are welcome.</p>
Bladon Parish Council	Cumulative impact	In response to the EIA Scoping Opinion, BPC asked that the developer produce a map to show all of the proposed developments in the surrounding area of the development.	Yes	An updated review of relevant cumulative schemes was completed prior to submission of the ES. These schemes are considered in the individual technical chapters, and a

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>These maps have been provided but it appears that Figure 19.1 Cumulative Developments – Overview does not include the sites shown on Figures 19.2 and 19.3, which show the Cumulative Developments for Cherwell and Vale of the White Horse and Oxford.</p> <p>This omission means that the full impact of the developments is not illustrated, for example it does not show the ribbon of development starting at Wolvercote Roundabout and going along most of the A44 into Woodstock.</p> <p>Table 19.7 in Chapter 19 of the PEIR states that there has been no cumulative effect identified for most of the categories in the table including Landscape and Visual Resources, Ecology and Nature Conservation and Agricultural</p>		<p>summary is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3] Chapter 20 includes associated Figures at Appendix 20.1 [EN010147/APP/6.5].</p> <p>These Figures are divided into three parts for ease of reference; West Oxfordshire (Fig. 20.1), Cherwell (Fig 20.2) and Vale and Oxford City (Fig 20.3). The Figure numbers have changed since the PEIR, as there is now an additional Chapter on Air Quality (Chapter 19).</p>

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		<p>Land Use and Public Rights of Way.</p> <p>BPC would like to understand how once built, the developments in Eynsham, Begbroke and Yarnton, which will be surrounding the proposal and will remove huge areas of land that are currently shown on the plans as open countryside, does not create a cumulative effect on the landscape, ecology, agricultural land or PRowS.</p>		
Bladon Parish Council	General	Based on the limited information provided it is obvious that Bladon Parish and its residents will be significantly affected by this development.	Yes	A thorough environmental impact assessment has been undertaken, the results of which are presented in the Environmental Statement [EN010147/APP/6.3] .
Bladon Parish Council	Historic Environment	The PEIR does not appear to take into account the Conservation Area Character Appraisal for Bladon's	Yes	This issue is addressed in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Conservation Area, which identifies important views out of the village towards the south.</p> <p>BPC asks that the Conservation Character Appraisal is taken into account when assessing the impact of the development on the area.</p>		
Bladon Parish Council	Historic Environment	<p>The PEIR does not acknowledge that St Martin's Church in Bladon is of historical significance.</p> <p>St Martin's is the resting place of Sir Winston Churchill and is visited by a large number of tourists annually and plays host to several memorial events every year.</p> <p>BPC asks that the impact of the proposal on St Martin's and its visitors is assessed as part of the application.</p>	Yes	This issue is addressed in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5].

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Bladon Parish Council	Historic Environment	BPC is also concerned that proposal will have detrimental impact on Blenheim World Heritage Site and other historic and heritage sites in the area due to the visibility of the proposal by all visitors approaching the area along the A44.	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .
Bladon Parish Council	Landscape and visual	The maps provided show that approx. 53% of Bladon Parish (176 hectares) has been earmarked for the development and all of those 176 hectares falls within the Green Belt. Development on Green Belt around Bladon is in contradiction to the National Policy Planning Framework (NPPF) unless exceptional circumstances can be proved.	Yes	Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1] . ['Exceptional Circumstances' relate to Plan Making, not to Decision Making, where the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>No exceptional circumstances have been given in any of the documents available and BPC feels that, due to this being a major planning consideration, the exceptional circumstances should have been provided as part of this consultation.</p> <p>BPC feels that the loss of all the Green Belt around Bladon is unacceptable, especially when considering the other developments proposed in the area. These other developments will be removing large areas of open countryside just outside the boundaries of the designated Green Belt and if the BWSF development is approved, it will result in near continuous development between Oxford and Woodstock.</p>		<p>test is 'Very Special Circumstances']</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Bladon Parish Council	Landscape and visual	Bladon village is surrounded by rolling farmland and much of the landscape is open and visually sensitive. The views southwards out of the village and towards the development have been identified as being important in The Bladon Conservation Area - Conservation Area Character Appraisal. Even with the limited information provided, it is clear that the area around Bladon will be physically and visibly changed. In addition, enclosing of the Public Rights of Way (PRoW) with 2.1m high fencing will create unattractive corridors that will deter users and prevent the free roaming of the larger wildlife in the area.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment considers views from and towards Bladon, including from local footpath networks [EN010147/APP/6.3] Chapter 7 on Historic Environment also considers the setting of the Conservation Area and listed buildings in Bladon [EN010147/APP/6.3] and the latter is supplemented by a Historic Impact Assessment in relation to the Blenheim World Heritage Site [EN010147/APP/6.5] Chapter 16 Human Health also considers the effects of the development on the users of footpaths, including the potential to deter

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				recreational use, and Chapter 9 Ecology and Nature Conservation assesses the potential severance effects on wildlife. [EN010147/APP/6.3]
Bladon Parish Council	Landscape and visual	<p>Due to the poor quality of the uploaded and printed masterplan documents provided, it is not easy to identify some of the infrastructure required for the development; for example, it is not easy to identify the location of the proposed fencing without zooming in quite a lot on the on-line documents.</p> <p>BPC requests that additional plans be provided to show proposed infrastructure and proposed landscaping separately.</p>	N/A	The Applicant prepared and published a range of consultation materials available in various formats to cater for differing preferences and levels of interest and expertise. For example, this includes: a Preliminary Environmental Information Report (PEIR); a Non-Technical Summary of the PEIR; Community Consultation Leaflet; and a Feedback Form.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Bladon Parish Council	Landscape and visual	<p>BPC understands that at this stage not all the visualisation for viewing points that have been identified are available.</p> <p>Of the visualisation's provided, none show how a PRoW enclosed on both sides by a 2.1m fence and fields of panels will create a corridor effect for the users of the footpath.</p>	Yes	<p>The PEIR, published for consultation in November 2023, included a series of visualisations available at the time.</p> <p>The Applicant has continued to prepare further visualisations to support the ES, which are presented as photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 [EN010147/APP/6.4]</p> <p>The Landscape and Visual Impact Assessment (LVIA) and photomontages have been produced in accordance with current best practice guidance. Including the Guidelines for</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Landscape and Visual Impact Assessment (Third Edition) (GLVIA3) and LI TGN 06/19 Visual Representation of Development Proposals.
Bladon Parish Council	Landscape and visual	Since the Phase One Consultation, the buffer zone behind the properties in Bladon has been increased to 25m.	Yes	The Applicant notes this comment, and responds further on the point in the row below.
Bladon Parish Council	Landscape and visual	<p>BPC does not consider a 25m buffer as acceptable due to the impact the proposal will have on the Bladon Conservation area, the recreational facilities in Bladon and also the residential properties.</p> <p>BPC requests that the buffer zones in the area are substantially increased.</p>	Yes	The Applicant carefully considered feedback at the Phase One consultation stage, in terms of the relationship between the settlement and the development, and made changes to create further separation between residential areas and the installation, and to further review the design of the footpath and proposed cycle path route. The impacts of the development upon

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				residential and visual amenity, including the use of footpaths, are considered in detail in the ES in Chapter 8 [EN010147/APP/6.3] and the Heritage impacts are assessed in Chapter 7 [EN010147/APP/6.3]
Bladon Parish Council	Landscape and visual	<p>BPC also concerned with the possible locations of the 81 CCTV that are proposed to be located at the gates and the 4-6 substations proposed within Bladon Parish. It is not clear from the information provided where the proposed gates are to be located and thus where the CCTV is to be located.</p> <p>BPC would like consideration to be given to the location of the CCTV and for the locations to avoid impacting the users of the PRowS and of Bladon Recreation Ground.</p>	Yes	<p>Details of the proposed access gates are provided on the Illustrative Masterplans [EN010147/APP/6.4] and the number of CCTV cameras and their location is identified in the Project Description, Chapter 6 of the ES [EN010147/APP/6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		BPC also requests that the locations of the PCS's are kept as far away as possible from residential and recreational areas and also away from the PRoWs.		
Bladon Parish Council	Local ecology	Due to the lack of information at this stage, such as no baseline assessment and no agreed biodiversity metric, it is not possible to understand how the development will be able to create 70% biodiversity net gain (BNG), especially as, at the moment, the only suggestions are bat and bird boxes, bee hives and log piles.	NA	<p>The Biodiversity Net Gain Assessment is provided in Volume 3, Appendix 9.13. [EN010147/APP/6.5] It is intended that the Project will have a gain of at least 70% Habitat BNG. The Defra Statutory Metric has been used to demonstrate net gain.</p> <p>The outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project.</p>

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Bladon Parish Council	Local ecology	<p>At various points in Chapter 9 - Ecology and Nature Conservation, the land within the proposal is referred to as 'intensive managed agricultural fields'. BPC would like the ES to explain how they have assessed that land as intensively managed.</p> <p>The farmland around Bladon has not been managed intensively and been managed in such a way that the ecosystem is flourishing in the area.</p>	NA	<p>This is in reference to majority of the arable fields within the site being of 'intensive agriculture' as defined within the Cambridge Dictionary.</p> <p>The baseline condition of the habitats on site is set out in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] and associated appendices [EN010147/APP/6.5]. As shown in ES Appendix 9.13 Biodiversity Net Gain Statement [EN010147/APP/6.5], the Project will deliver over 70% habitat net gain demonstrating the uplift in ecological value associated with it, compared to that baseline.</p>

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Bladon Parish Council	Local ecology	Although the PEIR covers the possible impact on certain wildlife it only concentrates on the species that have been identified as important and does not consider the impact on other wildlife in the area such as deer and foxes.	Yes	<p>The scope of survey work was agreed with Natural England during pre-application consultation.</p> <p>Deer and foxes are not of conservation concern and therefore do not require assessment.</p> <p>However, as deer are wide-ranging in their habits and movements, it is not considered that changes in deer movements brought about by perimeter fencing.</p> <p>All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Bladon Parish Council	Local ecology	BPC also request the negative impact on the larger wildlife be considered in the relevant Environmental Statement (ES) and that mitigation be provided to prevent the loss of this wildlife from the area.	Yes	Species of conservation concern have been included in the ES. General mitigation for wildlife is included in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.
Bladon Parish Council	Noise and Vibration	BPC is also concerned with the location of the PCS and the noise that will be generated from their operation. The PEIR indicates that the noise level will be 67db at 10 metres. There are several PCS located in Bladon Parish including near the residential areas of Heath Lane and Church Street, in the field adjacent to Bladon Recreation Ground and in close vicinity to many footpaths that run through the development.	Yes	Noise from the operational phase of the Project is considered in Section 13.8, and Volume 3: Appendix 13.3: Operational Phase Noise [EN010147/APP/6.5] .

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Bladon Parish Council	Noise and Vibration	BPC is concerned that the topography of the Parish has not been taken into account when assessing the noise impact from these PCS and other noise making pieces of infrastructure. There are many locations around Bladon Village where the topography means that sound bounces around and is magnified.	Yes	As set-out in Volume 3: Appendix 13.3: Operational Phase Noise [EN010147/APP/6.5] , noise from the PCS units, and topography has been included into the computer noise model which has been used to establish noise emissions from the PCS units.
Bladon Parish Council	Noise and Vibration	It is likely that the due to this effect that the sound from the PCS will be heard at St Martin's Churchyard and the burial site of Winston Churchill, and by the users of the PRowS.	Yes	As set-out in Volume 3: Appendix 13.3: Operational Phase Noise [EN010147/APP/7.5] , noise from the PCS units is shown to cause a minor adverse impact at residential receptors. There are residential receptors on Church Street, Bladon. These receptors are located closer to the Project than St Martin's

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				Churchyard and the burial site of Winston Churchill. Therefore, the noise impact at St Martin's Churchyard and the burial site of Winston Churchill will be less than minor adverse. Any users of the PRow are considered to be transient receptors, and less sensitive to noise than residential receptors.
Bladon Parish Council	Noise and Vibration	BPC requests the ES takes into account the topography when assessing all noise impacts.	Yes	As set-out in Volume 3: Appendix 13.3: Operational Phase Noise [EN010147/APP/6.5] , the existing site topography has been included into the computer noise model which has been used to establish noise emissions from the PCS units.

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Bladon Parish Council	PEIR	<p>After reviewing the information provided it is clear that this proposal is lacking detail in many areas and that the detail will only be available when the Environmental Statements are submitted with the Development Consent Order (DCO).</p> <p>This lack of information means that Bladon Parish Council is unable at this stage to provide detailed comments on issues such as the impacts on the landscape character of the area and the local biodiversity, the loss of amenity for the public and the loss of good quality agricultural land and Green Belt.</p>	No	The Applicant prepared and published a range of consultation materials available in various formats to cater for differing preferences and levels of interest and expertise. For example, this includes: a Preliminary Environmental Information Report (PEIR); a Non-Technical Summary of the PEIR; Community Consultation Leaflet; and a Feedback Form.
Bladon Parish Council	Public Rights of Way	It is proposed that fencing will be erected adjacent to all existing and proposed PRowS within the development. This fencing will create a corridor effect along the PRowS.	Yes	The Applicant notes this comment and appreciates the importance of Public Rights of Way. The impacts of the Project with respect to recreational resources,

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		<p>It is not possible from the information provided to see how wide the PRowS will be and thus the width of the corridors. BPC is concerned that due to Oxfordshire County Council's on-line definitive map not having a record of the widths of many of the PRowS that are identified in the proposal that only the minimal legal requirement for PRowS will be used. These are currently: -</p> <ul style="list-style-type: none"> • Footpaths Cross-field/other 1m • Footpaths Field-edge 1.5m • Bridleways Cross-field/other 2m • Bridleways Field-edge 3m <p>The creation of narrow corridors with 2.1m fencing either side will impact both the users of the network and the wildlife in the area.</p>		<p>including public footpaths and bridleways, are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3]. Measures adopted as part of the Project to mitigate impacts on land use and recreation are provided in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes preparation of PRow Management Strategy in general accordance with the Outline PRow Management Strategy [EN010147/APP/7.6] submitted with the</p>

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		<p>There are concerns about personal safety when walking along the corridors that will be created by the high and continuous fencing.</p> <p>There are hundreds of kilometres of PRowS throughout the development. There is over 5.8km of PRowS in the development area behind Bladon Village between Bladon Heath and the A44.</p> <p>This 5.8km represents all of the PRowS available and easily accessible by Bladon residents.</p> <p>Of the 5.8km of PRow, all but approximately 840m will be surrounded on both sides by solar panels and 2.1m fencing. The remaining 840m will have solar panels and fencing one side. This means that users of the PRowS</p>		<p>application for development consent.</p> <p>The measures to be implemented as part of the PRow Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g., NCRs, Long Distance Footpaths) during construction of the Project.</p>

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		<p>around Bladon will have not any PRowS available to them that are not surrounded by a continuous view of solar panels and fencing. The only other option for recreational walking is within the grounds of Blenheim Palace.</p> <p>The amenity of the PRowS network will be impacted and the creation of corridors will make the footpaths no longer attractive to users of the network for recreational purposes. This loss of amenity will have a negative impact on health and wellbeing.</p> <p>BPC request that development in the proximity of the PRowS is avoided and that if this is not possible then the width of the PRowS should include a considerable sized buffer so that amenity of the PRowS can be preserved.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Bladon Parish Council	Public Rights of Way	Larger wildlife such as Badgers, Foxes and Deer will no longer be able to freely roam across most of the proposal, which includes 176 hectares within Bladon Parish. This inability to free roam will affect their natural pathways and their behaviour and may force many of the larger wildlife out of the area. The loss of larger wildlife will have a negative impact on the biodiversity in the area.	Yes	All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. As deer are wide-ranging in their habits and movements, it is not considered that changes in deer movements brought about by perimeter fencing.
Bladon Parish Council	Public Rights of Way	BPC also request the negative impact on the larger wildlife be considered in the relevant Environmental Statement (ES) and that mitigation be provided to prevent the loss of this wildlife from the area.	Yes	Deer are not of conservation concern and therefore do not require assessment. All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained.

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Bladon Parish Council	Recreation and amenity	The suggested change of footpaths 132/2/10, 265/26/10 and 124/12/10 to create a cycle path will require a legal order to allow cycling along the route.	Yes	The Applicant notes this comment. The Applicant has undertaken discussions with OCC, including the PRow officer and Public Health team, and will continue to develop the approach to public access and the management of rights of way, active travel and mitigation, through the advancement of Statements of Common Ground, prior to examination.
Bladon Parish Council	Recreation and amenity	BPC is concerned that the change of the footpath into a cycle route will cause conflict between cyclists and both the existing vulnerable users of the path and the regular vehicles which use the road to access the properties along the lane. It should be noted that the start of the proposed cycle route is continuously used by children and	Yes	The Applicant has undertaken discussions with OCC, including the PRow officer and Public Health team, and will continue to develop the approach to public access and the management of rights of way, active travel and mitigation, including the safe use of shared routes,

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		parents accessing the school and that the remainder of the path is used extensively for recreation.		through the advancement of Statements of Common Ground, prior to examination.
Bladon Parish Council	Recreation and amenity	It may be appropriate to improve the bridleway that runs from Heath Lane directly to Begbroke to make it more accessible to cyclists, which are allowed to cycle on a bridleway.	Yes	The Applicant notes this comment.
British Transport Police	Project Description	Having looked at the project details, I can confirm that I have no immediate concerns with the project - on the provision that the Safety & Security of the Railway is not in any way undermined and any mitigation to prevent trespass onto the railway is considered.	Yes	The Applicant notes this comment from the British Transport Police. Safety Risk Assessments will be developed as part of the EPC stage. As part of this design development, risk assessment will have to be undertaken, by the designers, for the inherent risks associated with the construction, operation, and dismantling of the scheme.

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Cassington Parish Council	Construction	Currently detailed traffic and construction management plans are not available for evaluation. However, given the construction of the proposed solar power station will take two years, involve numerous traffic movements, pile driving foundation modules for solar arrays to a depth of 2.5m, earthworks and other infrastructure we suspect that disturbance to the communities in the Parish of Cassington will be high given its proximity to the central area. Following construction there will also be disturbance from maintenance of the solar power station (7 days a week) as well as general noise associated with operation. Heat island effects will also be likely to be relevant with such a large acreage of solar arrays in such close proximity to residential areas. This may lead to higher	Yes	Noise from the construction phase of the Project is considered in Section 13.8, and Volume 3, Appendix 13.2: Construction Phase Noise and Vibration [EN010147/APP/7.6] . Noise from the operational phase of the Project is considered in Section 13.8, and Volume 3: Appendix 13.3: Operational Phase Noise [EN010147/APP/7.5] . The impacts of construction traffic are assessed in Chapter 12 Traffic and Transport [EM010147/APP/6.3] and the ES is supported by an Outline Construction Traffic Management Plan, which sits within the wider Outline Code of Construction Practice [EN010147/APP/7.6.1] .

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		<p>than ambient temperatures during the summer leading to health effects and disturbance of residents.</p>		<p>On-going management is considered in the Outline Operational Management Plan [EN010147/APP/7.6.2] The Applicant notes concerns raised regarding the potential for solar heat island effects. However, the scientific literature on this issue is sparse and the available evidence indicates that any effect is likely to be relatively small and geographically limited in the context relevant to this project (for example, Fthenakis and Yu 2013). The Applicant notes that the studies that tend to identify solar heat island effects tend to be from arid or desert contexts (Barron-Gafford et al 2016), with the greatest temperature</p>

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				<p>variations being at night and within the array areas. Recent studies show solar farms may have a cooling effect (Xu et al., 2024). The role of vegetation within the Project, including the planting of trees and hedgerows is likely to contribute to cooling and shade for those passing through array areas. The Applicant does not consider there to be the potential for a likely significant population health effect on this issue and as such it has not been scoped into the Environmental Assessment.</p>
Cassington Parish Council	Hydrology and flood risk	As detailed in the document Cassington Parish Council: Response to Scoping Report for Botley West Solar Farm, June 2023 we believe that for	Yes	The Applicant acknowledges the existing flow pathway at Worton Farms, which appears to

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Cassington, Jericho Farm and Worton surface water flooding is a significant issue associated with this development. Elm's Road in the village of Cassington is particularly vulnerable to surface water flooding events which result from surface water draining off the high ground of the fields to the north of Cassington. This is consistent with flooding of properties on Elm's Road in 2007. Foxwell Court, St Peter's Close, Horsemere Lane, Foxwell End and Reynold's Farm are also at risk of flooding from extreme surface water events. Outside the village Jericho Farm and Worton are also vulnerable to flooding and the road junction to Worton Farm was flooded over the winter of 2020/2021. Following the 2007 flood events action was taken to mitigate future surface-water flooding including the clearing of</p>		<p>correlate to runoff from adjacent fields.</p> <p>Due to the proximity to the railway line and Cassington Wastewater Treatment Works, it was not deemed feasible to propose betterment to pre-existing flood risk at this location. Surface water attenuation measure, to achieve betterment in terms of the existing flooding issues, have, however, been proposed closer to the northern side of Cassington – see Illustrative Masterplan Fig. 2.2D [EN010147/APP/6.4]</p> <p>In line with the wider Project, a Surface Water Drainage Strategy for the Project has been prepared</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>previously blocked drains and the building of a drainage pond behind the southwest corner of the playing fields. Since this time there have been no further property flooding events in Cassington village although the threat remains as demonstrated by near flooding in the winter of 2022-2023 and 2023-2024.</p>		<p>and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5]. Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use. The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module. A second environmental benefit of solar PV modules are soil quality improvement from cessation of intensive</p>

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				<p>arable use and organic management of the land. It is expected that soil health will be improved through the Project.</p> <p>As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of panels. These measures ensure there is no significant increase in runoff or gully erosion.</p> <p>The FRA, Volume 3 Appendix 10.1, concludes that as a result of the solar Project there is no increase</p>

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				flood risk on-site and off-site in line with the NPPF and NPS. [EN010147/APP/6.5] .
Cassington Parish Council	Hydrology and flood risk	Studies of how utility-scale solar power stations impact hydrology are relatively few at present. However, the studies that do exist show changes in soil moisture content associated with solar panel arrays and also increases in surface water runoff (e.g. Pisinaras et al., 2014; Yavari et al., 2022). Alterations in hydrology also have the potential to increase soil erosion in some circumstances (e.g. Yavari et al., 2022). One aspect of solar array design which influences runoff of rainwater is the tilt angle and orientation of the solar panels at a given site (Yavari et al., 2022).	Yes	<p>The Applicant notes that studies are limited in regard to solar schemes.</p> <p>A full comprehensive literature review has been provided in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5].</p> <p>This includes a review of the provided literature in the context of the Project.</p> <p>Notably the impact of solar panels on surface water runoff is dependent on the embedded mitigation proposed as part of the study. Notably the drainage</p>

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				<p>strategy proposed seeks to have vegetation cover across the PV array areas and beneath the panels themselves.</p> <p>Research undertaken by Cook and McCuen (2013) found that provided full vegetation cover beneath the solar panels is maintained, the change in runoff characteristics from solar farm sites is likely to be insignificant and that ground cover has a much more important control over runoff.</p> <p>The Project includes for seeded vegetation below and between rows of the solar PV modules to help interrupt and slow the channelised flows, reducing</p>

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				erosion and also enhance and promote the infiltration and interception capacity. Further information on the surface water drainage is available in Volume 3 Appendix 10.2 Surface Water Drainage Strategy.
Cassington Parish Council	Hydrology and flood risk	RPS dismiss the scientific literature cited in the Cassington response to the Scoping report by stating that the studies are mostly based on situations not relevant to the UK (i.e. lands which are typically drier than the UK and subject to sporadic heavy rainfall). However, periods of drought interspersed by extremely heavy rain are exactly the type of weather pattern we are seeing in the UK as a result of climate change. The PEIR offers three main mitigations for flood risk, the slope of the panels	Yes	<p>The Applicant acknowledges that there is a pre-existing surface water runoff risk at Cassington.</p> <p>Surface water modelling was undertaken at Cassington, which was a highlighted area subject to existing flood risk, and the report is provided Volume 3, Appendix 10.5: Surface Water Modelling Report [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>aimed at reducing speed of runoff, vegetated spaces between the solar arrays and the use of swales (vegetated drainage channels) at the downhill sides of the solar arrays. We note that compression of the soil will result from vehicle movements, earthworks and the extensive driving of foundations for solar arrays into the land on which the solar power station will be constructed. This has been identified as a major contributor to flood risk in the UK (ADAS, 2023). This is also likely to damage existing field underdrainage. Unlike many other solar power stations which are located on flat land this scheme is proposed for sloping land forming the vales around the Evenlode, Glyme and Thames. Layers of clay are a feature of these soils, and it is notable that the land to</p>		<p>Surface water attenuation has been built into the design of the site to reduce the baseline flood risk at this location, as betterment.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the east of Cassington earmarked for this scheme (to the north of the sewage works) is permanently wet usually with standing water across the entire slope during the winter (hence the name Springhill for the nearby farm). During periods of heavy rainfall water will simply runoff the vegetated topsoil so this measure, one of the three mentioned in the PEIR will not function at the point when most needed. Flood mitigation for Cassington has therefore not been considered in detail in the PEIR and many factors remain unaccounted for or not based on a solid grounding of scientific evidence. We therefore remain unconvinced that the measures proposed will be sufficient to prevent flooding of households in the parish.</p>		

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Cassington Parish Council	Land use and agriculture	<p>Despite the claims of Dominic Hare, the CEO of Blenheim Estates that the Botley West Utility-Scale Solar Power Station will be located on “poor” agricultural land (e.g. Cassington Parish Council Meeting, 1st December, 2022 referring to Grade 3B land) it is now clear that much of the proposed site is Grades 1, 2 and 3A, in other words Best and Most Versatile (BMV) land. PVDPs own estimates indicate that 38% of the land covered by the Utility-Scale Solar Power Station is on BMV land. According to estimates provided to Stop Botley West based on GIS studies solar panels in the central site will be positioned on land which is 80% BMV. The NPPF guidelines direct that planning decisions should:</p> <p>“enhance the local environment”</p>	Yes	<p>The Applicant notes this comment and appreciates the importance of agricultural land, including best and most versatile soils.</p> <p>Justification for the location of the Project, including the design and environmental constraints considered is provided in Volume 1, Chapter 5: Alternatives Considered of the ES [EN010147/APP/6.3]. Soil surveys have been undertaken to identify the quality of agricultural land within the Project site, which are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>by “recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”</p> <p>“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.”</p> <p>Chapter 15 Para 181 62.</p> <p>The Botley West Utility-Scale</p>		<p>The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of a Soil Management Plan in</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Solar Power Station does not conform to the guidance by the NPPF and neither are alternatives that might site the proposal on less high-quality farmland considered by the applicants.		<p>general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the Development Consent Order (DCO) application.</p> <p>The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p>
Cassington Parish Council	Land use and agriculture	Loss of viable farms in the Parish of Cassington also detracts from the landscape as well as depriving the U.K. of productive farmland. This has been the cause of considerable stress to our farmers (as revealed by interventions of one of farmers at the Parish Council meeting of the 1 st December 2022).	Yes	<p>The Applicant notes this comment and appreciates the importance of agricultural land in providing food to the UK.</p> <p>Justification for the location of the Project, including the design and environmental constraints considered is provided in Volume 1,</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Chapter 5: Need, National Planning Policy and Alternatives Considered of the ES [EN010147/APP/6.3]. The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the Development Consent Order (DCO) application.</p> <p>The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project. These measures also include the preparation of a Code of Construction Practice in general</p>

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				<p>accordance with the Outline Code of Construction Practice [EN010147/APP/7.6] submitted with the application for development consent.</p> <p>The measures to be implemented as part of the Code of Construction Practice seek to limit disruption to the operation of individual farm holdings through effects on access to land.</p>
Cassington Parish Council	Landscape and visual	The Botley West Utility-Scale Solar Power Station represents a development the size of Heathrow Airport being dropped into the rural landscape of West Oxfordshire, Cherwell and the Vale of the Whitehorse. The entire area represents a mosaic of habitats which is	No	The Applicant notes this comment.

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		interconnected by the valleys of the Rivers Dorn, Glyme, Evenlode, Windrush and Thames. These form a coherent north-south river valley landscape of consistently high quality and sensitivity which is straddled by the Blenheim Park WHS at its heart, between the proposed Northern and Central development sites. The Parish of Cassington will have 50% of its area covered by the proposed solar power station. 75% of the scheme is on greenbelt land.		
Cassington Parish Council	Landscape and visual	The proposed scheme is directly in contradiction to the NPPF Chapter 13 (Protecting Greenbelt Land) Paragraphs 152, 153 and 156. The development is clearly very harmful to the greenbelt of the City of Oxford and its purposes; "very special circumstances" to locate Botley West Utility-Scale Solar Power	Yes	Planning Policy and the overall balance of harm and benefits is considered within Planning Supporting Statement (PSS), including the case for Very Special Circumstances, which form Appendix 8 to the PSS [EN010147/APP/7.1] .

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		Station on the greenbelt have not been demonstrated and alternatives to this scheme have not been considered likely because these do not result in large financial benefits to the landowners and developers.		Chapter 5 of the ES considers the Alternatives Considered [EN010147/APP/6.3] .
Cassington Parish Council	Landscape and visual	<p>To the people of Cassington this development will be utterly transformative. The rural views to the north of the village enjoyed by some of our households and the many of the rights of way currently enjoyed by many of our residents, for exercise, leisure and watching wildlife will be converted to an industrial landscape of solar arrays, power converter stations and high voltage transformers as well as fencing and other infrastructure such as security cameras.</p> <p>Proposed mitigations to these losses of visual landscape,</p>	Yes	<p>The Applicant notes this comment and appreciates the importance of topics such as green belt, ecology, agricultural land, and landscape.</p> <p>A thorough environmental impact assessment has been undertaken, the results of which are presented in the Environmental Statement [EN010147/APP/6.3].</p>

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		amenity and wellbeing are wholly inadequate. Some of our residents are so traumatised by this proposal that they have left the consultations in tears, and many are suffering stress as a result of the prospect of the change in our lives that this proposal will bring.		
Cassington Parish Council	Local ecology	It is noted that consideration has been given to the importance of Long Mead Wildlife Site and that Horizontal Directional Drilling is planned for the cable route (as opposed to more damaging methods) which appears to be beneficial. Method statements would highlight potential risks if provided.	Yes	The cable route has been amended to avoid the LWS with HDD now planned from undesignated fields, under the flood meadows and the Thames.
Cassington Parish Council	Local ecology	The land of the Parish of Cassington comprises a mosaic of habitats including farmland, hedgerows, tree lines bordering fields and tracks, woodland and river valleys and associated flood	Yes	The impacts of the Project on Important Ecological Features are fully assessed in the ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and

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		<p>meadows. This mosaic of habitats leads to a rich and diverse fauna and flora significant elements of which will be severely degraded or even lost as a result of this scheme. This is because many elements of the wildlife, especially birds require farmland in rotational cropping, along with hedgerows and other landscape features to thrive. As demonstrated by the PEIR the land in questions hosts healthy populations of Red Listed birds (e.g. yellowhammers, linnets and corn bunting), bats, badgers, hares and other wildlife. The mitigation measures laid out by the PEIR are inadequate to compensate for the massive loss of habitat for these animals where they are sensitive to the presence of solar arrays and other infrastructure. Furthermore, important elements of the</p>		<p>Nature Conservation, with suitable mitigation proposed to be implemented where necessary, such as additional hedgerow and tree planting, and skylark plots.</p> <p>The Biodiversity Net Gain Assessment is provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13.</p> <p>It is intended that the Project will have a gain of at least 70% Habitat BNG. The Defra Statutory BNG Metric has been used to demonstrate net gain.</p> <p>An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and</p>

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		<p>environmental mitigation plans are missing from the PEIR, including the Biodiversity Net Gain Report and the Environmental Management Plan. The latter is particularly important in understanding the management of mitigation measures throughout the lifetime of the scheme. Cassington Parish Council therefore regards this scheme as having significant impacts on wildlife over a large area of the Parish and wider area of the proposed solar power station.</p>		<p>an Outline Code of Construction Practice in EN010147/APP/7.6.1.</p> <p>The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.</p>
Cassington Parish Council	Local ecology	<p>The region around the Thames, Evenlode and wider area has the potential for considerable restoration activity and further national-level designation at the highest level for nature conservation and landscape preservation. The countryside around Cassington is included in</p>	Yes	<p>The Applicant notes this comment, and has been in discussions with the Evenlode Catchment Partnership, Natural England and the host authorities, including in regard to nature recovery network opportunities that</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the current Nature Recovery Network for Oxfordshire. We believe that the development of the Botley West Utility-Scale Solar Power Station, despite ideas being put forward of a nature corridor along the Evenlode by the developers, will actually prevent such nature recovery activities from reaching their full potential and will damage wildlife dependent on a mosaic of habitats including farmland. This opportunity cost is not considered by PVDP or their consultants. Such nature restoration plans could also be coupled with a wider network of footpaths and cycleways, community solar and other forms of sustainable living in a much more effective and inclusive manner than is offered by the current proposal. As such, if adopted, Botley West would represent opportunity loss rather</p>		<p>the development can bring. The proposals for a landscape scale managed area in the Evenlode Valley part of the Project site is a direct reflection of this, and has been part of the Applicant's overall ambition since the earliest stages of the work, and prior to the first phase of consultation.</p>

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		<p>than gain for the people of our Parish and Oxford City and Oxfordshire as a whole.</p>		
Cassington Parish Council	PEIR	<p>The PEIR submitted by RPS on behalf of PVDP was an inadequate basis on which to allow members of the public to understand the proposal, its risks and proposed mitigations. Despite its enormous length, at more than 7,000 pages, vital documents and data were missing from the PEIR. Examples included the Traffic Management Report, the Biodiversity Net Gain Report and the Environmental Management Plan. Despite PINS advising PVDP during the Scoping Report and during a meeting of September 2023 no justification was provided in the PEIR of the enormous take of</p>	Yes	<p>The Applicant has undertaken a comprehensive pre-application consultation on the Project, which is described and evidenced in the Consultation Report [EN010147/APP/5.1]. The Applicant's approach to consultation has been informed by and complied with the requirements of the 2008 Act, and associated guidance and legislation. The Applicant's strategy of coordinating consultation activities across the Project has resulted in a high level of engagement and</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Greenbelt Land by this proposal. We ask how the public are supposed to adequately engage with the consultation process if such critical information is not supplied to inform opinion, questions and suggestions as to how the scheme could be improved or whether it should be rejected.</p> <p>A further issue with the PEIR is that it has not been provided with an adequate index. This makes navigating such an enormous document impossible. Given the limited time to examine such a document this omission is a serious one as readers cannot focus on specific areas of the PEIR to lift information relevant to their questions.</p> <p>Space devoted to the hard copy of the PEIR in Eynsham Library</p>		<p>consultation responses, as described in the Consultation Report.</p> <p>The Applicant purposely carried out the Section 42 consultation and phase two Section 47 consultation in parallel to enable consultation on the PEIR with Section 42 consultees and the community. A consultation period of 70 days was provided for responses to the PEIR and phase two consultation information, exceeding the statutory requirement of 28 days. The Applicant considered the period of 10 weeks to be sufficient time to engage with the consultation materials provided.</p>

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		<p>was inadequate for examination of the multiple folders making up the report.</p>		<p>To support responses to the consultation, the Applicant published a range of consultation materials including a Community Consultation Leaflet summarising the proposals, a Non-Technical Summary of the PEIR, held a series of in-person and online information events where the proposals could be discussed with members of the Applicant's Project Team, and hosted free-to-use Project communications channels for enquiries.</p> <p>The DCO submission contains detailed reports and management plans, including those needed to address Biodiversity Net Gain, transport and construction management,</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>and the Very Special Circumstances to support development in the Green Belt.</p> <p>The Applicant is grateful to all residents, consultees and interested parties that have taken the time to engage with and respond to the consultation activities undertaken.</p>
Cassington Parish Council	The Consultation Process	The developers have engaged in two rounds of public consultation, an informal consultation, which took place in December 2022, and the Phase Two Consultation, which has taken place in December and January 2023/2024. Cassington Parish Council notes very little change of material consequence to its Parishioners in the proposed scheme since the Phase One Community Consultation which is	No	<p>The Applicant notes this comment and has prepared a Consultation Report [EN010147/APP/5.1] to explain and detail the pre-application consultation undertaken, the feedback received, and the Applicant's consideration of this feedback.</p> <p>The Applicant's approach to consultation, as described</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>a concern as the scheme will cover approximately 50% of the land of the Parish. The proposed Utility-Scale Solar Power Station, possibly the largest in Europe and amongst the largest in the world still entirely dominates the land to the north and northeast of the village, it comes to within 15m of our resident's property and many questions regarding mitigation of impacts to flood risk and to the natural environment remain unanswered or answered in vague terms.</p> <p>We question the utility of a consultation process that results in little perceivable change to the proposed project. We also note that according to the Gunning Principle (Local Government Association, 2019), No. 1 states that for proper consultation to take place proposals should still</p>		<p>in Chapter 1 of the Consultation Report [EN010147/APP/5.1] involved undertaking a series of defined phases of consultation during the pre-application period, providing opportunities to understand and comment on the Project at varying levels of detail prior to the submission of an application for a Development Consent Order.</p> <p>The Applicant published a Consultation Summary Report between the Phase One consultation held in November - December 2022 and the Phase Two consultation held in November 2023 - February 2024 phases of consultation to summarise the feedback</p>

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		<p>be at a formative stage. Specifically: "A final decision has not yet been made, or predetermined, by the decision makers". Furthermore Principle No. 4 states that 'conscientious consideration' must be given to the consultation responses before a decision is made. Specifically: "Decision-makers should be able to provide evidence that they took consultation responses into account".</p>		<p>received during the phase one consultation and how this feedback was being considered to inform the Project.</p> <p>The Applicant's consideration of feedback received is summarised in chapters 10 and 11 of the Consultation Report [EN010147/APP/5.1].</p> <p>The Applicant is grateful to all consultees and interested parties that have taken the time to engage with and respond to the consultation activities undertaken.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cassington Parish Council	The Consultation Process	The Phase Two Consultation straddled the Christmas and New Year Period despite requests from Stop Botley West, CPRE Oxfordshire and others to move the period of the consultation to after the holidays to enable residents the best opportunity to engage and feed into the process. These requests were ignored and given the huge size of the material provided by PVDP (i.e. the PEIR being over 7,000 pages long), and despite an additional time allocation over and above the legal requirement for consultation we believe that this gave Parishioners insufficient time to fully comprehend and assess the proposed scheme. It is therefore the case that Parishioners are unlikely to have been fully informed when engaging with the public events scheduled by PVDP, including the	No	<p>The Applicant has undertaken a comprehensive pre-application consultation on the Project, which is described and evidenced in a Consultation Report [EN010147/APP/5.1].</p> <p>The Applicant's approach to consultation has been informed by and complied with the requirements of the 2008 Act, and associated guidance and legislation. The Applicant's strategy of coordinating consultation activities across the Project has resulted in a high level of engagement and consultation responses, as described in the Consultation Report.</p> <p>The Applicant purposely</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>one in Cassington on the 12th of January. Coming back to the Gunning principles, No. 3. States that “there is adequate time for consideration and response”. Specifically:</p> <p>“There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation, despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of the impact of the consultation”.</p> <p>The Phase Two Community Consultation Leaflet was only distributed just before Christmas 2023 and therefore it may have been lost or discarded by householders in the busy period</p>		<p>carried out the Section 42 consultation and phase two Section 47 consultation in parallel to enable consultation on the PEIR with Section 42 consultees and the community. A consultation period of 70 days was provided for responses to the PEIR and phase two consultation information, exceeding the statutory requirement of 28 days.</p> <p>The ten week consultation period exceeded the minimum eight week consultation period originally suggested in the draft SoCC. The Applicant increased the consultation period to account for the festive period overlapping with the consultation period.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>before Christmas. Notwithstanding this issue this is the document which most Residents are likely to have read. The contents of this document were superficial and largely highly biased towards the proposal. Many details of aspects of the proposal referred to in the Phase Two Consultation Leaflet are not even addressed in the PEIR (e.g. the Traffic Management Plan).</p> <p>Members of the Parish Council attended the Cassington Consultation Event and both of the online consultation events. At the Cassington event specialist consultants were not available on Hydrology or Ecology. Both of these areas are of significant importance to the residents of Cassington.</p> <p>At times during consultations our</p>		<p>Accordingly, no public information events were held 10 days prior to Christmas Day or 10 days following New Year's Day. The Applicant considered the period of 10 weeks to be sufficient time to engage with the consultation materials provided.</p> <p>To support responses to the consultation, the Applicant published a range of consultation materials including a Community Consultation Leaflet summarising the proposals, a Non-Technical Summary of the PEIR, held a series of in-person and online information events where the proposals could be discussed with members of the Applicant's Project</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>residents were dealt with in a brusque manner by the representatives of PVDP and RPS. This left our residents frustrated and in some cases in tears.</p> <p>The online consultation events were highly unsatisfactory. At the event for Parish Councils attendees could only propose questions via the chat box (no audio available) which provided no opportunity for rebuttal or clarification of any of the replies provided by the panel. To compound the frustration, once the question had been "answered" by the panel, the chat box indicated that "this question was answered online". This was not the case, and the panel were challenged (via the chat box!) to this effect. None of the questions put forward by Cassington Parish</p>		<p>Team, and hosted free-to-use Project communications channels for enquiries.</p> <p>The Applicant is grateful to all residents, consultees and interested parties that have taken the time to engage with and respond to the consultation activities undertaken.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Council were addressed. The event on the 23rd of January was chaired by a member of Counter Context, the communications company employed by PVDP. The format was the same as the Parish Council Event. The questions selected for answering by the panellists Marc Owen Lloyd and consultants from RPS were in favour the scheme and generally allowed the panel to cast the proposal in a positive light. None of the questions submitted by Cassington Parish Councillors were answered. At one stage the online consultation comprised of extolling a series of positive aspects of the proposed scheme, in other words pure propaganda. If the developers were serious about the online consultation being useful to the public, then it should have been chaired by a neutral party.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Overall, for such a large and significant proposal for our Parishioners, insufficient information has been provided for intelligent consideration. This is in direct contravention of Gunning Principle No. 2: "there is sufficient information to give 'intelligent consideration'". Specifically:</p> <p>"The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response".</p>		
Cassington Parish Council	Hydrology and flood risk	<p>The village [Cassington] is currently at high risk of surface-water flooding from the fields to the north of the village which slope down from north to south. Flooding events have in the past particularly affected Elms Road.</p>	Yes	<p>The Applicant notes this comment.</p> <p>In line with the wider Project, a Surface Water Drainage Strategy for the Project has been prepared</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5].</p> <p>Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use.</p> <p>The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module.</p> <p>A second environmental</p>

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				<p>benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project.</p> <p>The FRA, Appendix 10.1, concludes that as a result of the solar Project there is no increase flood risk on-site and off-site in line with the NPPF and NPS [EN010147/APP/6].</p>

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Cassington Parish Council	Recreation and amenity	Many of our residents enjoy walking on the footpath that reaches a high point just before Purwell Farm which not only gives open views of green countryside to the east, southeast and south all the way to Oxford and Wytham Wood, but also the opportunity to view wildlife such as farmland birds.	Yes	The Applicant notes this comment. The local network of paths, views available from them, the health benefits of using them and the impacts of construction upon them are considered in the ES [EN010147/APP/6.3]
Cassington Parish Council	Planning policy	As stated in the NPPF Chapter 15 Paragraph 180: "Planning policies and decisions should contribute to and enhance the natural and local environment by: recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land,	Yes	Impacts on wildlife, landscape, greenbelt and health have been considered through the chapters of the Environmental Statement [EN010147/APP/6.3] . Impacts on local residents have been evaluated throughout the EIA, and can be read in Chapter 20 "Summary of Significant

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		<p>and of trees and woodland;"</p> <p>Loss of the currently beautiful and open landscape to the north of Cassington will have a serious impact on ecosystem services provided by the land to the residents of the Parish. This will mainly be in the form of cultural services in terms of amenity gained from exercise, walking and viewing wildlife in the open countryside of the current landscape and greenbelt. Such amenity is important to the health and well being of our Parishioners. Furthermore, some of our residents will be within 15m of the proposed scheme and thus will suffer an immediate and long-lasting impact to the quality of their lives.</p>		<p>Effects" [EN010147/APP/6.3].</p>

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Cotswolds National Landscape	General	<p>The Board recommends that the applicant also has regard to this statutory duty and should also take into account the following Board publications in the preparation of any such application 4:</p> <ul style="list-style-type: none"> •Cotswolds National Landscape Management Plan 2023-2025 ; in particular Policies CE1 (Landscape), CE4 (Tranquillity), CE5 (Dark Skies) and CE11 (Major Development); •Cotswolds AONB Landscape Character Assessment particularly, in this instance, with regards to Landscape Character Type (LCT) 16 (Broad Floodplain Valley); •Cotswolds AONB Landscape Strategy and Guidelines particularly, in this instance, with regards to LCT 16 , including Section 16.4; •Cotswolds AONB Local 	Yes	<p>A summary of local planning policy is detailed in Table 8.4 of Chapter 8: Landscape and Visual Resources [EN010147/APP/6.3]. This includes a review and reference to the Cotswolds National Landscape (AONB) Management Plan 2023-2025, referring to policies of relevance to the Project.</p>

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		<p>Distinctiveness and Landscape Change ;</p> <ul style="list-style-type: none"> •Cotswolds National Landscape Climate Change Strategy ; •Cotswolds National Landscape Board Position Statements particularly, in this instance, with regards to the Renewable Energy Position Statement , in particular section 3.4.4, Development in the Setting of the AONB and Tranquillity Position Statement sections 4.4 and 5.2 		
Cotswolds National Landscape	General	<p>Having reviewed the Preliminary Environmental Information Report (PEIR) which forms part of this consultation and in particular Chapter 8 which deals with landscape and visual matters, the Board is disappointed to see that our previous recommendations have not been reflected within the assessment.</p>	Yes	<p>Chapter 8 of the Environmental Statement advances the work and should be reviewed in the context of the wider setting of the Cotswolds National Landscape [EN010147/APP/6.3].</p>

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Cotswolds National Landscape	Landscape and visual	<p>The representative viewpoints shown at Figure 8.10 of the PEIR are unchanged from Figure 7 of the Scoping Report in the respect that they remain oriented in the direction of the development rather than outwards back towards the National Landscape (for example from footpath 132/6/10) and contrary to our recommendations, it remains the case that no representative viewpoints are located within the National Landscape designation.</p> <p>We would wish to reiterate our previous advice that footpath 173/1/20 appears to fall within the Zone of Theoretical Visibility shown at Figure 8.10 of the PEIR and we would recommend that, at the very least, a viewpoint is located along this stretch between Boltons Farm and East End.</p>	Yes	<p>With reference to the ZTV, there is very limited intervisibility within the Cotswolds National Landscape and only a very small part of the overall National Landscape. Much of those areas which fall within the ZTV do not have public access.</p> <p>The Applicant notes the reference to a footpath between Boltons Farm and East End (173/1/20). This section of PRow has very limited intervisibility according to the ZTV. Sections of PRow and roads (Park Road) at the edge of Combe are more likely to have a view, though very limited.</p> <p>No viewpoints in this</p>

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				<p>location were considered necessary prior to the PEIR and, as such, this area was not visited before completion of the ES.</p> <p>Assessment of effects (landscape) upon the Cotswolds AONB (National Landscape) is included within section 8.9 of Chapter 8: Landscape and Visual Resources [EN010147/APP/6.3].</p> <p>As part of some ongoing work, in respect of effects on the World Heritage Site, a number of additional views have been completed. As part of this work, an additional winter view could be taken from the suggested location</p>

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				within the Cotswolds National Landscape. So that effects can then be considered.
Cotswolds National Landscape	Landscape and visual	We note that Table 8.1 of the PEIR states the legislative requirements of The National Parks and Access to the Countryside Act (1949) and The Countryside and Rights of Way Act (2000) in relation to Areas of Outstanding Natural Beauty. In response to these requirements, the text in the adjacent column states that further comment is given at Section 8.9 of the PEIR however Section 8.9 makes no mention of the Cotswolds National Landscape (AONB). Additionally, please note the comments above and in Appendix 1 regarding the new legislative requirements of the Levelling Up and Regeneration Act 2023.	Yes	Assessment of effects upon the Cotswolds AONB (National Landscape) is included within section 8.9 of Chapter 8: Landscape and Visual Resources [EN010147/APP/6.3] .

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Cotswolds National Landscape	Landscape and visual	<p>Re-orientation of viewpoints to allow assessment of impact upon the views to and from the National Landscape;</p> <p>Addition of at least one viewpoint within the National Landscape, for example footpath 173/1/20;</p>	Yes	<p>Representative Viewpoints are used looking towards the Proposed Development and assessed accordingly. The LVIA does not consider views from the Proposed Development towards a given landscape area / feature.</p>
Cotswolds National Landscape	Landscape and visual	<p>The Landscape and Visual chapter should in particular include an assessment of winter-time conditions when there would be less vegetation to screen the development. It should also include consideration of glint or glare caused by the reflection of sunlight off the solar panels during daylight hours and of any light pollution that might be associated with the development and the introduction of lit elements into the night-time landscape as a result of any</p>	Yes	<p>The assessment of landscape and visual effects from the 55 agreed Representative Viewpoints includes an assessment at winter Year 1 and summer Year 15.</p>

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		lighting associated with the proposed development;		
Cotswolds National Landscape	Landscape and visual	Full consideration of all relevant Board policy and guidance outlined above.	Yes	A summary of local planning policy is detailed in Table 8.4 of Chapter 8: Landscape and Visual Resources [EN010147/APP/6.3] . This includes a review and reference to the Cotswolds National Landscape (AONB) Management Plan 2023-2025, referring to policies of relevance to the Project.
CPRE Oxfordshire	Cable routes	CPRE Oxfordshire strongly opposes any cabling route that would compromise the Long Mead Wildlife Site and other nearby SSSIs. This ancient floodplain wildflower meadow comprises some of the rarest habitat in the UK, 98% of which	Yes	Long Mead Meadow has been removed from within the Project site with the proposed HDD now to the north of the Swinford Crossing in order to ensure no impacts to the LWS.

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		has been lost in the past 100 years. The remaining fragments now together comprise only 4sq miles in the UK.		Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and priority habitats, including the Thames and associated floodplain meadow. No significant effects are proposed to nearby SSSIs.
CPRE Oxfordshire	Climate Change	Based on the best-case scenario presented, recouping the carbon costs of this project will take at least 10 years, but more realistically over 13 years.	Yes	Climate Change Chapter 14 of the ES assesses the overall carbon cost and balance of the development [EN010147/APP/6.3]
CPRE Oxfordshire	Climate Change	In fact, using the 'long run marginal' - assuming the CO2 intensity of electricity generation decreases over time, following Government policy – construction 'cost' is never recouped (although we accept that this is a Catch 22	Yes	UK Government projections, consistent with national carbon budget commitments, have been used in the assessment ('long-run marginal' projections).

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		with investment needed in renewables to ensure CO2 intensity decreases).		<p>It should be noted that latest UK Government projections include an increase in renewable energy generation, in particular from increased offshore wind capacity (DESNZ, 2023a), consistent with the UK Government's current policy of a low-carbon electricity grid by 2035 with no unabated fossil fuel generation (BEIS, 2021).</p> <p>Thereby, for the Project operational lifetime, the long-run marginal projections presented are reliant on solar generation projects such as this project being brought online. As such, the long-run marginal does not represent a true</p>

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				<p>'without development' future baseline.</p> <p>Additionally, there is inherent uncertainty in such projections as the UK grid electricity factor changes from year to year as the fuel mix consumed in UK power stations changes, and as the proportion of net imported electricity also changes. Annual fluctuations can be large as they depend on the relative prices of coal and natural gas, alongside fluctuations in peak demand and renewable provision (DESNZ, 2023).</p> <p>Therefore, multiple scenarios have been considered to present a likely range of avoided</p>

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				emissions, including displacement of non-renewable fuels as an upper estimate for the likely avoided emissions, and comparison to the long-run marginal projections as a lower estimate.
CPRE Oxfordshire	Climate Change	The question which clearly is not addressed here is a comparison with the construction cost of other low carbon electricity sources, like wind or nuclear. Is this really the most emission efficient technology for achieving low carbon electricity?	Yes	<p>The UK Government has an ambition to fully decarbonise the power system by 2035, subject to security of supply. This includes a balance of new renewable generation including (onshore/offshore wind, solar and inclusion of batter energy storage).</p> <p>As has been confirmed within the British Energy Security Strategy "There is currently 14GW of solar capacity in the UK split between large scale</p>

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				projects to smaller scale rooftop solar. The cost of solar has fallen by around 85 per cent over the past decade, and can be installed in just one day on a domestic roof."
CPRE Oxfordshire	Climate Change	The World Bank states that in fact the UK is the 239th worst location out of 240 countries for the potential output of solar power. ²	Yes	As has been confirmed within the British Energy Security Strategy "There is currently 14GW of solar capacity in the UK split between large scale projects to smaller scale rooftop solar. The cost of solar has fallen by around 85 per cent over the past decade, and can be installed in just one day on a domestic roof. We expect a five-fold increase in deployment by 2035."

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CPRE Oxfordshire	Climate Change	Notwithstanding the above comments, if the project were to go ahead we would expect to see a robust lifetime maintenance plan to ensure maximum long-term efficiency of the panels, without being subject to investor pressure if the predicted returns do not materialise.	Yes	An Outline Operational Management Plan [EN010147/APP/7.6.2] and Outline Decommissioning Plan [EN010147/APP/7.6.4] have been prepared as part of the application.
CPRE Oxfordshire	Cumulative impact	The cumulative effects assessment here either fails to mention or does not appear to take due account of: a) The 19,000 houses currently coming forward in the Oxford Green Belt through Local Plan allocations – see graphic/map: https://www.cpreoxon.org.uk/care/oxford-green-belt/ (plus other relevant allocations such as the Salt Cross Garden Village) b) The number of ground-mounted solar farms already allocated on Oxfordshire land, totalling over 1,000 hectares –	Yes	The Applicant notes that Salt Cross Garden Village is an allocation, and the outline application is in abeyance pending the re-opened AAP hearing - so it is, in effect, a Tier 1 development. It is included within the cumulative assessment as part of the ES, including by individual topic authors. An updated review of relevant cumulative schemes has been

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		see: https://www.google.com/maps/d/viewer?mid=1KnG6KFyRE-i_ol8bZytYY43EKZ0TvGmW&ll=51.816848538843196%2C-1.28941286999999996&z=9		completed prior to submission of the ES, and is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3] .
CPRE Oxfordshire	General	CPRE Oxfordshire remains opposed in principle to the Botley West Solar Farm proposal as this is an entirely inappropriate location for solar energy generation in terms of its impact on the Green Belt, productive farmland, the countryside and ecology, and local communities.	No	The Applicant notes this comment by CPRE Oxfordshire.
CPRE Oxfordshire	Historic Environment	This preliminary report fails to provide a good initial outline, even at a generic level, of the nature and scale of impacts and how they would be avoided, prevented or reduced and, if possible, offset, both in themselves and with regard to	Yes	The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] .

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		heritage and interactions with other factors, including the settings of heritage assets.		A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5] .
CPRE Oxfordshire	Historic Environment	For example, the sections dealing with the 'Magnitude of Impact' make no reference at all to the total ground disturbance or its distribution within different components. The statement that 'It is anticipated that the footprint of activities associated with decommissioning will not exceed the footprint required for construction' is not credible unless all footings were to be left in the ground or could be extracted with no additional disturbance: neither is remotely likely.	Yes	The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] . It includes the assessment of likely impacts and effects during decommissioning.

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CPRE Oxfordshire	Historic Environment	The full significance of archaeological sites that would be affected has yet to be established. Three scheduled monuments are adjacent to or surrounded by the development including cable runs which would be deep enough to disturb archaeology. The immediate surroundings (i.e. 'setting') would be physically disturbed, potentially destroying buried remains highly relevant to their significance, and prior archaeological investigation would clearly be warranted.	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A total of 42 areas containing significant archaeological remains have been identified within the Project Site.</p> <p>These have been removed from the developable land and will be retained as managed grassland. No significant buried archaeological remains would be impacted during construction of the Project.</p>

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CPRE Oxfordshire	Historic Environment	Information on the effects on the Blenheim World Heritage Site (which includes a landmark monument visible from well outside the WHS and therefore has a wide setting) is not yet provided.	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .
CPRE Oxfordshire	Historic Environment	There are four Conservation Areas (CAs) that are immediately adjacent to the proposed locations of solar panel arrays, and in two cases the development impinges on the CA. Conservation Areas seek to maintain the historic character of rural villages that have been set amongst fields throughout their existence. Where they have been extended by more recent suburban development the areas where CAs are still abutted by fields is where their setting is best	Yes	A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5] . This includes assessment of the likely impacts and effects on Conservation Areas.

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		preserved. This applies in several cases and the loss of the remaining open farmland to industrial development would be a major change to their setting and how their historic role relates to their surroundings.		
CPRE Oxfordshire	Historic Environment	In order to establish the full 'likely significant effects' in terms of setting issues and identify suitable mitigation measures to avoid, prevent or offset any harm it will be necessary to establish the future use of listed farmhouses and associated historic farm buildings and their future viability.	Yes	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of the ES chapter, with additional information in Volume 3, Appendix 7.5: Settings Assessment of the ES. It is not within the remit of the Applicant to determine the future use of listed farmhouses and associated historic farm buildings, or their future viability – this is a matter for the owners and occupiers of such buildings.

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CPRE Oxfordshire	Historic Environment	<p>The coverage of Historic Landscape Character issues in the report only looks at the importance of the main Historic Landscape types affected in terms of age and rarity within the county, not the nature and scale of the impact. Thus, there is nothing about the nature of the impact being a fundamental change of historic landscape character from agriculture (since at least the Middle Ages and in some cases demonstrably Roman and earlier) to industrial energy generation (in the Oxon HLC terminology, 'Civic Amenity Utilities').</p> <p>Contrary to the methodology proposed there is no discussion of historical importance of different Historic Landscape character types, only their relative rarity which is not the same.</p>	Yes	The updated assessment of likely impacts and effects on heritage assets, including the character of the historic landscape, is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] .

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CPRE Oxfordshire	Historic Environment	<p>The approach here is flawed in that the only reference to the scale of impact is the bizarre suggestion that the numerous other solar and housing developments considered as cumulative effects would not noticeably add to the impact of the proposal because it is so large!</p> <p>This claim is not supported by any figures for the total areas concerned, nor their locality both of which are key to the overall cumulative effect. The map of cumulative projects (which is very limited in spatial scope to the immediate surroundings of the proposed development) shows that a key effect of the cumulation of solar and other (mainly housing) developments would be to create an urbanised swathe of countryside from Wootton in the</p>	Yes	The updated cumulative assessment of likely impacts and effects on heritage assets, including the character of the historic landscape, is presented in Section 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].

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		north east almost to Cumnor in the south west. But this fails to consider further cumulative effects – for example the major developments proposed around Didcot, Harwell and Abingdon, including the proposed Abingdon Reservoir; or further east around Bicester, whose proximity all fall well within the overall length of this development.		
CPRE Oxfordshire	Hydrology and flood risk	It is clear that there is the potential for increased flood peaks, erosion and degradation of water courses following the installation works and during the operational phase of this project. Given the sensitivity of the downstream villages (and indeed Oxford City) to flooding this would clearly be unacceptable. From the limited evidence presented (based on a single study) it seems possible that these impacts could be mitigated (it is	Yes	The Applicant notes that studies are limited in regard to solar schemes. A full comprehensive literature review has been provided in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5] . This includes a review of the provided literature in the context of the Project.

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		<p>even possible, but not proven, the flood response could be improved). We do note that within site filter strip SUDS and Swales are proposed.</p>		<p>Notably the impact of solar panels on surface water runoff is dependent on the embedded mitigation proposed as part of the study. Notably the drainage strategy proposed seeks to have vegetation cover across the PV array areas and beneath the panels themselves. Research undertaken by Cook and McCuen (2013) found that provided full vegetation cover beneath the solar panels is maintained, the change in runoff characteristics from solar farm sites is likely to be insignificant and that ground cover has a much more important control over runoff.</p> <p>The Project includes for</p>

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				seeded vegetation below and between rows of the solar PV modules to help interrupt and slow the channelised flows, reducing erosion and also enhance and promote the infiltration and interception capacity. Further information on the surface water drainage is available in Volume 3 Appendix 10.2 Surface Water Drainage Strategy.
CPRE Oxfordshire	Hydrology and flood risk	Strict protocols are developed, and monitored, during, and after, the installation phase, particularly with regard to the piling, the use of heavy machinery on site and during the installation of the connecting cabling.	Yes	An Outline Code of Construction Practice (CoCP) [EN010147/APP/7.6.1] has been submitted to be secured as DCO requirement. The applicant will develop detailed CoCP's in line with the Outline CoCP and

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				<p>agreed with relevant stakeholders. This will include details in regard to the piling, the use of heavy machinery on site and during the installation of the connecting cabling.</p> <p>Similarly, monitoring during operation and maintenance phase of the project and decommissioning of the Project will be secured via requirements set out in Detailed OMP's and DEMP's. Outline OMP's and DMP's have been prepared as part of the DCO and set out these requirements [EN010147/APP/7.6.5] and [EN010147/APP/7.6.4].</p>

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CPRE Oxfordshire	Hydrology and flood risk	A more comprehensive and critical literature search is undertaken on the impact of solar farms on the local hydrology.	Yes	<p>A full comprehensive literature review has been provided in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5].</p> <p>This includes a review of literature in the context of the Project. This literature has been carried forward for the design of the Project.</p>
CPRE Oxfordshire	Hydrology and flood risk	The proposed filter strips and swales are installed in a timely manner.	Yes	<p>Temporary drainage will be provided where required prior to the construction of the solar panels and associated ancillary infrastructure.</p> <p>An Outline Code of Construction Practice [EN010147/APP/7.6.1], and associated annexes for managing soils and</p>

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				<p>materials, are to be secured as DCO requirement.</p> <p>Detailed CoCPs to be developed in line with the Outline CoCP, and agreed with relevant stakeholders, and will include details in regard to drainage such as filter strips and formal drainage upwards of Cassington.</p>
CPRE Oxfordshire	Hydrology and flood risk	A comprehensive land and water management and monitoring plan for the operational phase is agreed and implemented.	Yes	<p>An Outline Operational Management Plan (oOMP) is provided as part of application for development consent [EN010147/APP/7.6.2]. Detailed OMP's to be developed in line with Outline OMP and agreed with relevant stakeholders. Detailed OMP's to be secured as DCO requirement.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				The oOMP sets out management and monitoring during the operation and maintenance phase of the Project.
CPRE Oxfordshire	Land use and agriculture	<p>Nearly 40% of the land in question is identified by the PEIR as 'Best & Most Versatile'</p> <p>(PEIR 17.5.2.2) i.e. Grades 1 – 3a, which Government policy seeks to protect from “significant, inappropriate or unsustainable development proposals”³. We note that the UK is already the world’s third largest importer of food, behind only China and Japan, relying on imports to provide almost half of our food⁵. The Climate Change Committee has not surprisingly found that climate change will ‘make it harder for the government to</p>	Yes	<p>The Applicant notes this comment and appreciates the importance of agricultural land, including best and most versatile soils.</p> <p>Of the 1351ha surveyed 36.4% is BMV. Figure 17.3 of the ES [EN010147/APP/6.4] maps the areas of BMV, and shows that it is generally dispersed throughout the Project site. The land not surveyed at this point primarily comprises the area of the Thames River</p>

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		<p>ensure the resilience of the UK's food supply'6.</p> <p>Although precise information on how this figure breaks down across the three site sections has not been provided, the maps (p5-7 Chap 17 Agricultural Land & PRow figures) make it clear that the northern section and the western area of the central section have a particularly high concentration of BMV.</p> <p>Whilst CPRE Oxfordshire would maintain that none of the land in question should be ceded for this development, the BMV land (especially where it is also part of the Green Belt) should be prioritised for protection and the landtake reduced accordingly.</p>		<p>meadow where cables and HDD are proposed.</p> <p>Justification for the location of the Project, including the design and environmental constraints considered in establishing the location, is provided in Volume 1, Chapter 5: Alternatives Assessed [EN010147/APP/6.3].</p> <p>Soil surveys have been undertaken to identify the quality of agricultural land within the Project site, which are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES [EN010147/APP/6.5].</p> <p>The potential impacts of the Project with respect to</p>

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				<p>agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management</p>

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				<p>Plan [EN010147/APP/7.6], which has been submitted with the Development Consent Order (DCO) application.</p> <p>The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p> <p>The Site will continue to be used for agricultural purposes, primarily for conservation grazing, and land is being made available for local community food growing, which assists in generating more local produce.</p>

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CPRE Oxfordshire	Landscape and visual	<p>Over 76% of the proposed land take for Botley West would be in the Oxford Green Belt. This would represent 3.1% of the Oxford Green Belt, marking almost certainly the biggest ever single loss of Green Belt land within the County. It would also cover over a 1/4 of the Green Belt within West Oxfordshire (451Ha out of total 1,610Ha).</p> <p>Whilst the need to demonstrate very special circumstances to justify the development in the Green Belt is acknowledged, the case for this is not yet provided (PEIR 5.4.1.22). At this point, we find it hard to conceive what justification could exist for such a significant loss.</p> <p>The Green Belt is valued for its permanence and openness. This is not just about the visual impact but also the landscape resource,</p>	Yes	<p>Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1].</p>

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		<p>in line with this recent Appeal judgement: "...Green Belt is a spatial planning designation and not a landscape policy. That said, it is clear that the openness of the Green Belt has a spatial as well as a visual aspect, so assessment of openness is not just a matter of comparing the current nature of the land – in this case undeveloped pasture - with the proposal." According to the same judgement, arguments about the 'temporary' nature of the development should also carry little weight: "Although the proposal is for a limited period, the length of that period is very substantial. But even more importantly, the fundamental aim of national Green Belt policy is to prevent urban sprawl by keeping land</p>		

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		<p>permanently open. With that well established policy background it cannot be right that the fact that approval is sought for a 40-year period is accorded more than very limited weight in favour of the scheme in relation to the loss of openness. To do so would go against the concept of permanence.”</p>		
CPRE Oxfordshire	Landscape and visual	<p>As well as over 2 million solar panels, the project proposes 156 power converter stations each up to 12m long and 3m high, six high voltage transformers each 18m long and 6 m high, and over 100km of 2m high security fencing.</p> <p>CPRE Oxfordshire does not consider it possible to mitigate to any substantial degree the dramatic landscape and visual impacts that would occur as a result of a project of this scale. It</p>	Yes	<p>Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>would effectively transform a vast swathe of rural Oxfordshire into an industrial landscape, on a scale never previously seen.</p> <p>The landscape and visual impact of the Botley West solar farm would be enormous, completely transforming almost 1,400 hectares of countryside into an industrial area.</p>		
CPRE Oxfordshire	Local ecology	<p>What is clear is that the land in question provides a rich mosaic of habitat, including farmland, hedges and woodland (incl. Ancient woodland) and rivers. As one would expect, it is therefore rich in biodiversity. The wildlife surveys of reptiles, wintering birds and badgers indicate that actually the land affected is of considerable importance in the wildlife it supports. Badger activity is particularly concentrated in the central section. The bird survey</p>	Yes	<p>The effects of the Project on ecological features of importance, conservation species, biodiversity and habitat are assessed in detail in ES Chapter 9: Ecology & Nature Conservation, and its appendices [EN010147/6.3].</p>

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		indicates the land is of importance to many red-listed and amber listed species, such as yellow hammers and linnets. The bat survey shows very high numbers of bats especially over the land north of Cassington.		
CPRE Oxfordshire	Local ecology	How comparisons of benefits will be made – will Biodiversity Net Gain benefits be assessed on the basis of how the agricultural land has been previously managed, or against how it could be managed (e.g. regenerative farming, introduction of Environmental Land Management Schemes, ELMS)	Yes	The calculation of BNG is set out in ES Appendix 9.13 Biodiversity Net Gain Statement [EN010147/APP/6.5] . The pre and post-development BNG was calculated with the use of Natural England's Statutory Biodiversity Metric Tool and guidance. The pre-development score was assessed from current site conditions.

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CPRE Oxfordshire	Local ecology	The ecological isolation that would be caused by over 100km of fencing. We note that Thames Valley Police are now calling for high security fencing at all large-scale solar installations to help combat rural crime.	Yes	All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. Security strategies other than intrusive fencing will be used – cameras and PIR-triggered lighting. The design of fencing also necessarily represents a compromise with visual amenity considerations.
CPRE Oxfordshire	Local ecology	Buffers and connectivity – in particular, the buffer zones for Ancient woodlands still look to be inadequate, and more thought should be given to connectivity between these areas.	Yes	Ancient woodland will have a minimum 15m buffer and following discussions with Natural England, appropriate buffers will be incorporated into the final design either side of any important bat commuting routes. These distances of buffer are considered minimum distance sufficient

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				to ensure impacts to such features are avoided.
CPRE Oxfordshire	Local ecology	Impact of cabling route on the extremely rare ancient wildflower floodplain meadows around Swinford	Yes	Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and priority habitats, including the Thames and associated floodplain meadow. Long Mead Meadow has been removed from within the Project site with the proposed HDD now to the north of the Swinford Crossing in order to ensure no impacts to the LWS.
CPRE Oxfordshire	Local ecology	The ability to deliver an extensive wildflower area under the panels. What commitments will be made in terms of avoid of use of herbicides?	Yes	The Applicant has prepared an outline Landscape and Ecology Management Plan (oLEMP) [EN010147/APP/7.6.3],

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				which sets out that habitat management will be restricted to weed control and will be targeted using weed wipes etc.
CPRE Oxfordshire	Local ecology	The claims re sheep and grazing – our information from industry insiders is that despite all the promises, the use of sheep rarely lasts more than one season, as they are curious and disruptive (eating cables, escaping etc).	Yes	Sheep and Cattle Grazing is a key part of the Project, maintaining agricultural use and the BNG commitments. The oLEMP Table 11.1 Grassland Management Specifications sets out more details [EN010147/APP/7.6.3] . The Applicant commissioned a Land Care Proposal from Savills Food and Farming. The proposal is based on commercial sheep farming includes approximately 2,250 sheep grazing across the whole site. The proposal includes full responsibility for all land

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				care including hedge and tree management.
CPRE Oxfordshire	Local ecology	Our view is that the scientific evidence on the biodiversity benefits of large-scale solar farms is still patchy and contradictory. Notwithstanding CPRE Oxfordshire's overall opposition to Botley West, if it were to receive consent, we would consider it vital that a full-scale, robust and independent scientific survey were put in place so that lessons could be fully learnt and appreciated.	Yes	It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details of the gain are set out in Appendix 9.13. [EN010147/APP/6.5] The Defra Statutory BNG Metric has been used to demonstrate net gain. The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project.
CPRE Oxfordshire	Local ecology	Development on this scale would have a radical impact on local ecology. Providing a few plots for growing local food would do little	Yes	The impact of the Project on agriculture is considered in Chapter 17 of the ES (Agricultural Land Use and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>to replace the agricultural land which would be lost, much of which has been identified as 'Best and Most Versatile' land which should not be built on. Over three quarters of the land in question is also in the Oxford Green Belt, which is valued precisely because of its openness and permanence.</p>		<p>Public Rights of Way) [EN010147/APP/7.6.3].</p> <p>Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1].</p>
CPRE Oxfordshire	Project Description	<p>We understand that PVDP is looking at 1,307MW at peak output, compared to National Grid maximum capacity of 840MW.</p> <p>We appreciate that this is to ensure generation of as much power as possible across less efficient months, even if 'wasting' power in the summer, and that such oversizing is standard in the industry perhaps to a factor of 30-35%.</p>	Yes	<p>The Applicant notes this comment.</p> <p>Justification for the Project, including the scale, design and environmental constraints considered, is provided in the ES Volume 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3].</p>

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		<p>However, here the over-sizing is 60%. We ask that PVDP provide justification for this exceptionally high level of oversizing along with clarification of how much land this impacts. If the over-provision was brought down to the more normal 30%, how many hectares of countryside could remain untouched by this development?</p>		
CPRE Oxfordshire	Public Rights of Way	<p>CPRE Oxfordshire supports the stated intention to retain all the public rights of way affected and to improve their connectivity notably by extending the cul-de-sac Cassington FP6 to re-provide a lost footpath link between Cassington and Church Hanborough and by providing new cycle paths between Bladon and Begbroke, along Lower Road, Church Hanborough and between Sansom's and Hordley and a number of other permissive paths.</p>	Yes	<p>The Applicant notes this comment of support by CPRE. A key design objective of the Project was to retain and protect the use of all existing Public Rights of Way, including careful management during the construction phase, and where possible to increase opportunities for active travel and recreation, including through the creation of new permissive paths and cycle routes.</p>

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CPRE Oxfordshire	Public Rights of Way	However, this cannot disguise the fact that most of the public rights of way concerned would be aesthetically ruined by being encased between high fences and solar arrays totally alien to the Oxfordshire countryside. However much care has therefore been taken to assuage the practical concerns of rights of way users, this overlooks why people use public rights of way – namely to enjoy the natural countryside and not simply to perform some physical ritual.	Yes	Human health effects arising from the Project are assessed in Chapter 16 of the ES [EN010147/APP/6.3] . Table 16.29 in the chapter presents a summary of the potential impacts, measures adopted as part of the Project and residual effects in respect to human health. Overall, it is concluded that there will be no likely significant adverse effects on human health during the construction, operation and maintenance or decommissioning phases of the Project. This is supported by the contribution of the Project in securing new recreational routes, including permissive paths, cycleways and Green Ways, to mitigate potential

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				adverse effects on public health associated with changes in the use of the PRow network.
CPRE Oxfordshire	Site selection and alternatives	We reject entirely the justification set out by PVDP in 5.2.1.4. Many of the constraints subscribed to rooftop renewables apply just as much to the Botley West scheme e.g. impact on conservation areas, competing land uses. In addition, large-scale solar farms create energy away from the point of use, with subsequent loss of energy through distribution.	No	The Applicant made the main point in Para 5.2.1.4 of the PEIR that the Government target of 70GW of solar by 2035 through rooftop solar and brownfield sites alone. This is not to say that ground mounted solar would not have impacts, but that the solution cannot rely solely on roof mounted solutions. Brownfield sites too are a significant source of land for the UKs housing land supply. The Assessment of Alternatives, and the suitability of grid connection

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				to serve the sub-region, is set out in Chapter 5 of the ES [EN010147/APP/6.3] and the consideration of the pressing need to meet targets is set out in the Planning Supporting Statement [EN010147/APP/7.1]
CPRE Oxfordshire	Site selection and alternatives	The Pathways to Zero Carbon Oxfordshire report, produced by Oxford University, says we need the equivalent of 1% of Oxfordshire's land surface for solar. Since Oxfordshire's domestic and commercial roofs provide three times as much space as that, CPRE Oxfordshire believes this is where the County's future solar power needs should be accommodated. The priority should be investing in the appropriate infrastructure to deliver this, including creation of a	No	The Applicant notes this comment. Professor Nick Eyre and the authors of the Pathways to Zero Carbon report also acknowledge that solar is the most likely solution for generating renewable energy demands in the County, and the Applicant highlights the point made in the response above in terms of the balance of how the demand on land use, connectivity and distribution can be met.

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		distributed network that supports community-based solar.		
CPRE Oxfordshire	Site selection and alternatives	In terms of consideration of alternatives, the options presented appear to rest between 'do nothing' or 'build the biggest solar farm you can imagine'. There is no reasonable consideration given to other alternatives, such as a network of rooftop/brownfield based smaller sites established by engaging with local communities or, for example, to exploration of the former power station site at Didcot that presumably has good transmission capacity. We have been told verbally by PVDP representatives that this latter site was explored and ruled out, but no explanation or justification is provided here.	Yes	Site Selection and Alternatives are considered within ES Vol 1, Chapter 5: Alternatives Considered. [EN010147/APP/6.3] .

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		<p>Can it really be true that there are no feasible alternatives to building a 1,400 hectare solar farm on productive agricultural land, in the Green Belt, between a world renowned historic city and a World Heritage site, in an area that would directly impact the amenity of many thousands of residents? We are inclined to think that, in any reasonable judgement, this is perhaps one of the last places in the world that one would select!</p>		
CPRE Oxfordshire	Site selection and alternatives	<p>The damaging nature of this proposal highlights the urgent need for our Oxfordshire local authorities to work together to produce an overall land use framework for the county, including a spatial strategy for renewables that prioritises a brownfield first approach.</p>	No	The Applicant notes this comment.

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CPRE Oxfordshire	The Consultation Process	We note that despite specific requests from CPRE Oxfordshire and the Stop Botley West campaign group to avoid the Christmas period, this consultation was launched on 30 November and ran over exactly that timeframe.	No	<p>The Applicant's approach to consultation has been informed by and complied with the requirements of the 2008 Act, and associated guidance and legislation. The Applicant's strategy of coordinating consultation activities across the Project has resulted in a high level of engagement and consultation responses, as described in the Consultation Report.</p> <p>The Applicant purposely carried out the Section 42 consultation and phase two Section 47 consultation in parallel to enable consultation on the PEIR with Section 42 consultees and the community. A consultation period of 70 days was provided for</p>

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				<p>responses to the PEIR and phase two consultation information, exceeding the statutory requirement of 28 days.</p> <p>The ten week consultation period exceeded the minimum eight week consultation period originally suggested in the draft SoCC. The Applicant increased the consultation period to account for the festive period overlapping with the consultation period. Accordingly, no public information events were held 10 days prior to Christmas Day or 10 days following New Year's Day. The Applicant considered the period of 10 weeks to be sufficient time to engage</p>

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				with the consultation materials provided.
CPRE Oxfordshire	The Consultation Process	We also note that despite providing many thousands of pages of material, much of it inconsequential, there are a significant number of key areas where information is yet to be provided. Just as examples: - Failure to set out the Applicant's grounds for establishing the 'very special circumstances' required to justify building on the Green Belt - Failure to provide a Biodiversity	No	The Applicant's approach to consultation has been informed by and complied with the requirements of the 2008 Act, and associated guidance and legislation. The Applicant's strategy of coordinating consultation activities across the Project has resulted in a high level of engagement and consultation responses, as described in the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Net Gain Assessment</p> <ul style="list-style-type: none"> - Failure to provide an Environmental Management Plan - Failure to provide a Construction Traffic Management Plan - Failure to provide an impact assessment on the Blenheim World Heritage Site - A very limited and inadequate selection of photomontages, including omission of many of the most significant view-points. <p>Although much of this information is promised at a later stage, CPRE Oxfordshire does not believe that the public currently has enough detail to engage properly in this Phase 2 consultation. We therefore request that the consultation is re-run when the appropriate information is available and that submission of the proposal to the Planning Inspectorate is delayed</p>		<p>Consultation Report.</p> <p>The Applicant purposely carried out the Section 42 consultation and phase two Section 47 consultation in parallel to enable consultation on the PEIR with Section 42 consultees and the community.</p> <p>The PEIR comprised of the information specified in Regulation 12(2) of the EIA Regulations which has been compiled by the Applicant and is reasonably required for consultation bodies to develop an informed view of the likely significant environmental effects of the Project.</p> <p>A PEIR Non-Technical Summary was also</p>

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		<p>until after this has taken place.</p> <p>We note that there is still a considerable amount of information not yet provided that is relevant to this issue, including a Biodiversity Net Gain statement, an environmental management plan, and specific surveys e.g. on owls. We would not expect the project to be submitted to the Planning Inspectorate prior to a pre-application consultation where this information is publicly available.</p>		<p>produced, recognising that some Section 42 consultees may wish to view a more concise and less-detailed document.</p>
Cumnor Parish Council	Community Benefit	<p>The proposed level of community funding, at £50,000 per annum, is derisory and would merely add insult to injury.</p>	Yes	<p>The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit that can be provided by the Applicant.</p> <p>The Environmental Statement [EN010147/APP/6.3] and</p>

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				<p>the overall planning balance in the Planning Supporting Statement [EN010147/APP/7.1] has therefore not attached any weight to this fund when assessing the impact of the development.</p> <p>Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000 to £200,000 per annum.</p>

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Cumnor Parish Council	Landscape and visual	Councils' principal objection to the project is that it will result in the industrialisation – in all likelihood permanent – of a large portion of the Oxford Green Belt, particularly when taken together with the proposed Red House Farm and Cumnor Hill solar projects, which would also be located in Cumnor parish. This is contrary to the principle, set out in the National Planning Policy Framework (NPPF), that the Green Belt should be kept permanently open. Council does not believe that you have shown that there are 'very special circumstances' which would justify overriding that principle.	Yes	<p>Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1].</p> <p>An updated review of relevant cumulative schemes has been completed prior to submission of the ES, and is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3].</p>

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Cumnor Parish Council	PEIR	At this stage, given the vagueness of the PEIR (notwithstanding its great length) with regard to many of these aspects, and in particular the 'very special circumstances' issue, we will refrain from commenting further, but will do so as and when your application to the Planning Inspectorate has been submitted.	Yes	Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1] .
Cumnor Parish Council	Planning policy	The project also conflicts with various other provisions of the NPPF, as well as the applicable Local Plan and Cumnor Neighbourhood Plan, concerning protected views, heritage, biodiversity, ecology, flood risk and drainage.	Yes	Planning Policy, including the relationship with the Cumnor Neighbourhood Plan, is considered within Planning Supporting Statement (PSS). [EN010147/APP/7.1] .
Cumnor Parish Council	Socioeconomic	More generally, it will inevitably have an enormous and negative impact on the lives of local residents in both the short-term and the long-term.	Yes	Socio Economic impacts of the Project are assessed in chapter 15 of the ES [EN010147/APP/6.3]

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Environment Agency	Cable routes	<p>Issue Open trenches during cable laying pose a risk to wildlife by entrapment.</p> <p>Impact Risks to ecology in particular protected species – otter and water vole during cable route installation.</p> <p>Solution No open trenches should be located within a 10m buffer zone for all watercourses.</p>	Yes	<p>All watercourses now have a minimum 10m buffer, adhering to the Local Authority requirement and in compliance with the EA's minimum requirements. This is secured in the outline Code of Construction Practice [EN010147/APP/7.6.1] as secured by Requirement 11 of the draft DCO [EN010147/APP/3.1].</p> <p>Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses from outside of these buffers.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Cable routes	<p>Issue Potential risk of bentonite breakout within the riverbed.</p> <p>Impact Risks to waterbody and ecology.</p> <p>Solution The applicant will need to consider this risk and produce Bentonite Breakout Plan detailing how this will be avoided as addressed if occurs.</p> <p>The Non-Technical Summary states that where any features encountered along the cable route are considered sensitive then horizontal directional drilling will be applied. This includes using HDD for crossing the Thames at Swinford Bridge.</p> <p>Table 9.1.4 Summary of Scoping Responses of Chapter 9 states that all water course crossings will be achieved through Horizontal Directional Drilling (HDD) rather than any direct</p>	Yes	<p>A construction method statement for watercourse crossings that will include a bentonite breakout plan is provided in the Outline Code of Construction Practice [EN010147/APP/7.6.1].</p>

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		<p>trenching. We have based our comments on this assumption, should this change then further assessment of risks to ecology will be required.</p> <p>We support the use of HDD as a preferred method to cross waterbodies, with least risk to ecology however a significant risk of HDD is bentonite breakout within the riverbed.</p>		
Environment Agency	DCO Process	<p>Any requests to disapply any permits or consents should be sent to us in writing as soon as possible to allow us sufficient time to consider them (minimum 6 months). Depending on the outcome this will have implications on the content of the DCO.</p>	Yes	<p>The Applicant's environmental consultant team has notified the Environment Agency that the Applicant will be seeking the disapplication of permits/consents.</p> <p>Article 6 of the draft DCO [EN010147/APP/3.1] seeks the disapplication of the need for a flood risk activity permit under regulation 12 of the Environmental</p>

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				<p>Permitting (England and Wales) Regulations 2016 and any applicable bylaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 to the Water Resources Act 1991.</p> <p>The Applicant appreciates that the consent of the Environment Agency is required in order to disapply those provisions under section 150 of the Planning Act 2008 and is already in discussions with the Environment Agency to agree protective provisions to ensure that the Environment Agency is comfortable giving any such consent. In the meantime, the Applicant has included protective provisions for the benefit of the Environment</p>

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				Agency at Part 7 of Schedule 15 of the draft DCO [EN010147/APP/3.1].
Environment Agency	Hydrology and flood risk	The below comments detail the PEIR comments received from the EA.	Yes	A technical note has been prepared responding to the PEIR comments received from the EA. This was submitted on the 24 June 2024 and a meeting was held on the 16th July 2024. An updated technical note with additional supporting information requested from the EA was submitted on the 12th August 2024. The Applicant will continue to develop a Statement of Common Ground with the EA.

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Environment Agency	Hydrology and flood risk	Water Framework Directive (WFD) There is no preliminary WFD assessment included with the PEIR. WFD mitigation measures and the Thames River Basin Management Plan are one of the key assessments used when considering impacts and enhancement opportunities both within or outside of Biodiversity Net Gain.	Yes	Information regarding water quality is included within formal WFD Assessment details are provided within Volume 3, Appendix 10.5: Water Framework Directive Assessment [EN010147/APP/6.5] .
Environment Agency	Hydrology and flood risk	There are errors in the flood risk assessment (FRA). We have identified errors in identifying watercourses and classifying accurately (e.g., Cassington Stream, Eynsham Mead ditch and the Filchampstead Brook - see FRA 5.1.5.4 and FRA 5.1.5.6). Owing to these, please carry out a check on the information presented to ensure that it is accurate e.g., classification of	Yes	The Applicant has updated the identification of any incorrect classified watercourses. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

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		watercourses within the Study Area/Order Limits.		
Environment Agency	Hydrology and flood risk	There should be no net loss of flood storage volume within 1 in 100-year + CC flood extent. Any proposed compensation will need to be level-for-level, volume-for-volume, and localised. The proposed changes must not inhibit flood flow paths. By way of example we would expect compensation from the solar panel structure should within the 1 in 100-year + CC flood extent. An accurate assessment of this matter depends on modelling of the 1 in 100-year + CC flood event.	Yes	<p>No permanent development is proposed within the 100 year plus climate change flood event.</p> <p>Furthermore, the Applicant has commissioned a detailed hydraulic model of the River Evenlode which dissects the Central Site Area, again steering development to the 100 year plus climate change flood event.</p> <p>This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>

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Environment Agency	Hydrology and flood risk	Please note that we would oppose the culverting of any watercourses and instead prefer the installation of a temporary clear-span bridge crossing. This is in line with the Environment Agency's anti-culverting policy. We will normally only grant a permit for a culvert if there is no reasonably practical alternative, and if the detrimental effects would be sufficiently minor that a more costly alternative would not be justified or there are reasons of overriding public/economic interest. The developer should consider the effects of proposed crossings on hydrology and geomorphology. The developer will need to model the hydrology of culvert installation and how this relates to flood risk. This is supported by the Vale of White Horse District Council Local Plan 2031 – Part 2 (adopted Oct 2019)	Yes	<p>Temporary clear-span bridge crossings is the preferred option for the Project where access roads cross watercourses.</p> <p>The Outline CoCP [EN010147/APP/7.6.1] is to be secured as DCO requirement. Detailed CoCP's are to be developed in line with Outline CoCP and agreed with relevant stakeholders this will include details in regard to crossing methodologies.</p>

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		<p>- see FRA section 2.1.3.17. Also supported by the Cherwell Local Plan 2011 - 2033 - see FRA section 2.1.3.22.</p>		
Environment Agency	Hydrology and flood risk	<p>Some of the Main Rivers and Ordinary Watercourses which bisect the sites or are close by have no associated Flood Zones due to the small size of their respective catchments (<3km²). There may be flood risk associated with these watercourses, it is just not modelled and mapped as a catchment area of 3km² was the de minimis in the generalised 2d modelling used to determine the extent of Flood Zone 2 and 3 where no detailed hydraulic modelling is available.</p>	Yes	<p>Further information has been provided to discuss the assessment of watercourses with a catchment <3km². This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>

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		<p>The flood risk from these watercourses must be considered. For example, in the Central Site, Eynsham Mead Ditch (grid reference: 443575, 210300) and Main River through Cassington (grid reference: 445250, 211100) are two main rivers which have no associated Flood Zone mapping due to their small catchment sizes. In the Central Area, there is also an unnamed Ordinary Watercourse which runs in a south easterly direction from grid reference 444940, 213500 to grid reference 446320, 210060. Finally, in the Southern Site, there is a Main River which flows through Filchampstead (grid reference: 445400, 205550) which has no associated Flood Zones in its upper reaches. It is important to define flood risk for these watercourses through modelling</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		so that infrastructure can be appropriately located and designed.		
Environment Agency	Hydrology and flood risk	A non-technical summary of the hydraulic modelling and hydrological assessment undertaken needs to be provided. This would briefly describe the model results, placement of infrastructure in relation to areas of flood risk shown by the detailed modelling and any associated off-site impacts once any “with construction” and “with development” modelling is undertaken.	Yes	A non-technical summary of the hydraulic modelling and hydrological assessment is provided in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] . “With construction” modelling has not been undertaken as development has instead been sequentially steered to Flood Zone 1.
Environment Agency	Hydrology and flood risk	Issue There are errors in the submission – this includes in the identification of the watercourses and classifying accurately (e.g., Cassington Stream, Eynsham Mead ditch and the	Yes	The FRA has been updated to correctly reference the identification of watercourses within the study area. This information is included in Volume 3, Appendix 10.1 Flood Risk

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		<p>Filchampstead Brook - see FRA 5.1.5.4 and FRA 5.1.5.6).</p> <p>Impact Misrepresentation of flood risks and misunderstanding about obligations and the responsible public body with whom the developer must consult.</p> <p>Solution Carry out a check on the information presented to ensure that it is accurate e.g., classification of watercourses and identification of all Ordinary Watercourses and Main Rivers within the Order Limits and Study Area respectively. This minimisation of uncertainty will allow flood risks to be considered with more certainty for all Sites.</p>		<p>Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	<p>Issue Catchments with an area of less than 3km² will not have been modelled by the Flood Map for Planning.</p> <p>Impact Misrepresentation of flood risk within the Order Limits.</p> <p>Solution Carry out hydraulic modelling for the catchments which intersect the Order Limits.</p>	Yes	Further information has been provided to discuss the assessment of watercourses with a catchment <3km ² . This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .
Environment Agency	Hydrology and flood risk	<p>Issue The developer should assume a design-life of at least 75 years rather than 42 years.</p> <p>Impact The proposal is not aligned with the NPPF and may affect the climate change projections on which the proposal is based and the significance of effects within the ES.</p> <p>Solution Assume a design-life of at least</p>	Yes	<p>Following correspondence with the EA it was confirmed that a 42-year lifetime is appropriate as under the auspices of this DCO proposal the site is seeking approval for a 42-year period during which time the solar farm will be constructed, operated and decommissioned.</p> <p>This was confirmed via</p>

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		<p>75 years, noting that construction has been projected to commence in 2025 (see section 4.2.11 and 6.1.1.3). Update analysis as required to accurately predict climate change in the context of flood risk which should be used to inform modelling.</p> <p>Consent being sought is for 42 years. In line with NPPF; the lifetime of a non-residential development depends on the characteristics of that development but a period of at least 75 years is likely to form a starting point for assessment.</p>		<p>email on the 15 April 2024. "Regarding the question around flood risk assessments and lifetime of the solar development, for the Botley scheme we accept the lifetime figure of 42 years, which can be secured via a requirement, and therefore your assessment against this is appropriate."</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	<p>Issue There is a contradiction within the information presented. According to the Flood Map for Planning, Flood Zones 2 and 3 do intersect the Northern Site.</p> <p>Impact Misunderstanding/misrepresentation of the flood risks within the Order Limits.</p> <p>Solution Further investigation of the causation of Flood Zones 2 and 3 within the Northern Site is required e.g., the presence of underground flows within chalk or culverting. We can then consider whether further hydraulic modelling is required for the Northern Site.</p>	Yes	<p>The FRA has been updated to correctly reference the locations of Flood Zone 2 and 3 which intersects the Northern Site Area. The risk is associated with a dry field ditch/culvert and development has been sequentially steered to Flood Zone 1 at this location. Surface water model extents have been used to provide a conservative proxy for climate change in the absence of this data. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>
Environment Agency	Hydrology and flood risk	<p>Issue The flood extents of Flood Zone 2 and 3 may increase due to the effects of climate change and not all watercourses have been</p>	Yes	<p>Surface water modelling has been commissioned by the Applicant for the area of surface water risk upstream of Cassington and includes</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>considered within the modelling provided (e.g., Cassington Stream).</p> <p>Impact Structures may not be positioned within an inappropriate Flood Zone for that which it was approved during the lifetime of the development. The proposed elevation of structures may have insufficient offset (e.g., 300mm vertical offset for solar panels).</p> <p>Solution Model all watercourses within the Central Site. Utilise the hydraulic modelling with appropriate projections for climate change to model the Future Flood Zone extents to inform decision-making for the placement and elevation of structures.</p>		<p>Cassington Stream. This information is provided in Appendix 10.5: Surface Water Modelling Report [EN010147/APP/6.5].</p> <p>Development has been sequentially steered to areas of Flood Zone 1, including the Central Site Area where updated modelling has been undertaken. The modelling includes a primary tributary to the River Evenlode and the flood extent is captured within the smaller channels in the Two-Dimensional floodplain.</p> <p>Any other smaller watercourses depths have been assessed using the Risk of Flooding from Surface Water maps.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .
Environment Agency	Hydrology and flood risk	<p>Issue Insufficient modelling of flood risks with the consideration of climate change. (Please see General Comment 2 relating to catchment size)</p> <p>Impact The proposed elevation of structures may have insufficient offset. The development may be within the future flood extent for the 1-in-100 + CC flood event.</p> <p>Solution Complete hydraulic modelling for all watercourses within the Southern Site.</p> <p>Is there a typo at the end of FRA5.5.2.1 where 'central section' should be 'southern section'?</p>	Yes	<p>Development has been sequentially steered to areas of Flood Zone 1, including the Central Site Area where updated modelling has been undertaken.</p> <p>Surface water modelling has been commissioned by the client for the area of surface water risk upstream of Cassington and includes Cassington Stream. This information is provided in Appendix 10.5: Surface Water Modelling Report [EN010147/APP/6.5].</p> <p>Typo has been amended</p>

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				<p>within the updated FRA. Any other smaller watercourses depths have been assessed using the Risk of Flooding from Surface Water maps.</p> <p>This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>
Environment Agency	Hydrology and flood risk	<p>Issue The 33kV and 220kV cables will be left in place under the flood defences and watercourses.</p> <p>Impact This may inhibit future works to the flood defences and the cables may become exposed from erosion of the watercourses.</p> <p>Solution Consider whether remediation works to the flood defences at proposed crossings could be carried out to minimise the</p>	Yes	<p>Consideration of the cable routes on flood defences and watercourses is included within the ES, at Chapter 10. [EN010147/APP/6.3]. This includes consideration of increased flood risk arising from damage to existing flood defences.</p> <p>Where a surface watercourse is to be crossed by HDD (or other</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		likelihood of future works. Ensure that the cables are sufficiently deep such that they will not become exposed, this decision should be evidence-based.		<p>trenchless methodology), the HVAC cables will be installed at least 2 m beneath the hard bed of any watercourses and the optimal clearance depth beneath watercourses will be agreed with the relevant authorities prior to construction.</p> <p>Outline CoCP [EN010147/APP/7.6.1] to be secured as DCO requirement. Detailed CoCP's to be developed in line with Outline CoCP and agreed with relevant stakeholders this will include details in regard to crossing methodologies.</p>
Environment Agency	Hydrology and flood risk	Issue Minimum depth of cables beneath the watercourses has not been	Yes	Consideration of the cable routes on flood defences and watercourses is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>stated. Impact The cables may become exposed due to erosion. Solution Commit to a minimum vertical displacement below the bed level. The applicant should define and describe the Project by reference to maximum (and where relevant, minimum) design parameters, commonly referred to as the 'Rochdale Envelope'.</p>		<p>included within the ES at Chapter 10. [EN010147/APP/6.3]. Where a surface watercourse is to be crossed by HDD (or other trenchless methodology), the HVAC cables will be installed at least 2 m beneath the hard bed of any watercourses and the optimal clearance depth beneath watercourses will be agreed with the relevant authorities prior to construction. An Outline CoCP [EN010147/APP/7.6.1] is to be secured as DCO requirement. Detailed CoCP's to be developed in line with Outline CoCP and agreed with relevant stakeholders this will</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				include details in regard to crossing methodologies.
Environment Agency	Hydrology and flood risk	<p>Issue The two metres vertical offset needs to be demonstrated to be sufficient</p> <p>Impact Potential to compromise the structural integrity of flood defences.</p> <p>Solution We will require a survey to ensure the offset is acceptable. As the cables are to remain in place after decommissioning, there is a risk that erosion will expose them beyond the assumed design-life of 75 years. The proposed proximity and method will likely be considered within a FRAP.</p>	Yes	<p>Consideration of the cable routes on flood defences and watercourses is included within the ES at Chapter 10.</p> <p>[EN010147/APP/6.3] Where a surface watercourse is to be crossed by HDD (or other trenchless methodology), the HVAC cables will be installed at least 2 m beneath the hard bed of any watercourses and the optimal clearance depth beneath watercourses will be agreed with the relevant authorities prior to construction.</p> <p>A HDD Compound Report is included in Volume 3 Appendix 6.2</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>[EN010147/APP/6.5] FRAP's will be obtained prior to construction at the site.</p> <p>Following correspondence with the EA it was confirmed that a 42-year lifetime is appropriate as under the auspices of this DCO proposal the site is seeking approval for a 42 year development lifetime.</p> <p>This was confirmed via email on the 15 April 2024. "Regarding the question around flood risk assessments and lifetime of the solar development, for the Botley scheme we accept the lifetime figure of 42 years, which can be secured via a requirement, and therefore your</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>assessment against this is appropriate.”</p> <p>As such no update to the ES is required in regard to this matter.</p>
Environment Agency	Hydrology and flood risk	<p>Issue The proposals could lead to other failure mechanisms such as flood flow routes beneath the earth embankment and internal erosion.</p> <p>Impact An increase in flood risk.</p> <p>Solution An assessment of the risks relating to mechanism failures needs to be undertaken.</p>	Yes	<p>Consideration of the cable routes on flood defences and watercourses is included within the ES at Chapter 10.</p> <p>[EN010147/APP/6.3] This includes consideration of increased flood risk arising from damage to existing flood defences.</p> <p>Where a surface watercourse is to be crossed by HDD (or other trenchless methodology), the HVAC cables will be installed at least 2 m beneath the hard bed of any watercourses and the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>optimal clearance depth beneath watercourses will be agreed with the relevant authorities prior to construction.</p> <p>Outline CoCP [EN010147/APP/7.6.1] to be secured as DCO requirement. Detailed CoCP's to be developed in line with Outline CoCP and agreed with relevant stakeholders this will include details in regard to crossing methodologies.</p>
Environment Agency	Hydrology and flood risk	<p>Issue There may be insufficient spacing between structures for access to and maintenance of watercourses and flood defences.</p> <p>Impact Access to flood defences and watercourses may be inhibited for</p>	Yes	The distance of easements from on-site watercourses is dependent on the Local Planning Authorities and their associated guidance. It is proposed to provide a 8m easement for watercourses within West Oxfordshire District Council, a 9m

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>future works. There may not be safe ingress and egress during a flood event.</p> <p>Solution The developer must ensure access to watercourses are not inhibited by the proposed structures e.g., sufficient separation between tables such that access is possible during a flood event. This could be demonstrated by tracking plans.</p>		<p>easement for watercourses within Cherwell District Council and a 10m easement for watercourses within the Vale of White Horse District Council.</p> <p>Development has been sequentially steered to areas of Flood Zone 1, including the Central Site Area where updated modelling has been undertaken. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>
Environment Agency	Hydrology and flood risk	<p>Issue Possible inconsistency in parameters presented. Table 14.9: Mitigation measures intended to be adopted as part of the Project, suggests a spacing of 3m-6m. Table 6.1: Solar Design</p>	Yes	<p>Clarification has been provided in the ES Chapter 10, Hydrology and Flood Risk, at Table 10-27 [EN010147/APP/6.3] This has also been updated in FRA Volume 3, Appendix</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Parameters, suggest a separation distance between tables on 2m North/South and 0.30m East/West.</p> <p>Impact Uncertainty about proposal.</p> <p>Solution Please clarify whether there is an inconsistency, and which is correct. Solar Design Parameters (Table 6.1) suggest a separation distance between tables on 2m North/South and 0.30m East/West. Please clarify whether there is an inconsistency and which is correct. To avoid losses in floodplain storage volume from the impedance of flood flow routes, access roads should be set at the existing ground level.</p>		<p>10.1 Flood Risk Assessment [EN010147/APP/6.5].</p> <p>Further details are provided in the Project Description, Volume 1 Chapter 6: Project Description [EN010147/APP/6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	<p>Issue Storage of materials in the floodplain.</p> <p>Impact Reduction of floodplain capacity and the displacement of flood water.</p> <p>Solution Excess material/spoil should be located outside the 1 in 100-year + CC flood extent (unless compensation is provided).</p>	Yes	<p>Development has been sequentially steered to areas of Flood Zone 1, including the Central Site Area where updated modelling has been undertaken.</p> <p>No storage of materials will take place in Flood Zone 1.</p> <p>This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>
Environment Agency	Hydrology and flood risk	<p>Issue Walls and fences located within the floodplain can cause obstruction of flood flow routes and flood storage areas</p> <p>Impact Reduction of floodplain capacity and the displacement of flood</p>	Yes	<p>Development, including walls and fences, has been sequentially steered to areas of Flood Zone 1, including the Central Site Area where updated modelling has been undertaken.</p> <p>This information is included</p>

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		<p>water.</p> <p>Solution The use of post and rail fencing, hit and miss fencing (vertical slats fixed alternately on each side of horizontal posts) or hedging If a solid wall is proposed there must be openings below the 1% annual probability (1 in 100) flood level with an appropriate allowance for climate change to allow the movement of flood water. The openings should be at least 1 metre wide by the depth of flooding and there should be one opening in every 5-metre length of wall.</p>		<p>in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p> <p>No part of the solar farm installation is proposed in Flood Zone 3. Any fencing will be designed not to impede flow or affect flood storage areas.</p>
Environment Agency	Hydrology and flood risk	<p>Issue Temporary construction compounds located within the floodplain can cause obstruction of flood flow routes and flood storage areas</p>	Yes	Development has been sequentially steered to areas of Flood Zone 1, including the Central Site Area where updated modelling has been undertaken.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Impact Reduction of floodplain capacity and the displacement of flood water.</p> <p>Solution temporary compounds should be located outside the 1 in 100 + CC flood extent (in this case the 2020s CC is acceptable for the Construction Phase). The FRA suggests that the proposal is not assessed to be at risk from tidal flooding (see 3.2.1.12, 4.2.1.15, 5.2.1.10, 7.2.1.2) and we can confirm that there is no tidal flood risk in Oxfordshire. Measures which may be pertinent include but are not limited to the following: - Materials to be secured/stored within Flood Zone 1 to prevent debris within flood waters. - Use of Flood Warnings/Alerts to</p>		<p>The only temporary development in Flood Zone 3a is the potential for HDD Compounds which are required to cross watercourses. For temporary HDD Compounds to be situated with Flood Zone 3a there is a commitment for a flood management plan to reduce vulnerability of site users during the development lifetime to ensure development is safe for its lifetime. This is set out in the Outline CoCP [EN010147/APP/7.6.1].</p> <p>Modelled data and research indicates that tidal flooding does not affect the watercourses in proximity to</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>inform evacuation plans.</p> <ul style="list-style-type: none"> - No loss of flood storage volume. - Consideration of SuDS for temporary compounds. 		the Project.
Environment Agency	Hydrology and flood risk	<p>Issue Inconsistent representation of the proposed easement and a lack of clarity about where from and to this will be measured.</p> <p>Impact As the easement is a minimum design parameter required to manage flood risks and vibration risks this uncertainty may adversely affect the development.</p> <p>Solution Clarify the easement proposed and state where from and to this will be measured. State how this will be protected during the works. Ensure this is a Requirement.</p>	Yes	In regards to Ordinary Watercourses, the distance of easements between the banks of watercourses and temporary and permanent development is dependent on the Local Planning Authorities and their associated guidance. It is proposed to provide a 8m easement for ordinary watercourses within West Oxfordshire District Council, a 9m easement for ordinary watercourses within Cherwell District Council and a 10m easement for ordinary watercourses within the Vale of White Horse District Council.

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		<p>The easement required by Vale of White Horse District Council is 10m. The proposed easement seems to vary across the Order Limits, this could perhaps be represented diagrammatically so as to avoid confusion.</p> <p>We would require clarity on where the 10 metres is measured to and from, for HDD/other trenchless method entry and exit points, in the case where there is no (engineered) flood defence (e.g., centre of watercourse, crest of riverbank, etc). The developer will, at the appropriate stage of their application (FRAPs), need to justify the chosen proximity by demonstrating the works to be safe.</p>		<p>This information is included in Volume 3 Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] as well as in Table 10.27 of Chapter 10 of the ES Hydrology 7 Flood Risk [EN010147/APP/6.3]</p> <p>FRAP's will be obtained where required prior to construction beginning. The permits required for the Project are set out in the 'Consents and Licenses Required under Other Legislation' Document [EN010147/APP/5.2]</p>
Environment Agency	Hydrology and flood risk	<p>Issue</p> <p>The developer may have assumed that the Flood Map for Planning accounts for climate</p>	Yes	The higher central climate change allowances for the 2080s scenario have been assessed.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>change (CC)</p> <p>Impact This would lead to inaccurate conclusions about managing flood risk for the lifetime of the development.</p> <p>Solution Carry out hydraulic modelling which does account for CC. The flood Zones do not account for climate change. This seems to contradict section 10.8.6.1.</p>		<p>The FRA has been updated provide further information regarding the assessment of climate change. The hydraulic modelling for the Central Site Area includes the higher central climate change scenario. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>
Environment Agency	Hydrology and flood risk	<p>Issue The developer has used the incorrect CC.</p> <p>Impact This may lead to inaccurate conclusions e.g., in hydraulic modelling and the risks to the environment are not understood.</p>	Yes	<p>Following correspondence with the EA it was confirmed that a 42-year lifetime is appropriate as under the auspices of this DCO proposal the site is seeking approval for a 42 year development lifetime.</p> <p>This was confirmed via email on the 15 April 2024.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Solution</p> <p>Reassess all factors which will be affected by the change in CC. The developer must consider the Higher Central Estimate (70th percentile) and Upper Estimate (95th percentile) as suggested in section 10.5.8.6.</p> <p>Assuming a design-life of at least 75 years (therefore epoch 2070-2115) this will give:</p> <ul style="list-style-type: none"> - A Higher Central Estimate of 43% for the Cotswolds, 41% for Gloucestershire and the Vale, and 25% for Cherwell and Ray respectively. - An Upper Estimate of 82% for the Cotswolds, 84% for Gloucestershire and the Vale, and 49% for Cherwell and Ray respectively for the total anticipated change in the peak river flow. 		<p>“Regarding the question around flood risk assessments and lifetime of the solar development, for the Botley scheme we accept the lifetime figure of 42 years, which can be secured via a requirement, and therefore your assessment against this is appropriate.”</p> <p>As such no updates to the climate change scenarios are required.</p> <p>The peak river flow allowances use the higher central (2080's epoch) in line with the development lifetime.</p> <p>The peak rainfall allowances use the central (2070's epoch) in line with the development lifetime.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	<p>Issue The developer has used the incorrect CC.</p> <p>Impact This may lead to inaccurate conclusions e.g., greenfield runoff attenuation required, or surface water modelling.</p> <p>Solution Reassess all factors which will be affected by the change in CC. The peak rainfall allowance may affect estimates of greenfield runoff attenuation required and surface water modelling should this be requested by the LLFA. Section 10.5.8.10 suggest that the developments with a lifetime beyond 2100 must assess the upper end allowance for the 2070s epoch. Assuming a design-life of at least 75 years (therefore</p>	Yes	<p>Following correspondence with the EA it was confirmed that a 42-year lifetime is appropriate as under the auspices of this DCO proposal the site is seeking approval for a 42 year development lifetime.</p> <p>This was confirmed via email on the 15 April 2024. "Regarding the question around flood risk assessments and lifetime of the solar development, for the Botley scheme we accept the lifetime figure of 42 years, which can be secured via a requirement, and therefore your assessment against this is appropriate."</p> <p>As such no update to the ES is required.</p>

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		epoch 2061-2125) this will give an Upper Estimate of 40%.		
Environment Agency	Hydrology and flood risk	<p>Issue Utilisation of cable corridors for drainage.</p> <p>Impact Increasing flood risk</p> <p>Solution Report how the export cable corridor is proposed to be used as a drainage channel for surface water flows.</p> <p>The impact magnitude being considered negligible depends on the robustness of supporting documents pertaining to the management of flood risk during the Construction Phase to ensure</p>	Yes	<p>The impact of construction, operation and decommissioning of the scheme on increased flooding is considered within Section 10.9 of Volume 1 Chapter 10 Hydrology and Flood Risk [EN010147/APP/6.3].</p> <p>A Conceptual Drainage Strategy for the site has been prepared and details how runoff will be managed as part of the scheme, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5]. This</p>

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		<p>that flood risk is not increased (e.g., CoCP which is proposed to be submitted with the ES and Outline Infrastructure Drainage Strategy and Infrastructure Construction Drainage Scheme). Any increase in flood risk is considered unacceptable and appropriate mitigation must be implemented for all phases of the development.</p> <p>There are many Ordinary Watercourses within the Order Limits which may seem to be ditches/field drains; it is paramount that these watercourses are identified accurately to safeguard the fluvial flood flows and prevent an increase in fluvial flood risk.</p>		<p>provides outline details regarding how the drainage will be managed through the implementation of SuDS. This includes details regarding the construction of the drainage scheme.</p> <p>An Outline CoCP has been prepared for submission alongside this ES. This is included in [EN010147/APP/7.6.1].</p> <p>Requirements for the temporary compounds will be set out in Detailed CoCP's in collaboration with appropriate stakeholders.</p> <p>A site visit has been undertaken to establish the nature and size of the ordinary watercourses which intersect the site.</p>

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				Further details are included in Volume 3 Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .
Environment Agency	Hydrology and flood risk	<p>Issue The Applicant has inaccurately assessed the type of watercourse and the proximity to the Southern Site.</p> <p>Impact Misunderstanding of the responsible bodies to be consulted and the appropriate Policy which is applicable.</p> <p>Solution Reassess watercourses to ensure accuracy of classification and that all watercourses within the Order Limits have been considered. Note that there exist Ordinary Watercourses within the Order limits of the Southern Site. There exists a Main River at the</p>	Yes	The FRA has been updated to correctly assess the type of watercourse. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

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		northern boundary of the Southern Site which is circa ten metres away.		
Environment Agency	Hydrology and flood risk	<p>Issue Flood defences have not been considered as a receptor.</p> <p>Impact Vibration analysis/conclusions are inaccurate.</p> <p>Solution Reassess vibration with consideration of the flood defences as a sensitive receptor. No mitigation proposed which relates to vibration. There should be agreed maximum thresholds and live monitoring at sensitive receptors e.g., flood defences. Traffic should be set back from the flood defences to prevent damage from vibration. We would expect more information about vibration in</p>	Yes	<p>Vibration monitoring will be undertaken where HDD works occur close to flood defences and water courses (e.g. HDD 6).</p> <p>Consideration of the cable routes on flood defences and watercourses is included within the Volume 1 Chapter 10 Hydrology and Flood Risk Section 10.6 [EN010147/APP/6.3].</p> <p>Where a surface watercourse is to be crossed by HDD (or other trenchless methodology), the HVAC cables will be installed at least 2 m beneath the hard bed of any watercourses and the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>close proximity to flood defences from piling to be considered in more detail. A bespoke method would be required for HDD in close proximity to flood defences. Vibration from traffic or solar piling in relation to the flood defences should also be considered.</p> <p>We would expect the CoCP to consider mitigation of risks from vibration such as:</p> <ul style="list-style-type: none"> - Live monitoring at key receptors during works with agreed thresholds for stopping/action. - Pre-works and post-works survey of flood defences with remediation for defects identified. - Traffic should be set back from the flood defences to prevent damage from vibration. <p>Note that this may be required for approval of a FRAP.</p>		<p>optimal clearance depth beneath watercourses will be agreed with the relevant authorities prior to construction.</p> <p>Where EA flood defences are present, a minimum 1.5 m vertical clearance will be maintained between the hard bed of the watercourse and the landward toe of those flood defences.</p> <p>An Outline CoCP has been prepared for submission alongside this ES. This is included in [EN010147/APP/7.6.1]. Requirements for the HDD crossings will be set out in Detailed CoCP's in collaboration with appropriate stakeholders.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	<p>Issue The Eynsham Mead Ditch (grid reference: 443475, 210390) and the Main River through Cassington (grid reference: 445250, 211100) are not listed. These are main rivers which either cross the study areas or bound them.</p> <p>Impact Potential misrepresentation of flood risk</p> <p>Solution Please add missing Main Rivers to the text in section 10.5.3.2</p>	Yes	The FRA has been updated to include these watercourses. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .
Environment Agency	Hydrology and flood risk	<p>Issue The maps in figure 2 (Northern Site – Hydrological Features), figure 10 (Central Site – Hydrological Features), figure 17 (Southern Site – Hydrological Features), and figure 23 (Cable Route – Hydrological Features)</p>	Yes	The FRA has been updated to accurately classify these watercourses. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>show Ordinary Watercourses and Main Rivers. There are watercourses which are shown on these plans as Main River, however, according to the latest available Statutory Main River Designation available at environment.data.gov.uk are not designated as Main River and vice versa. For example, on figure 2 Northern Site Hydrological Features, the River Dorn is shown as Main River on this plan when it is classed as an Ordinary Watercourse. In addition, on figure 10 Central Site Hydrological Features, the watercourse through Cassington is shown as Ordinary Watercourse on the plan in figure 10 yet this is classed as Main River (grid reference: 445250, 211100) and the watercourse to the east of Cassington is shown</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>as Main River when this is Ordinary Watercourse. Additionally, on the map in figure 10 (Central Site – Hydrological Features) the Eynsham Mead Ditch up to Mill Lane (grid reference: 443475, 210390) is marked as Ordinary Watercourse when it is designated as Main River.</p> <p>On figure 13 Central Site – EA Flood Map for Planning, figure 20 Southern Site – EA Flood Map for Planning, and figure 26 Cable Route – EA Flood Map for Planning, Flood Zone 2 is placed above Flood Zone 3 in the mapping order, consequently it is not possible to see the extent of Flood Zone 3 on these plans.</p> <p>Impact Potential misrepresentation of flood risk</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Solution Please evaluate the Main River and Ordinary Watercourse designations shown in figures 2, 10, 17, and 23 as they do not appear to be correct in some cases. It is recommended that the placement of Flood Zone 2 and 3 is re-ordered on figure 13, figure 20, and figure 26 to make these plans clearer</p>		
Environment Agency	Hydrology and flood risk	<p>Issue There is a main river which runs through Cassington which runs adjacent to the Central Site boundary (grid reference: 445250, 211100). This is not mentioned in the Main Rivers section of the Flood Risk Assessment. In addition, Eynsham Mead Ditch (grid reference: 443575, 210300) is a Main River in the lower portion of</p>	Yes	The FRA has been updated to include these watercourses. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the Central Site which is not listed</p> <p>Impact Potential misrepresentation of flood risk</p> <p>Solution Please add these watercourses to this section of the Flood Risk Assessment.</p>		
Environment Agency	Hydrology and flood risk	<p>Issue The watercourse through Cassington is shown as Ordinary Watercourse on the plan in figure 10 yet this is classed as Main River (grid reference: 445250, 211100).</p> <p>Impact Potential misrepresentation of flood risk</p> <p>Solution Please current the Main River and Ordinary Watercourse</p>	Yes	The FRA has been updated to accurately classify this watercourse. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		classification on the map in Figure 10		
Environment Agency	Hydrology and flood risk	<p>Issue Should this be Flood Zone 3? If this is the case, then assessment of the impacts of the Solar Panel mounting structures on flood risk in the hydraulic model should be undertaken as noted within the review of the River Evenlode hydraulic model dated November 2023.</p> <p>Impact Potential misrepresentation of flood risk</p> <p>Solution Please correct the text. Should this stage Flood Zone 3 rather than Flood Zone 1?</p>	Yes	The FRA has been updated to accurately classify the flood zone at this location. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	<p>Issue There is also an unnamed drain which is designated as Main River 250 metres to the west of the Southern Site boundary (grid reference: 444650, 205300) which is note listed.</p> <p>Impact Potential misrepresentation of flood risk</p> <p>Solution Please acknowledge this watercourse in this section of the Flood Risk Assessment</p>	Yes	The FRA has been updated to accurately classify this watercourse. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .
Environment Agency	Hydrology and flood risk	<p>Issue Some of the Main Rivers and Ordinary Watercourses which bisect the sites or are close by have no associated Flood Zones due to the small size of their respective catchments (<3km²). There may be flood risk associated with these</p>	Yes	Further information has been provided to discuss the assessment of watercourses with a catchment <3km ² . This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>watercourses, it is just not modelled and mapped as a catchment area of 3km² was the de minimis in the generalised 2d modelling used to determine the extent of Flood Zone 2 and 3 where no detailed hydraulic modelling is available. How is flood risk from these watercourses being considered? For example, in the Central Site, Eynsham Mead Ditch (grid reference: 443575, 210300) and Main River through Cassington (grid reference: 445250, 211100) are two main rivers which have no associated Flood Zone mapping due to their small catchment sizes. In the Central Area, there is also an unnamed Ordinary Watercourse which runs in a south easterly direction from grid reference 444940, 213500 to grid reference 446320, 210060. Finally, in the Southern Site, there</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>is a Main River which flows through Filchampstead (grid reference: 445400, 205550) which has no associated Flood Zones in its upper reaches</p> <p>Impact Flood risk could be misrepresented in some locations, particularly for watercourses where their respective catchments are less than 3km²</p> <p>Solution It is important to define flood risk for these watercourses through hydraulic modelling so that infrastructure can be appropriately</p>		
Environment Agency	Hydrology and flood risk	Issue Evaluation of the Detailed River Network (DRN) and Ordnance Survey 25k base mapping shows a watercourse emerging at grid	Yes	Further information has been provided to discuss the assessment of watercourses with a catchment <3km ² . The FRA

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>reference 445010, 218250 and eventually joining the River Glyme. In addition, Ordnance Survey 25k base mapping shows a watercourse disappearing at grid reference 445620, 219715. These watercourses are in alignment with the Flood Zones in this area.</p> <p>Impact Potential mis categorisation of flood risk</p> <p>Solution If it is anticipated that infrastructure will be located within Flood Zone 2 and 3 in this location at a minimum it would be sensible to undertake further investigation, for example a site visit and evaluation of other datasets such as 1m resolution Lidar, to confirm that no watercourse exists here, and that</p>		<p>has been updated to include these watercourses. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p> <p>Surface water modelling has been commissioned by the client for the area of surface water risk upstream of Cassington and includes Cassington Stream. This information is provided in Appendix 10.5: Surface Water Modelling Report [EN010147/APP/6.5].</p> <p>Development has been steered to FZ1.</p> <p>Furthermore, in the absence of fluvial flood zone mapping, surface water extents have been used for</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		flood risk here would be from surface water rather than fluvial sources. If it is established that the Flood Zones are based on flooding from fluvial sources and infrastructure is planned to be within them, fluvial hydraulic modelling should be undertaken so that water surface elevation for a range of scenarios including the design flood, can be determined		catchments below 3km ² as agreed with the EA.
Environment Agency	Hydrology and flood risk	Issue There are currently no Flood Zones in the upper reaches of the Main River that flows through Cassington (grid reference: 445250, 211100) and the Eynsham Mead Ditch (grid reference: 443575, 210300) due to the catchment size being less than 3km ² . How is flood risk for these watercourses being considered?	Yes	Further information has been provided to discuss the assessment of watercourses with a catchment <3km ² . This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Impact Potential underestimation of flood risk</p> <p>Solution It is recommended that further investigation and modelling is undertaken for these watercourses so the risks to the Central Site can be quantified, particularly given the information presented in paragraph 4.1.5.10 (Previous Hydrological Study) on page 38 of the Flood Risk Assessment.</p>		
Environment Agency	Hydrology and flood risk	<p>Issue There are portions of the upper reaches of the Main River which flows through Filchampstead which have no associated Flood Zone. In addition, there is an Ordinary Watercourse which flows through the Southern Site boundary and joins a Main River at grid reference: 444650, 205300</p>	Yes	The impact of construction, operation and decommissioning of the scheme on water quality and increased flooding is considered within Section 10.6 of Volume 1 Chapter 10 Hydrology and Flood Risk [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>which has no associated Flood Zone mapping due to its small catchment size. How is flood risk from these watercourses being informed?</p> <p>Impact Potential underestimation of flood risk</p> <p>Solution It is recommended that further investigation and modelling is undertaken for these watercourses.</p>		<p>Development has been sequentially steered to areas of Flood Zone 1 as such "with scheme" modelling is not required.</p>
Environment Agency	Hydrology and flood risk	<p>Issue How will the impact of the construction phase on fluvial flood risk elsewhere be assessed? Particularly where construction is taking place in Flood Zones 2 and 3? At present only a baseline hydraulic model of the River Evenlode for the Central Area site</p>	Yes	<p>Hydraulic Modelling for the River Thames and Chill Brook has been obtained and is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>has been reviewed.</p> <p>Impact There could be detriment to third parties associated with construction phase infrastructure being placed in areas of fluvial flood risk.</p> <p>Solution Fluvial hydraulic modelling for the construction phase should be undertaken where applicable</p>		
Environment Agency	Hydrology and flood risk	<p>Issue The Cable Corridor site passes through the River Thames and Chill Brook floodplains. It is acknowledged that the export cable corridor appears to be underground cabling with no permanent above ground structures. How will flood risk during the construction phase be informed and any off-site impacts associated with construction</p>	Yes	<p>No permanent development is proposed within the 100-year + CC flood event.</p> <p>Furthermore, the Applicant has commissioned a detailed hydraulic model of the River Evenlode which dissects the Central Site Area, again steering development to the 100-year + CC flood event.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>phase infrastructure?</p> <p>Impact There could be detriment to third parties associated with construction phase infrastructure being placed in areas of fluvial flood risk.</p> <p>Solution Fluvial hydraulic modelling for the construction phase should be undertaken where applicable For information, the Environment Agency holds detailed hydraulic models for the River Thames and Chill Brook in this area, these being The River Thames St Johns to Evenlode Confluence Flood Risk Mapping Study (2010), the Thames (Eynsham to Sandford) 2022 model, and the Chill Brook model (2014). Some review and update would likely be required, particularly with respect</p>		<p>This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		to climate change, if these models were used to inform the Flood Risk Assessment for the Cable Corridor Site.		
Environment Agency	Hydrology and flood risk	<p>Issue The impact on flood risk from a loss of floodplain storage and reduced conveyance in locations where infrastructure is in Flood Zones 2 and 3 is not discussed in section 10.9.</p> <p>Impact Placing infrastructure locations at fluvial flood risk could impact flood conveyance and storage and would need to be mitigated against.</p> <p>Solution Please add detail regarding the impact of increased flood risk from loss of floodplain storage and impeded conveyance to section 10.9 of the report As noted in the response to paragraph 3.2.1.1 on page 31</p>	Yes	<p>No permanent development is proposed within the 100-year + CC flood event.</p> <p>Furthermore, the Applicant has commissioned a detailed hydraulic model of the River Evenlode which dissects the Central Site Area, again steering development to the 100-year + CC flood event.</p> <p>As development is steered to FZ1 there is no loss of floodplain storage.</p> <p>This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		(see comment above), detailed modelling and/or investigation would need to be undertaken for the Northern Site if this were the case.		
Environment Agency	Hydrology and flood risk	<p>Issue Table 10.9 does not list the “Thames (Leach to Evenlode)” and “Chil and Limb Brooks (source to B4044)” water body catchments. Aspects of the proposed development lie within these catchments and therefore they have the potential to be impacted.</p> <p>Impact If these catchments are not included in the Environmental Statement or a separate Water Framework Directive (WFD) Assessment, then compliance with The Water Environment (Water Framework Directive)</p>	Yes	<p>Hydraulic Modelling for the River Thames and Chill Brook has been obtained and is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p> <p>These catchments are included within the WFD Assessment included in Volume 3, Appendix 10.7: Water Framework Directive Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>(England and Wales) Regulations 2017 or the Thames River Basin Management Plan cannot properly be understood.</p> <p>Solution Ensure these catchments are included within the final Environmental Statement or in a separate WFD assessment. PINS Advice Note 18 provides guidance to ensure that the requirements of the above regulations can be incorporated into the DCO application.</p>		
Environment Agency	Hydrology and flood risk	<p>Issue The assessment does not cover the following aspects:</p> <ul style="list-style-type: none"> • The magnitude of effect from silt-laden run-off from areas of exposed soils during construction. • The magnitude of effect from any potential sewage discharges from the temporary construction compounds. 	Yes	This has been included in Volume 1 Chapter 10 Hydrology and Flood Risk in Section 10.9 and Table 10.27 [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>The impacts from firewater produced in the event of a fire at the substation transformers.</p> <p>Impact If these aspects are not considered, then the impacts of the development on water quality could be greater than stated within the Environmental Statement.</p> <p>Solution These aspects should be incorporated into the Environmental Impact Assessment as well as any associated mitigation</p>		
Environment Agency	Hydrology and flood risk	<p>Issue Table 1.1 lists surface water abstraction licences which were identified within the hydrology and flood risk study area. However, it does not identify the following three active abstraction licences:</p>	Yes	The updated list includes these surface water abstraction licenses and is included in Volume 3, Appendix 10.6 Surface water and groundwater abstractions, pollution

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<ul style="list-style-type: none"> • 28/39/16/0078 – Potable Water Supply (Thames Water Utilities Ltd) • 28/39/14/0294 – Spray Irrigation (Storage) • 28/39/14/0285 – Make-Up or Top Up Water (Amenity) <p>In addition, neither this report or Chapter 10 of the PEIR identify that aspects of the proposed development are within a Drinking Water Safeguard Zone (Surface Water) and a Drinking Water Protection catchment (Thames (Leach to Evenlode)).</p> <p>Impact Without establishing these abstraction licences and protected designations within the baseline conditions, the Environmental Statement cannot properly assess the potential effects of the proposed development on water quality and</p>		<p>incidents and discharge consents report [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>water users.</p> <p>Solution These aspects should be incorporated into the baseline conditions of the Hydrology and Flood Risk chapter.</p>		
Environment Agency	Hydrology and flood risk	If Flood Zone 3 has not been subdivided into Flood Zone 3a and 3b, the developer may need to carry out further modelling to allow temporary development within Flood Zone 3.	Yes	<p>The development has been sequentially steered towards Flood Zone 1 and therefore no development has been placed within Flood Zone 3a and 3b. This is apart from the exception of HDD compounds, which are considered temporary development. These will be restricted to Flood Zone 3a with appropriate mitigation. Details of which are presented in Volume 3 Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Outline CoCP [EN010147/APP/7.6.1] to be secured as DCO requirement. Detailed CoCP's to be developed in line with Outline CoCP and agreed with relevant stakeholders this will include details in regard to temporary HDD compounds and required Flood Management Plans.
Environment Agency	Hydrology and flood risk	Note that the Cotswold District Council Strategic Flood Risk Assessment (Level 2 May 2016) states that: 3.2.2 Functional floodplain (Flood Zone 3b) - The 'functional floodplain' is defined as an area of land where water has to flow or be stored in times of flood. This forms Flood Zone 3b in terms of the NPPF. Following discussion between CDC and Environment Agency, the following definition of	Yes	All development has been sequentially steered to Flood Zone 1. Temporary development will be restricted to Flood Zone 1, except for some HDD compounds which will be placed in Flood Zone 3a. This is detailed in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the functional floodplain was agreed:</p> <ul style="list-style-type: none"> • Use the 1 in 20 year modelled flood extent wherever suitable hydraulic models are available. • Elsewhere, take a precautionary approach and assume that Flood Zone 3a (1 in 100 year flood extent) represents the functional floodplain 		
Environment Agency	Hydrology and flood risk	<p>The Gloucestershire website for the SFRA Level 1 states that: The Strategic Flood Risk Assessments (SFRA) were undertaken in 2008 using the most up to date information at that time. However, we would now regard the Environment Agency's flood maps as a more up to date and appropriate source to use for flood risk information.</p>	Yes	<p>The EA Flood Map for Planning and EA Long Term Surface Water flood risk maps have been used to assess the risk at the site. Development has been sequentially steered towards areas of lowest risk. This is detailed in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	<p>The Cherwell and Ray SFRA define the following:</p> <ul style="list-style-type: none"> • EA Flood Zone 3a High probability of fluvial flooding. Probability of fluvial flooding is 1% (1 in 100 years) or greater. Probability of tidal flooding is 0.5%(1 in 200 years) • EA Flood Zone 3b Functional floodplain. High probability of fluvial flooding. Probability of fluvial flooding is >5% 	Yes	<p>We recognise the classification of Cherwell and Ray SFRA Flood Zone classifications, and this has been reflected in the FRA (Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p> <p>Cherwell and Ray SFRA have been assessed and Flood Zone 3a and Flood Zone 3b does not intersect with the site boundary.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	In Table 13.11: (Maximum design scenario considered for the assessment of potential impacts) the maximum burial depth for HDD is stated as 30m, please confirm if this is correct.	Yes	The table has been updated in the ES, Table 10.26. Excavations to install HVAC cables via trenched techniques will typically be 1.42m deep and 0.60m wide.
Environment Agency	Hydrology and flood risk	It would be useful to have a non-technical summary of the hydraulic modelling and hydrological assessment undertaken. This would briefly describe the model results, placement of infrastructure in relation to areas of flood risk shown by the detailed modelling	Yes	A non-technical summary is included in ES Volume 0 Non-Technical Summary [EN010147/APP/6.2] . Section 6.5 provides a summary of the Hydraulic Modelling.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		and any associated off-site impacts once any “with construction” and “with development” modelling is undertaken.		
Environment Agency	Hydrology and flood risk	<p>If the developer utilises an existing model, it is important to check that it:</p> <ul style="list-style-type: none"> • Represents current risk. • Uses the latest available datasets. • Complies with current modelling standards. • Is at a scale suitable for the assessment being undertaken. • Captures the detail required for a site-specific assessment. • Makes use of current climate change allowances. 	Yes	<p>In the Northern and Southern Site Area, no modelled data was available from the EA, therefore no model checks could be performed. As a result, due to the operational life, nature of the development and scale of risk RPS in the absence of climate change data the Applicant has used the Flood Zone 2 / 1 in 1,000-year fluvial flood extent within the FMfP.</p> <p>For the Central Site Area hydraulic modelling was undertaken to provide a more refined fluvial flood extent as the Flood Map for</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Planning resolution was coarse at this location and intersected with a large area of the site plan. Appropriate model checks have been undertaken in accordance with modelling guidance.</p> <p>This is detailed further in Volume 3 Appendix 10.3 Hydraulic Modelling Report [EN010147/APP/6.5].</p>
Environment Agency	Hydrology and flood risk	<p>Please be aware that:</p> <ul style="list-style-type: none"> • Environment Agency models are not designed to assess third-party developments. The developer should not assume that the model is suitable for assessing the flood risk associated with the proposed development. • It is the developer's responsibility to assess the suitability of a model for the project. • The developer should provide 	Yes	<p>The Applicant notes this comment. Post PEIR the Model was submitted to the EA for verification and comment. The EA has subsequently responded with comments. RPS has addressed these, and followed up with a meeting with the EA and then addressed final comments in response to comments received in August 2024.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		evidence of any modelling checks and subsequent updates and document these in the FRA model reporting.		
Environment Agency	Hydrology and flood risk	<p>The developer should consider the modelling cited within the Environment Agency's EIA Scoping response or provide a justification for the exclusion. These were as follows:</p> <ul style="list-style-type: none"> • Thames (Shifford to Eynsham) & Windrush (A40 to Thames Confluence) 2011. • Thames Eynsham to Sandford) 2018 2022. • Chil Brook (Eynsham) 2013 model. 	Yes	<p>These models have been obtained and are referenced in Volume 3 Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].</p>
Environment Agency	Hydrology and flood risk	The previous Hydrological Study - Cassington shows a history of flooding from surface water due to topography. There may be an opportunity to improve the	Yes	We note the existing flood risk at Cassington. Surface water modelling has been commissioned by the client for the area of surface water

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		management of surface water and help better protect Cassington.		<p>risk upstream of Cassington and includes Cassington Stream. This information is provided in Appendix 10.5: Surface Water Modelling Report [EN010147/APP/6.5].</p> <p>The model report shows that flood depths may reach up to 0.5m during a modelled 100 year plus climate change event.</p> <p>Measures have been proposed to provide a betterment to surface water runoff and this is discussed in the Conceptual Drainage Strategy for the site within Appendix 10.2: Conceptual Drainage Strategy [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	<p>There are some statements within the report which require correction or clarification:</p> <ul style="list-style-type: none"> • Table 1.1, page 1. refers to the "River Enlode". Please correct this to Evenlode • Table 1.1, page 1. Key Limitations and uncertainties in the results. It is not clear what is meant by the statement "The gauged station is located onto one of the inflow locations". Please clarify. • Section 1.2.2.1 The Catchment. Please update the location details, for example to northwest of Oxford City Centre rather than northeast. Is Longtown within the study area or does this refer to Longtown in Cumbria? • Section 1.2.7.1, page 7. Conceptual model. Please update 	Yes	The Hydrology Report has been updated in line with the comments and this is provided in Volume 3 Appendix 10.4 Hydrology Report [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>this section of the report as this appears to reference a catchment in Cumbria. Please also highlight whether peak flow or flood volume are the determining flood risk drivers for the study catchment.</p> <ul style="list-style-type: none"> • Table 1.4. Summary of Subject Sites, page 9. Please correct the grid reference for Lateral_1 as the northing value appears to be incorrect. • Please make it clear on the graph in section 1.7.2 on page 16 the location on which these growth curves are based. It appears that the graphs are comparing HAP2 statistical estimates with HAP1 ReFH2 estimates so not a like for like comparison? • Please make it clear in the hydrology report where flow estimation point HAP 3 is located. Is this the full study catchment? 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>HAP 3 is not referenced in table 1.4 on page 9.</p> <ul style="list-style-type: none"> • Section 1.7.5 Checks, page 18. Please make it clear in the calculation record how the 1000/100 year ratios for the FEH statistical and ReFH2 approaches have been calculated. Both are quoted as being 1.7 which seems unlikely. • Section 10.5.3.4. Not all hydrological features are described within the report. The Cassington Canal which runs adjacent to the River Evenlode should be included. 		
Environment Agency	Hydrology and flood risk	<p>Baseline conditions The principal aquifers are receptors in their own right and must be protected from contamination. We therefore expect it to be considered as highly sensitive going forward.</p>	Yes	<p>This receptor has been added to Volume 1 Chapter Hydrology and Flood Risk of the ES in Table 10-25 and is considered throughout the impacts. [EN010147/APP/6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Hydrology and flood risk	Construction Environmental Management plan: Pollution prevention measures during the construction of the scheme need to be presented in an Outline Code of Construction Practice (Full CEMP can be a requirement).	Yes	The impact of pollution throughout construction will be managed through a Code of Construction Practice (CoCP) to be agreed with relevant stakeholders. An Outline COCP has been prepared as part of the DCO [EN010147/APP/7.6.1] . The CoCP includes management of soils. As part of the detailed CoCP's a Pollution Prevention Plan (PPP) will be prepared to ensure that pollutants are effectively managed throughout construction.
Environment Agency	Hydrology and flood risk	A water discharge activity permit is required to carry out discharges of sewage and trade effluent. Given the size of the development it is unlikely that the Regulatory Position Statement on Temporary dewatering from	Yes	A water discharge activity permit will be obtained prior to construction. Details regarding required permits is outlined in the Code of Construction Practice (CoCP) to be agreed with

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		excavations to surface water can be met and therefore a permit will likely be required to discharge dewatering effluent or surface water run-off generated from areas of exposed soil during construction.		relevant stakeholders. An Outline COCP has been prepared as part of the DCO [EN010147/APP/7.6.1] . The CoCP will include management of temporary dewatering.
Environment Agency	Hydrology and flood risk	We recommend that the requirement for discharge permits be reflected within the Outline Infrastructure Drainage Strategy. Given the timeframe to determine environmental permits we encourage the applicant to engage with us on permit requirements at the earliest possible stage.	Yes	Details regarding required permits is outlined in the Code of Construction Practice (CoCP) to be agreed with relevant stakeholders, and the Applicant will pursue this further with the EA in the period prior to examination, and in order to finalise a Statement of Common Ground. An Outline COCP has been prepared as part of the DCO [EN010147/APP/7.6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Local ecology	Further clarification will be required regarding the approach to the BNG and how it will be delivered. We advise the applicant to consider opportunities in Local Nature Recovery Strategies, any mitigation measures listed for the affected waterbodies under Water Framework Directive (WFD) and contribute to the delivery of the River Basin Management Plans	Yes	It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details of the gain are set out in Appendix 9.13. [EN010147/APP/6.5] The Defra Statutory BNG Metric has been used to demonstrate net gain. The proposals are also supported by an Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] . The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project, including having regard to the Local Nature Recovery Strategies.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Local ecology	<p>Issue Operational activities may include risks to ecology in particular protected species – otter and water vole.</p> <p>Impact Construction compounds, fencing and lighting within 10m of a watercourse may interrupt the movement of wildlife up and down the river corridor</p> <p>Solution A 10m buffer zone for all watercourses should be implemented.</p>	Yes	<p>All watercourses now have a minimum 10m buffer, in compliance with the EA's minimum requirements. This is secured in the outline Code of Construction Practice [EN010147/APP/7.6.1] as secured by Requirement 11 of the draft DCO [EN010147/APP/3.1].</p>
Environment Agency	Local ecology	<p>Issue There is a potential need for temporary or permanent bridges or watercourse crossings for access during construction or operation.</p> <p>Impact Watercourse crossings for access pose a risk to the river corridor</p>	No	<p>No new watercourse crossings are proposed during construction. All crossings of watercourses for the purposes of cable laying will be via trenchless techniques to ensure no impacts to such features.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>habitats and species.</p> <p>Solution Any watercourse crossing bridge designs will need to be clear span to reduce impacts on ecology and processes within the river corridor.</p>		<p>The Project will also utilise existing bridges for the work, and for the creation of new permissive paths.</p>
Environment Agency	Local ecology	<p>Issue Water vole surveys have not been undertaken</p> <p>Impact To protect water vole and their habitats from disturbance during construction and operation.</p> <p>Solution Surveys should be undertaken to identify and gain an understanding of the areas frequented by water vole. These areas may need extra mitigation to ensure no disturbance.</p>	No	<p>No specific survey work has been completed with respect to water vole as no impacts to this species' habitats are anticipated. The scope of survey work was agreed with Natural England during pre-submission consultation.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Local ecology	<p>Issue Otter surveys have not been undertaken</p> <p>Impact Risk to otter from the construction and operation of this development.</p> <p>Solution Surveys should be undertaken to identify and gain an understanding of the areas frequented by otter and potential holts or rest areas. These areas may need extra mitigation to ensure no disturbance. From local knowledge it is understood that otters are very active along the Evenlode.</p>	No	No specific survey work has been completed with respect to otter as no impacts to this species' habitats are anticipated. The scope of survey work was agreed with Natural England during pre-submission consultation.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Local ecology	<p>Issue Fish are at potential risk from both construction and operational phases of this development and need to be included.</p> <p>Impact Impact is currently unknown</p> <p>Solution The impacts to fish from piling and the potential risks of Electro Magnetic Fields on all life stages of both migratory and non-migratory fish should be considered The Environment Agency have records of European Eel, Brown/Sea Trout, Bullhead, Lamprey (unidentified) in the location of the project. The WFD status for the Evenlode is poor for fish. We welcome measures to improve spawning habitat within the channel and</p>	No	No specific survey work has been completed with respect to fish as no impacts to this species' habitats are anticipated. The scope of survey work was agreed with Natural England during pre-submission consultation.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		encourage you to consider this as part of the enhancements and BNG opportunities.		
Environment Agency	Local ecology	<p>Issue The Environment Agency have records of white clawed crayfish and fine lined pea mussel in the location of the project. Chapter 9, section 9.6.5 Species has not considered the risks to these species.</p> <p>Impact Impact currently unknown</p> <p>Solution Risks to these species need to be considered and the PEIR report updated accordingly.</p>	No	No specific survey work has been completed with respect to these species as no impacts to this species' habitats are anticipated. The scope of survey work was agreed with Natural England during pre-submission consultation.
Environment Agency	Local ecology	Impacts of Erosion on protected species: The Evenlode is a deeply incised	No	Noted. As no bulk earth movement is necessary to construct the Project, it is

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		river in a clay catchment with associated issues of silt mobilisation and deposition. This is impacting on the fish population. Any bare earth during construction is likely to become vulnerable to erosion with further mobilisation of silt into the river.		not anticipated that significant silt will be generated. However, appropriate silt management will be incorporated into the CoCP [EN010147/APP/7.6.1] .
Environment Agency	Local ecology	We support the mitigation measures listed under Table 9.1.14 (mitigation measures intended to be adopted as part of the project). However, Section 9.10.2.53 & 9.10.3.71 of Chapter 9, does not include the assessment of risks to fish, white clawed crayfish and fine lined pea mussel and we cannot agree with the conclusion that there is no change to waterbodies & their ecology.	Yes	Although not directly surveyed, the Applicant notes that all three of these features occur wholly within watercourses. Watercourses are included as a receptor in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] and, as such, the avoidance of impacts on the watercourses will also avoid impacts to these receptors.

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				<p>There are no physical effects to any of the water courses on the Project site. This was a deliberate Project design decision. Indirect effects to watercourses from pollution etc. would be prevented through the implementation of the measures set out in the oCoCP [EN010147/APP/7.6.1] for construction and the Operational Management Plan [EN010147/APP/7.6.2] for operation.</p>
Environment Agency	Local ecology	<p>There are records of a number of non-native invasive species within the project location including Himalayan balsam, Japanese knotweed, New Zealand pygmyweed and signal crayfish. We understand a biosecurity plan will be included.</p>	Yes	<p>An Invasive Non-Native Species (INNS) Management Plan will be set out in the final Code of Construction Practice, following the principals set out in the outline CoCP [EN010147/APP/7.6.1].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Environment Agency	Local ecology	Please note that Section 9.3.1 of Chapter 9 is missing some key legislation relevant to this chapter including the Salmon & Freshwater Fisheries Act 1974, the Eel Regulations 2009 and the Water Framework Directive 2017.	Yes	Reference to this legislation added has been added to ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Evenlode Catchment Partnership	Cable routes	<p>The cabling and connection to the national grid is likely to have a major impact on the landscape and we would only be supportive of underground cable routes. All cable routes will have to take full account of archaeological remains that have not been covered by the NTS.</p> <p>The proposed cable routes around Swinford Bridge cut through species rich meadows that are part of a Thames corridor meadow restoration project and have strong local opposition.</p>	Yes	The only cables proposed above ground are the DC cables connecting solar panels. DC cabling between PV modules and combiner boxes within each of the installation areas will be fixed to the mounting structure underneath the arrays. DC cables will also be laid in trenches (unless that approach would affect areas of archaeological sensitivity, in which case they will be laid on the surface, and suitably protected).

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		<p>Have other routes to reach high voltage transmission lines been considered in less sensitive locations?</p>		<p>The main 33kv and 275kv connecting cables will be underground. Archaeological geophysical survey has been undertaken across some land within the cable corridor in order to assist with the option appraisal work. When the cable routes are finalised further archaeological surveys will be undertaken in order to inform final route selection and any appropriate mitigation.</p> <p>This approach is set out in the Outline Written Scheme of Investigation [EN010147/APP/7.6.5]</p> <p>The wider Alternatives Assessed are set out in</p>

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				Chapter 5 of the ES [EN010147/APP/6.3]
Evenlode Catchment Partnership	Community Benefit	We would like to see a legacy through the life of the solar farm, a £ percentage/ Megawatt generated/annum for community benefit. Ideally this would be run by a community group or charity and distributed by them. Can we suggest you talk to TOE.	Yes	The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit to be provided by the Applicant. The Environmental Statement has therefore not attached any significance to this fund when assessing the impact of the development given that the beneficial impacts associated with the community benefit fund are not yet fully known and thus cannot be committed to as part of the DCO. Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p>
Evenlode Catchment Partnership	Construction	Emissions from construction in particular should be assessed and robust processes put in place to minimise these.	Yes	<p>Air Quality impacts, including the effects of construction traffic upon human health and ecology receptors, are assessed in Chapter 19 of the ES (the topic was scoped in as a full chapter as opposed to a technical study in support of the DCO) [EN010147/APP/6.3]</p>

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Evenlode Catchment Partnership	Hydrology and flood risk	The water quality is classed as poor across 70% of the catchment. One of the reasons for this is diffuse pollution from land run-off. Much of the land covered by the proposal is arable which poses both risks and opportunities.	Yes	<p>The impact of deterioration of water quality within Main Rivers and ordinary watercourses is discussed within Section 10.6 of ES Volume 1 Hydrology and Flood Risk [EN010147/APP/6.3] and considers the construction, operation and maintenance and decommissioning phases</p> <p>This includes pollutants that could mobilise as a result of ground disturbance / earthworks and also as a result of spillage of stored materials. This includes fine particulate materials (e.g. silts and clays), cement, oil and chemicals (from plant machinery and processes and spillage), and other wastes such as wood,</p>

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				<p>plastics, sewage and rubble.</p> <p>Information regarding water quality is also included within a formal WFD Assessment details are provided within Volume 3, Appendix 10.5: Water Framework Directive Assessment [EN010147/APP/6.5].</p> <p>The impact of construction, operation and decommissioning of the scheme on 'The impact of deterioration of water quality within surface and ground waterbody receptors' and 'increased flooding arising from additional surface water runoff' is considered within is discussed within Section 10.9 of ES Volume</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>1 Hydrology and Flood Risk [EN010147/APP/6.3].</p> <p>The impact of pollution throughout construction will be managed through a Code of Construction Practice (CoCP) to be agreed with relevant stakeholders. An Outline COCP has been prepared as part of the DCO [EN010147/APP/7.6.1]. The CoCP includes management of soils. As part of the detailed CoCP's a Pollution Prevention Plan (PPP) will be prepared to ensure that pollutants are effectively managed throughout construction.</p> <p>A Surface Water Drainage Strategy for the site has been prepared and details</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5].</p> <p>Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use.</p> <p>The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module.</p> <p>A second environmental benefit of solar PV modules</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project.
Evenlode Catchment Partnership	Hydrology and flood risk	Some of the fields in the middle sector are on steep slopes and the installation of solar panels could increase the intensity of run-off from the panels and the bare ground underneath, increasing the risk of diffuse pollution from the clay-based soils being carried into the river. The potential for diffuse pollution from the solar farm needs full consideration and effective mitigation measures designed into the scheme. There will also be a particularly high risk of run-off and diffuse pollution during construction.	Yes	<p>The impact of construction, operation and decommissioning of the scheme in regard to 'increased flooding arising from additional surface water runoff' is considered within is discussed within Section 10.9 of ES Volume 1 Hydrology and Flood Risk [EN010147/APP/6.3].</p> <p>A Surface Water Drainage Strategy for the site has been prepared and details how runoff will be managed throughout the Project, this is included in Volume 3,</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5].</p> <p>Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use.</p> <p>The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module.</p> <p>A second environmental benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				management of the land. It is expected that soil health will be improved through the Project.
Evenlode Catchment Partnership	Hydrology and flood risk	In particular, the section from Gooseye Farm to Eynsham Mill, where panels are proposed in narrow bands on the steep eastern valley slopes. These will be both highly visible and will be subject to significant surface water runoff with high erosion potential.	Yes	The impact of construction, operation and decommissioning of the scheme in regard to 'increased flooding arising from additional surface water runoff' is considered within is discussed within Section 10.9 of ES Volume 1 Chapter 10 Hydrology and Flood Risk, and the Landscape and Visual Impact Assessment is set out in Chapter 8, including impacts on views between Eynsham Mill, Gooseye Farm and along Lower Road generally. [EN010147/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>A Surface Water Drainage Strategy for the site has been prepared and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy (EN010147/APP/6.5).</p> <p>Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use.</p> <p>The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>within solar PV module.</p> <p>A second environmental benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project.</p>
Evenlode Catchment Partnership	Hydrology and flood risk	The details of these proposals are still unknown and will be critical to design correctly. Unless designed to allow sufficient light under the panels there will be issues with both diffuse pollution and potential flooding in surface water runoff. The proposed land use and management will be vital in the success or otherwise of infiltration from surface water runoff.	Yes	<p>Full details regarding the plans for the DCO application are now available.</p> <p>The Project has been designed to sequentially steer the solar PV arrays and associated ancillary infrastructure towards the low areas of flood risk, including surface water.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>The layout and design of the Solar PV arrays have been undertaken to allow light beneath the panels to support vegetation across the solar Project including beneath the panels.</p> <p>The management of the Project is outlined in the Outline Operational Management Plan (OMP) [EN010147/APP/7.6.5] with the detailed OMP's to be agreed with stakeholders prior to operation. This will detail land management to ensure vegetation remains across the Project to support infiltration close to the runoff from the panels.</p> <p>A Surface Water Drainage Strategy for the site has</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>been prepared and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5].</p> <p>Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use.</p> <p>The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module.</p> <p>A second environmental</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project.
Evenlode Catchment Partnership	Hydrology and flood risk	To help overcome the problems of runoff and diffuse pollution there are significant opportunities to improve the River Evenlode and the Dorn and Glyme in the north section and its value for wildlife and society. These include: <ul style="list-style-type: none"> •Restoring and naturalising the river •Reconnecting the river to the floodplain •Creating wetlands and grasslands •Increasing recreational and educational access 	Yes	Further information regarding proposals to retain water meadows, retain grazing of sheep, and provide community food ground groups is provided in Volume 1, Chapter 6 Project Description [EN010147/APP/6.3] . Proposed Development Plans including Masterplans and Landscape, Ecology & Amenities Layer Plans are provided

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<ul style="list-style-type: none"> •Creating substantial buffer zones to the solar panels linking with and extending the river floodplain corridor •Creating substantial buffer zones to protect the significant area of Ancient Woodland to the north, joining as part of a strategic network, with biodiversity and landscape benefits. •Raising the height from the ground of the panels and spacing them sufficiently far apart so grazing animals cannot damage the panels and create a better chance of getting species rich meadow growing beneath and around them. •Low grazing numbers and rotational management. 		<p>[EN010147/APP/7.3.1] and [EN010147/APP/7.3.3].</p> <p>These show how the Project has been planned to ensure the design accounts for a Biodiversity Net Gain (BNG) and includes appropriate buffers around areas of environmental interest.</p> <p>A Surface Water Drainage Strategy for the site has been prepared and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5].</p> <p>Solar panels have been sufficiently spaced to allow for access for maintenance</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				and to prevent the 'drip' effect. This is detailed in ES Volume 3 Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5] .
Evenlode Catchment Partnership	Hydrology and flood risk	River Valley Floodplains River Valleys form a crucial part of the Landscape Recovery Pilot, the Catchment Partnerships, Local Nature Recovery Strategy and Nature Recovery mapping. We believe that there will be significant impact on the river corridors and full surveys should be conducted. Any proposed enhancement should be consistent with the aims and objectives of these initiatives.	Yes	The impact of construction, operation and decommissioning of the scheme on 'The impact of deterioration of water quality within surface and ground waterbody receptors' and 'increased flooding arising from additional surface water runoff' is considered within Section 10.9 of ES Volume 1 Hydrology and Flood Risk [EN010147/APP/6.3] . The impact of pollution throughout construction will

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>be managed through a Code of Construction Practice (CoCP) to be agreed with relevant stakeholders. An Outline COCP has been prepared as part of the DCO [EN010147/APP/7.6.1].</p> <p>The CoCP includes management of soils. As part of the detailed CoCP's a Pollution Prevention Plan (PPP) will be prepared to ensure that pollutants are effectively managed throughout construction.</p> <p>A Surface Water Drainage Strategy for the site has been prepared and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Drainage Strategy [EN010147/APP/6.5].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Evenlode Catchment Partnership	Land use and agriculture	A significant other issue is the loss of much 3a/3b farmland (in the BMV category). Reverting to low production sheep grazing will not off-set this loss, we suggest this is an opportunity to support regenerative farming and other local food production initiatives in the wider landscape.	Yes	<p>The Applicant notes this comment and appreciates the importance of agricultural land, including best and most versatile soils.</p> <p>Justification for the location of the Project, including the design and environmental constraints considered is provided in Volume 1, Chapter 5: Alternatives Considered of the ES [EN010147/APP/6.3].</p> <p>Soil surveys have been undertaken to identify the quality of agricultural land within the Project site, which are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of a Soil</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Management Plan in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the Development Consent Order (DCO) application.</p> <p>The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p>
Evenlode Catchment Partnership	Landscape and visual	The main route from Oxford to Blenheim World Heritage Site, proposed panels are shown right up to the road which will have a significant impact on the gateway route, especially if visitors arrive in coaches with elevated views of the countryside.	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Assessment [EN010147/APP/6.5] .
Evenlode Catchment Partnership	Landscape and visual	Part of the solar farm is within Green Belt. Solar panels are an inappropriate development for green belt which should protect the openness and character of settlements and the landscape.	Yes	Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1] .
Evenlode Catchment Partnership	Landscape and visual	The north and south sector will be very visible from a wide area in the open landscapes and will have a significant impact on the landscape character especially due to the importance of recreation and the type of topography. A full Landscape Visual Impact Assessment (LVIA) will be required as part of the EIA to inform any changes in layout that may be required to reduce landscape impact and to inform the need for any mitigation. Particularly challenging visual	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, including views from public rights of way and other key receptors, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3] The Applicant has continued to prepare further

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		receptor locations will be the public rights of way network that pass through or close to the proposed solar farm.		visualisations since the PEIR to support the ES, which are presented as photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 [EN010147/APP/6.4]
Evenlode Catchment Partnership	Landscape and visual	With many solar farms the impact from the various buildings, plant, fencing, trackways etc necessary for the operation and maintenance of the solar farm may be locally significant. These aspects need to be covered in detail in the LVIA and EIA and appropriately located and designed to minimise impact.	Yes	As mentioned in the comment above the Applicant has continued to prepare further visualisations since the PEIR to support the ES, which are presented as photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 [EN010147/APP/6.4] The design has continued to

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				evolve, and be informed by the LVIA assessment, and this has resulted in the relocation of a number of items of equipment, such as PCS units, away from the PRow where possible.
Evenlode Catchment Partnership	Local ecology	The impact on wildlife needs to be taken into consideration, for example the potential for birds like lapwing looking for water being confused by the reflective properties of the panels.	Yes	Impacts to ecology receptors including the 'lake effect' have been considered within Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation of the ES.
Evenlode Catchment Partnership	Local ecology	No research is available to show that plots are going to be attractive to ground nesting species such as Lapwing and in fact they are likely to be unattractive due to the potential additional predator posts from the solar farms fencing and infrastructure. Alternative mitigation such as improving the	Yes	The Applicant considers this feedback to refer to the provision of skylark plots within the Project. These are included to enhance the diversity of foraging habitat for birds as, being open areas amongst the panels, they will be

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		pollinator habitat for insects would provide a better outcome so a variety of early and late wildflowers and leguminous species would be more preferable.		botanically different to panel areas, thereby providing a different foraging opportunity. Details are provided in the oLEMP [EN010147/APP/7.6.3] .
Evenlode Catchment Partnership	Local ecology	The loss of habitat for wintering birds might be one of the more significant impacts, there will be a need for undertaking habitat improvements on a wider scale at an early stage to provide a buffer for future loss.	Yes	<p>Impacts to wintering birds are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.</p> <p>Wintering bird surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.10 of the ES.</p> <p>The creation and enhancements of habitats for wintering birds is considered within Chapter 9.</p>

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Evenlode Catchment Partnership	Local ecology	<p>The north sector abuts the Glyme and Dorn valleys Conservation Target Area (CTA). CTAs are the most important areas for wildlife in Oxfordshire where targeted conservation action will have the maximum benefit. Their aim is to restore biodiversity at a landscape-scale through the maintenance, restoration and creation of BAP priority habitats. Potential impacts on the CTA will need to be fully considered and any mitigation put in place. Opportunities to extend and link habitats both within the CTA and to the surrounding landscape should be sought. The early enhancement of habitats would be encouraged. Effective long-term maintenance of new habitats will be required if mitigation is to be successful.</p>	Yes	<p>Impacts to CTAs are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Habitat enhancement and creation is implemented under the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].</p> <p>The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3].</p> <p>This has been based on the aims of the Oxfordshire Nature Recovery Network which incorporates the CTAs.</p> <p>The Strategy includes specifications for the</p>

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				creation/ enhancement of habitats, a monitoring program and a scheduled review process to report on progress and propose additional management measures where they are required to meet BNG, ecology and landscape objectives.
Evenlode Catchment Partnership	Local ecology	Connectivity of all habitats types will need to be taken into consideration throughout the proposed development. The encirclement of Pinsley, Burleigh and Bladon / Worton Heath ancient woodlands is a particular concern. Rather than a simple offset the opportunity should be taken to create a strong habitat link between these sites.	Yes	The impact of habitat severance to all ecology receptors (including ancient woodlands) are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Furthermore, the approach to mitigation is set out in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. This includes a minimum 15m

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				<p>buffer to ancient woodlands bordering the Project.</p> <p>The landscaping proposals aim to enhance the connectivity of the Project site with specific focus on bordering ancient woodland parcels. Further details on the ecology strategy for the Project is presented in the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].</p> <p>The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3].</p>
Eynsham Parish Council	Climate Change	Eynsham Parish Council consider that a change of mindset is required on the approach to addressing Climate Change and providing green energy is only one aspect. The Council support	No	The Applicant notes this comment, and acknowledges that energy efficiency improvements and new home target

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		that new homes built by 2030 are to LETI1 zero carbon standards which could negate the need for such vast solar farms such as Botley West.		<p>performance is important for new homes.</p> <p>The Applicant considers that this needs to be balanced with the need for renewable energy, not only for new developments but also existing developments that rely on fossil fuel generation.</p>
Eynsham Parish Council	Community Benefit	The proposed community benefit of £50,000/year seems very low for the scale of this development. There is an 800MW proposal for a solar farm in Nottingham where the offer being discussed is £1,200/MW/year, a total of about £1m/year; this project is slightly smaller than Botley West. It is therefore recommended that a more appropriate, increased community benefit sum is provided.	Yes	<p>The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit that can be provided by the Applicant.</p> <p>The Environmental Statement [EN010147/APP/6.3] and the overall planning balance in the Planning Supporting Statement [EN010147/APP/7.1] has therefore not attached any</p>

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				<p>weight to this fund when assessing the impact of the development.</p> <p>Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p>
Eynsham Parish Council	Community Benefit	It is recommended that the applicants liaise with local groups such as the Eynsham Allotment	Yes	Noted. The Applicant has undertaken a series of defined phases of consultation during the pre-

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Association and Nature Recovery Network to identify opportunities.		application period, to allow for iterative involvement, engagement and feedback throughout the development of proposals.
Eynsham Parish Council	Community Benefit	<p>Nature Recovery</p> <ul style="list-style-type: none"> • More hedgerows including either side of wide new footpaths/bike routes with wildflower strips (not just narrow paths between tall fences!); reinforce the landscape character by adding substantial hedgerows outside new fence lines. • Larger buffer strips and corridors for nature. • Extension of future Eynsham's nature networks and linking to the Evenlode Valley Nature Reserve (Eynsham Green Wheel) into Evenlode valley (link to Evenlode partnership). 	Yes	<p>The Project includes the provision of 26.5 km of new species rich hedgerow that will increase the habitat available.</p> <p>Hedgerows and trees will be incorporated to either side of PRow routes (trees to one side only in some places to avoid shadowing of panels). Details of typical sections of footpath and cycle path routes are illustrated in Figure 7.6.3.2 [EN010147/APP/7.6.3]</p> <p>New woodland block along with hedgerow corridors are proposed to ensure a</p>

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				<p>continued link to existing woodland habitats.</p> <p>The Evenlode corridor is a key habitat area, clear of panels, and will be grazed flood meadow.</p> <p>A path along part of the Evenlode was suggested by the Applicant in the Phase 1 consultation, but not supported by the majority of those who responded.</p>
Eynsham Parish Council	Community Benefit	<p>Active Travel</p> <ul style="list-style-type: none"> • B4044 Community Path, Lower Road bike route and connections through the solar farm to provide a connected network. • Wide pleasant routes with hedges and wildflower verges. 	Yes	<p>The Applicant has made allowance for the incorporation of the Salt Cross to Hanborough Station active travel route, which was a pre-existing requirement of the Salt Cross AAP – and would be delivered by the Salt Cross developer.</p> <p>The opportunity for other active travel routes and</p>

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				<p>suggested cycle paths has been identified elsewhere within the Project, between Bladon and Campsfield and Wootton and Sansom's Farm, and the Applicant has been in liaison with OCC's highways, PRoW and Public Health teams to develop illustrative sections for routes – which can be seen in Figure 7.6.3.2 [EN010147/APP/7.6.3]</p>
Eynsham Parish Council	Community Benefit	<p>Supporting the Local Community •Helping to reduce energy bills through community energy opportunities - a local power company with discount to residents is offered and should include other benefits: a) smart flexibility services and time of use tariff like Octopus and b) give people a fair price for any electricity exported to the grid. These are examples of the types</p>	Yes	<p>Once consented, the Applicant will establish a new retail electricity company and that company will offer BWSF electricity and green power from other suppliers to all of Oxfordshire. Residential customers within the 2km consultation zone will be offered a 5% discount from the Ofgem price cap.</p>

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		<p>of support we would expect of a community energy services company.</p> <ul style="list-style-type: none"> •The Council is looking for funds to procure grounds maintenance equipment that will enable grass cutting to be undertaken in the recommended practise of 'cut and collect' to promote biodiversity. The equipment will be used on highway verges and larger areas such as play areas. •Financial contributions are sought towards our net zero Sports Pavilion rebuild project. 		<p>-Planning Supporting Statement [EN010147/APP/7.1].</p>
Eynsham Parish Council	General	<p>Eynsham Parish Council strongly objects to development of this magnitude and location in Oxfordshire. Whilst it is understood that energy needs to be created that does not use fossil fuels (Eynsham already has two solar farms), the wholesale development of this scale is tantamount to piracy of our</p>	Yes	<p>The Applicant notes this comment. Planning policy and compliance with this is considered within the Planning Supporting Statement (PSS) including the Green Belt Case [EN010147/APP/7.1].</p>

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		<p>natural environment, residential amenity and biodiversity. The proposal, as it is currently designed, will have such adverse impacts that it will significantly and demonstrably outweigh the benefits and is considered contrary to the National Planning Policy Framework 2023.</p> <p>The proposals are contrary to NPPF (2023, para 13 and 156) and ENP14 Sustainable Growth due to the Oxford Green Belt and wider countryside being developed and not safeguarded. We call on the Planning Inspectorate to refuse this application as there are insufficient 'special circumstances' (para 156) associated with it – its scale and massing do not make it 'special', but rather wholly inappropriate.</p>		

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Eynsham Parish Council	Human Health	<p>Para 16.9.3.4. reports that there is a '...potential disruption to public open spaces and PRow's' that has a potential impact on population health effect. The Council wish to draw to the applicant's attention that Eynsham has only 1.1%/16.2ha² of total green space accessible to the public within the Parish (compared to an average of 2.2% in England). Therefore, any disruption is strongly objected to, for the health and well-being of the community. Urbanisation of the PRow's due to installation of the solar arrays cannot be mitigated through the use of information boards, benches etc. The Council's previous consultation response requested that consideration of the potential substantial impacts of the proposal to existing residents, is undertaken. It was recommended</p>	Yes	<p>A specific local population profile and impacts are included in the integrated health impact assessment, Chapter 16 of the ES on Human Health [EN010147/APP/6.3].</p>

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		that a comprehensive, location-specific, impact assessment of human health was undertaken, but this is not evident.		
Eynsham Parish Council	Hydrology and flood risk	Eynsham Parish Council request to be consulted on a Hydrogeological Risk Assessment and associated reports for the River Thames cable crossing. We object to any development that will increase flood risk to the community, local amenities or accessible countryside. (See Fig 1 Flood Risk Map).	Yes	<p>At detailed design stage prior to construction a hydrogeological risk assessment will be undertaken to inform a site-specific crossing method statement for the River Thames. This will be agreed with the relevant authorities and stakeholders (including Eynsham Prior Council) prior to construction.</p> <p>Requirement for method statements is set out in the Outline CoCP which is provided as part of the</p>

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				<p>application for development consent [EN010147/APP/7.6.1].</p> <p>The impact of construction, operation and decommissioning of the Project on increased flooding arising from additional surface water runoff is considered within is discussed within Section 10.9 of ES Volume 1 Hydrology and Flood Risk [EN010147/APP/6.3].</p> <p>A Surface Water Drainage Strategy for the site has been prepared and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5].</p>

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				<p>As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of panels. These measures ensure there is no significant increase in runoff or gully erosion.</p>
Eynsham Parish Council	Landscape and visual	Eynsham's Wharf Stream Way permissive footpath appears to have been omitted from Fig 8.6 which is part of an art trail widely used by the community and beyond.	Yes	<p>Public Rights of Way and other Promoted Routes (including national routes) are illustrated in the ES at Figure 17.5 [EN010147/APP/6.4]</p>

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Eynsham Parish Council	Landscape and visual	<p>Insufficient impact has been considered for views of Church Hanborough church and surrounding rolling hills at viewpoint 29 at 206/12/10.</p> <p>The viewpoints included in the report are for the north/north east, however in accordance with ENP14 (G) they should have regard to its impact on the village edge as viewed from public paths and bridleways particularly over open fields towards the historic village centre and significant distance landscape features such as Wytham Hill. The village edge is south from the viewpoints.</p>	Yes	Not all Representative Viewpoints were assessed as part of the PEIR. Viewpoints 24, 25, 26, 27 and 28 are located at or near the edge of Church Hanborough and are included within the assessment of effects in Chapter 8 of the ES [EN010147/APP/6.3] .
Eynsham Parish Council	Landscape and visual	Eynsham Parish Council's previous consultation response requested that the proposed Salt Cross Garden Village of 2200 homes be scoped into assessments which so far, has been ignored. Salt Cross Garden	Yes	The Applicant notes that Salt Cross Garden Village is an allocation, and the outline application is in abeyance pending the re-opened AAP hearing - so it

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		<p>Village (Garden City Principles re 'enhancing the natural environment') will be impacted by the proposals - panels will go from the end of site to the end of Church Hanborough and beyond. The cumulative urbanising effect on the current green landscape will have a significant detrimental effect.</p>		<p>is, in effect, a Tier 1 development. It is included within the cumulative assessment as part of the ES, including by individual topic authors.</p> <p>An updated review of relevant cumulative schemes has been completed prior to submission of the ES, and is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3].</p>
Eynsham Parish Council	Landscape and visual	<p>At Fig 8.2, it is not understood how the proposals will impact Dovehouse Close Woodland owned by Eynsham Parish Council and Oxfordshire County Council.</p>	Yes	<p>There would be no direct effect on any woodland as a result of the Proposed Development. The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which</p>

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				<p>provides a survey of trees affected by the Project and a methodology for protecting trees during works and managing them through the operational stage of the development. [EN010147/APP/6.5]</p>
Eynsham Parish Council	Planning policy	<p>The proposals are considered contrary to Eynsham Neighbourhood Plan policies:-</p> <p>ENP14 Sustainable Growth – (C) Protect the wider village setting including its relationship to the Oxford Green Belt and the wider countryside.</p> <p>(H) Provide accessible and safe connectivity between new development and Eynsham for pedestrians, cyclists, riders and motorised vehicles designed to minimise the impact on through traffic and existing road users.</p>	Yes	<p>Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1].</p>

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Eynsham Parish Council	Public Rights of Way	<p>We note on page 27 of Chapter 17 the PRoWs that could be affected by the proposals. In regards to Eynsham3:-</p> <p>Bridleways 206/23/20 – Access from Eynsham Allotments north via Mead Lane to Cassington Road. 206/23/30 – Provides access to Eynsham Allotments. 206/8/20 – Popular path for children to Eynsham Primary School. 206/8/30 – Very well used path for daily recreation.</p> <p>Footpaths 206/5/10 – Hazeldene/Bitterell footpath – Very well used path for daily recreation. Provides access to Oxford Road Playing Field (North) and Oxford Road Play Area/Skate Park. 206/6/20 – Leads from Pumping</p>	Yes	<p>Chapter 17 of the ES contains a detailed assessment of the effects of the development on Public Rights of Way, during and post construction [EN010147/APP/6.3] and the application is supported by an Outline Code of Construction Practice, which includes a PRoW Management Strategy [EN010147/APP/7.6.1], and an Outline Operational Management Plan [EN010147/APP/7.6.2]</p>

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		<p>Station/Hazeldene to 206/23/20 and 206/23/10 – Heavily used path for recreation which links to Eynsham Allotments footpath and Wharf Stream Way (206/5/20).</p> <p>Please see comments made under Human Health for the Council's strong objection to any proposals that would impact on these PROWs.</p>		
Eynsham Parish Council	Socioeconomic s	It is noted at page 35 that the operational stage will last for 42 years (15.9.2.17). However, this appears contrary to 31 operating years quoted in table 14.11 of the Preliminary Environmental Information Report. It is unknown why there is a difference in figures quoted.	Yes	ES Chapter 15 (Section 15.9.2.17) [EN010147/APP/6.3] has been updated.
Eynsham Parish Council	The Consultation Process	The consultation appears to be entirely biased and seeks to downplay the negative points. Further, that it does not cover subjects that the Council	No	The Applicant has undertaken a comprehensive pre-application consultation on the Project, which is

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		<p>requested to be scoped in that were raised in the previous consultation. For instance, the Garden Village and West Eynsham Strategic Development Area are not shown or their corresponding landscape assessments provided.</p>		<p>described and evidenced in the Consultation Report [EN010147/APP/5.1].</p> <p>The Applicant's approach to consultation has been informed by and complied with the requirements of the 2008 Act, and associated guidance and legislation.</p> <p>To support responses to the consultation, the Applicant published a range of consultation materials including a Community Consultation Leaflet summarising the proposals, a Non-Technical Summary of the PEIR, held a series of in-person and online information events where the proposals could be discussed with members of the Applicant's Project</p>

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				Team, and hosted free-to-use Project communications channels for enquiries.
Eynsham Parish Council	Traffic and Transport	Page 27 of the Chapter 12: Traffic and Transport report advises that the Link 18 speed limit is 50mph whereas it is in fact 40mph.	Yes	The Applicant notes this comment and Appendix 12.1: Description of network links and sensitivity [EN010147/APP/6.5] has been updated accordingly.
Eynsham Parish Council	Traffic and Transport	It is noted at page 33 that a construction compound is planned for the B4044 Eynsham Road (compound number 4) and for the route to use the Swinford Toll Bridge. Given the limited highway width over the bridge, existing substantial volume of traffic and Listed Building status of the bridge, it is recommended that an appropriate assessment (and mitigations) of the development impact is made. Where at all possible, Swinford Toll Bridge should not be used as	Yes	There are no HGV access routes over the Swinford Bridge, as confirmed in the Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] .

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		it is unsuitable for Heavy Goods Vehicles.		
Eynsham Parish Council	Cable	Should HDD 5 Option C or HDD 6 be pursued, it is requested that under no circumstances should the development impact Eynsham Parish Council's Allotment site or Public Rights of Way which are accessed via Wharf Road.	Yes	<p>Consideration is given to the impacts of the Project on Public Rights of Way in Chapter 17 of the ES, including those accessed along and via Wharf Road. [EN010147/APP/6.3]</p> <p>The proposals will necessitate a temporary diversion of a short length of the path on the north side of Wharf Road, to facilitate safe use whilst cables are laid. The Outline Code of Construction Practice includes an Outline Public Rights of Way Management Strategy [EN010147/APP/7.6.1]</p>

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Eynsham Parish Council	Traffic and Transport	Eynsham residents access the countryside, Wharf Stream Way and Eynsham Allotments by crossing the B4449 to/from PROW 206/5 Bitterell. Sight lines are difficult at this crossing and the ability to safely cross the road will be further impacted by construction traffic. An assessment of this should be undertaken as part of the Construction Traffic Management plan which the Parish Council request to be consulted on.	Yes	An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO, from which a detailed Construction Traffic Management Plan will be prepared in consultation with relevant consultees.
Freeland Parish Council	Climate Change	The best-case scenario for payback of carbon manufacturing and installation costs for solar panels is 10 years, although more realistically it is over 13 years. With the declining efficiency of panels over time, panels will need to be replaced at least every 20 years. By the time this development is up and running, the proposed excessive land take	Yes	Noted, as such, the assessment provides a worst-case approach.

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		could be unnecessary as a consequence of exponentially increasing new green technologies.		
Freeland Parish Council	Cumulative impact	<p>Other development to consider on the Oxford Green Belt includes 20,000 proposed houses, mainly in the middle section of the 'farm', and over 1000Ha of solar farms already permitted in Oxfordshire. (This would be almost doubled by Botley West.)</p> <p>The cumulative effect of all this development together with Oxford North, Salt Cross and Eynsham West, would be to effectively suburbanise a huge segment of the area between Oxford, Kidlington, Woodstock and Witney, creating a single urban sprawl, and taking up much of the eastern side of West Oxfordshire District.</p>	Yes	<p>An updated review of relevant cumulative schemes has been completed prior to submission of the ES, and is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3] and includes associated Figures at Appendix 20.1 [EN010147/APP/6.5].</p>

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Freeland Parish Council	Historic Environment	This development would represent a massive change to the historic landscape of the area, which has been farmland at least since the middle ages. Again – it is the scale of change that is so concerning. Although the development is presented as temporary, 40 years represents two generations of children growing up within an industrialised landscape. At the end of that period, will the historic character be capable of restoration	Yes	The updated assessment of likely impacts and effects on heritage assets, including the character of the historic landscape, is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] . The change to the character of the historic landscape is fully reversible, although it is accepted that areas of landscape planting are unlikely to be removed as part of the decommissioning of the Project.
Freeland Parish Council	Historic Environment	We are also seriously concerned about the effect on the landscape setting to Blenheim Palace, which has until now been the traditional estate farmlands of the palace. The proposed development could clearly result in Blenheim losing	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site -

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		its WHS status following the precedent of Liverpool Docks.		Heritage Impact Assessment [EN010147/APP/6.5] .
Freeland Parish Council	Landscape and visual	Although Freeland Parish land is not directly affected by the proposals, we have major concerns on their scale and impact on the wider area, which is now an attractive mosaic of rolling farmland comprising the river basins of the Rivers Dorn, Glyme, Evenlode, Windrush – all tributaries of the Thames - interspersed with compact areas of woodland, some of which is categorised as Ancient Woodland.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3]
Freeland Parish Council	Landscape and visual	The SCALE of the development proposed The overwhelming size and repetitive nature of the development proposed will have cumulative impacts greater than the sum of its parts. We feel this is almost impossible to convey	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		adequately to the public and this topic is not dealt with anywhere in the consultation documents.		<p>mitigation measures being proposed, and the consideration of cumulative effects with other developments.</p> <p>[EN010147/APP/6.3] The Applicant has continued to prepare further visualisations to support the ES, which are presented as photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371</p> <p>[EN010147/APP/6.4] An updated review of relevant cumulative schemes was completed prior to submission of the ES. These schemes are considered within the individual technical chapters, and a summary is</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3] Chapter 20 includes associated Figures at Appendix 20.1 [EN010147/APP/6.5]. These Figures are divided into three parts for ease of reference; West Oxfordshire (Fig. 20.1), Cherwell (Fig 20.2) and Vale and Oxford City (Fig 20.3). The Figure numbers have changed since the PEIR, as there is now an additional Chapter on Air Quality (Chapter 19).</p>
Freeland Parish Council	Landscape and visual	<p>The quality of the landscape being lost and the fact that 76% is in the Oxford Green belt The entirety of the Southern Site and the majority of the Central Site are located within the Green</p>	Yes	<p>Planning Policy, including the relationship with the NPPF, the NPS policies relating to NSIPs, and relevant Development Plan policy, is considered within Planning Supporting</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Belt for the City of Oxford, a fact that is omitted from Table 8.10.</p> <p>The National Planning Policy Framework makes clear that renewable energy projects, including solar farms, are not appropriate development for green belt land, except in very special circumstances. There has been no detail of such circumstances identified in the consultation documents as yet.</p> <p>According to NPPF guidelines the fundamental Aim of a Green Belt is: “ To prevent urban sprawl by keeping land permanently open.” This openness is both spatial and visual so the loss of open farmland to an ocean of solar panels, will contravene this fundamental aim.</p>		<p>Statement (PSS), including Green Belt Case and an assessment of the project against the purposes of Green Belt. Appendix 8 of the PSS sets out the Very Special Circumstances [EN010147/APP/7.1].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>The five Objectives of the Green Belt are:</p> <ul style="list-style-type: none"> a] " To check the unrestricted sprawl of large built up areas. " b] " To prevent neighbouring towns merging into one another " c] " To assist in safeguarding the countryside from encroachment." d] " To preserve the setting and character of historic towns " e] " To assist in urban regeneration." <p>This development will severely compromise 4 of these 5 Objectives:</p> <ul style="list-style-type: none"> a] It would substantially extend the built up area of the City of Oxford. b] It would exacerbate the coalescence of settlements through a significant reduction in the area of undeveloped countryside between the city and rural communities including the market town of Woodstock and 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the villages of Wootton, Tackley, Bladon, Begbroke, Yarnton, Cassington, Long Hanborough, Church Hanborough, Eynsham, Farmoor and Botley.</p> <p>c] It would result in the encroachment of development allied with the City of Oxford deep into its rural setting.</p> <p>d] It would severely compromise the settings of the internationally renowned, historic tourist attractions of the City of Oxford and the market town of Woodstock.</p>		
Freeland Parish Council	Landscape and visual	<p>The assessment of landscape and visual impacts in the PEIR does little to reassure us – the photomontages are not clearly presented, and difficult to locate. They do not convey the true scale of visual impact over wide areas. Overall it does not comply with current guidance from the Landscape Institute.</p>	Yes	<p>The Applicant has continued to prepare further visualisations to support the ES, which are presented as photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>8.248 to 8.371 [EN010147/APP/6.4] The Landscape and Visual Impact Assessment (LVIA) and photomontages have been produced in accordance with current best practice guidance. Including the Guidelines for Landscape and Visual Impact Assessment (Third Edition) (GLVIA3) and LI TGN 06/19 Visual Representation of Development Proposals.</p>
Freeland Parish Council	Local ecology	The baseline conditions set out in the PEIR show a rich diversity of habitats, with a mosaic of ancient woodland, woods, hedgerows and vales, which are regionally important. We are concerned that any Biodiversity Net Gain will be in name only, and the loss and fragmentation of habitats due to miles of deer proof fencing will	Yes	<p>The impacts of the Project on Important Ecological Features are fully assessed in the ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation, with suitable mitigation proposed to be implemented where necessary, such as</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>severely damage the existing wildlife corridors, particularly by isolating the woodland blocks. To be effective, any mitigation would need to comprise substantial woodland screen belts and not just the odd 'meadow' or reinforced hedgerow.</p>		<p>additional hedgerow and tree planting, and skylark plots.</p> <p>The Biodiversity Net Gain Assessment is provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13.</p> <p>It is intended that the Project will have a gain of at least 70% Habitat BNG. The Defra Statutory BNG Metric has been used to demonstrate net gain.</p> <p>An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project. All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained.</p>
Freeland Parish Council	Project Description	<p>We understand that it is usual to over-size solar installations by 30% to allow for reduced production in winter, even if some is 'wasted' in the summer. However a peak production here of 1350MW represents a 60% overshoot above the 850MW, and a large extra land take.</p>	Yes	<p>The Applicant notes this comment.</p> <p>Justification for the Project, including the design and environmental constraints considered, is provided in the ES Volume 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Freeland Parish Council	Recreation and amenity	Even though an extension of the network is offered with extra "permissive" footpaths, the consultation fundamentally ignores why people want to walk in the countryside – i.e. for their mental well-being. This would not be achieved by walking through a forest of fencing and solar arrays.	Yes	A specific local population profile and impacts are included in the integrated health impact assessment, Chapter 16 of the ES on Human Health [EN010147/APP/6.3] .
Freeland Parish Council	Site selection and alternatives	The consideration of alternative sites No sign that this has been carried out. A number of locally supported smaller sites would be a far more satisfactory solution and has the potential to supply almost as much power in a much shorter lead in time due to faster local planning procedure. This project is unlikely to come on stream for several years, assuming the hearing proceeds without delay.	Yes	Alternatives are considered within Vol 1, Chapter 5: [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Gardens Trust	Cable routes	Both cable routes are part of the local Nature Recovery Network which includes c550 people. The Network begins at Long Mead LWS which is an important ancient floodplain meadow and centre of a conservation project which has attracted national attention. Only 4 square miles of this habitat survive in the UK. The project is restoring wildflower rich floodplain meadow all along the Thames from Northmoor and into Oxford. It is essential that detailed engagement with land owners and managers is carried out before decisions are taken.	Yes	Long Mead Meadow has been removed from within the Project site with proposed Horizontal Directional Drilling (HDD) now to the north of the Swinford Crossing in order to ensure no impacts to the LWS. HDD to be used to lay underground cables under watercourses and priority habitats, including the Thames and associated floodplain meadow.
Gardens Trust	Cable routes	The fields adjoining the Thames in the southern section of northern (red) cable route have just been taken into management by the Nature Recovery Network. Work by around 50 volunteers on these fields began on 28 January 2024 and included hedge planting	Yes	Horizontal Directional Drilling (HDD) will be used to lay underground cables under hedgerows, woodland, watercourses and priority habitats. This will include the River

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		along the boundary identified as a cable route.		Thames and associated flood meadows.
Gardens Trust	Cable routes	The southern (blue) route passes through or under Long Mead and Swinford Meadow (Oxford Preservation Trust) which was also successfully enhanced using green hay from Long Mead. Section 9 of the PEIR page 25 states that at Long Mead and Swinford (farm) meadow LWS use of HDD (Horizontal Directional Drilling) means it will have no impact.	Yes	Long Mead Meadow has been removed from within the Project site with the proposed Horizontal Direction Drilling (HDD) now to the north of the Swinford Crossing in order to ensure no impacts to the LWS.
Gardens Trust	Cable routes	Please provide details of depths and location of compounds which must be outside these meadows, as well as method statements and risk assessments to ensure that impacts on irreplaceable habitats are avoided. This should apply to any of the meadows along the Thames.	Yes	Details of HDD are provided in Project Description in the Volume 1 [EN010147/APP/6.3] Chapter 6. No works are proposed within the meadows.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Gardens Trust	Cable routes	We are concerned that Vol 3 Appendix 9.2 Phase 1 habitat survey has so little detail and does not contain a survey of Long Mead and Swinford meadows (page 208 of section 9 Appendices 9.1 to 9.4). They are not even indicated on the habitat plans, although identified in Table 3.1 in Appendix 9.1 (desk study). Nor are they included in other surveys such as Appendix 9.9 breeding birds. There is a need for detailed surveys including the main flowering time in May/June to set the baseline; and a need for close consultation with the owners of Long Mead.	Yes	Long Mead Meadow has been removed from within the Project site with the proposed Horizontal Direction Drilling (HDD) now to the north of the Swinford Crossing in order to ensure no impacts to the LWS.
Gardens Trust	Community Benefit	Considering the scale and ultimate profitability of the proposals, we do not consider that the bursary fund of £50,000 pa is nearly sufficient recompense for the harm to their local heritage and landscape.	Yes	The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit that can be provided by the Applicant.

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		<p>It would be much easier to protect the landscape if the overall scale and density were reduced.</p>		<p>The Environmental Statement [EN010147/APP/6.3] and the overall planning balance in the Planning Supporting Statement [EN010147/APP/7.1] has therefore not attached any weight to this fund when assessing the impact of the development.</p> <p>Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual</p>

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				contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.
Gardens Trust	Historic Environment	Despite the available guidance, it is our opinion the PEIR fails to adequately define, assess, and give appropriate weight to the value of setting and its contribution to the significance of designated assets, in particular the WHS and RPG as advised by policy and other national guidance. The PEIR acknowledges that as part of a compliant HIA, a full analysis including the ' <i>Impact on the Blenheim Palace WHS as a result of change within its setting</i> ' is still work in progress and recognizes the importance of the HIA process being iterative. It is also stated that there are ' <i>uncertainties</i> ' about some of the impact conclusions (particularly	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5].</p> <p>A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		those concerning the WHS) but that these impacts can be dealt with by further mitigation if they arise. This is disingenuous and underlines the need for a fuller evaluation before further decisions in the NSIP process are taken.		is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .
Gardens Trust	Historic Environment	We consider the conclusions of the Preliminary Heritage Assessment in relation to the WHS and its setting are oversimplified and flawed when the heritage assessment method relies primarily on visual criteria and ignores the sensitivity and value of the wider landscape setting and the contribution this makes to the OUV of the WHS and other designated assets. Potential impacts on the OUV and setting of the WHS should not be screened out at this stage and should be reconsidered in a comprehensive HIA prepared	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] . This assessment has been undertaken in accordance with published UNESCO guidance.

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		<p>using UNESCO guidance. The large scale and wide spread of the solar farm and its intervisibility with the wider landscapes would severely impact on the character of a sequence of local and distinctive landscape character areas. These are interconnected with subtle transitions and form a coherent whole of high value and sensitivity. This quality is in large part a result of the presence of features and patterns in the landscape that create a time depth and historical dimension.</p>		
Gardens Trust	Historic Environment	<p>The Blenheim Palace WHS was placed on the World Heritage List in 1987. Like some other WHSs of this period the inscription for Blenheim did not include a formal buffer zone. In the case of Blenheim, the OUV of the WHS was focused on the Palace with the Park being perceived as the setting for this. Today, the</p>	Yes	<p>A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>concept of setting is fully appreciated with many WHSs now also having a recognized 'buffer zone' which is a material consideration in decision taking. This has brought WHS more into line with national guidance which emphasises the importance of defining and protecting the setting of heritage assets. In response, UK WHSs including Blenheim, have retrogressively refined their Statements of OUV and related attributes (significance) and had these adopted by UNESCO. The most recent WHS Management Plan (2017) adopted by Blenheim and UNESCO incorporates these refinements and incorporates, as Appendix III, a Setting Study.</p>		
Gardens Trust	Historic Environment	<p>This important document follows best practice and guidance. It uses both views and intervisibility as well as landscape character and quality as a basis for</p>	Yes	<p>A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3,</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>describing in detail the definition of, and value of the Blenheim WHS setting and its components. Crucially, the study acknowledges that the wider landscape setting beyond the Park contributes to the OUV of the WHS and considers in Para 5.02 that the elements that most directly related to this are:</p> <ul style="list-style-type: none"> • 'The connection with the River Glyme -the management of this river as it runs through the setting of the WHS directly affects the character, ecological value and water quality of Lancelot Brown's lake within the WHS; • The links with the much larger and ancient Wychwood Forest area; • The value of the boundary wall and plantations which mainly hide the park from outside views, but also form important woodland elements in the wider landscape; 		<p>Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<ul style="list-style-type: none"> • The key visual linkages between Blenheim and its setting - to Bladon church in the south and from Old Woodstock to the Column of Victory in the east; • The character of the setting as traditional English countryside, dotted with picturesque villages mainly built using a uniform palate of materials.' <p>The last of the points above essentially acknowledges that the rural agricultural character of the wider landscape, including the extensive areas proposed for the solar farm, have a value that as a setting is both in contrast to and complimentary to the historic designed parkland of Blenheim Park.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Gardens Trust	Historic Environment	<p>We therefore feel the sensitivity of the landscape of the Project site is undervalued by the PEIR analysis (Ch 8 Table 8.9). The rating fails to reflect the high value of the landscape as a setting for designated heritage assets including the WHS and the presence of numerous undesignated heritage sites, landscape features and patterns that create a time depth and historic dimension in the landscape. It also fails to take proper account of the current and cumulative development pressures and threats that are changing the character of the emerging 'in between' landscapes and creating an even greater sense of sensitivity for these areas as perceived by local communities and stakeholders. For example, Salt Cross Garden Village, with its 2,200 new homes</p>	Yes	<p>The updated assessment of likely cumulative impacts and effects on heritage assets is presented in Section 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		and a new science business park, is due to be built immediately to the north of Eynsham. It shares a north-eastern boundary with Botley West solar farm and currently appears as open countryside on the accompanying maps, giving a false impression of unchanged landscape area.		
Gardens Trust	Historic Environment	The PEIR acknowledges that the wider landscape including the Project Site has a role as setting for the WHS as described above and that there will be ' <i>potential impacts and residual effects</i> ' on ' <i>the Blenheim WHS as a result of change within its setting</i> ' (Table 7.17 Para 7.14 .1.2 of Vol 1 Ch 7 (Historic Environment). However, these critically important impacts on setting have not yet been defined and evaluated but will be examined in a separate HIA which ' <i>is being undertaken to review the potential for the</i>	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p><i>Project to harm the significance of the WHS as a result of change within its setting.</i> If the concept of a valuable and sensitive setting for the WHS is accepted and the large scale and wide extent of the project is imposed on this, there seems little doubt that a severe and adverse impact on the character and functions of the WHS setting would result.</p>		
Gardens Trust	Historic Environment	<p>Tables 17 and 18 in Vol I Ch 7 of the PEIR summarize the result of the assessment of impacts on the historic environment. While of some use at this stage, we feel this assessment is incomplete until the submission of the full HIA.</p>	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5:</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Settings Assessment of the ES [EN010147/APP/6.5].</p> <p>A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>
Gardens Trust	Landscape and visual	The proposal would directly and indirectly impact adversely upon a sequence of 11 no. distinct local landscape character areas which are interconnected with subtle transitions, and which form a coherent whole landscape of consistently high quality and sensitivity. Using primarily the three planning authorities' landscape character area studies, the PEIR (Ch 8 Table 8.9) asserts	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project upon landscape character areas, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		that the 6 no. character areas directly affected by the development are judged to be only of ' <i>medium to high sensitivity</i> ' to change. This neither reflects the magnitude of the project proposal nor the intrinsic sensitivity of these landscapes and the pressure they are under in 2024.		
Gardens Trust	Landscape and visual	Apart from ensuring the intrinsic landscape value (including its historic dimension) is correctly assessed, sensitivity to change needs to be fully understood and in relation to this, the capacity of the landscape to absorb development or change. The scale and magnitude of the proposal will not allow it to be easily absorbed into the high value intricate mosaic of landscapes and the amenity that these provide for the local communities. The character and	Yes	<p>The Applicant notes that the perceived sensitivity of any given landscape is derived from the combination of value and susceptibility to proposed change.</p> <p>An element of professional judgement needs to be applied and differing views as to the landscapes' ability to absorb a development of this nature are understood.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>quality of the wider landscape in the environs of the Project site has already, and is significantly, changing. Exceptional pressures for housing and infrastructure is creating a cumulative adverse impact on the landscapes, settlements, and communities east of and south of the WHS (some 1080 houses on sites approved or planned) as well as an additional 2,200 new homes and a new science business park at the Salt Cross Garden Village to the south-west. The rural unaffected 'residual' or 'in between' landscapes - including the corridor of the Project site - are greatly valued by the local communities, and through this are perceived rightly to have an increased sense of sensitivity to change as development threats increase.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Gardens Trust	Landscape and visual	<p>In addition, when looked at in a wider landscape and planning context there are other related and existing influences that add to the perceptions that the Project site and its context have a particular value which should not be compromised. These include:</p> <ul style="list-style-type: none"> • The importance of open countryside and the Greenbelt in separating the relatively dense mosaic of historic hamlets, villages and Woodstock town from the City of Oxford which characterizes the area and prevents coalescence. • The Importance of maintaining open agricultural land as a counterbalance to the intensity of ongoing suburbanization, traffic congestion and other urban impacts. • The Importance of the rural character of the Project site being 	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		part of the gateway, tourist route and strategic setting for visitors approaching internationally significant destinations of the historic City of Oxford, Blenheim Palace WHS, the historic town of Woodstock, and the Cotswolds AONB.		
Gardens Trust	Landscape and visual	The assessment of views (PEIR non-Technical Summary and LVIA) is incomplete and does not fully assess the effects in operation. Views are in one direction only but should be to and from viewpoints on PROW and of key heritage assets including Blenheim Palace, listed buildings, archaeology, and ancient woodland etc. There are only 18 photomontage visualizations so far and many of the most severe impacts are not	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3] The Applicant has continued to prepare additional visualisations to

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>illustrated. For example, viewpoints with high visual impact and no photomontage include viewpoint 9 near Grade II* Hordley House and historic landscape; a reverse of this view looking towards the house is also needed to establish the impact on setting. The value of Historic Routes is also an omission that has yet to be assessed: Akeman Street, Dornford drove road, Eynsham toll road, and long-distance routes such as Oxford Greenbelt Way and the Oxfordshire Way. Another omission is the lack of assessment of non-registered sites contained in the draft Gazetteer of Parks and Gardens in Oxfordshire compiled by OGT. Lower Dornford, a landscape designed by Capability Brown which is on the OGT Gazetteer, has not been assessed in the</p>		<p>support the ES, which are presented as photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 [EN010147/APP/6.4] The impact of the Project upon the setting of heritage assets including Hordley House, historic parks and gardens and the World Heritage Site are assessed in Chapter 7 of the ES [EN010147/APP/6.3]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		PEIR. The PEIR also fails to assess the impacts of the proposed solar farm on the significance of heritage assets and their settings as required in NPPF 2023, paragraph 194.		
Gardens Trust	Landscape and visual	GT and the OGT believe the consultation lacks adequate identification of designated heritage assets impacted, in addition to contextual and related designations or assessments of cultural value such as historic routes, ancient woodland and local farmland character areas which all contribute to the setting and approach to Blenheim WHS and Grade I RPG. The consultation fails to adequately assess their significance and level of harm which would be caused.	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5].</p> <p>A detailed assessment of the likely impacts and</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].
Gardens Trust	Planning policy	UK planning policy legislation can allow development to take place if 'public benefit' can be shown to outweigh harm. However, such a test does not apply to a WHS. The evaluation process of UNESCO/World Heritage Committee of the impacts on the OUV of a WHS does not allow for adverse impact to be balanced or mitigated by public benefit. In such a situation it is for the UK to make a final decision whether to issue a development consent order (DCO). This risks UNESCO choosing to place Blenheim on their List of World	Yes	The Applicant notes this comment. A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Heritage Sites in Danger and even deleting it from the World Heritage List as was the case for the Liverpool WHS in 2021.		
Gardens Trust	Site selection and alternatives	The GT/OGT are, however, concerned that the proposal does not respond to an overarching national spatial strategy to guide appropriate land use including for solar sites countrywide. The choice of energy sites is currently unplanned and opportunistic. Nor does it provide a national picture of the significance of heritage, ecology, and landscape against which the selection of the Botley West proposal can be seen to have been sequentially evaluated and then selected as an appropriate location. Where are the other potential sites and why have they been ruled out?	Yes	Site Selection and Alternatives are considered within Vol 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Gardens Trust	Site selection and alternatives	Despite the undesirability of this scheme, which we strongly oppose, we consider that walking routes/cycleways/foot paths and bridleways between the various solar blocks should be generally far wider, with mixed native hedgerows and trees. This would improve the experience for users, softening and somewhat disguising the stark security fencing as well as increasing biodiversity.	Yes	<p>The effects of the Project on Public Rights of Way are considered within Vol 1, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1] The Project includes the provision of 26.5 km of new species rich hedgerow that will increase the habitat available. Hedgerows and trees will be incorporated to either side of PRow routes (trees to one side only in some places to avoid shadowing of panels). Details of typical sections of footpath and</p>

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				<p>cycle path routes are illustrated in Figure 7.6.3.2 [EN010147/APP/7.6.3]</p> <p>New woodland block along with hedgerow corridors are proposed to ensure a continued link to existing woodland habitats.</p>
Gardens Trust	Landscape and visual	Further, staff at public event centres including Cassington were unable to provide adequate information on assessment of views and settings impacted, referring to the sample of viewpoints in the PEIR, which are woefully inadequate, from one view only, not to, from, in and around assets and not assessed according to the NPPF 2023 in terms of significance and substantial or less than substantial levels of harm.	Yes	<p>The Applicant notes that the LVIA has been completed in accordance with industry standard guidelines (GLVIA3) assessing magnitude and significance from all Representative Viewpoints and other receptors.</p> <p>A preliminary assessment was presented for consultation so not all views were available.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Historic England	Historic Environment	The comments set out in this letter would need to be incorporated into future impact assessment work, including the ES, and further drafts of the Heritage Impact Assessment (HIA), before Historic England would consider that the detail and conclusions are sufficiently robust, supportive of each other, fit for decision-making, and appropriate for a major infrastructure project with the potential to impact the Blenheim Palace World Heritage Site.	Yes	The Applicant notes this comment, and has addressed this within Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] . The ES contains an updated HIA at Appendix 7.4 [EN010147/APP/6.5]
Historic England	Historic Environment	Historic England has emphasised that impacts on the Overall Universal Value (OUV) of the WHS must be approached in a manner appropriate to this highest form of heritage designation. Great emphasis must be placed on avoiding (preferably) or minimising impacts through design or site selection	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>(for example), rather than relying on mitigation.</p> <p>The attributes of the OUV of the WHS and the elements that support those attributes have not always been given sufficient weight or have not been sufficiently assessed both in themselves, and in terms of the predicted impact on them. This is particularly important for attributes and elements relating to setting of the WHS.</p>		<p>Assessment [EN010147/APP/6.5].</p>
Historic England	Historic Environment	<p>A more considered approach is needed to the 42-year life span of the project which is described as temporary. The PEIR should recognise that the scheme will be experienced by many as permanent.</p>	No	<p>The consent sought for the Project is time-limited and covers the periods of construction, operation and maintenance, and decommissioning. UK government policy is that time-limited consents, where granted, should be described as temporary regardless of the duration of</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>the consent (e.g. National Policy Statement for Renewable Energy Infrastructure (EN-3), paragraph 2.10.66). Notwithstanding this point, the assessment of likely impacts and effects presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] uses the terms 'short-term', 'medium-term', 'long-term' and 'permanent' to describe the duration of impacts, and therefore does not the use the term 'temporary'.</p>
Historic England	Historic Environment	Benefits, particularly possible heritage benefits, require more detailed treatment.	Yes	Positive benefits with regard to buried archaeological remains are set out in Section 7.9 of Volume 1, Chapter 7: Historic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Environment of the ES [EN010147/APP/6.3].</p> <p>Positive benefits with regard to the Blenheim Palace WHS are set out in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES [EN010147/APP/6.5].</p>
Historic England	Historic Environment	<p>Designated heritage assets both inside and outside of the WHS have not yet been assessed (7.9.5.3) so our comments are limited at this time. We would have expected a more realistic and detailed assessment of the potential impacts of the proposals on these designated heritage assets to have been provided at this stage. We however do welcome the intention to avoid direct impacts on designated assets, meaning that the focus of</p>	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5:</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		future assessment will be on impact caused by change to their settings.		Settings Assessment of the ES [EN010147/APP/6.5] . A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .
Historic England	Historic Environment	For non-designated heritage assets we welcome the approach taken thus far which has included extensive consultation with the Oxfordshire County Archaeology Team and desk-based assessment followed by geophysical survey. Discussions regarding the scope of evaluation work (trial trenching) are in progress. The research done so far has already found below-	Yes	The Applicant notes and welcomes this comment from Historic England.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		ground archaeological remains which may well be of equivalent (national) importance to designated sites. The approach taken to such remains, of avoiding direct impacts and assessing the impact of change to their setting, is welcome.		
Historic England	Historic Environment	We note that the results of the evaluation trenching will be incorporated into the Environmental Statement (ES) and this will be valuable, as is the intention to use these results in adjusting the design of the scheme to reduce or remove impacts.	Yes	The programme of trial trenching commenced in August 2024. The reports on the results of this work will be submitted to the Examining Authority at the earliest possible opportunity. The Project design has already been adjusted to ensure the protection of buried archaeological remains. The evolution in the Site layout is described in Chapter 5 of the ES [EN010147/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Historic England	Historic Environment	We have below for your reference a number of policy areas of relevance to development within the setting of a WHS, particularly for renewable energy. These were not generally referenced in the HIA or PEIR. However welcome the use made of the <i>Guidance and Toolkit for World Heritage Assessments in a World Heritage Context</i> (UNESCO 2022).	Yes	Noted. Reference is made to these policy documents within Volume 3, Appendix 7.1: Historic environment desk-based assessment of the ES [EN010147/APP/6.5] .
Historic England	Historic Environment	It is important that any statements made within the PEIR are clearly supported by evidence. Where statements are predictive, due to the preliminary nature of the document and supporting assessments, it should be clear that the statements may need to be revised for the ES. This includes revision beyond a predicted range, e.g. where impacts are predicted as 'Up to Low', further assessment may	Yes	The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] . A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5:

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		identify impacts that are greater than low.		<p>Settings Assessment of the ES [EN010147/APP/6.5].</p> <p>A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>
Historic England	Historic Environment	The Non-technical Summary (NTS) concludes that: 'No significant effects in respect of any aspect of the historic environment have been identified within the PEIR.' (6.2.14). The Phase Two Community Consultation Leaflet repeats that statement. This is not supported by the contents of the PEIR. Chapter 7 on heritage assesses that impacts on designated	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A detailed assessment of likely impacts and effects on heritage assets as a result of change within their</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>heritage assets may be up to moderate adverse, which is significant (7.9.5.6). (These impacts would be from change to the setting of the assets - the PEIR seems confident that the impacts can be reduced (7.9.5.7) but this is premature when detailed assessment has not been carried out.)</p>		<p>setting is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5]. A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5]. No significant adverse effects have been identified.</p>
Historic England	Historic Environment	<p>Table (7.17) summarises potential environmental effects and monitoring. Impacts on archaeological remains are assessed as up to low, leading to minor adverse effect (not significant). This may need to be revised when the archaeological trench evaluation work has been carried out. We also note that</p>	Yes	<p>A total of 43 areas containing significant buried archaeological remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as Figures 2.1 – 2.3 within</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>some cable trenches are in road verges where evaluation is not possible and opportunity for mitigation by design (if the trench passes through archaeological remains) will be very limited. A greater effect could therefore also occur in that situation.</p>		<p>Volume 2, Figures of the ES [EN010147/APP/6.4].</p> <p>The mitigation measures established for the avoidance and/or reduction of potential impacts on significant archaeological remains are set out in Section 7.8 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>Options for reducing impacts on buried archaeological remains during the construction of the 275 kV cable route are set out in Section 7.9 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>The assessment of likely impacts on buried</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				archaeological remains concludes that any effects would be of minor adverse significance and therefore not significant.
Historic England	Historic Environment	The project has an anticipated life span of 42 years and is described within the PEIR as temporary. The PEIR should approach and discuss this in a more nuanced way as the solar installation will be experienced by many people as permanent (e.g. for all of their remaining lifetime). In discussions of setting of heritage assets, experience is a key factor and there are a range of experiences to be considered. These range from a single visit to Blenheim Palace, to a local person who has	Yes	The consent sought for the Project is time-limited and covers the periods of construction, operation and maintenance, and decommissioning. UK government policy is that time-limited consents, where granted, should be described as temporary regardless of the duration of the consent (e.g. National Policy Statement for Renewable Energy Infrastructure (EN-3),

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>known the area all their life and walks regularly in the surrounding countryside. The predicted life span of the project may be 42 years but can this be guaranteed for a point so far in the future when planning regimes and technology will be very different. The solar installation could have its life extended or be replaced by a different technology, particularly considering that it will have the advantage of already being connected to the grid. All these points should be considered.</p>		<p>paragraph 2.10.66). Notwithstanding this point, the assessment of likely impacts and effects presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] uses the terms 'short-term', 'medium-term', 'long-term' and 'permanent' to describe the duration of impacts, and does not use the term 'temporary'.</p>
Historic England	Historic Environment	<p>Throughout the PEIR many impacts are described as fully reversible (e.g. see NTS 6.7.15). Taking a cautious approach, we would note that changes such as planting to screen the solar plant are potentially reversible but in practice this is unlikely to happen after over forty years of growth. Although planting may be</p>	Yes	<p>This issue is discussed within Section 7.9 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] and in detail within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		ecologically beneficial it is not always beneficial within the setting of heritage assets and could be a permanent effect.		<p>Assessment of the ES [EN010147/APP/6.5].</p> <p>A geophysical survey has been carried has covered all areas of the Site that are suitable for this type of survey, including areas proposed for new planting. The results of this survey are presented within Volume 3, Appendix 7.3: Geophysical Survey Report of the ES [EN010147/APP/6.5]</p> <p>It is correct that some of the landscape mitigation planting is unlikely to be removed during decommissioning due to its ecological benefits As outlined in section 7.9 of Chapter 7: Historic Environment of the ES,</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>some components of the historic landscape may be strengthened through reinforcement of existing hedgerows, whilst some existing footpaths may be more visually prominent as a result of the planting of new hedgerows along each side. The planting of new blocks of woodland as part of the landscape and ecological mitigation would not affect the character of the historic landscape as similar woodland blocks are already present.</p>
Historic England	Historic Environment	<p>There is very limited discussion in the PEIR (and the HIA) of predicted positive impacts on heritage assets, or of benefits that could accrue from the scheme which would provide community benefit or directly benefit the WHS. There would appear to be</p>	Yes	<p>Positive benefits with regard to buried archaeological remains are set out in Section 7.9 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3]. By way of example, where</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		scope for positive impacts including support of the WHS by the wider estate as has traditionally been the case.		<p>surveys have identified the presence of areas containing significant archaeological remains, no development is proposed and these areas would be retained as grassland within the development. The change in land-use within these areas containing significant archaeological remains (from arable to grassland) represents a positive contribution to the historic environment as these areas would no longer be subject to recurring impacts from ploughing and secondary cultivation.</p> <p>Positive benefits with regard to the Blenheim Palace WHS are set out in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				– Heritage Impact Assessment of the ES [EN010147/APP/6.5].
Historic England	Historic Environment	This is covered in a preliminary Heritage Impact Assessment (HIA) which is included within the PEIR as Appendix 7.4. The HIA is recommended in the Guidance and Toolkit for World Heritage Assessments in a World Heritage Context (UNESCO 2022). We welcome the use of this toolkit, and the use of the Blenheim Palace World Heritage Site Revised Management Plan 2017, Historic Landscape Management Ltd 2017), (WHSMP). We also welcome the commitment to an iterative approach and ongoing engagement with Historic England. Detailed advice on the preliminary HIA has recently been given to the applicant for	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		consideration and what follows is a summary of that advice.		
Historic England	Historic Environment	Historic England has emphasised that impacts on the OUV of the WHS must be approached in a manner appropriate to this highest form of heritage designation. Great emphasis must be placed on avoiding (preferably) or minimising impacts through design or site selection (for example), rather than relying on mitigation. We remain concerned that throughout the HIA, impacts on the WHS are described as 'minor adverse', 'not significant' or 'acceptable'. The HIA process (in line with UNESCO guidance) should provide a more detailed understanding of impacts on OUV	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		such that it identifies impacts that would not be considered acceptable in a WHS context (and are therefore potentially adverse and significant).		
Historic England	Historic Environment	The question of considering alternative sites is also relevant here. The HIA does not currently include the detail on how the current site configuration has been arrived at. The extent to which a given negative impact is avoidable is therefore unclear. The process of identifying certain land parcels as potentially suitable to accommodate the proposed development is described in the HIA as being based on the principle of avoidance of <u>significant adverse effects</u> following the principle of EIA. In the absence of an HIA until this stage, and at this stage only at screening level, we would	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		be cautious about any conclusions that have been reached on that basis.		
Historic England	Historic Environment	The attributes of the Overall Universal Value (OUV) of the WHS and the elements that support those attributes have not always been given sufficient weight or have not been sufficiently assessed both in themselves, and in terms of the predicted impact on them. We therefore advise that the HIA is not currently sufficiently robust to support the conclusions reached, such as: no element of the defined OUV of the Blenheim Palace WHS would be affected by the Project, and ...lead the Applicant to conclude that overall there is no impact - described as	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		a neutral effect in the overall evaluation table above.		
Historic England	Historic Environment	The scheme is entirely located outside of the WHS and its enclosing stone wall, meaning that the most important attributes, values and impacts to be considered are those concerning how the wider setting of the WHS contributes to its OUV.	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Historic England	Historic Environment	<p>The Impact Identification Table of the HIA sets out attributes and predicted impacts on them. We advise that the table needs considerable revision, as follows:</p> <ul style="list-style-type: none"> • Consider attributes individually before considering any groups of attributes. • Entries under impact should be directly relatable to the attribute and there should not be what appears as cut and paste. For example, the first attribute is: It remains the home of the same aristocratic family, the successive Dukes of Marlborough, for whom it was built. Under Impact the entry reads: No direct effect upon the Palace or grounds within its walled boundary. No material change in traffic flows is predicted above existing levels on surrounding road network, nor significant change to visual impacts or landscape character or 	Yes	<p>These issues are addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>setting. Once decommissioned, land to return to agricultural use. This does not seem relevant, and the same text is then repeated for various entries in the table.</p> <ul style="list-style-type: none"> • Attributes of the OUV are supported by a number of elements. In relation to setting, these are given in 5.02 of the WHSMP; Appendix III: Setting Study . One highly relevant element of Blenheim's OUV : The character of the setting as traditional English countryside, dotted with picturesque villages mainly built using a uniform palate of materials, is mentioned in the HIA but then not assessed. • The Table could usefully address the questions of authenticity and integrity so that the existing baseline can be understood, and the potential change. 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Historic England	Historic Environment	The WHSMP mentions solar farms under 'Managing the setting' notes on page 44. Tall developments on the skyline, or large-scale development (particularly those of a non-residential nature which tend to be bulkier and non-vernacular, for example industrial development; wind turbines; solar farms etc) could detrimentally influence the character of the adjoining rural areas. We advise that this impact has been given insufficient weight in the HIA, by not taking adequate account of attributes (see above), but also because the rural nature of the setting of the WHS has a particular historic value. In this context it is important that change to setting is considered in the widest sense, without over-reliance on consideration of intervisibility - we consider this to	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		be a weakness of the HIA current draft.		
Historic England	Historic Environment	The wider setting of the park, part of the Blenheim Estate, has traditionally supported and protected what is now the WHS. Change to the setting has the potential to have a negative impact on the understanding of this close historic relationship if the rural character is eroded. This point needs to be considered in relation to the impact on the historic landscape character in the HIA (and PEIR) where the value of the historic landscapes may be higher than the current assessment of 'Generally low'. Enclosure landscapes, which are a large proportion of the areas considered, were enclosed due to the influence of the Dukes of Marlborough and they therefore have value in relation to the WHS	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		which is higher than their intrinsic value.		
Historic England	Historic Environment	With regard to views, the HIA has assessed the impact on the WHS from two sites: the Column of Victory and Blenheim Palace; these are tightly defined. The WHS boundary is obviously far larger than that. Page eight states that 'Indeed, no part of the Project site is visible from any location within the WHS'. The HIA will need to set out what other viewpoints have been assessed to support this statement. Chapter 4 of Appendix III of the WHSMP sets out a number of key and secondary views which should be considered. Whilst views out are limited now, it is important to remember the forty-two year	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		lifetime of the scheme, especially where existing tree cover is to be relied on. Where there are views with less dense tree screening, the impact on these views and the natural life of the tree screening should be examined.		
Historic England	Historic Environment	We advised previously that the LVIA and HIA would need to be closely connected. The assertions in the HIA regarding potential visibility of the proposed development are presented, currently, without the detailed supporting evidence from the LVIA. We would recommend that you review the relevant sections of the PEIR (Chapter 8 and Figures) to understand the scope of representative viewpoints incorporated and to assess whether representative viewpoints are a robust basis for assessment of visual impacts relevant to OUV.	Yes	<p>This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p> <p>Additional Viewpoints have been agreed with Historic England. The visualisations from these additional Viewpoints will be reviewed</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				against the current assessment of impacts and effects. Summer photography has already been captured, and winter photography will be secured between December and February, and in advance of examination.
Historic England	Historic Environment	Positive impacts and benefits, including heritage benefit have already been mentioned above as being inadequately covered. This point applies particularly to the WHS, where communal value is part of the OUV and community benefit is therefore clearly desirable.	No	Positive benefits with regard to the Blenheim Palace WHS are set out in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Historic England	Historic Environment	<p>Individual designated heritage assets both inside and outside of the WHS have not yet been assessed (7.9.5.3) so our comments are limited at this time. We would have expected a more realistic and detailed assessment of the potential impacts of the proposals on these designated heritage assets to have been provided at this stage. We however do welcome the intention to avoid direct impacts on designated assets, meaning that the focus of future assessment will be on impact caused by change to their settings. On this matter paragraph 7.9.5.4 is too generalised and the term 'reasonable contribution' is too woolly to be useful. (7.9.5.4 For most designated heritage assets, the greatest part of their significance comes from their</p>	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5].</p> <p>A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>physical fabric. However, for some designated heritage assets their setting may make a reasonable contribution to their significance.) As noted above, the Non-technical summary is not in step with the Heritage Chapter 7 - which predicts that: Overall, the magnitude of the adverse impact is up to low and the sensitivity of the receptor is up to high. The effect will, therefore, be of up to moderate adverse significance, which is significant. (7.9.5.6). The chapter goes on to suggest that there is uncertainty on this but that design changes would enable the effect to be reduced - this seems premature when the values and impacts have not yet been assessed. Our comments above on the reversibility of impacts from change to setting apply equally to these assets.</p>		<p>Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Historic England	Historic Environment	As part of that further examination of the setting of designated heritage assets (7.9.5.3), as highlighted above, there should be a close connection with the LVIA in order to provide the evidence base for the conclusions that are drawn. We are pleased to hear that photomontage visualisations will be prepared, and we recommend that the precise locations of these are reviewed so that any visual impacts on the historic environment can be fully assessed. These photomontages should illustrate not only the solar panels themselves, but also any associated infrastructure proposed (e.g. fencing, lighting, cctv towers and battery storage) so the full visual impact of the proposal can be understood. Historic England would be happy to work alongside the local	Yes	<p>This issue is addressed within the detailed assessment of the likely impacts and effects on heritage assets as a result of change within their setting which is presented in Volume 3, Appendix 7.5: Settings Assessment [EN010147/APP/6.5].</p> <p>Additional Viewpoints have been agreed with Historic England. The visualisations from these additional Viewpoints will be reviewed against the current assessment of impacts and effects.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		authority in identifying these key viewpoints.		
Historic England	Historic Environment	For non-designated heritage assets we welcome the approach taken thus far which has included extensive consultation with the Oxfordshire County Archaeology Team and desk-based assessment followed by geophysical survey. Discussions regarding the scope of evaluation work (trial trenching) are in progress. The research done so far has already found below-ground archaeological remains which may well be of equivalent (national) importance to designated sites, including a possible Roman temple. The approach taken to such remains, of avoiding direct impacts and assessing the impact of change to their setting, is welcome. However, predicting that the	Yes	The Applicant notes this comment. The approach taken to mitigation of potential impacts on significant archaeological sites is one of total avoidance, hence the predicted magnitude of impact as set out in Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] . We continue to work with Historic England on the further assessment of impacts and effects.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>magnitude of impact will be negligible seems premature (7.9.3.10). We would appreciate involvement in future discussions regarding assets of potential national importance.</p>		
Historic England	Historic Environment	<p>We note that the results of the evaluation trenching will be incorporated into the Environmental Statement (ES) and this will be valuable, as is the intention to use these results in adjusting the design of the scheme to reduce or remove impacts.</p>	Yes	<p>The programme of trial trenching commenced in August 2024. The reports on the results of this work will be submitted to the Examining Authority at the earliest possible opportunity. The Project design has already been adjusted to ensure the protection of buried archaeological remains.</p>
Historic England	Historic Environment	<p>There is a very full summary of national and local heritage policy and guidance in Section 1.3 of Appendix 7.1 (Desk-based Assessment). A summary of policy and guidance is in Chapter</p>	Yes	<p>The detailed and updated summary of national and local heritage policy and guidance is set out in Section 1.3 of Volume 3, Appendix 7.1: Historic</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>7 of the PEIR - please note that during this consultation process the NPPF has been updated (December 2023) and the paragraph numbers referred to above have now changed. We recommend these are updated to reflect the latest version of the NPPF.</p>		<p>environment desk-based assessment of the ES [EN010147/APP/6.5].</p>
Historic England	Historic Environment	<p>We have also noted below for your reference a number of policy areas of relevance to development within the setting of a WHS, particularly for renewable energy. In the main we did not identify reference to these in either the HIA or PEIR.</p> <p>The relevant National Policy Statements, in addition to policies in relation to the impacts on designated heritage assets (including World Heritage Sites), include policies with similar intent to that at paragraph 2 of the</p>	No	<p>These policies are referenced in Section 1.3 of Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>NPPF: <i>“Planning policies and decisions must also reflect relevant international obligations and statutory requirements.”</i> Amongst those international obligations are the UK Government’s duties under the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972) - the World Heritage Convention.</p> <p>NPS-EN1 (1.1.4): The Planning Act 2008 also requires that, where an NPS has effect, the Secretary of State must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent the Secretary of State is satisfied that to do so would lead to the UK being in breach of its international obligations. We noted that Chapter 7 of the PEIR makes no reference to Section</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		1.1.4 of NPS-EN1, nor paragraph 2 of the NPPF.		
Historic England	Historic Environment	The above comments would need to be incorporated into future impact assessment work, including the ES, and further drafts of the HIA, before Historic England would consider that the detail and conclusions are sufficiently robust, supportive of each other, fit for decision-making, and appropriate for a major infrastructure project with the potential to impact the Blenheim Palace World Heritage Site.	Yes	The Applicant notes this comment.
ICOMOS	Historic Environment	The proposed n Solar Farm is planned as three components: The most northerly runs north-south, north of Wootton to north of Woodstock towards the east of the Blenheim Palace World Heritage property. The northern site lies approximately 1km north to the north of the Blenheim	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Palace World Heritage property. The middle component is projected east and south of the Blenheim Palace World Heritage property between the villages of Begbrook to the east, Church Hanborough in the west and Cassington to the south. The most southernly component is planned north of the village Cumnor.</p>		
ICOMOS	Historic Environment	<p>The proposal is most proximate to the property at its southern end, just beyond Bladon Village, approximately 500m from the boundary. The area of the Blenheim Palace World Heritage property is therefore not included in the area planned for solar panels. The developer's leaflet 'Botley West Solar Farm Phase Two Community Consultation Leaflet November 2023' indicates that: 'Buffer zones around Bladon have been increased to mitigate</p>	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		against potential landscape and visual impacts.'		
ICOMOS	Historic Environment	The proposal is, however, located in the setting of the property: a predominantly rural environment that consists of woodland, punctuated by villages. The project will include approximately 110km length of fences at 2,1m height, the installation of – mostly subsurface – power cables and the construction of substations etc. The project does propose the planting and management of grassland, hedgerows, trees and areas of scrub to support the extant landscape character.	No	Noted.
ICOMOS	Historic Environment	The Statement of Integrity for the property, notes that: The integrity of the property is well protected by its enclosing wall but important visual links do exist between the gates, the parkland buildings,	No	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		buildings in the surrounding villages and landscape, and care needs to be taken to ensure these key visual links are protected.		presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].
ICOMOS	Historic Environment	The Statement on Protection and management requirements indicates that the Maintenance of the setting of the property is of importance to the maintenance of its Outstanding Universal Value: Government guidance on protecting the Historic Environment and World Heritage is set out in the National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents.	No	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
ICOMOS	Historic Environment	It also indicates that: Firm implementation of existing policies is important to provide effective protection of the setting of the World Heritage property and it will be important to ensure that the management of the Park prioritises conservation of the elements of the landscape that reflect the work of Vanbrugh and Brown.	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .
ICOMOS	Historic Environment	This concern with the setting of the property resonates with the provisions of the Operational Guidelines ¹ , which indicate that with regard the authenticity of the property that: [Par. 82] Depending on the type of cultural heritage, and its cultural context, properties may be understood to meet the conditions of authenticity if their cultural values (as recognized in the nomination criteria proposed) are truthfully and credibly	Yes	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		expressed through a variety of attributes including: ...location and setting... spirit and feeling and other internal and external factors.		
ICOMOS	Historic Environment	Par. 112 provides further guidance on the contribution of the setting of a property to the maintenance of Outstanding Universal Value: Effective management involves a cycle of short, medium and long-term actions to protect, conserve and present the nominated property. An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s), as well as the wider setting. The wider setting may relate to the	Yes	This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>property's topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization, and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the wider setting is related to its role in supporting the Outstanding Universal Value. Its effective management may also contribute to sustainable development, through harnessing the reciprocal benefits for heritage and society.</p>		
ICOMOS	Historic Environment	<p>Finally, Par. 118bis, taking cognisance of the importance of the wider setting of a property to the maintenance of its OUV mandates Impact Assessments for development projects and activities that are planned or</p>	Yes	<p>This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3,</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>implemented within or around a World Heritage property, including its wider setting. The guidance further notes that such assessments should: serve to identify development alternatives, as well as both potential positive and negative impacts on the Outstanding Universal Value of the property and to recommend mitigation measures against degradation or other negative impacts on the cultural or natural heritage within the property or its wider setting.</p>		<p>Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>
ICOMOS	Historic Environment	<p>Seeing the large change in landscape character of the wider setting of the World Heritage property that the Botley West Solar Farm proposal would lead to, if implemented, the proposal will have an impact on the wider setting of the property, and that this should be assessed before</p>	Yes	<p>This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		any decisions on its implementation are made.		Assessment [EN010147/APP/6.5] .
ICOMOS	Historic Environment	Concurrently, the proposal aims to reduce the State Party's reliance on carbon-emitting energy sources. The Botley West Solar Farm is presented to deliver 840 Megawatts (MW) of power and contribute to Oxfordshire's Energy Strategy and transition to net-zero. The updated UNESCO policy document on Climate Action for World Heritage, adopted by the General Assembly of States Parties at its 24th session (UNESCO, 2023) in Resolution 24 GA 8, acknowledges that: Climate change has become one of the most significant threats to World Heritage, impacting the Outstanding Universal Values (OUV), including integrity and authenticity, of many properties,	Yes	The Applicant notes this comment. This issue is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>as well as the economic and social development and quality of life of communities connected with World Heritage properties. The development of carbon-neutral energy sources is one strategy to limit human-induced climate change. The Policy document on Climate Action for World Heritage notes that: In the context of the World Heritage Convention, transformative change would be exemplified by decisions that contribute towards making World Heritage properties carbon neutral, as much as possible, and more resilient and better adapted to a changing climate, while safeguarding their Outstanding Universal Value. By acting as exemplars of climate action, World Heritage properties may serve as catalysts for change in the wider policy, economic, environment and</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		social sectors for the benefit of present and future generations.		
ICOMOS	Historic Environment	<p>From the above it is deduced that:</p> <ul style="list-style-type: none"> • The Botley West Solar Farm proposal will affect the wider setting of the Blenheim Palace World Heritage property, and therefore may have an impact on the maintenance of its Outstanding Universal Value, • The proposal should be assessed through an iterative Impact Assessment, that identifies development alternatives and mitigation 	Yes	<p>These issues are addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>measures to avoid negative impacts and ensure the maintenance of the Outstanding Universal Value of the property,</p> <ul style="list-style-type: none"> • The objectives of positive contributions to reductions in carbon emissions of the Botley West Solar Farm should be achieved while safeguarding the Outstanding Universal Value of the Blenheim Palace World Heritage property. 		
ICOMOS	Historic Environment	<p>The Botley West Solar Farm project is proposed in a development context where multiple applications for housing have been brought forward in the wider setting of the property. Some of these have been approved, such as east of Woodstock, while others have been submitted to the World Heritage Centre for review through Par. 172 notifications. These projects, along with the</p>	Yes	<p>These issues are addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Botley West Solar Farm project, presenting a potential large-scale conversion of the landscape character within which the property lies, if all are implemented, will result in a significant cumulative change in the wider setting of the property. The character of the setting, including what is passed through in the approach to the Park and Palace is important to the maintenance of the OUV of the property.</p>		
ICOMOS	Historic Environment	<p>The applicant has, in response to comments made by Historic England on the Scoping Report, commissioned a separate stand-alone Preliminary Screening/Assessment of Impacts upon the Blenheim Palace World Heritage Site specifically focussed on the Blenheim Palace World Heritage property, following the method</p>	Yes	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		recommended in the 2022 Guidance and Toolkit for Impact Assessment in a World Heritage Context. This is appended to the PEIR report.		
ICOMOS	Historic Environment	According to the EIA Scoping Report, the project is planned for implementation starting 2025-2027 and for operation from 2027-2067, following which all above-ground infrastructure is planned to be removed. Chapter 7 of the EIA Scoping report is of interest, specifically sections 7.1 'Historic environment' and 7.2 'Landscape and Visual Resources'. It is notable that the Section 7.1 'Historic environment' reporting on the Legislative and Policy Context does not include the 1972 World Heritage Convention and the commitment of signatory States Parties to the Convention to: ensure: ...the identification, protection,	Yes	The Applicant notes this comment. Chapter 6 of the ES, Project Description, contains an updated construction programme at Table 6.1 [EN010147/APP/6.3] The ES contains an updated assessment of the impacts of the Project upon the historic environment at Chapter 7 [EN010147/APP/6.3] and these issues are addressed further within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site, which is presented in Volume 3,

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory... ' and that it will: 'do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.'		Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].
ICOMOS	Historic Environment	Section 7.1 'Historic environment' also does not mention the Operational Guidelines, though it does refer to the 2022 Guidance and Toolkit for Impact Assessments in a World Heritage context. Its description of the Blenheim Palace World Heritage property in the Baseline Assessment refers only to the property – not to its Outstanding Universal Value nor to the	Yes	These issues are addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		potential importance of the setting of the property. The baseline assessment does however propose that a historic environment desk-based assessment baseline study be conducted to: '... identify designated heritage assets whose significance may be affected through changes in their settings resulting from the construction, operation and decommissioning of the Project'		
ICOMOS	Historic Environment	Section 7.1 'Historic environment' also proposed to limit the area to be assessed for visual impacts on Heritage assets to 2km from the boundaries of the development area and identifies potential effects on the settings of designated heritage assets during construction, operation and decommissioning of the project. It is notable that the Scoping Report includes an 'Approach to	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Mitigation, Enhancement and Monitoring,' which states that: 'Consideration will be given to any situation where the Project will lead to effects on the significance of heritage assets as a result of change within their settings. It may be possible that mitigation could be proposed that would eliminate or reduce any adverse effects.'		
ICOMOS	Historic Environment	Section 7.2 'Landscape and Visual Resources' indicates the EIA will include the assessment of visual impacts based on an analysis of the Zone of Theoretical Visibility as well as the resultant change in landscape character that is expected due to the proposal. The 5km study area for the landscape and visual receptors will include the Blenheim Palace World Heritage property.	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
ICOMOS	Historic Environment	The Historic Environment chapter of the PEIR continues on from the Scoping Report and indicates that the proximity of the Blenheim Palace World Heritage property was identified as a constraining factor to the development of the project throughout the identification and selection of areas for solar development. It also outlines the process towards the selection of areas for the solar farm development, effectively arguing that the process of land selection has shown that no other viable and available locations exist. In the section: Need, National Planning Policy, and Alternatives Considered it refers to the State Party's commitments to the Kyoto Protocol (1997), the United Nations Paris Agreement (COP21) and COP26, the UK Climate Change Act (2008, as amended) etc. It does not	Yes	These issues are addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		consider the State Party's commitments under the 1972 UNESCO World Heritage Convention.		
ICOMOS	Historic Environment	The PEIR Volume 1 Chapter 7 outlines the preliminary assessment of the impact of the proposed development on the Historic Environment. The Blenheim Palace World Heritage property is identified as a receptor with 'Very High' sensitivity; the 'Overall character of the historic landscape' is assessed as having a 'Generally low' sensitivity/ value.	No	The Applicant notes this comment.
ICOMOS	Historic Environment	No development will take place within the property and the proponent has worked to avoid any direct visual impacts of the proposed development. These	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		mitigatory measures are also reported to in the preliminary standalone HIA, which includes visualisations that show that the solar farm components will not be visible from within the property.		
ICOMOS	Historic Environment	The PEIR, due to its assessment of the sensitivity rating of the larger historic landscape, finds the impact of the proposal on this receptor to be 'Up to Minor Adverse'.	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5].</p> <p>A detailed assessment of the likely impacts and</p>

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				effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .
ICOMOS	Historic Environment	The preliminary standalone HIA focusses on the property, provides a first identification of the attributes of the Outstanding Universal Value of the property. It also defines the setting of the property through reference to Appendix 3 on the Management Plan for the property.	No	The Applicant notes this comment.
ICOMOS	Historic Environment	The preliminary standalone HIA concludes that none of the attributes that contribute to the Outstanding Universal Value of the Blenheim Palace World Heritage property will undergo any change and that,	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		consequently, the impact on all will be neutral.		Assessment [EN010147/APP/6.5].
ICOMOS	Historic Environment	The Blenheim Palace World Heritage property is of international significance, amongst others, as a historical designed landscape park, which is emblematic of the Arcadian landscape ideals associated with the English Romantic movement. The Arcadian Landscape presents an idealisation of a bucolic pastoral landscape. As such, landscape parks like that at Blenheim should not be seen in isolation but rather as inextricably linked to the rural vestiges of its wider setting. This lineage goes beyond the visual, and includes, as defined in the Operational Guidelines, topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		organization, and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Blenheim and the experience of Blenheim is linked to the Oxfordshire landscape.		
ICOMOS	Historic Environment	ICOMOS therefore does not agree that the 'Overall character of the historic Landscape' can be typified as 'Generally Low'. Such a typification, made in the PEIR, cannot be supported when the landscape is seen as the setting of the Outstanding Universal Value of the Blenheim Palace World Heritage property. Consequently, ICOMOS considers that the assessment of the impact of the proposed solar development, which will transform for a period of at least 40 years of	Yes	<p>The updated assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].</p> <p>A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5:</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>roughly 1000 ha of land and see the installation of 107km of 2,1 high fences on the wider setting of the OUV of the Blenheim Palace World Heritage property as 'Minor Adverse' to be inaccurate. ICOMOS considers that both the historical legibility of and the perception of the property may be dramatically altered by as significant a conversion of the predominantly rural wider setting of the property to effectively a semi-industrial landscape. ICOMOS also notes the concerning erosion of the landscape character of the immediate and wider settings of the</p>		<p>Settings Assessment of the ES [EN010147/APP/6.5].</p> <p>A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>
ICOMOS	Historic Environment	<p>ICOMOS is appreciative of the amount of in-depth research undertaken in preparation of the assessment of impacts of the Botley West Solar Farm project. It also acknowledges and supports</p>	No	<p>The Applicant notes this comment.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the State Party's international commitments and ambitions to achieving net-zero, including through a transition away from carbon-emitting energy production. Solar energy development offers one pathway in this direction. At the same time ICOMOS is cognisant of the State Party's commitment to the maintenance and transmission of the Outstanding Universal Value of the World Heritage properties, including that presented by the Blenheim Palace World Heritage property, under the 1972 World Heritage Convention.</p>		
ICOMOS	Historic Environment	<p>The preventative steps undertaken by the project proponent to ensure that the project will not have any direct visual impact on the World Heritage property are appropriate and commendable. These actions however do not eliminate all</p>	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>potential impacts on the World Heritage property. ICOMOS considers that the possible impact of the project on the setting of the property has not been fully investigated. ICOMOS also assess that the PEIR seems not to have taken sufficient note of the State Party's international obligations under the 1972 World Heritage Convention in assessing the proposed development.</p>		
ICOMOS	Historic Environment	<p>ICOMOS therefore advises that the PEIR remains limited in its consideration of the Outstanding Universal Value of the property including the contribution of the wider setting of the property to its Outstanding Universal Value. This is an aspect that should be further explored.</p>	Yes	<p>A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
ICOMOS	Historic Environment	<p>ICOMOS also notes that Historic England has advised that the preliminary standalone HIA should be further developed. ICOMOS concurs with this assessment. ICOMOS advises that such a further development should focus on:</p> <ul style="list-style-type: none"> • The revision and more thorough inventory of the attributes that contribute to the Outstanding Universal Value, as this is very underdeveloped in the November 2023 version of this document, • A further development of the relationship between property and its setting, including its wider setting, that explores the linkages between property and (wider) setting beyond only direct visual relationships, but also establishes how the wider setting supports the maintenance, legibility and experience of the property from the perspective of land use, 	Yes	<p>These issues are addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>spatial organization, social and cultural practices, perceptions and associations,</p> <ul style="list-style-type: none"> • The fact that the property has no defined buffer zone to provide an additional layer of protection to the property, • The setting and wider setting are under threat from diverse development proposals, meaning the cumulative impacts should be carefully considered. 		
ICOMOS	Historic Environment	<p>To achieve the above, ICOMOS additionally advises that:</p> <ul style="list-style-type: none"> • The proponent of the development commission a Landscape Character Assessment, specifically focussed on the relationship between the wider setting of the property and its Outstanding Universal Value as a baseline assessment from which a further assessment of the impact on the Outstanding Universal Value of 	Yes	<p>It is beyond the scope of the Applicant to undertake an extensive Landscape Character Assessment. The issue of the wider setting of the World Heritage Property is addressed within the detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site which is presented in Volume 3, Appendix 7.4: Blenheim</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the property can be further developed. Such a Landscape Character Assessment should:</p> <ul style="list-style-type: none"> o Be undertaken as a foundational study to allow for the further development of the HIA, noted above, o Assess the efficacy of the management of the immediate and wider setting in maintaining the landscape character of the immediate and wider setting of the property, and o Clearly explore the importance of the wider setting, also in the understanding of the immediate setting and wider setting as what is passed through in the approach to the Park and Palace that cumulatively may have a large negative impact on the Outstanding Universal Value of the property. 		<p>Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
ICOMOS	Historic Environment	In conclusion, ICOMOS, based on the material at its disposal, advises that it considers that the proposal will likely have an adverse impact on the Outstanding Universal Value of the World Heritage property and advises that the proponent consider alternative locations for this development to avoid these negative impacts on the Blenheim Palace World Heritage property.	No	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .
ICOMOS	Historic Environment	ICOMOS also expresses its concern at the level of development pressure on the immediate setting and wider setting of the property, specifically in this context where the property has no buffer zone defined to provide it with an extra layer of protection. The continued erosion of the landscape character of the immediate and wider settings pose an imminent danger of erosion on the contribution of the	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		setting of the property to its Outstanding Universal Value.		
ICOMOS	Historic Environment	Should the proponent wish to continue to consider the project, ICOMOS recommends that the State Party submit further developed iterations of the PEIR, the proposed Landscape Character Assessment and the preliminary standalone HIA for review before any further decisions are made on the future implementation of the project.	Yes	A detailed assessment of the likely impacts and effects on the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment [EN010147/APP/6.5] .
Kidlington Parish Council	Decommissioning	Solar farms are usually established for 30 or more years, but decommissioning costs can be twice as large as original installation costs. Solar farms frequently change ownership during their lifetime and there is no guarantee that future owners will pay for decommissioning.	Yes	The application is supported by an outline Operational Management Plan [EN010147/APP/7.6.2] and an outline Decommissioning Plan [EN010147/APP/7.6.4] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Kidlington Parish Council	Fire Safety	Solar panels can occasionally catch fire spontaneously. Given the very large number of panels involved, Botley West presents a 10 sq. km fire hazard, in many places without obvious access for fire control measures.	No	The ES considers the likely significant environmental effects. Fires are considered to be unlikely. To the extent this is relevant fire risk will be referred to in the Outline Operational Management Plan, and developed in detailed management plans for approval as Requirements under any DCO approval [EN010147/APP/7.6.2]
Kidlington Parish Council	Ground conditions	Many claims are made for increased biodiversity within solar farms. The reality is different. Toxic chemicals leak slowly from commercial panels and permanently pollute the soil.	No	The Applicant notes that no source of information provided for the background to this statement. A report prepared for Welsh Government 'The impact of solar photovoltaic (PV) sites on agricultural soils and land' (2023) does not identify this as a potential risk to soil quality and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				regular inspection in accordance with the Outline Operational Management Plan [EN010147/APP/7.6.5] and replacement of any damaged panels during operation would negate any risk from failure of panel components.
Kidlington Parish Council	Hydrology and flood risk	Run-off from the panels causes gulley erosion of the soil and possible flooding of nearby properties.	Yes	<p>Whilst the ES chapter, FRA and Conceptual Drainage Strategy ensure the design of the site does not increase flood risk it is proposed to provide a betterment to the existing surface water risk at this location given the pre-existing issues.</p> <p>Surface water modelling has been undertaken for the catchment area upstream and including Cassington. The results of which are</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>detailed in Appendix 10.5: Surface Water Modelling Report [EN010147/APP/6.5]. The model report shows that flood depths may reach up to 0.5m during a modelled 100 year plus climate change event.</p> <p>Measures have been proposed to provide a betterment to surface water runoff and this is discussed in the Conceptual Drainage Strategy for the site within Appendix 10.2: Conceptual Drainage Strategy [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Kidlington Parish Council	Land use and agriculture	There is a food emergency as well as a climate emergency. Britain currently imports more than half of the food we eat. We should not use any productive farmland for solar farms when there are 250,000 hectares of unused, south-facing commercial roofs in the UK.	Yes	<p>The Applicant notes this comment and appreciates the importance of agricultural land in providing food to the UK.</p> <p>Justification for the location of the Project, including the design and environmental constraints considered is provided in Volume 1, Chapter 5: Alternatives Considered of the ES [EN010147/APP/6.3].</p> <p>The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the Development Consent Order (DCO) application. The measures to be implemented as part of the Soil Management Plan seek to minimise</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>impacts on soil health and protect and maintain soil quality during construction of the Project.</p> <p>These measures also include the preparation of a Code of Construction Practice in general accordance with the Outline Code of Construction Practice [EN010147/APP/7.6] submitted with the application for development consent. The measures to be implemented as part of the Code of Construction Practice seek to limit disruption to the operation of individual farm holdings through effects on access to land.</p>
Kidlington Parish Council	Landscape and visual	Botley West Solar Farm (BWSF) would be the biggest Solar Farm	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		in Europe (currently the eleventh biggest in the world), and would be the biggest solar farm anywhere globally built on farmland.		
Kidlington Parish Council	Landscape and visual	The Green Belt is for leisure, health and landscape views, not for solar factories. More than three-quarters of BWSF falls within Oxford's Green Belt, occupying more land within 2kms of the city than all of the proposed new houses being built there.	Yes	Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1] .
Kidlington Parish Council	Landscape and visual	Botley West would be situated between Oxford city and the Blenheim Palace World Heritage site, sits on the border of an Area of Outstanding Natural Beauty (the Cotswolds), is overlooked by ancient woodlands and the world class Site of Special Scientific Interest, Wytham Woods, and is consequently an obvious tourist destination. Botley West would occupy a total of 1400 hectares,	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		an area greater than Heathrow Airport. Who wants to visit Heathrow Airport in the Cotswolds?		
Kidlington Parish Council	Landscape and visual	Property values are decreased by between 0% and 30% when utility-scale solar farms are built nearby. No Solar Farm of this size has ever been built anywhere on earth so close to major human settlements. The impact is greater the larger the solar farm.	No	The Applicant notes this comment. Th effect of development upon property values is not, however, a material planning consideration.
Kidlington Parish Council	Project Description	The developers claim that Botley West will provide sufficient power to meet the electricity needs of 330,000 homes. But this applies only to the sunniest day of the year, not to the other 364 days. On average, throughout the year, only 220,000 homes will be provided with Botley West's solar power, which goes straight into the National Grid supply to the	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		entire country, not just to Oxfordshire.		
Kidlington Parish Council	Site selection and alternatives	Solar Farms are a very inefficient way of generating green energy. In the UK, solar panels produce their maximum output for fewer than three hours each day, and none at all during the night. Offshore wind turbines produce maximum power for at least four times longer each day, including during the night-time.	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Kidlington Parish Council	Site selection and alternatives	There are no evident direct benefits for local residents; alternatives can easily be located elsewhere.	Yes	Site Selection and Alternatives are considered within Vol 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3] . The public benefits of the Project are considered within the Planning Supporting Statement [EN010147/APP/7.1] .
Low Carbon Hub	Community Benefit	The impacts we propose to achieve in the communities affected by the Botley West Solar Farm are: 1. substantial progress in planning and implementing the transition to a net zero energy system, particularly action that reduces energy demand and therefore energy bills for the least advantaged in the community; 2. a landscape of nature recovery that achieves at least 70%	N/A	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>biodiversity net gain, and that is open and accessible to all in the community;</p> <p>3. opportunities for our young people to gain work experience, training and job opportunities in renewable energy and environmental management.</p>		
Low Carbon Hub	Community Benefit	<p>We consider that there is a case for substantially more funding to be offered than the £50,000 per year currently proposed. Whatever sum is agreed, it must be index linked or otherwise linked to the revenues of the solar farm, so that it does not lose its value over time.</p> <p>We would expect the range to be up to £4.2m per year, based on the amount of £5,000 per MW of renewable energy developed that is offered in Scotland. We have arranged our proposals below in a 'modular' way that demonstrates in outline what we</p>	Yes	<p>The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit that can be provided by the Applicant.</p> <p>The Environmental Statement [EN010147/APP/6.3] and the overall planning balance in the Planning Supporting Statement [EN010147/APP/7.1] has therefore not attached any weight to this fund when assessing the impact of the development.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		think could be achieved at each level of funding.		Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.
Low Carbon Hub	Community Benefit	We understand that the developer is proposing a number of benefits already that we would welcome, including community agriculture and allotments and learning trails for local schools. We are particularly pleased to hear that	N/A	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		the developer may be able to provide the B4044 cycle path as part of the works to put in the proposed cabling works.		
Low Carbon Hub	Community Benefit	We would not, however, agree that the biodiversity net gain or retail energy company opportunities should be seen as part of a community benefit offer; these are both either required or provide potential new trading opportunities that would increase the economic returns of the solar farm, even if discounts were offered to local people.	Yes	<p>Once consented, the Applicant will establish a new retail electricity company and that company will offer BWSF electricity and green power from other suppliers to all of Oxfordshire. Residential customers within the 2km consultation zone will be offered a 5% discount from the Ofgem price cap.</p> <p>-Planning Supporting Statement [EN010147/APP/7.1].</p> <p>The public benefits of the Project are considered within the Planning</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Supporting Statement [EN010147/APP/7.1].
Low Carbon Hub	Community Benefit	We propose that the funding and resulting activities are governed by a combination of landowner, developer, local authorities and community members. This could take the form of a Board whose job would be to make sure that the agreed benefits were achieved over time.	Yes	<p>The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit that can be provided by the Applicant.</p> <p>The Environmental Statement [EN010147/APP/6.3] and the overall planning balance in the Planning Supporting Statement [EN010147/APP/7.1] has therefore not attached any weight to this fund when assessing the impact of the development.</p> <p>Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>[EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p> <p>The management of the fund has not yet been decided, but the Applicant will consider a board containing local stakeholders in addition to owner and landowner, in order to ensure the maximum effectiveness of grants of funds.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Low Carbon Hub	Community Benefit	Further, we consider that social enterprise structures could be used to run the energy, nature recovery and education activities. There are exemplar structures to follow for this, such as the Community Management options proposed for the Salt Cross development or the community energy corporate structures already used locally by Low Carbon Hub, Southhill Community Energy and the Westmill Wind and Solar Parks. Our experience of such corporate structures is that they encourage focus on the delivery of community benefit through an entrepreneurial approach to increasing the desired social impact.	Y	The Applicant has agreed to discuss this matter bilaterally with LCH.
Low Carbon Hub	Community Benefit	A Botley West community nature management company and a Botley West community energy company would provide very	Y	The Applicant has agreed to discuss this matter bilaterally with LCH.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>tangible and visible, long-lasting structures that would be incentivised to maximise leverage of the funding they received. Their shareholder and management structures could embed community representation for the long-term.</p>		
Low Carbon Hub	Community Benefit	<p>We understand that the developer has ruled out the opportunity to explore any form of community ownership for Botley West solar farm. We agree that the technical and financial requirements of this proposal would make it very difficult either to split the site or the investment. It is an issue, however, that is mentioned often by community members; it is an opportunity that would be very much valued. We would ask, therefore, that the developer explore options with us to see if there is any that could fit the bill.</p>	N/A	<p>The Applicant has agreed to discuss this matter bilaterally with LCH.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Low Carbon Hub	Community Benefit	Botley West Community Nature (BWCN) would operate using funds already in place for developing and managing the landscape and ecology masterplan and would raise funds in the normal way to fund apprenticeships.	N/A	The Applicant has agreed to discuss this matter bilaterally with LCH.
Low Carbon Hub	Community Benefit	Botley West Community Energy (BWCE), on the other hand, would be the conduit for new community benefit funds to be spent on agreed energy priorities in the affected communities. We have therefore focused on the options for BWCE to assess the impact of a new community energy fund.	N/A	The Applicant has agreed to discuss this matter bilaterally with LCH.
Low Carbon Hub	Community Benefit	We assume that a BWCE would use funding in the first year to produce Community Action Plans for Net Zero for the affected primary substation areas (PSAs), like that produced already for the Eynsham PSA (short version	N/A	The Applicant has agreed to discuss this matter bilaterally with LCH.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>included as an appendix to this paper). We have assumed 3 further PSAs to cover: Woodstock, Yarnton and North Hinksey. We would expect to be able to produce these new CAPZeros much more quickly and cheaply than the Eynsham prototype using the new LENZA local energy mapping tool being developed by the County Council. We would expect to work with Parity Projects (www.parityprojects.com) to produce detailed mapping of housing standards and socio-economic factors.</p>		
Low Carbon Hub	Community Benefit	<p>We further assume that the BWCE primary focus, at least in the first instance, would be to tackle the intractable problem of households in fuel poverty with a view to completing fabric upgrades to LETI standards as soon as possible. It may be that</p>	N/A	<p>The Applicant has agreed to discuss this matter bilaterally with LCH.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		the BWEC could channel public funding to help these households, but we have assumed no funding available for these purposes.		
Low Carbon Hub	Community Benefit	We would expect that there would also be a focus on helping households and community buildings to become 'future-proofed' and 'smart', so that they could take part in new tariff opportunities. For these reasons, we have proposed the development of a revolving fund to help 'able to pay' households to benefit from new opportunities and, over the longer term, to support the roll-out of new smart community options.	N/A	The Applicant has agreed to discuss this matter bilaterally with LCH.
Low Carbon Hub	Community Benefit	In summary, the lower level of funding allows action to be taken but quite slowly, whereas the higher levels of funding allow a real momentum to develop alongside a critical mass of energy assessors, retrofit	N/A	The Applicant has agreed to discuss this matter bilaterally with LCH.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>coordinators and installers. The lower level of funding would mean that it would take around 55 years to help all the current fuel poor households, 11 years at the middle level, and 4 years at the higher level. Addressing the issue of fuel poverty with the speed and momentum enabled by the middle or higher level of funding would also allow a critical mass of trained support professionals and installers to develop locally. This could make a significant impact on fuel poverty in the area quite quickly as well as allowing 'able to pay' householders to work as streets or communities in upgrading their fabric and installing solar PV, batteries and EV chargers in order to become 'smart'.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Low Carbon Hub	Community Benefit	<p>The opportunity for a full Community Energy Services Company</p> <p>We have included an outline below of the way in which the BWCE could work with the proposed new Solar Retail company to develop a Community Energy Services Company (CESCO):</p> <p>1. A CESCO could write a Power Purchase Agreement (PPA) with the Botley West solar farm for an amount of electricity per household in the community. Current UK average consumption is 3,000-4,000kWh, though this will go up as we transition to electric heat and transport. Starting at 2,000kWh per household might be a good starting point as a significant fraction of a typical home's load and a good target to encourage</p>	N/A	Once consented, the Applicant will establish a new retail electricity company and that company will offer BWSF electricity and green power from other suppliers to all of Oxfordshire. Residential customers within the 2km consultation zone will be offered a 5% discount from the Ofgem price cap.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>people to bring their consumption down via insulation and other energy saving measures.</p> <p>2. The CESCO could use flexibility within the community's electricity demand and battery storage to manage many of the risks around matching the availability of this 2,000kWh per household from the solar farm to the demand in the homes. Template contracts would need to be developed, so that the CESCO and local customers could easily contract on 'approved' terms.</p> <p>3. The CESCO would then sell a progressive tariff to its members, with the first 2,000kWh being reasonably cheap and backed by the PPA with a mix of generators. Subsequent kWh would be progressively more expensive, reflecting the fact that (a) they would need to be bought on shorter-term PPAs or wholesale</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>markets, so would be likely be more expensive for the CESCO, and (b) this would create an incentive for energy efficiency, while keeping the basic supply reasonably priced.</p> <p>4. Botley West solar farm could be asked to reserve a certain amount of its generation for a community PPA like this one, or indeed a series of them, so that local communities could benefit from having the solar farm in their area. There is no reason why Botley West would need to make any commercial sacrifice in doing this – a long-term PPA at a stable wholesale price is good for both parties.</p> <p>5. More thought would be given over time to how the CESCO could combine the progressive tariff with Time of Use pricing because we do want to steer demand away from peak times.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Ministry of Defence	Glint and glare	After review of the documents provided, there are no DIO Safeguarding concerns identified at this time. However, due to the location of part of the proposed PV installation being in proximity to the Approach at RAF Weston on the Green the MOD request that an aviation glint and glare report be submitted by the applicant should this development progress.	Yes	A Glint and Glare Study including a Technical Aerodrome Safeguarding Report produced by Pager Power is provided as Appendix 4.4 in Volume 3 of the ES [EN010147/APP/6.5] .
Ministry of Defence	Glint and glare	The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents on the Planning Inspectorate website provided in support of the pre application for the Botley West Solar Farm. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the	Yes	A Technical Aerodrome Safeguarding Report produced by Pager Power is provided as Appendix 4.4 in Volume 3 of the ES [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.		
Ministry of Defence	Glint and glare	I can confirm the MOD has no concerns at this stage with the proposed development regarding RAF Brize Norton.	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
National Air Traffic Systems	Project Description	<p>The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.</p> <p>However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly</p>	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>consulted.</p> <p>If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.</p>		
National Highways	Traffic and Transport	<p>In the case of this development proposal, our interest is in the A34 located east of the site. The proposed site is large and spread out over several individual areas, but at the closest point to the SRN it is approximately 0.8 miles west of the A34.</p>	Yes	<p>A full assessment of traffic and transport is included within Chapter 12 of the ES [EN010147/APP/6.3] which contains an integrated Transport Statement to consider the potential impacts and effects on the operation of the highway network arising from the Project. An Outline Construction Traffic</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO. Chapter 6 of the ES [EN010147/APP/6.3] includes a detailed project description.</p>
National Highways	Traffic and Transport	<p>If a formal Development Consent Order (DCO) were to come forward for this site, we would expect to see a Transport Assessment (TA) containing the following as a minimum:</p> <ul style="list-style-type: none"> • The site context and local highway network and a review of personal injury accidents within the vicinity of the site for the most recent three year period. • A broad summary of key national and local transport planning policies applicable to the 	Yes	<p>A full assessment of traffic and transport is included within Chapter 12 of the ES [EN010147/APP/6.3] which contains an integrated Transport Statement to consider the potential impacts and effects on the operation of the highway network arising from the Project.</p> <p>An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>scheme and how the scheme accords with these policies.</p> <ul style="list-style-type: none"> • The appropriateness of the local pedestrian, cycle and public transport networks with reference to opportunities for potential staff to travel via sustainable transport modes as a genuine alternative to single occupancy vehicle trips. • A detailed description of the development proposals. This will include details relating to the proposed parking, access and servicing arrangements. • An assessment of forecast vehicular trips generated by the site. • A distribution assessment indicating where vehicles will travel to/from the site. This should indicate what percentage of vehicles use the A27 to access the site. 		<p>been prepared to be secured as part of the CoCP requirement within the draft DCO. Chapter 6 of the ES [EN010147/APP/6.3] includes a detailed project description.</p>
National Highways	Traffic and Transport	The Transport Assessment when submitted should also take into	Yes	An assessment of cumulative effects on traffic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		account other committed development in the area, particularly anything which may also impact upon the A34.		and transport, including the A34, during the construction phase is included within Chapter 12 of the ES [EN010147/APP/6.3] .
National Highways	Traffic and Transport	Chapter 12 of the PEIR contains information about how construction traffic impacts will be estimated. However, there is no clear indication of what the impact may be upon the SRN. We would ask that the TA in a future DCO application specifically estimates the number of construction vehicle trips expected at each junction of the A34.	Yes	The construction traffic flows along each link in the traffic and transport study area, including the A34, is included within Chapter 12 of the ES [EN010147/APP/6.3] .
National Highways	Traffic and Transport	We draw your attention to Paragraph 51 of the updated DfT Circular 01/2022, which states that where development proposals would have an unacceptable safety impact, or the residual cumulative impacts on the SRN would be severe, suitable mitigation should be	Yes	The construction traffic flows along each link in the traffic and transport study area, including the A34, is included within Chapter 12 of the ES [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>identified and agreed to future-proof the network. National Highways considers that any development trips adding to a grade separated junction off-slip, which then results in mainline queuing, extends a mainline queue, and/or increases the frequency at which a mainline queuing occurs, to be an unacceptable safety impact. In such a circumstance, we would seek mitigation measures for any severe / significant impacts generated, also taking into consideration any improvements schemes identified as part of the emerging Local Plan.</p>		<p>Mitigation and enhancement measures adopted as part of the Project are set out in Chapter 12 of the ES [EN010147/APP/6.3].</p> <p>An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO.</p>
National Highways	Traffic and Transport	<p>We welcome the statement that a Construction Traffic Management Plan (CTMP) will be included in a future DCO application and encourage this to fully assess the impact of construction traffic upon the SRN.</p>	Yes	<p>An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
National Highways	Traffic and Transport	Given the complex nature of these proposals and the likely construction traffic impact on the SRN, we would welcome the opportunity to discuss these matters with the applicant's transport consultant before a DCO application is submitted. We can be contacted to request a meeting on the email address below.	Yes	<p>The construction traffic flows along each link in the traffic and transport study area, including the A34, is included within Chapter 12 of the ES [EN010147/APP/6.3].</p> <p>Mitigation and enhancement measures adopted as part of the Project are set out in Chapter 12 of the ES [EN010147/APP/6.3].</p> <p>An Outline Construction Traffic Management Plan [EN010147/APP/7.6.2] has been prepared to be secured as part of the CoCP requirement within the draft DCO.</p>
Natural England	Land use and agriculture	The ALC survey should follow the Guide to assessment development proposals on agricultural land. It is unclear if	Yes	Soil surveys have been undertaken using a hand auger at suitable intervals across the Project site.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the survey was carried out by a suitably qualified or accredited professional. Some areas are scoped out of the ALC survey without justification. This may be for reasons such as access restriction, but the ALC survey should be updated with further detail on this. A map of sample locations should be overlaid on the ALC map for improved legibility.</p> <p>Ideally a full detailed ALC survey would have been carried out across the whole site in line with the 1988 MAFF Guidelines. If the applicant is to use predictive mapping, it is recommended in this instance, that an ALC survey is undertaken within the cable route, with flexibilities around density depending on land quality identified in the Predictive ALC Mapping report. A semi detailed</p>		<p>These soil surveys were carried out by a suitably qualified or accredited professional in accordance with Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the quality of agricultural land (MAFF, 1988) to identify the quality of agricultural land within the Project site.</p> <p>The methodology and results of the soil surveys are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		survey is acceptable where the site is clearly expected to be non-BMV (1 auger per 2 ha plus representative pits), but where BMV has been identified, a detailed ALC survey would be expected (1 auger per ha plus representative pits).		
Natural England	Land use and agriculture	The Environmental Statement should clearly demonstrate how the master planning process has considered the ALC grades and avoided BMV where possible in line with paragraph 5.10.8 of the draft National Policy Statement (NPS) EN1.	Yes	<p>The Applicant notes this comment and appreciates the importance of agricultural land, including best and most versatile soils. Justification for the location of the Project, including the design and environmental constraints considered is provided in Volume 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3].</p> <p>Soil surveys have been undertaken to identify the quality of agricultural land</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>within the Project site, which are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES [EN010147/APP/6.5].</p> <p>The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17:</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the Development Consent Order (DCO) application.</p> <p>The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p>

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Natural England	Land use and agriculture	<p>17.2.2.10 - In relation to soils, the Planning Practice Guidance for the Natural Environment describes how the planning system should take account of the natural capital value of soil resource and the ecosystem services it supports; and the use of the Defra Construction Code of Practice for the Sustainable use of Soil on Construction Sites. Therefore, the potential impact of the development needs to be considered in terms of potential damage to the soil resource and linking this to a Soil Resource Management Plan.</p>	Yes	<p>The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3]. This includes the preparation of Soil Management Plans in general accordance with the Outline Soil Management</p>

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				<p>Plan [EN010147/APP/7.6] which has been submitted with the application for development consent.</p> <p>The measures to be implemented as part of the Soil Management Plan are in general accordance with the IQ Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021), BSSS Working with Soil Guidance Note on Benefitting from Soil Management in Development and Construction (BSSS, 2022) and Department for Environmental, Food and Rural Affairs (Defra) Construction Code of Practice for Sustainable Use of Soils on Construction Sites (Defra, 2009) which seek to</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				minimise impacts on soil health and protect and maintain soil quality during construction of the Project.
Natural England	Land use and agriculture	<p>Natural England support the commitment (Table 17.4) to carry out detailed surveys to inform the ES. As mentioned above A semi detailed survey is acceptable where the site is clearly expected to be non-BMV (1 auger per 2 ha plus representative pits), but where BMV has been identified, a detailed ALC survey would be expected (1 auger per ha plus representative pits) to determine the full extent of BMV land. Natural England have agreed an approach with RPS. This type of</p>	Yes	<p>Soil surveys have been undertaken using a hand auger at suitable intervals across the Project site. These soil surveys were carried out in accordance with Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the quality of agricultural land (MAFF, 1988) to identify the quality of agricultural land within the Project site. The methodology and results of</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>survey requires an experienced ALC surveyor, in order to make the correct professional judgements, where to introduce flexibility. A semi detailed survey may not identify all of the BMV land.</p> <p>Paragraph 17.5.1.13 relays a series of soil associations. Natural England advise the study area comprises the additional following soil associations; Elmton 3, Oxpasture, Sutton 1 and Thames. Provisional mapping should be used to indicate where more detailed survey sampling should take place. If non BMV is evident through during soil sampling then it would be acceptable to reduce sampling density. These judgements are to be made by an experienced ALC surveyor.</p>		<p>the soil surveys are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Natural England	Land use and agriculture	<p>Natural England support the commitment to provide a Soil Management Plan (SMP) as a requirement of the DCO. A SMP may be expected to be prepared in line with the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. The SMP should include the following: Page 5 of 7</p> <ul style="list-style-type: none"> i) An assessment of agricultural land and soil resource of the site will be undertaken before work commences (as per Natural England's Guide to assessing development proposals on agricultural land) which is considered to represent UK good practice. ii) Mitigation should include reference to the Defra Construction Code iii) The methods by which the applicant intends to restore 	Yes	<p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of Soil Management Plans in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the application for development consent. The measures to be implemented as part of the Soil Management Plan are in general accordance with the IQ Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021), BSSS</p>

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		<p>appropriate affected areas to agricultural use after works including excavations and restoration has finished.</p> <p>iv) An aftercare programme which would enable a satisfactory standard of agricultural after-use to be reached, with regards to cultivating, reseeded, draining or irrigating, applying fertiliser, or cutting and grazing the site.</p>		<p>Working with Soil Guidance Note on Benefitting from Soil Management in Development and Construction (BSSS, 2022) and Department for Environmental, Food and Rural Affairs (Defra) Construction Code of Practice for Sustainable Use of Soils on Construction Sites (Defra, 2009) which seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p>

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Natural England	Land use and agriculture	Where topsoil is proposed to be stripped, typically for construction compounds; access tracks and laying cabling, the soil handling methodology (movement, storage & replacement) and soil protection proposals are reviewed to ensure that appropriate mitigation is in place to allow for the restoration of the land to the baseline ALC Grade.	Yes	<p>The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of Soil Management Plans in</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the application for development consent. The measures to be implemented as part of the Soil Management Plan are in general accordance with the IQ Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021), BSSS Working with Soil Guidance Note on Benefitting from Soil Management in Development and Construction (BSSS, 2022) and Department for Environmental, Food and Rural Affairs (Defra) Construction Code of Practice for Sustainable Use of Soils on Construction Sites (Defra,</p>

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				2009) which seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.
Natural England	Land use and agriculture	When reading paragraph 17.8.5.2 it is not clear whether the non-surveyed areas will be subject to a detailed survey for submission in the ES and this requires clarification.	Yes	Soil surveys have been undertaken using a hand auger at suitable intervals across the Project site. These soil surveys were carried out in accordance with Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>quality of agricultural land (MAFF, 1988) to identify the quality of agricultural land within the Project site. The methodology and results of the soil surveys are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES [EN010147/APP/6.5].</p>
Natural England	Land use and agriculture	<p>The PEIR concludes that the loss of approximately 5.7ha of BMV is not considered significant. This follows the Development Management Procedure Order (DMPO) and not the assessment matrix presented elsewhere in the PEIR (Table 17:19) which would produce a conclusion of moderate or major significance.</p>	Yes	<p>The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p>

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Natural England	Land use and agriculture	We advise that where land is being returned to an agricultural use that the land is restored to a high standard and to its original capability (Agricultural Land Classification (ALC) grade) as far as is practicable. This requires the retention and replacement of suitable topsoil and subsoil materials as well as the adoption of best practice techniques in soil handling. Where any BMV agricultural land is restored to a non-agricultural use (e.g. habitat, amenity use), it should be restored to its original physical capability.	Yes	<p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>This includes the preparation of Soil Management Plans in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6], which has been submitted with the application for development consent. The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p>

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				Reinstatement would be undertaken in accordance with procedures set out in the Soil Management Plan.
Natural England	Land use and agriculture	The 'Decommissioning Phase' section (17.9.4.9) does not consider BMV. There should be more attention given to the latter stages of project lifecycles (i.e. decommissioning), ensuring that mechanisms for environmental mitigation, restoration and enhancement that are built in at the design stage are secured well into the future. The spatial distribution of ALC grades determined from a detailed ALC survey are necessary to inform the reinstatement criteria, which allows the area of each ALC Grade temporarily disturbed to be	Yes	The potential impacts of the Project with respect to agricultural land and disruption to farm holdings, including during the decommissioning phase, are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] . In addition, a Decommissioning Plan will be prepared in general accordance with the Outline Decommissioning Plan [EN010147/APP/7.6] which

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		<p>returned to the same quality as far as practicable to minimise potential loss.</p>		<p>has been submitted with the DCO application for the Project. Soil surveys have been undertaken using a hand auger at suitable intervals across the Project site. These soil surveys were carried out in accordance with Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the quality of agricultural land (MAFF, 1988) to identify the quality of agricultural land within the Project site. The methodology and results of the soil surveys are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES [EN010147/APP/6.5].</p>

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Natural England	Landscape and visual	<p>The project lies within the setting of the Cotswolds Area of Outstanding Natural Beauty (AONB). Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A (2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacts on its natural beauty. Consideration should be given to the direct and indirect effects on this designated landscape, and in particular, the effect upon its purpose for designation. The management plan for the designated landscape may also</p>	Yes	<p>The Applicant has carefully considered the need to have regard to the statutory purposes of the designation and has applied the effects mitigation hierarchy to firstly avoid impacts on any National Landscapes (formerly AONBs) through location and design of the Project.</p> <p>Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 1, Chapter 8: Landscape and Visual Resources [EN010147/APP/6.3].</p> <p>The Project is outwith the Cotswolds National Landscape (AONB), there would therefore be no direct</p>

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		<p>have relevant information that should be considered.</p>		<p>effect upon it in Landscape and Visual terms.</p> <p>The ZTV as shown in ES Volume 2, Figures 8.9 to 8.11 [EN010147/APP/6.4] indicates that there would be limited potential intervisibility to a very small part of the National Landscape to the northwest of Bladon, near Coombe.</p> <p>It is therefore considered that there would be no direct or indirect significant landscape or visual effects upon the Cotswolds National Landscape.</p> <p>No specific Representative Viewpoints were chosen within the small part of the Cotswolds National</p>

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				Landscape, for the reasons set out above.
Natural England	Landscape and visual	Section 245 of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions.	Yes	There are no National Parks affected by the Project, and the duty to further the statutory purposes the Cotswolds AONB has been considered in the assessment of direct and indirect effects of the Project a suite of embedded mitigation measures have been recommended that will ensure likely significant effects, both direct and indirect, are managed to an appropriate level. As part of this assessment, the Applicant has incorporated measures which have sought to further the statutory purposes of the Cotswold AONB that are sufficient, proportionate and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				appropriate to the type and scale of the development in accordance with Section 5.10 of EN-1.
Natural England	Landscape and visual	The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.	Yes	The feedback provided by the Cotswold National Landscape Conservation Board has been considered by the Applicant in assessing both potential direct and indirect effects on the Cotswold AONB. The Applicant has ensured that impacts of the Project on the natural beauty of the area, and sought to further the statutory purposes of the Cotswold AONB that are sufficient, proportionate and appropriate to the type and scale of the development in accordance with Section 5.10 of EN-1.

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Natural England	Landscape and visual	The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm .	No	All relevant features of scenic, scientific or historic interest have been identified and considered and assessed. Where relevant, these features have informed the location, design, and mitigation measures proposed for the Project.
Natural England	Local ecology	Internationally Designated Sites The internationally designated sites relevant to this application are: <ul style="list-style-type: none"> • Cothill Fen Special Area of Conservation (SAC) • Oxford Meadows SAC The application site lies within close proximity to National Site Network sites (previously referred to as European or Natura 2000 sites), and therefore has the potential to affect their interest features. European sites are	Yes	The Habitat Regulations Assessment Report (HRAR) is presented in Volume 3 [EN010147/APP/6.5] Appendix 9.14.

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		afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'). The Shadow Habitats Regulations Assessment (HRA) has been included within the PEIR as Volume 3, Appendix 9.8.		
Natural England	Local ecology	Cothill Fen SAC has been screened out of further assessment due to both the distance of the project from the site, and a lack of hydrological connectivity. The HRA has adequately considered relevant impact pathways and based on the information provided, Natural England agrees with this screening conclusion.	Yes	The Applicant and Natural England are aligned on this point and on that basis this comment is considered to be adequately addressed.
Natural England	Local ecology	Please note that Natural England have not been able to access the Air Quality Assessment which is referred to as Volume 3 Appendix 4.5. It is not clear if this is	Yes	Air Quality impacts, including upon ecology receptors, are assessed within Volume 1, Chapter 19

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		available on the online document library or not.		of the ES [EN010147/APP/6.3].
Natural England	Local ecology	The 'Construction Traffic' paragraph of the HRA (4.4.10) acknowledges the need for an in-combination assessment of the traffic during construction and states that this will be presented in the Environmental Statement. Without this full in-combination assessment Natural England are not able to agree with the conclusions of the HRA. Air quality impacts should be carried through to stage 3 of the appropriate assessment.	Yes	The in-combination assessment with respect to changes in air quality has been incorporated into the assessment of effects and is reported in the HRAR (is presented in Volume 3 [EN010147/APP/6.5] Appendix 9.14).
Natural England	Local ecology	If there is potential for impacts to designated sites from pollution such as NO _x , NH ₃ , nitrogen deposition or acid deposition then this should be outlined in the next iteration of documentation. The assessment should be undertaken in line with Natural England's guidance NEA001. In	Yes	The air quality assessment with respect to the project has included NO _x , NH ₃ , nitrogen deposition and acid deposition. The assessment of effects is reported in the HRAR [EN010147/APP/6.5].

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		<p>the absence of access to the Air Quality Assessment we also provide the following advice: Further to the advice in NEA001, if it is determined that there are potential significant impacts from pollution associated with traffic then an assessment of ammonia impacts should also be undertaken. Ammonia emissions from road traffic could make a significant difference to nitrogen deposition close to roads. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road) – catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions – therefore consideration of the potential for impacts is needed (see here). There are currently two models which can be used to calculate the ammonia concentration and</p>		

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		contribution to total N deposition from road sources. One of these models is publicly available and called CREAM, and there is another produced by National Highways.		
Natural England	Local ecology	Potential impacts through changes to water quality have been carried through to stage 3 of the appropriate assessment. Natural England agree that, subject to the identified mitigation (a Code of Construction Practice (CoCP)) being appropriately guaranteed and secured, some water quality impacts will be avoided. We advise that mitigation measures included in the CoCP should be assessed in the HRA, where relevant to internationally designated sites.	Yes	Measures to be secured in the CoCP have been included in the HRAR [EN010147/APP/6.5]
Natural England	Local ecology	However, the watercourse crossings near Swinford and Eynsham Allotments do not appear to have been considered	Yes	HRAR [EN010147/APP/6.5] updated to consider such issues.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>in the HRA. Elsewhere in the PEIR this element of the project has been considered and it is made clear that Horizontal Direct Drilling (HDD) will be used. The HRA should provide further detail regarding the crossing works and provide evidence for why the use of HDD means this part of the project does not pose a likely significant effect.</p>		
Natural England	Local ecology	<p>Furthermore, the HRA does not consider the potential impact of the use of chemical cleaning agents or other potential contaminants which may be used during the operational phase of the project. We advise that consideration should be given to any potential sources of water pollution during operation, including details of the proposed approach to panel cleaning and potential nutrient or acidity effects</p>	Yes	<p>HRAR [EN010147/APP/6.5] updated to consider such issues.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		of any chemicals used on the designated sites.		
Natural England	Local ecology	Natural England welcome the suggested ecological enhancements to the 'River Evenlode corridor' and seek to input into the further design and development of this part of the scheme. There is not yet much detail on the design of these enhancements and it may be worth highlighting the hydrological connectivity to the designated sites, and the need to ensure no adverse effect on the integrity of Oxford Meadows SAC.	Yes	Further refinement of the proposed ecological enhancements of the River Evenlode corridor is anticipated to occur through the detailed design process, the framework for which will be set out within the DCO. The Applicant welcomes any further input from Natural England in developing those ecological enhancements. The Applicant will continue to engage with Natural England to identify the appropriate level of involvement.

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Natural England	Local ecology	In our EIA Scoping response (26 June 2023, ref: 438578, EN010147) we highlighted that 'the proposal could have potential impacts on Blenheim Park SSSI, Rushy Meadows SSSI, Wytham Ditches & Flushes SSSI and Wytham Woods SSSI. There are a number of potential impact pathways to consider at these sites during the construction and operational phases of the development which will require further assessment'.	Yes	The assessment of effects reported in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] has separated out the SSSIs to ensure what is scoped in/out is clear.
Natural England	Local ecology	This comment has been highlighted in Table 9.1.4. Table 9.1.1 (regarding the NPS requirements) contains a section which states that 'the approach taken to assess the impacts and effects of the Project on SSSIs is the same as for international sites'. Section 9.10 'Assessment of effects' uses the EIA framework to assess potential	Yes	ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] has been updated to clarify the approach to this issue.

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		impacts to SSSIs and this is not the same approach taken for internationally important sites.		
Natural England	Local ecology	Natural England advise that further depth should be given to the impact assessment for SSSIs. The Assessment of effects should highlight which nearby SSSIs are being considered, their interest features, potential impact pathways and any mitigation measures where appropriate. Presently, it is not clear which SSSIs have been scoped into the assessment or the reasons for any sites within the Zone of Influence of the project being scoped out.	Yes	HRAR [EN010147/APP/6.5] updated to consider such issues.
Natural England	Local ecology	In our EIA Scoping response, we noted the proximity of the red line boundary to Wytham Woods SSSI and highlighted the potential for direct loss of the designated site. We note that the PEIR has	Yes	The Applicant notes this comment. Impacts to Wytham Woods SSSI are considered in Section 9 of ES Chapter 9 Ecology and

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		been updated to confirm that the Project poses no direct loss to any designated sites.		Nature Conservation [EN010147/APP/6.3] .
Natural England	Local ecology	Natural England has not been able to fully review the protected species information provided in the PEIR in detail. Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures.	No	The Applicant notes this comment. As set out in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] and associated appendices [EN010147/APP/6.5] , surveys were undertaken according to good practice guidelines, in line with Natural England standing advice.
Natural England	Local ecology	A separate protected species licence from Natural England or Defra may be required. Applicants should refer to the guidance at Wildlife licences: when you need to apply to check to see if a mitigation licence is required. Applicants can also make use of Natural England's charged service Pre Submission	Yes	The Applicant notes this comment. Draft licences will be produced and sent to Natural England to ensure that LONIs are issued in advance of the close of Examination.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Screening Service for a review of a draft wildlife licence application. Natural England can then review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate National Infrastructure Planning for details of the LONI process.</p>		
Natural England	Local ecology	<p>The bat surveys have highlighted the presence of numerous rare species. Natural England understand that the project team are currently preparing a document which will provide more information on the local bat populations and the ecological function of the local environment. It should be noted that there have</p>	Yes	<p>The research noted and the consequences of it have been considered extensively during pre-submission discussions with Natural England. Surveys with respect to bats are reported in ES Appendix 9.4 Bat Survey Report [EN010147/APP/6.5].</p>

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		<p>been recent studies (Tinsley et al. 2023, Barré et al. 2023) which highlight the potential impacts that solar installations can have on bats. Natural England encourage the project team to consider this latest evidence and we hope to provide further input on this element of the scheme and on potential mitigation measures. The PEIR discusses the need for buffering relevant ecological features and Natural England hope that a positive management scheme for the field buffers and grassland can be implemented which would increase the prey availability for bat species.</p>		<p>The potential impacts of the Project on bats is considered in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3].</p>
Natural England	Local ecology	<p>Negative impacts resulting from habitat severance and connectivity have been scoped out of the assessment (Table 9.1.7) because the Project will retain woodland, hedgerows and</p>	Yes	<p>Negative impacts resulting from habitat severance and connectivity have been scoped back into the assessment.</p>

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		watercourses. The latest research highlights that there is a possibility the connectivity of the landscape might be impacted by the Project even with this planned retention of ecological features.		
Natural England	Local ecology	Natural England welcome the planned inclusion of a construction lighting plan (9.10.3.144) but advise there is uncertainty with regards to the conclusion of the assessment of impacts to bats (9.10.3.144) because of the issues we have raised in Section 3.1.	Yes	The Applicant notes this comment. The uncertainty with respect to the impacts of the Project on bats is reflected through the commitment to include appropriate buffers along important bat commuting routes to ensure that such routes are not compromised.
Natural England	Local ecology	The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or another local group. The ES should set out proposals for	Yes	Information with respect to local wildlife sites is set out in ES Appendix 9.1 Desk Study [EN010147/APP/6.5] with information obtained from the Local Records Centre.

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		<p>mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local Nature Recovery Strategies (LNRS) may also provide further useful information and the PEIR makes reference to this influencing the design.</p>		<p>The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3]. This draws on the Oxfordshire Nature Recovery Network, in particular with the focus on the River Evenlode corridor.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Natural England	Local ecology	Priority habitats and species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk.	Yes	The Applicant notes this comment. Priority habitats and species are considered in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Natural England	Local ecology	Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the	Yes	The Applicant notes this comment. Data relating to habitats, species and designated sites has been gathered from appropriate resources and is presented in ES Appendix 9.1 Desk Study [EN010147/APP/6.5] .

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		open mosaic habitats inventory can be found here.		
Natural England	Local ecology	The importance of the local area for wintering and farmland bird species is noted. Please note that we have not been able to review the wintering or breeding bird surveys of Volume 3 Appendix 9.4/9.9 of the PEIR. We hope to review this and provide further comments as the DCO application progresses.	Yes	Impacts to wintering and breeding birds are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Breeding bird and wintering bird surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.9 and 9.10 of the ES.
Natural England	Local ecology	Natural England highlight our research reports TIN101 and NEER012, which provide a useful review of the potential impacts of solar installations on birds. We would encourage the PEIR to consider these papers and address relevant topics.	Yes	The Applicant notes this comment. Both TIN101 and NEER012 have been drawn upon in the completion of ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3]

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Natural England	Local ecology	Natural England welcome the Project's aim to deliver a minimum of 70% biodiversity net gain. We recommend that the target increase in BNG of 70% across all biodiversity unit types is secured by a suitably worded requirement in the DCO.	Yes	BNG commitments will be secured via the oLEMP which, in turn, is secured via an appropriate DCO requirement.
Natural England	Local ecology	We hope to input into the design of the BNG elements of the scheme to deliver the best environmental outcomes. We recommend that developers use the latest version of the Defra biodiversity metric to calculate BNG (currently version 4.0) and adhere to the rules and principles set out within the metric guidance. We understand that the project team are currently struggling to implement the metric due to the scale of the data inputs required and we aim to work with them to resolve this issue.	Yes	It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details of the gain are set out in Appendix 9.13. [EN010147/APP/6.5] The Defra Statutory BNG Metric has been used to demonstrate net gain. The proposals are also supported by an Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].

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				The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project.
Natural England	Local ecology	Further best practice principles can be found: <ul style="list-style-type: none"> • BS 8683:2021 Process for designing and implementing Biodiversity Net Gain • CIEEM/IEEMA/CIRIA good practice principles (2016) and guidance (2019). 	Yes	The Applicant notes this comment. The best practice principles have been drawn upon through the completion of ES Appendix 9.13 Biodiversity Net Gain Statement [EN010147/APP/6.5]
Natural England	Local ecology	Created and enhanced habitats should seek, where practical and reasonable, to be local to any impact. They should also deliver strategically important outcomes	Yes	The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3] .

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		for nature conservation. We recommend that opportunities should be sought to link delivery to relevant plans or strategies. This could include Green Infrastructure Strategies or Local Nature Recovery Strategies.		This draws on the Oxfordshire Nature Recovery Network, in particular with the focus on the River Evenlode corridor.
Natural England	Local ecology	Natural England welcomes the commitment to habitat creation and enhancement, including the establishing of grassland under the solar panels. The PEIR refers to an oLEMP which is not yet available for review. There are potential opportunities for best practice grassland management under the panels and we hope to input into the design, establishment and monitoring program of the grassland.	Yes	The outline Landscape and Ecology Management Plan is presented in [EN010147/APP/7.6.3] .
Natural England	Local ecology	Aftercare of any sown sward is vital, and management will be required to ensure the establishment of the grassland. We would expect details of	Yes	Management requirements relating to landscape and ecology are indeed presented within the oLEMP, including draft

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		management requirements, such as grass cutting and collection or grazing, to be set out in the oLEMP.		<p>maintenance schedules and planting palettes. [EN010147/APP/7.6.3.]</p> <p>The Outline Operational Management Plan [EN010147/APP/7.6.2] details operational mitigation measures, and sets out the monitoring activities designed to demonstrate that such mitigation measures are carried out, and to measure their effectiveness.</p>
Natural England	Local ecology	Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account when determining relevant decisions. Natural England will only provide bespoke advice on ancient woodland,	Yes	<p>The Applicant notes this comment.</p> <p>Natural England and the Forestry Commission guidance has been taken into account in the determination of the protection measures necessary for both ancient woodland and veteran</p>

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		ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.		trees; 15m buffer minimum for the former and 15 times the DBH, uncapped for the latter.
Natural England	Local ecology	We would encourage the Project to look more at the ambitions of the LNRS and to identify potential opportunities for enhancing and connecting the woodland parcels in the landscape.	Yes	<p>The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3].</p> <p>This draws on the Oxfordshire Nature Recovery Network, in particular with the focus on the River Evenlode corridor and how this can be used to enhance connectivity between the various woodland parcels that surround the Project site, around the Blenheim Estate in particular and to the River Thames and Wytham Woods to the south.</p>

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Network Rail	Cable routes	The project description states that the depth of the AC cables under railway crossings is to be determined. Network Rail will require further details relating to this depth prior to any installation. The construction of the underground cables in this area may have an impact on the operational railway, which Network Rail will need to consider in full.	Yes	The Applicant has pursued further dialogue with Network Rail since the PEIR stage, including discussions about protective provisions and the level of detail required about the depth and accuracy of the HDD process to be undertaken beneath the railway line.
Network Rail	Construction	Two points of concern relate to the use of NR assets for construction traffic and the proposed underground cabling that crosses underneath the railway line. During construction of the proposed development, access will be required for heavy goods vehicles (HGVs), abnormal loads for certain items and for construction workforce traffic. The proposed access routes include the possibility of HGV's using	Yes	HGV routes have been designed to adhere to bridge weight limits and restrictions, unless there is proposed to be a temporary variation through a TRO. This is referred to in the Outline Traffic Management Plan. [EN010147/APP/7.6.1] Abnormal loads would not cross the railway on any unclassified roads and

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		overbridges that cross the railway which may be subject to weight limits for abnormal loads.		would do so only on the A44 and the A40, as considered by a heavy haulage contractor as part of ongoing studies.
Network Rail	Construction	Consideration should be given to ensure that the construction and subsequent maintenance can be carried out without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land. In addition, security of the railway boundary will require to be maintained at all times.	Yes	The Applicant is working directly with the Construction Manager (Asset Protection) at Network Rail in relation to works adjacent to Network Rail's assets.
Network Rail	Land agreements	Network Rail will be seeking protection from the exercise of compulsory purchase powers over operational land either for permanent or temporary purposes. In addition, Network Rail will wish to agree protection for the railway during the course of the construction works and otherwise to protect our	Yes	In June 2024, the Applicant commenced engagement with Network Rail in relation to discussing a bespoke set of protective provisions. The Applicant has included a set of protective provisions for the benefit of Network Rail at Part 4 of Schedule 15 of the draft DCO

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		<p>undertaking and land interests. Network Rail reserves the right to produce additional and further grounds of concern when further details of the application and its effect on Network Rail's land are available. In addition, any rights for power or other lines under, over or alongside the railway line will require appropriate asset protection measures deemed necessary by Network Rail to protect the operational railway and stations. We have standard protective provisions which will need to be included in the DCO as a minimum. In addition a number of legal and commercial agreements will need to be entered into, for example, asset protection agreements, , method statements, connection agreements, property agreements and all other relevant legal and commercial agreements. This list</p>		<p>[EN010147/APP/3.1] whilst engagement is ongoing.</p> <p>The Applicant is also continuing to engage with Network Rail on any other legal or commercial agreements that may be required, for example necessary property agreements and Asset Protection Agreements.</p>

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		is not exhaustive and will need to be reviewed once more details of the scheme are discussed between the parties.		
Network Rail	Land agreements	Network Rail is prepared to discuss the inclusion of Network Rail land or rights over land subject to there being no impact on the operational railway, all regulatory and other required consents being in place and appropriate commercial and other terms having been agreed between the parties and approved by Network Rail's board.	Yes	Since July 2023, the Applicant has been in correspondence with Network Rail to discuss its Project and proposed interactions with the Network Rail Infrastructure, including discussions on project programme and details on designs. Further details on these discussions can be found in the Land and Rights Negotiation Tracker [EN010147/APP/3.6] .

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Network Rail	Project Description	Network Rail has been reviewing the information to date and at this stage it is not sufficiently detailed to fully assess potential impacts of the scheme on the railway and further information will be required to properly respond on the likely impacts of the proposed scheme.	Yes	The Applicant is working with the Construction Manager (Asset Protection) at Network Rail in relation to works adjacent to NR's assets.
Network Rail	Traffic and Transport	Should the predicted traffic routes change once the origin of construction traffic is known, we would request the acknowledgement of a number of level crossings within the area. These include Sandy Lane, Yarnton Lane and Roundham Lock Level crossing. Any movement over the level crossings should not cause an increase in risk. There should be no permanent increase in movements and no potential for blocking back over the level crossings. Paragraph 12.6.2.13	Yes	The Applicant notes this comment. A full assessment of traffic and transport, including the construction access routes and justification for these routes, is included within Chapter 12 of the ES [EN010147/APP/6.3] . An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the

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		reference the submission of access junctions onto the highway which are to be detailed and submitted in the Transport statement. NR reserve the right to make further comment at this stage and raise concerns where necessary.		CoCP requirement within the draft DCO.
NGET	Construction	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004).	Yes	The Applicant is aware of the Technical Specification for “overhead line clearances Issue 3 (2004) and will adhere to EN-43 – 8.
NGET	Construction	If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety	Yes	No levels will be changed beneath or in close proximity to existing overhead lines.

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		clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.		
NGET	Construction	The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.	Yes	The Applicant will ensure that all site staff are aware of and comply with Guidance Note GS 6 "Avoidance of danger from Overhead Electric Lines".
NGET	Construction	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.	Yes	Guidance Note GS6 "Avoidance of danger from Overhead Electric Lines" sets out the safe distances from different voltage lines and how to operate safely beneath. The Applicant and their contractors will observe all

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				<p>guidance in the note and will obtain overhead line profile drawings from NGET before planning or commencing any work.</p> <p>The Applicant will also use the ENA publication “A Guide to the Safe Use of Mechanical Plant in the Vicinity of Electrical Overhead Lines”. This advises the setting of exclusion zones around the line, distance according to line voltage.</p>
NGET	Construction	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and	Yes	The Applicant is eager to negotiate protective provisions with NGET to ensure that its apparatus is protected. In the meantime, the Applicant has included

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		foundation ("pillar of support") drawings can be obtained using the contact details above		standard protective provisions for the benefit of Electricity, Gas, Water and Sewerage Undertakers at Part 1 of Schedule 15 of the draft DCO [EN010147/APP/3.1].
NGET	Construction	Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	Yes	The Applicant will comply with relevant regulatory requirements.

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NGET	General	NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.	Yes	The Applicant remains in close liaison with NGET, including in regard to their existing assets and the promotion of the new NGET sub-station.
NGET	Land agreements	NGET will require an adequate form of Protective Provisions included within the Order.	Yes	The Applicant has issued a standard set of protective provisions to NGET and sought confirmation as to whether a bespoke set of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>protective provisions are otherwise required. In light of this NGET consultation feedback and other recent precedent, the Applicant anticipates that a bespoke set of protective provisions may be requested and the Applicant is eager to negotiate those with NGET.</p> <p>In the meantime, the Applicant has included a standard set of protective provisions for the benefit of Electricity, Gas, Water and Sewerage Undertakers at Part 1 of Schedule 15 of the draft DCO [EN010147/APP/3.1].</p>
NGET	Land agreements	National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access	NA	The Applicant notes this comment.

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		to retain, maintain, repair and inspect our asset		
NGET	Land agreements	National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.	NA	<p>The Applicant has issued a standard set of protective provisions to NGET and sought confirmation as to whether a bespoke set of protective provisions are otherwise required. In light of this NGET consultation feedback and other recent precedent, the Applicant anticipates that a bespoke set of protective provisions may be requested and the Applicant is eager to negotiate those with NGET.</p> <p>In the meantime, the Applicant has included a standard set of protective provisions for the benefit of Electricity, Gas, Water and Sewerage Undertakers at</p>

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				Part 1 of Schedule 15 of the draft DCO [EN010147/APP/3.1].
NGET	Landscape and visual	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	Yes	The Applicant notes this comment, in relation to the need to carefully manage any form of planting in proximity to existing overhead line assets, and the proposed NGET substation. The tree planting shown on the Illustrative Masterplan [EN010147/APP/6.4] is indicative and will be further developed through detailed design stages, but will seek to avoid any compromise to statutory safety clearances.

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NGET	Project Description	<p>National Grid Electricity Transmission has high voltage electricity overhead transmission lines within or in close proximity to the order boundary. The overhead lines form an essential part of the electricity transmission network in England and Wales.</p> <p>Existing Infrastructure Overhead Lines 4TE 400kV OHL Cowley – Walham Cowley – Minety</p>	No	The Applicant notes this comment.
NGET	Project Description	<p>The following National Grid Electricity Transmission New Infrastructure lies within or in close proximity to the order boundary.</p> <p>Botley West 400 kV Substation; and associated overhead and underground apparatus including cables.</p>	Yes	The Applicant is aware of this new infrastructure and has been working closely with NGET on the delivery of these assets.

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OCC Fire Safety	Fire Safety	This site currently does not show any buildings that the fire safety order would apply too. However, if this does then it is taken that where required these works will be subject to a Building Regulations application and subsequent statutory consultation with the fire service, to ensure compliance with the functional requirements of The Building Regulations 2010.	No	The Applicant notes this comment and will comply with Building Regulations as required to.
Oxfordshire Local Nature Partnership	Landscape and visual	Due to the unprecedented scale of the development, especially in this type of landscape, any assessment of impact needs to go well over and above the minimum requirements of the planning system. Likewise, any mitigations (such as buffers, corridors etc) should also go above and beyond the mandatory minimum. The precautionary principle should be applied to minimise any potential negative	Yes	The Environmental Statement submitted with the application, including Chapter 8; Landscape and Visual Impact Assessment, provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed [EN010147/APP/6.3] . The assessment has been

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		outcomes arising from incorrect assumptions.		carried out on the 'Rochdale Envelope' basis and mitigation measures proposed is appropriate to mitigate the likely significant effects arising from this particular development.
Oxfordshire Local Nature Partnership	Local ecology	As with our first response over 12 months ago, this response reflects the lack of ecological detail provided. More clarity is still required prior to fully assessing the impacts on nature.	Yes	Impacts to wildlife are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation of the ES.
Oxfordshire Local Nature Partnership	Local ecology	OLNP is clear that most of the concerns raised in our response to your first consultation have not been addressed. If Photovolt Development Partnership (PVDP) wish to garner the thoughts of the environmental community of Oxfordshire on the ecological impacts of the development, more information needs to be provided. This consultation cannot achieve its aims without publication of the	Yes	The Applicant notes this comment. The Applicant has undertaken a series of defined phases of consultation during the pre-application period, to allow for iterative involvement, engagement and feedback throughout the development of proposals.

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		full Environmental Impact Assessment.		<p>This included a non-statutory phase one consultation on early-stage proposals, held for seven weeks between 03 November 2022 and 22 December 2022.</p> <p>The Applicant's strategy of undertaking an iterative consultation process has allowed for feedback to inform the development of the Project in a timely manner, including reporting back to consultees at an interim stage.</p> <p>The Applicant has actively sought and taken due regard to feedback provided by stakeholders on its approach to community consultation and has made</p>

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				<p>changes where possible as documented in the Consultation Report.</p> <p>Consultation responses to each stage of consultation have been carefully documented and considered as part of the iterative development of the Project, with stakeholders playing a key role in the design of the proposals</p>
Oxfordshire Local Nature Partnership	Local ecology	<p>What is the true nature-value of the land currently? The BWSF non-technical summary states, following 'a series of site specific surveys' and 'desk based study' that 'the fields were found to be of little ecological value'. It is assumed that the 70% BNG claim is based upon this. We would like to see clearer evidence of the baseline condition of the land, including full UK Habs ecological</p>	Yes	<p>It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details of the gain are set out in Appendix 9.13. [EN010147/APP/6.5] Appendix 9.13. BNG is implemented and managed under the outline Landscape and Ecology Management Plan is</p>

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		<p>survey. PVDP should also work closely with the tenants, landowners and other land managers and local ecologists to develop a comprehensive understanding of the current ecological state of the land. Agricultural land can be biodiverse, supporting numerous species of flora and fauna. This recommendation from our first consultation response has not, insofar as we can tell from the PEIR or its Appendices, been acted upon. Therefore, all claims that the land is currently low ecological value agricultural land seem unfounded. Furthermore, Appendix 9.2 (cursory 2021 Phase 1 habitat survey of small portions of the site) does not appear to be available.</p>		<p>provided in EN010147/APP/7.6.3.</p>

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Oxfordshire Local Nature Partnership	Local ecology	How can PVDP reassure stakeholders that pre-planning degradation has not and will not occur? Pre-planning degradation is where developers deliberately reduce the biodiversity value of the land prior to gaining planning permission. Having a lower biodiversity baseline makes it easier to claim greater biodiversity uplift, and therefore higher 'net gain' figures. OLNP seeks reassurance that this will not happen. One way to do so is to share full ecological habitat assessments of the land, conducted at the earliest available point. This links closely to 1.1.	Yes	Habitat extent and condition is assessed within the Biodiversity Net Gain Assessment provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13. It is based on the surveys completed as part of the pre-application stage and reflects the current intensive agricultural land use of the Project site.
Oxfordshire Local Nature Partnership	Local ecology	How will BWSF ensure that proposed gains are delivered in practice? Claims of delivering a net gain in biodiversity of 70% are to be welcomed, albeit cautiously. Evidence should be provided that	Yes	BNG habitat creation and enhancement was formulated in conjunction with project ecologists and landscape specialists, to

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		<p>satisfies ecologists not just that the pre- and post- habitat conditions entered into the DEFRA metric result in the gains claimed, but that the post-development habitat type and condition are realistic and achievable.</p>		<p>ensure habitat are achievable and realistic.</p> <p>BNG plans are implemented under the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].</p> <p>The oLEMP includes specifications of the creation/ enhancement of habitats, a monitoring program and a scheduled review process to report on progress and propose additional management measures where they are required to meet BNG, ecology and landscape objectives.</p>

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Oxfordshire Local Nature Partnership	Local ecology	Can the precautionary principle be applied across ecological decision making? The application of the precautionary principle manages risk where there is a lack of scientific certainty of the seriousness and likelihood of plausible environmental damage. There is a gap in evidence, even contradictory evidence, around the potential for large solar arrays to contribute to biodiversity. Given the unprecedented scale of the development, it is impossible to fully assess its cumulative impacts. Furthermore, there is inadequate evidence around some of the specific aspects, such as the success of skylark plots in a development of this size. Thus, all mitigations for issues highlighted should go above and beyond the statutory minimum.	No	The precautionary principal has been considered by the project team during the ecological assessments; and furthermore, will be considered by the approval bodies. The significant scale of the project makes cumulative impacts less likely; more information is provided in the cumulative effects assessment in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation of the ES. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. This ratio

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				has been exceeded by the project design. This mitigation is set out in the Project Mitigation Measures and Commitments Schedule at Appendix 6.1 of the ES [EN010147/APP/6.5]
Oxfordshire Local Nature Partnership	Local ecology	Can PVDP commit to using no herbicides or pesticides across the whole site? There are ways of managing nature, including plants and insects, that are less damaging to the environment. Indeed some, such as sheep, have positive benefits to society (and potentially nature). Therefore, OLNP requests PVDP's application commits the landowner or land manager to natural, holistic approaches to pest management and 'weed' control.	Yes	Outline details of the management of the landscape, including meadows, are set out in the oLEMP [EN010147/APP/7.6.3] and will be further advanced in detailed Landscape Management Plans, including the integration of conservation grazing, submitted to the LPA for approval under Requirements prior to construction. Some minimal

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				used of herbicide will be required.
Oxfordshire Local Nature Partnership	Local ecology	Can PVDP commit to a long-term partnership with academic institutions to ensure Botley West contributes significantly to the body of knowledge on solar parks and biodiversity? OLNP understand there are hopes to do so. It is vital that these plans are carried through, to ensure the impacts of BWSF in reality are captured, analysed and communicated to the sector as a whole.	Yes	The Applicant has had discussions with Oxford University's WildCRU to establish a study of the solar farm in operation. PVDP would like such a study to take place.
Oxfordshire Local Nature Partnership	Local ecology	Can BWSF commit to managing the main mitigation areas for nature in perpetuity? One way to achieve this would be to transform them into a nature reserve (with managed public access to some areas) that could achieve Local Wildlife Site status	Yes	As set out in the oLEMP [EN010147/APP/7.6.3] , it is anticipated that the management of the Evenlode Corridor will allow it to achieve LWS status in time.

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		and potentially ultimately become a Site of Special Scientific Interest (SSSI). This would create one of the largest and most wildlife-rich nature reserves in Oxfordshire.		
Oxfordshire Local Nature Partnership	Local ecology	Can the buffer around ancient woodland be extended from 15m to 50m? Woodland Trust research (ref) shows that the root network of ancient woodlands can extend to 50m. Animals also benefit from this transitional habitat area. PVDP need to provide evidence that shows a 15m buffer is sufficient to ensure no negative impact on the ancient woodland. If it can't, the buffer should be extended to 50m.	Yes	The 15m buffer to Ancient Woodland is that recommended by Natural England and, as such, has been adopted as the minimum requirement.

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Oxfordshire Local Nature Partnership	Local ecology	Can PVDP ensure that its final ecological design maximises the provision of nature corridors between portions of existing high-quality habitat (such as ancient woodland)? Doing so would maximise the benefits of any new habitat creation for biodiversity.	Yes	As set out in the oLEMP [EN010147/APP/7.6.3] , the Ecology Strategy for the Project has been driven by the aims of the Oxfordshire Nature Recovery Network, in particular with respect to the Evenlode Corridor and how such a corridor could function as a landscape-scale enhancement linking the Blenheim Estate and associated ancient woodland to the north and the River Thames, associated meadows and Wytham Woods to the south.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire Local Nature Partnership	Local ecology	<p>What is the proposed habitat management of the sites in which panels are places? It is anticipated that the majority of the 70% BNG is delivered in the areas without panels. What is PVDP going to do to ensure that the area that has panels on it is as nature-rich as possible? The provision of bee-hives, log piles, bird boxes and bat boxes is fine, but nature needs to thrive across the landscape, and such man-made contributions will only achieve so much. OLNP is pleased that PVDP has not made overreaching claims regarding establishing lowland meadow under panels but hopes that every effort will be made to encourage grassland of the highest possible biodiversity value, such Other Neutral Grassland' by pursuing a wildlife rich species mix with</p>	Yes	<p>Habitats are managed under the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].</p> <p>Panelled areas of grassland will be multi purpose, providing biodiversity improvements, conservation grazing areas and be used operationally by the solar farm.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		conservation grazing across the whole panelled area. Overall, OLNP support a principle of multifunctionality in a landscape, rather than one space for nature, one space for development.		
Oxfordshire Local Nature Partnership	Local ecology	Will BWSF utilise Natural England's Environmental Benefits from Nature tool (EBN) to calculate the extent to which the scheme is likely to deliver wider environmental net gain? The tool is a natural progression on from the DEFRA metric and allows calculation of changes to environmental benefit provision from habitat change. It is key to ensure that proposed changes to habitat as entered into the tool are realistic and achievable.	No	The EBN has not been used to date and has not been mentioned by Natural England during pre-submission consultation.
Oxfordshire Local Nature Partnership	Local ecology	Will BWSF consider utilising Alison Smith's ecosystem service opportunity mapping to guide site	No	Alison Smith's Ecosystem Service Opportunity tool has not been used. However,

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		design in a way that maximises provision of environmental benefits?		the opportunities for the delivery of environmental benefits have been considered throughout the design of the Project, for example, the provision of flood prevention measures near to Cassington.
Oxfordshire Local Nature Partnership	Local ecology	What precautions will be taken to ensure that any impact on biodiverse habitats and their provision of environmental benefits, especially water meadows at the side of the Thames, is positive not negative?	Yes	Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and priority habitats, including the Thames and associated floodplain meadow. Long Mead Meadow has been removed from within the Project site with the proposed HDD now to the north of the Swinford Crossing in order to ensure no impacts to the LWS. Impacts are assessed and mitigation outlined in Volume 1

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>[EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.</p> <p>A range of ecology surveys (including breeding and wintering bird surveys) have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.1-9.14 of the ES.</p> <p>A number of management plans have been prepared in order to limit any negative impacts to the environment [EN010147/APP/7.6].</p>
Oxfordshire Local Nature Partnership	Local ecology	How will BWSF impact local people's access to nature? OLNP suggests that in order to accurately analyse this, a baseline is required that enables understanding of the current access and recreational use of	Yes	Consideration of people's access to nature, in terms of their experience and enjoyment of the countryside, is assessed in Chapter 16 Human Health, and in the Socio Economic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the sites, and surrounding areas. This could take the form of surveys such as those used to assess zones of influence from Habitat Regulations Assessments (HRAs). Following a baseline assessment, the ORVal tool can be used to calculate the value of this access, and a post-development plan can also be run through the tool, to analyse changes to this. Only by doing this can we fully understand the impacts, and design appropriate solutions to mitigate and minimise these.</p>		<p>Chapter 15, including effects on tourism and visitors. [EN010147/APP/6.3] Footpath user surveys were also conducted in the summer 2024, and are reported on in the ES in these Chapters and Chapter 17 on the use of Public Rights of Way.</p>
Oxfordshire Local Nature Partnership	Local ecology	<p>Can PVDP commit to using low stock fencing (if necessary) instead of security fencing across the whole of the site? This would make a significant difference to people's interaction with nature whilst visiting the area, as well as potentially making it easier for certain species to travel across</p>	Yes	<p>The solar arrays need to be generally secure from intruders, and stock proof, which is why deer fencing is proposed. The deer fencing will be large gauge wire, mounted on timber posts – so intervisibility will not be greatly reduced. Rather it is</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the land. A 2.1m high fence has severe implications for both wildlife connectivity and for people's experience of the countryside. If there is to be no conservation grazing, OLNP questions the need for any fence at all.</p>		<p>the proposed use of hedgerows and additional hedge and tree planting that is being used to filter views of the Project. All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. The deer fencing is necessary to ensure no damage to the solar arrays from large herbivores.</p>
Oxfordshire Local Nature Partnership	Local ecology	<p>OLNP has serious concerns about the nature-related impacts of Botley West Solar Farm and feels there is insufficient information provided so far to adequately analyse the benefits, disbenefits and mitigations of the scheme.</p>	Yes	<p>The effects of the Project on ecology are assessed in ES Chapter 9: Ecology & Nature Conservation [EN010147/6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Answering the questions above would go a long way towards ensuring decisions are taken based on evidence, the precautionary principle is applied where evidence remains lacking, and outcomes for nature and nature-connectedness can be optimised and maximised across the site and beyond.</p>		
<p>Shipton-on-Cherwell and Thrupp Parish Council</p>	<p>Climate Change</p>	<p>The Parish Council supports, in principle, the development of non-carbon energy generation as essential in the fight to reverse the impact of climate change. We also acknowledge that our locality must be involved in the decarbonising of our energy supply.</p>	<p>No</p>	<p>The Applicant welcomes this comment.</p>
<p>Shipton-on-Cherwell and Thrupp Parish Council</p>	<p>Historic Environment</p>	<p>We welcome the increase to 15m of distance from ancient woodland and note that Weaveley Furze, ancient parish woodland, with common-law rights that date</p>	<p>No</p>	<p>The Applicant notes this comment.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		back centuries, must be included in the 15m measure.		
Shipton-on-Cherwell and Thrupp Parish Council	Land use and agriculture	We believe it is important that all land used by PVDP for the solar farm remains designated as greenfield land and is not designated brownfield land for subsequent development for other uses.	Yes	As explained in Volume 1, Chapter 6: Project Description of the ES [EN010147/APP/6.3], the Applicant will retain an agricultural land use beneath the proposed solar arrays and between the power converter stations and substations, and on areas of the Site that will remain undeveloped in the form of conservation grazing, primarily by sheep. The Applicant also proposes to introduce some small scale horticultural production areas, for use by community food growing groups.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Shipton-on-Cherwell and Thrupp Parish Council	Landscape and visual	We remain concerned about the overall size of the proposals, which is disproportionate to the local environment and infrastructure, particularly taking into account the very significant planned developments west and north of Oxford.	No	The Applicant notes this comment.
Shipton-on-Cherwell and Thrupp Parish Council	Landscape and visual	We wish to see evidence of measures that will be taken to reduce the visual impact of the solar farm.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3] The Applicant has continued to prepare further visualisations to support the ES, which are presented as photomontages, for winter and summer, at agreed

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 [EN010147/APP/6.4]</p>
<p>Shipton-on-Cherwell and Thrupp Parish Council</p>	<p>Local ecology</p>	<p>We welcome the proposed 70% net biodiversity gain (BNG) but, without detailed measures and monitoring, we remain concerned about how will be achieved. The University of Oxford has a world-leading research group (see reference below) focused on BNG and we strongly advise inviting them to participate in the design and monitoring of the BNG actions to be undertaken. Ref: Rampling, E. E., Ermgassen, S. O. S. E. zu, Hawkins, I. & Bull, J. W. (2023) Achieving biodiversity net gain by addressing governance gaps underpinning ecological compensation policies. Conserv.</p>	<p>Yes</p>	<p>Full details of the proposed 70% gain are set out in Appendix 9.13. [EN010147/APP/6.5] The Defra Statutory BNG Metric has been used to demonstrate net gain.</p> <p>The proposals are also supported by an Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]. The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created,</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Biol. (2023) doi:10.1111/cobi.14198.		or evolving, habitats during the operation of the Project.
Southern Gas Networks	Legal	To ensure these working practices are observed, all reasonable measures are taken prior to any works taking place and full access is maintained at all times, SGN require a legally binding agreement to protect the affected apparatus SGN will draft this agreement and expect and any associated costs incurred in relation to this are met. SGN look forward to hearing from you regarding this.	Yes	The Applicant is engaging with SGN on this matter – in the meantime, the Applicant has included Protective Provisions for the benefit of SGN at Part 6 of Schedule 15 of the draft DCO [EN010147/APP/3.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Southern Gas Networks	Project Description	<p>SGN have apparatus within and in the vicinity of the proposed Order boundary, the location of which are illustrated on the attached Infrastructure Plan and detailed below:</p> <ul style="list-style-type: none"> • High pressure gas mains • Intermediate pressure gas mains • Medium pressure gas mains • Low pressure gas mains • Gas governor ON239301 west of Banbury Rd Sturdy's Castle Oxford bordering the proposed Order boundary • Gas governor Church Road Hanborough OX29 8AE E443316,N212717 <p>All of the above form an integral part of SGN's gas network . Due to the inherent danger of gas, High and Intermediate pressure mains are subject to very</p>	Yes	<p>Ownership of assets is addressed in the Book of Reference [EN010147/APP/4.3], the Land and Rights Negotiations Tracker [EN010147/APP/3.6] and the draft DCO. [EN010147/APP/3.1]</p> <p>The Applicant has included Protective Provisions for the benefit of SGN at Part 6 of Schedule 15 of the draft DCO [EN010147/APP/3.1]; engagement is ongoing to ensure that SGN's apparatus is sufficiently protected.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		strategic working practices that must be followed by any third party working in the vicinity of them. The same applies to gas governor compounds.		
The Coal Authority	Project Description	I have checked the site location plan against the information held by the Coal Authority and can confirm that the proposed development site is located outside of the defined coalfield.	No	The Applicant notes this comment from the Coal Authority.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
UK Health Security Agency	Construction	Construction and site preparation activities may give rise to localised emissions of dust and particulate matter; a Construction Emissions Management Plan (CEMP) is proposed to mitigate this. In addition to on-site activities, construction traffic may impact on residential receptors between the development site and the strategic road network. An increase in air pollution levels at receptors in this area is predicted to occur as a consequence although the increase is low and temporary.	Yes	Air Quality impacts have been scoped into the ES since PEIR, and a detailed assessment of the traffic emission from the construction traffic has been undertaken in Volume 1 - Chapter 19; Air Quality [EN010147/APP/6.3] . The assessment concluded that the impacts would not be significant.
UK Health Security Agency	Construction	Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address	Yes	A construction dust risk assessment has been undertaken as part of Volume 1 - Chapter 19; Air Quality [EN010147/APP/6.3] and subsequently, a dust management plan has also be produced to mitigate

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		inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impact assessment, and development consent.		levels of dust to a level that is not significant [EN010147/APP/7.6.1] . A detailed modelling assessment of traffic emissions (NO2, PM10, PM2.5) from construction vehicles has also been undertaken. The assessment concluded that the impacts would not be significant.
UK Health Security Agency	Construction	We also expect to see risk assessment consideration of the impact of accidental fires from the development site on any nearby receptors.	Yes	The ES considers the likely significant environmental effects. Fires are considered to be unlikely. To the extent this is relevant it will be referred to in the Outline Code of Construction Practice [EN010147/APP/7.6.1]
Witney Town Council	Climate Change	Weather phenomena like those seen recently, have caused major concern locally; residents in	No	The Applicant notes this comment from Witney Town Council, in the context of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Witney have been rightfully concerned about rising river levels and the local response has included installation of emergency floodgates and sandbags, many of these resources have been made available since the serious flood incident in December 2020. These weather events are only going to increase, and whilst houses continue to be built and the town continues to grow, more people are going to move to Witney and more homes will be at risk of flooding. One of the few things that can be done directly and at this level is to mitigate the recurrence and regularity of extreme weather is to take steps to fight climate change, and one of those steps is a shift to renewable energy.</p>		<p>wider climate change effects.</p>

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Witney Town Council	Climate Change	<p>Whilst this scheme might not appear ideal to some, we cannot continue to push decisions into the future or look to move the problem elsewhere - time is running out. There may be locations within Oxfordshire for smaller schemes, and those conversations should continue, and challenges be explored with imagination and creativity for additional schemes. Climate change is not going to get any better, but we can stop it getting worse, one of the ways that we do that is in embracing solar technology. Witney Town Council support this scheme, Witney is not immune to the effects of climate change and the stakes are too high to be ignored. Greening our energy mix is beneficial to everyone.</p>	No	The Applicant welcomes this support.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Witney Town Council	Community Benefit	Witney Town Council are in favour of supporting community tariffs or community ownership and would urge the developer to fully explore these options - this could provide a real financial benefit to many residents, especially those particularly affected by the development. There is precedent for this type of scheme, as shown with offshore wind projects, especially around the Thames estuary.	Yes	Once consented, the Applicant will establish a new retail electricity company and that company will offer BWSF electricity and green power from other suppliers to all of Oxfordshire. Residential customers within the 2km consultation zone will be offered a 5% discount from the Ofgem price cap.
Witney Town Council	Community Benefit	The proposal should offer community tariffs and community ownership schemes. The last time the developer was approached about community ownership they said that a third-party company would be needed to facilitate such a scheme. This latest proposal does not appear to have produced that as an offer. Witney Town Council would like	Yes	The Applicant notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant. Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>to see a greater commitment towards community benefit by way of community tariffs and community ownership, and more imaginative mitigations than those outlined in the proposals.</p> <p>Local energy tariffs schemes are very much welcomed and need to be fully explored. If the scheme is to provide energy for 330,000 homes, that is more than the number of homes in Oxfordshire, and therefore all homes in Oxfordshire, including those in Witney, should be offered discounted energy rates.</p> <p>As a fallback position, and very much a second choice, community ownership options could be made available.</p>		<p>[EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p>
Witney Town Council	Community Benefit	These projects and their associated benefits should be maximised for those people living	Yes	More details are provided regarding the community farming initiatives within

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		in the closest proximity to the sites. Witney Town Council encourage consideration of community gardening and food-growing projects, not just allotments.		Chapter 15 of the ES (Section 15.9.4.28) [EN010147/APP/6.3] . Once consented, the Applicant will establish a new retail electricity company and that company will offer BWSF electricity and green power from other suppliers to all of Oxfordshire. Residential customers within the 2km consultation zone will be offered a 5% discount from the Ofgem price cap.
Witney Town Council	Community Benefit	Witney Town Council acknowledge the community offers such as the £50k annual grants, the cycle paths and walking paths to ensure that the countryside remains accessible through development areas. However, all community offers need to be quantified, and	Yes	The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit to be provided by the Applicant. The Environmental Statement has therefore not attached any significance to this fund when assessing

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		agreements sought to ensure any promised funding and promised benefits are secured.		<p>the impact of the development given that the beneficial impacts associated with the community benefit fund are not yet fully known and thus cannot be committed to as part of the DCO.</p> <p>Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region.</p> <p>The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Witney Town Council	Construction	The documents suggest that the equipment will be installed using aluminium piles and galvanised steel frames – when two dissimilar metals are abutted they are likely to corrode – what measures are planned to stop corrosion?	Yes	Details will be agreed at the detailed design stage and when applications are submitted to discharge Requirements to the host authorities. It is anticipated, however, that corrosion will be prevented by the use of a rubber or nylon bush.
Witney Town Council	General	Witney Town Council welcome this initiative. Since this scheme will primarily be supplying energy to the national grid, it might not be obvious as to how this scheme benefits the residents of Witney	Yes	The Applicant notes this comment. Once consented, the Applicant will establish a new retail electricity company and that company will offer BWSF electricity and green power from other suppliers to all of Oxfordshire. Residential customers within the 2km consultation zone will be offered a 5% discount from the Ofgem price cap.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Witney Town Council	Land use and agriculture	The documents suggest that in areas where the panels are too low for grazing, undergrowth can be cut and collected for composting – there is no detail as to how or where this will be facilitated. A commitment is required to demonstrate how this will work and who is responsible for these ongoing works in the long term.	Yes	As explained in Volume 1, Chapter 6: Project Description of the ES [EN010147/APP/6.3] , the Applicant will retain an agricultural land use beneath the proposed solar arrays and between the power converter stations and substations, and on areas of the Site that will remain undeveloped in the form of conservation grazing, primarily by sheep. The Applicant also proposes to introduce some small scale horticultural production areas, for use by community food growing groups.
Witney Town Council	Local ecology	Witney Town Council acknowledge the estimated 70% gain in biodiversity through mitigation. However, members express concerns about the	Yes	The application is supported by an outline Operational Management Plan [EN010147/APP/7.6.2] , and outline Landscape and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>longer-term future of the development sites. Assurances and guarantees are sought that when the scheme has reached the end of its lifecycle, the sites and development areas are protected from automatically being deemed brownfield sites. The developer has a duty to return the land to greenfield sites, or that the sites continue to provide renewable energy.</p>		<p>Ecology Management Plan [EN010147/APP/7.6.3] and an outline Decommissioning Plan [EN010147/APP/7.6.4].</p>
<p>Wootton (Woodstock) Parish Council</p>	<p>Community Benefit</p>	<p>A very substantial increase in the level of Community Benefits including a community fund offering grants for improved recreational and wellbeing facilities to the villages affected (sports, green spaces, community projects and related buildings and restoration). This should be managed by an independent foundation. The offer of £50,000 pa suggested as community benefit is a derisorily</p>	<p>Yes</p>	<p>The Applicant notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant. The Environmental Statement has therefore not attached any significance to this fund when assessing the impact of the development given that the beneficial impacts associated with the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>low figure. There are legitimate reasons to expect a significantly higher figure: the impact of the project on the green belt; its proximity to a UNESCO World Heritage Site; and the impact on the amenity of both residents and tourists.</p> <ul style="list-style-type: none"> • Considerably higher benefits have been agreed elsewhere on the basis of income per installed Megawatt; for example large renewable energy projects have set a payment of around £5,000 per Megawatt per year. 		<p>community benefit fund are not yet fully known and thus cannot be committed to as part of the DCO. Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Wootton (Woodstock) Parish Council	Community Benefit	The creation of a scheme to provide energy at materially reduced rates to affected villages.	Yes	<p>The Applicant notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant.</p> <p>Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Wootton (Woodstock) Parish Council	Landscape and visual	Wootton Parish Council opposes the development of the Botley West Solar Farm for the following major reasons: <ul style="list-style-type: none"> • the scale of the development and the choice of site in an area where landscape resource is increasingly scarce and likely to become more so with further housing, economic and commercial development already planned • the impact of the solar arrays and associated converters on the visual amenity and recreational amenity of local residents and visiting tourists • the high proportion of the development on Green Belt land 	Yes	The Applicant notes this comment. Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1] .
Wootton (Woodstock) Parish Council	Landscape and visual	Wider buffer zones around residential properties and sensitive locations such as Conservation areas, listed buildings and the UNESCO World Heritage site. There should be at	Yes	A minimum buffer of 25m has been applied to residential properties. The Project layout has also, since its inception, avoided any development within

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		least a 20% increase over those currently proposed, or where the buffer currently proposed is zero it should be at least 25 metres.		Conservation Areas. These buffers are shown on the Illustrative Masterplans [EN010147/APP/6.4] Specific consideration of the impacts upon the World Heritage Site is set out in the HIA at Appendix 7.4 [EN010147/APP/6.5]
Wootton (Woodstock) Parish Council	Landscape and visual	Planting for screening purposes to be a mix of native hedgerow with both evergreen and deciduous trees and shrubs to ensure screening in winter and summer. A long term commitment to maintenance of the planting and replacement of unsuccessful sections/plants.	Yes	All planting would be native species and a mix of deciduous and evergreen species. An outline Landscape and Ecology Management Plan (oLEMP) has been produced as part of the application setting out key management objectives for the existing and proposed landscape elements. [EN010147/APP/7.6.3]
Wootton (Woodstock) Parish Council	Landscape and visual	Rejection of arrays in field numbers: 1.12, 1.13, and the southern section of 1.11 (i.e.	Yes	Changes have been made, to amend the installation areas in the context of these

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		moving the boundary to the north, further away from the footpath)		<p>fields, due to the presence of features of archaeological significance revealed through geophysical surveys. The approach to the mitigation of impacts on significant archaeological sites is set out in Chapter 7: Historic Environment of the ES [EN010147/APP/6.3]. A total of 42 areas have been removed from the development and will be retained as managed grassland within the Project. The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Wootton (Woodstock) Parish Council	Local ecology	An improved flora and fauna and biodiversity survey with plans for improvement clearly specified in detail. We are aware that the Landscape and Ecology Management plan is still not completed and we require that the public and councils should be able to comment on it when it is complete. The plan must include the following improvements. The Biodiversity net gain target of 85% to be achieved across all sites: This target should be made a legal requirement. This should not be an average of all sites, but at each individual site. Currently the stated target is 70% but this is unacceptable because it be achieved with very little effort and does not constitute sufficient benefit or improvement. Appendix A lays out in more detail particular clauses with need	Yes	<p>The outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3. It is intended that the Project will have a gain of at least 70% Habitat BNG.</p> <p>Full details of the gain are set out in Appendix 9.13. [EN010147/APP/6.5]</p> <p>The Defra Statutory BNG Metric has been used to demonstrate net gain.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		to be addressed and resubmitted for consultation.		
Wootton (Woodstock) Parish Council	Local ecology	A number of studies have been concluded but a genuine baseline cannot be established with out-of-date data. All species of Flora and Fauna must be studied and data collected accordingly. Studies should not be limited to just protected species or species of conservation interest. A full and comprehensive baseline is required to establish BNG.	Yes	The scope of survey work was agreed with Natural England during pre-submission consultation. Impacts to wildlife are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. A range of ecology surveys (including breeding and wintering bird surveys) have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.1-9.14 of the ES. All data is current at the time of submission of the ES, pre-commencement surveys will be undertaken

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				to update any out of date data. BNG for the Project is based on the Biodiversity Net Gain Assessment provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13. BNG is implemented and managed under the outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3.
Wootton (Woodstock) Parish Council	Local ecology	<p>Habitat Regulations Assessment to be compulsory 6 months prior to any works commencing.</p> <p>Minimum 20m Buffer Zones: This to include but not limited to Housing, Footpaths, Hedgerows, Watercourse, Ponds, Woodlands etc.</p>	Yes	<p>The Habitat Regulations Assessment Report is provided in Volume 3 [EN010147/APP/6.5] Appendix 9.14. Minimum buffers zone to interest features are provided in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.</p>

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Wootton (Woodstock) Parish Council	Local ecology	<p>Surveys of Flora, Fauna and Habitats: Every species of Flora and Fauna must be studied. Deer and foxes to be included. It should not be limited to just protected species or species of conservational interest. Studies must be conducted continuously up until any works commence. Studies should then be conducted annually which will contribute towards ongoing management strategies to achieve min 85% BNG.</p> <p>Clause by clause comments on Chapter 9 of the PEIR on Ecology and Nature Conservation 9.1 – no removal of any Hedges / Trees / Woodlands 9.2 - 20m buffers 9.4 - 20m buffers 9.8 - Deliver at least 85% BNG 9.12 - 85% BNG</p>	Yes	<p>The scope of survey work and BNG for the Project was agreed with Natural England during pre-submission consultation. The scope of survey work was agreed with Natural England during pre-submission consultation. Deer and foxes are not of conservation concern. As deer are wide-ranging in their habits and movements, it is not considered that changes in deer movements brought about by perimeter fencing. All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. Pre-commencement surveys will</p>

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				<p>be undertaken to update any out-of-date data. BNG plans are implemented under the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].</p> <p>The oLEMP includes specifications of the creation/ enhancement of habitats, a monitoring program and a scheduled review process to report on progress and propose additional management measures where they are required to meet BNG, ecology and landscape objectives.</p>
Wootton (Woodstock) Parish Council	Local ecology	<p>The following should be implemented across all areas of sites:</p> <ul style="list-style-type: none"> - bee hives - log piles and other refugia 	Yes	All species-specific enhancements mentioned are incorporated into the masterplan and implemented under the

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		- bird boxes on retained trees - bat boxes on retained trees		outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] .
Wootton (Woodstock) Parish Council	Local ecology	9.16 - Fencing must not eliminate the badgers or <u>any</u> other animal's ability to 'forage or roam.' Other methods must be sought to prevent harm to wildlife. 9.18 - Herras fencing is too high	Yes	All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. As deer are wide-ranging in their habits and movements, it is not considered that changes in deer movements brought about by perimeter fencing.
Wootton (Woodstock) Parish Council	Local ecology	9.10.2.1 Planting within the panel arrays to be sown with appropriate wildflower mixes suitable for the land. Advice on planting and grazing plans to be sought from relevant experts / organisations. This must be carried out across all sites and	Yes	Grassland habitats will be created within panel arrays (this approach has been welcomed by Natural England). The development of the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]

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		<p>planting/ grazing plans and strategies must be carried on for the whole period the solar farm is in use. At the end of the period; 35 or 42 yrs whichever is first (but before decommissioning) Wildflower areas must be studied and records taken. Appropriate measures for protection of important areas must be sought.</p>		<p>was sought from experts in the field. Monitoring programs in accordance with the oLEMP will be undertaken for a 30-year period. The protection of important areas is outlined in the mitigation section of Volume 1 Chapter 9: Ecology and Nature Conservation [EN010147/APP/6.3] and the outline management plans prepared for the project [EN010147/APP/7.6].</p>
<p>Wootton (Woodstock) Parish Council</p>	<p>Local ecology</p>	<p>9.10.2.73 - Any vegetation removal must be carried out outside of any breeding season. No exceptions.</p>	<p>Yes</p>	<p>The following best practice measure has been implemented to protect nesting birds during works: Suitable habitat for breeding birds will be cleared between October and mid-February, outside the breeding bird season, as far</p>

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				as practicable. Where this is not feasible the vegetation, building or structure due to be removed would first be inspected by a suitably qualified ecologist. Any active nests would be retained along with a minimum 5 metre buffer around them.
Wootton (Woodstock) Parish Council	Local ecology	9.10.2.95 - Badger activity to be continuously monitored, any set locations noted that are in use or not in use should be assessed every 3 months.	Yes	Pre-commencement surveys will be undertaken for badger. The badger protected species mitigation licence will guide further mitigation for badgers.
Wootton (Woodstock) Parish Council	Local ecology	9.10.2.121 - Specific surveys for dormouse/hazel mouse MUST be undertaken and continuously assessed every season.	Yes	As some areas of hedgerow are proposed to be impacted by the project, dormouse surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES. The lifespan of this data is

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				considered to be 2-years, pre-commencement surveys will be undertaken where required. The survey/monitoring requirements of the Dormouse European Protected Species Mitigation Licence will adhered to.
Wootton (Woodstock) Parish Council	Local ecology	9.10.2.129 - Specific surveys for Otters MUST be undertaken due to the likelihood to use areas of the sites for commuting and foraging.	No	Given that all water courses will be protected with appropriate buffers during both construction and operation of the Project, no specific surveys for these species have been undertaken. Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and a buffer distance of a minimum of 10m will be observed surrounding

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				watercourses. Considering this negligible impacts are likely to occur. The scope of survey work was agreed with Natural England during pre-submission consultation.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.139 - Specific surveys MUST be carried out.	Yes	Badger surveys will be undertaken prior to decommissioning.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.37 - 20m buffers	Yes	Ancient woodland will have a minimum 15m buffer, as per Natural England guidelines.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.73 - 20m buffers	Yes	Ponds will have a minimum 5 metre buffer. Watercourses will have a minimum 8 metre buffer. These distances of buffer is considered minimum distance sufficient to ensure impacts to such features are avoided.

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Wootton (Woodstock) Parish Council	Local ecology	9.10.3.85 - Emphasises the need to carry out studies for Dormice.	Yes	As some areas of hedgerow are proposed to be impacted by the project, dormouse surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.131 - 20m buffers to be implemented. No set closures. Continuous monitoring of all sets occupied or unoccupied.	Yes	All badger setts will be retained, where possible, with an appropriate buffer of undisturbed habitat. Retention will be incorporated in the final Project design following pre-commencement surveys.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.143 - Sensitivity of the receptor to be changed to HIGH due to the conservation importance level and low ability to recover.	Yes	Bat sensitivity changed to High to account for increased value of bat population identified on site since the PEIR.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.167 - Specific surveys MUST be undertaken.	Yes	As some areas of hedgerow are proposed to be impacted by the project, dormouse surveys have

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				been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.169 - Features to be identified and mapped. Species survey MUST be undertaken.	Yes	Dormouse surveys undertaken and features mapped presented in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.180 - Specific surveys MUST be undertaken.	No	Given that all water courses will be protected with appropriate buffers during both construction and operation of the Project, no specific surveys for these species have been undertaken. Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and a buffer distance of a minimum of 10m will be observed surrounding watercourses.

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				Considering this negligible impacts are likely to occur. The scope of survey work was agreed with Natural England during pre-submission consultation.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.195 - Specific surveys MUST be undertaken.	Yes	There have been incidental sightings of hare and hedgehog around the Project site during other surveys. Both species are therefore considered as receptors within ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3]
Wootton (Woodstock) Parish Council	Local ecology	9.10.8.2 - Target gain of 85 % BNG to be a LEGAL requirement.	Yes	The approach to BNG is set out in ES Appendix 9.13 Biodiversity Net Gain Statement [EN010147/APP/6.5]
Wootton (Woodstock) Parish Council	Local ecology	9.10.8.3 - Wildflower meadows to be planted and managed in all solar panel array areas. Grazing	Yes	The approach to site management is set out in

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		plans to be implemented in accordance with expert advice. No mechanical cutting. No removal of cuttings.		the oLEMP [EN010147/APP/7.6.3]

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Wootton (Woodstock) Parish Council	Local ecology	Buffers to be minimum 20m. Planting/Management strategies to be implemented.	Yes	All hedgerows will have minimum of 5m buffer. This distance of buffer is considered the minimum distance sufficient to ensure impacts to such features are avoided.

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Wootton (Woodstock) Parish Council	Local ecology	New woodland planting to increase to 10ha	No	5 ha of new woodland is proposed to be created.
Wootton (Woodstock) Parish Council	Local ecology	New hedgerow planting to increase to 40km. Current hedgerows within site to be reinforced/gapped-up with relevant species. All hedgerows to be 3m in width.	No	The Project includes the provision of 26.5 km of new species rich hedgerow that will increase the habitat available. Hedgerows and trees will be incorporated to either side of PRow routes (trees to one side only in some places to avoid shadowing of panels). Details of typical sections of footpath and cycle path routes, with hedgerow planting, are illustrated in Figure 7.6.3.2 [EN010147/APP/7.6.3] In addition a length of some 22km of existing hedgerow will be reinforced/gapped up.

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Wootton (Woodstock) Parish Council	Local ecology	9.10.9 - Future monitoring. This should take place across all sites. All species of Flora and Fauna should be studied. This should be done annually throughout the life of the solar farm. All results to be published.	Yes	The monitoring program is outlined in the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] . Representative areas of the Project site will be included in the monitoring program. Monitoring reports will be produced following monitoring events.
Wootton (Woodstock) Parish Council	Local ecology	Decommissioning - Current mitigation plans for the decommission of the site are, at this stage, to only be considered as 'recommended steps'. With a BNG of 85% to be achieved this will greatly impact the way in which all areas of site would be decommissioned. Many ecological and environmental changes can occur in 35/42 years and as such, full studies across all sites should be carried out to	Yes	Completion of pre-decommissioning ecology surveys will be undertaken, as necessary, to ensure an up to date baseline with respect to the location and distribution of relevant protected species. This will inform any necessary applications for protected species licences and any method statements which are required to be complied

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		<p>assess the impact decommissioning could impact the BNG achieved.</p> <p>Sensitivity of receptors at decommissioning stage cannot currently be estimated. With an 85% BNG to be achieved this will greatly increase the sensitivity of receptors across the entire project. Full studies must be carried out no earlier than 1yr prior to decommissioning to assess the ecological impact it will have to all sites.</p>		with during the decommissioning phase.
Wootton (Woodstock) Parish Council	Needs case	However, the parish council recognises that there will be considerable pressure on the Planning Inspectorate to satisfy the need for a rapidly increased supply of renewables of all types; that the climate emergency requires major investment across the UK; and that the grid infrastructure in Oxfordshire will	N/A	The Applicant notes this comment by Wootton (Woodstock) Parish Council.

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		allow quick and straightforward implementation. If the Planning Inspectorate is minded to accept the need for some generating capacity, despite the arguments against that provision in this location, then the WPC would want to see very substantial changes to the size and extent of the site and much higher levels of mitigation agreed. This should include all the following but is not limited to them:		
Wootton (Woodstock) Parish Council	Recreation and amenity	A minimum width of 20 metres along all footpaths/cycleways with wider stretches in key sections of the Oxfordshire Way and Akeman street footpaths. The existing plans would be very detrimental to the aesthetic enjoyment of these paths and rights of way because they will be encased between high fences or hedges - or have views of solar arrays.	Yes	Details of typical sections of footpath and cycle path routes are illustrated in Figure 7.6.3.2 [EN010147/APP/7.6.3]

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Wootton (Woodstock) Parish Council	Recreation and amenity	Commitment to work with the appropriate agencies to improve visual amenity and walking and cycle connections between villages in areas where the solar development and associated security fencing creates a visual and physical separation between villages. This should include greatly improved crossings at key road points, already identified by other organisations, along with investment in better foot and cycle paths with new signage which will help offset the creation of physical and psychological barriers. See Appendix 2 for details for the Northern Section which impacts Wootton	Yes	Details of typical sections of footpath and cycle path routes are illustrated in Figure 7.6.3.2 [EN010147/APP/7.6.3]
Wootton (Woodstock) Parish Council	Recreation and amenity	With reference to the northern site, the documents in the second consultation propose a cycle path which joins the public right of way at Hordley and continues across fields along the Glyme Valley	Yes	The opportunity for a suggested cycle path has been identified between Wootton and Sansom's Farm. The Applicant has been in liaison with OCC's

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		<p>which are part of the Wootton Conservation Trust land. This route needs to be discussed with other parties involved in creating a new route for cycle paths, in particular the Village Travel Network and Blenheim Estates.</p> <p>The route of the cycle route apparently being proposed by the Developer is not feasible because of both the annual flooding of water meadows and the steepness of the terrain. The developer needs to ensure proposals of this nature are practical and feasible.</p>		<p>highways, PRow and Public Health teams about this opportunity, but the Applicant is aware of the physical and practical constraints that affect the route. It is hoped that a design can be advanced through the examination period, which can be delivered.</p>

<p>Worton Farms</p>	<p>Hydrology and flood risk</p>	<p>we have experienced a number of flooding events which have affected the estate. The origin of the floods being water run-off from the land that borders us, namely spring hill. This land, forms part of your solar proposal. However, you don't seem to have recognised our site as a flood risk. As a result, we commissioned a Flood Risk Appraisal; the report was produced by LDE (a RSK Company). A copy of the report is attached.</p> <p>It concludes:</p> <p>“Any localised increased in runoff, or alteration to land drainage patterns could potentially serve to exacerbate the existing flood risk situation, potentially impacting the Worton Park access road and adjacent residential properties.”</p> <p>“Whilst some preliminary environmental documentation is available on the Botley West Solar Farm website, there is currently no specific mention of this land parcel, or indication that</p>	<p>Yes</p>	<p>We acknowledge the existing flow pathway existing at Worton Farms which appears to correlate to runoff from adjacent fields. Due to the proximity to the railway line and Cassington Wastewater Treatment Works it was not deemed feasible to propose enhancement mitigation to pre-existing flood risk at this location.</p> <p>The flow pathway is discussed within the FRA prepared for this Project [EN010147/APP/6.5].</p> <p>In line with the wider Project a Surface Water Drainage Strategy for the Project has been prepared and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5]. Compared to agricultural (arable and livestock) use, solar PV modules are likely</p>
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		<p>this specific area has been fully investigated with respect to the known flood risk history to the land itself, the Yarnton Road, or Worton Park site access road. It is noted, however, that under the National Planning Policy Framework, the proposals should not be given consent if there is any potential increase in flood risk offsite.”</p> <p>Our site is undoubtedly a flood risk. We ask once again for you to properly investigate this risk.</p>	<p>to create an overall betterment in surface water drainage than a continuation of the existing use.</p> <p>The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module.</p> <p>A second environmental benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project.</p> <p>As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays. Vegetation will be placed beneath the</p>
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				<p>panels to allow for infiltration at the lowest leading edge of panels. These measures ensure there is no significant increase in runoff or gully erosion.</p> <p>The FRA concludes that as a result of the solar Project there is no increase flood risk on site and off-site in line with the NPPF and NPS [EN010147/APP/6].</p>
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Worton Farms	Landscape and visual	Proposed mitigation and enhancement areas. We would like to know when will these trees and hedge rows be planted? Will they be of sufficient height and width to properly shield the panels? We have seen other mitigation schemes that take many years before any screening and enhancement begins.	Yes	The details of the proposed mitigation planting, including proposed hedgerow heights, for the Project are set out in the oLEMP [EN010147/APP/7.6.3] , and in the Landscape, Ecology and Amenities Plan [EN010147/ALL/7.3.3] . These will be further developed in detailed management plans. Early planting, in advance of the scheme being consented, may be feasible, but the Applicant has not committed to this currently.
Worton Farms	Local ecology	The estate is home to a number of protected species especially rare aquatic birds. We worry what sort of impact a large scale solar farm may have on the birds, particularly their migration? We would ask that your findings from any wildlife surveys to be made	Yes	Impacts to wintering and breeding birds are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Breeding bird and wintering bird surveys have been

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		public so we, and others can understand how the wildlife will be affected.		undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.9 and 9.10 of the ES.
(Section 44 consultee) Contact ID 101792	Access	We have concerns about the maintenance of the access to our property at all times during the installation of the site.	Yes	The overall approach to managing construction traffic is set out in the ES within an Outline Construction Traffic Management Plan, which sits within the wider Outline Code of Construction Practice [EN010147/APP/7.6.1] . Detailed management plans, including the specific arrangements to keep access to property available, will form part of the later stage Requirements associated with the DCO.

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(Section 44 consultee) Contact ID 101792	Buffer Zone	Request made for a substantial buffer zone for the properties backing on to the site along Bladon Road. The site obliterates any open countryside for a considerable distance beyond these houses and is currently also very close to the back gardens. A good buffer zone would mitigate the effect of the site a little and would have little impact on the site itself. The request is that it is extended up to the public footpath. The current buffer zone on the plans is of no significant size.	Yes	The Applicant has considered the request for a further increase in the buffer zone from the rear of residential property on Bladon Road / Grove Road. For consistency of approach with other residential buffers, following on from revisions to the scheme post PEIR, and based on the separation being provided, it is not proposed to make a further revision.
(Section 44 consultee) Contact ID 55831	General	I demand at least fields 1.6, 1.7, 1.11, 1.12, 1.13 and 1.14 around Sansoms Platt in the Northern area of Botley West, as shown on the map below, are taken out of the Botley West plans.	Yes	Land within Fields 1.11, 1.12, 1.13 and 1.14 has been removed from the development and will be retained as managed grassland within the Project. This has been done to protect the archaeological remains associated with the

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				<p>Scheduled Monument at Sansom's Platt and also the setting of this Scheduled Monument.</p> <p>Fields 1.6 and 1.7 do not form part of the setting of the Scheduled Monument and remain within the development.</p>
<p>(Section 44 consultee)</p> <p>Contact ID 55831</p>	<p>Archaeology</p>	<p>Do you accept there is evidence to support the existence of the remainder of the currently protected Roman Town, around Sansoms Platt in the surrounding fields?</p> <p>Do you agree these fields are going to be covered with solar panels in an act of cultural vandalism when legislation states 'surrounding areas' to Protected Monuments should also be protected?</p>	<p>Yes</p>	<p>The Applicant has reviewed available information regarding the Scheduled Monument at Sansom's Platt and has undertaken additional fieldwork in the land adjacent to the Scheduled Monument where this falls within the Order Limits for the Project.</p> <p>It is very clear that the Roman settlement and associated activity here extends beyond the Scheduled area.</p>

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		<p>Do you accept that this area is subject to UNESCO rules and regulations particularly as outlined above ?</p> <p>Do you accept that the fields around Sansoms Platt, an English Heritage site, are owned by Blenheim and are to have solar panels built on them ?</p> <p>Do you accept that, in so doing, you will be disobeying the above UNESCO rules?</p>		<p>The design of the Project has been adjusted appropriately such that an area of land in excess of 17 hectares has been removed from the development and will be retained as managed grassland. This includes land to the north, north-west, west, south-west and south-east of the Scheduled Monument and provides a suitable buffer to protect the setting of the Scheduled Monument.</p> <p>By changing the use of this land from its current arable status to one of managed grassland, the archaeological remains identified by the Applicant will be protected from the damage caused by regular</p>

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				ploughing and secondary cultivation.
<p>(Section 44 consultee)</p> <p>Contact ID 55831</p>	<p>Planning Policy</p>	<p>National Planning Policy Guidelines (NPPF) has a lot to say about 'Conserving and enhancing the historic environment. [Citing P55 – Conserving and enhancing the historic environment:]</p> <p>a) <i>Heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.</i></p> <p>In building solar panels on aforementioned fields do you agree you will be ignoring the above NPPF guideline ?</p>	<p>Yes</p>	<p>The approach to the mitigation of impacts on significant archaeological sites is set out in Chapter 7: Historic Environment of the ES [EN010147/APP/6.3]. A total of 42 areas have been removed from the development and will be retained as managed grassland within the Project.</p> <p>By changing the use of this land from its current arable status to one of managed grassland, the archaeological remains will be protected from the damage caused by regular ploughing and secondary cultivation. All such remains would be available for</p>

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		<p><i>b) Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</i></p> <ul style="list-style-type: none"> <i>• opportunities to draw on the contribution made by the historic environment to the character of a place.</i> <i>• the desirability of sustaining and enhancing the significance of heritage assets</i> <i>• Local planning authorities should maintain or have</i> 		<p>expert investigation during the operation and maintenance phase of the Project.</p>

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		<p><i>access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.</i></p> <p>Do you agree that, in covering the afore mentioned fields with solar panels you will be ignoring all of the above and blighting future chances of "expert investigation at some point "?</p>		

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		<p>Do you agree with the Annex 2. Definition of the terms taken from the NPPF publication?</p> <p>Do you agree that the fields around Sansoms Platt upon which you will be putting solar panels are defined and fall within the above definitions of Annex 2?</p>		
<p>(Section 44 consultee)</p> <p>Contact ID 55831</p>	<p>Ecology</p>	<p>Since it is a matter of record that the protected Canada Geese used field 1.11 do you accept that field 1.11 is eligible to be classified as a 'special protection area' ?</p> <p>Do you agree that this field is to be covered in solar panels thus directly contravening the spirit of it being eligible to be considered a special protection area and you will be proceeding with this knowledge?</p>	<p>Yes</p>	<p>Nesting Canada geese are protected under the Wildlife and Countryside Act (1981) as amended, in the same way all wild birds are. Canada geese are a naturalised feral species (category A, C and E of the British Ornithological Union British List) and as such they do not have any other additional protection (e.g. Schedule 1 of the Wildlife and Countryside Act (1981)). Impacts arising</p>

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		<p>Do you agree that the fields mentioned above are also home to ground species and birds that are eligible to be protected under national nature conservation rules?</p> <p>Please detail your reasoning that putting solar panels in fields 1.6, 1.7, 1.11, 1.12, 1.13 and 1.14 will improve and also enhance the local ecology over and above that mentioned above?</p>		<p>from the Project on wild birds are assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3].</p> <p>An SPA cannot be designated for this species as it's not included within Annex 1 of the Birds Directive (2009/137/EC) (Article 4.1) or a regularly occurring migratory species not listed in Annex 1 (Article 4.2). The Birds Directive has been transposed into UK law via the Habitat Regulations 2017, as amended.</p> <p>No part of the Project site qualifies under any of the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>criteria for which SPAs are designated.</p> <p>The enhancements the Project will deliver for ecology are set out in the oLEMP [EN010147/APP/7.6.3].</p>
<p>(Section 44 consultee)</p> <p>Contact ID 55831</p>	<p>Heat Island Effect</p>	<p>Are you aware of the recent findings in the journal 'Nature Scientific Reports' entitled Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures?</p> <p>Are you happy that, in light of this latest research, you will be agreeing to subject some 2,447 acres to an increase in temperature of 3-4 degrees at a time of global warming when we are trying to contain the temperature of the earth by 1.5 degrees?</p>	<p>Yes</p>	<p>The Applicant notes concerns raised regarding the potential for solar heat island effects. However, the scientific literature on this issue is sparse and the available evidence indicates that any effect is likely to be relatively small and geographically limited in the context relevant to this project (for example, Fthenakis and Yu 2013). The Applicant notes that the studies that tend to identify</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>solar heat island effects tend to be from arid or desert contexts (Barron-Gafford et al 2016), with the greatest temperature variations being at night and within the array areas. Recent studies show solar farms may have a cooling effect (Xu et al., 2024). The role of vegetation within the Project, including the planting of trees and hedgerows is likely to contribute to cooling and shade for those passing through array areas. The Applicant does not consider there to be the potential for a likely significant population health effect on this issue and as such it has not been scoped into the Environmental Assessment.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
<p>(Section 44 consultee)</p> <p>Contact ID 55831</p>	<p>Landscape and Visual</p>	<p>Please define and detail your argument that putting solar panels in fields 1.6, 1.7, 1.11, 1.12, 1,13 and 1.14 will improve and also enhance the landscape and visual impact over and above that mentioned above</p>	<p>Yes</p>	<p>The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Table 8.24 and 8.25 of that chapter. On balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects.</p> <p>In addition, proposed planting would have a longer term benefit reinforcing the landscape</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				character of the local landscape.
(Section 44 consultee) Contact ID 55831	Traffic and Transport	<p>Please define and detail your plans to ensure traffic access will be designed to be suitable for the narrow lanes in the vicinity to Sansoms Platt and a school and will cause minimal disruption to the area.</p> <p>Please define the traffic flow and lorry weight measures that will be introduced to specifically cope with working in this area.</p> <p>Define the measures you will implement to ensure minimum construction intrusion onto the local wildlife (as partly detailed above) and minimum construction intrusion to the local area including working hours, lorry size restrictions, light pollution from</p>	Yes	<p>Traffic and Transportation effects are identified and assessed in Chapter 12 of the ES along with all assumptions used [EN010147/APP/6.3]. Both the Transport and Agriculture, Land use and Public Rights of way chapters consider 'internal' access points - Chapters 12 and 17 [EN010147/APP/6.3] and seek to minimize traffic on the minor roads. See also Volume 3, Appendix 12.8 (Access and Highway drawings) [EN010147/APP/6.5], Site Construction Compound Accesses [EN010147/APP/7.3.1] and</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		any floodlights and general good work practices to be deployed.		Crossing Schedule [EN010147/APP/7.3.9] . the ES is supported by an Outline Construction Traffic Management Plan, which sits within the wider Outline Code of Construction Practice, which includes consideration of the need for lighting, working hours and practices to be deployed. [EN010147/APP/7.6.1] . On-going management is considered in the Outline Operational Management Plan [EN010147/APP/7.6.2]
(Section 44 consultee) Contact ID 55831	Land Use and Agriculture	Please supply in detail the research and decision making process you have deployed to reach the conclusion that you can ignore the above and put solar	Yes	The development pressures in the region are also a driver for renewable energy generation to meet existing and future needs. Solar

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>panels in fields and not brownfield sites or on roofs both of which would save much needed agricultural land particularly in todays uncertain food supply chain.</p> <p>Have you considered alternative sites such as using the Didcot Power Station site as a suitable (and ready made) entry point to the National Grid based as it is on a 'brownfield' site ideal for solar panels instead of the proposed Botley West area which includes blitzing an area around a National Heritage protected site ?</p> <p>List the alternative sites to Botley West you are expected to and have considered.</p> <p>In light of this will you continue to promote the Botley West Scheme across Grade 3b farmland ?</p>		<p>panels on roofs are an important contributor, as recognised in the Governments British Energy Strategy, but will not in their own right provide sufficient energy generation, even if they can be connected to the grid or provide a local 'private wire' connection to a local off-taker. The target for solar ground-mounted energy will continue to be a significant part of the renewable development mix in order to meet targets. The Site Selection and Alternatives are considered, including Didcot Power Station, and an analysis of grid capacity and connection locations are set out within ES Volume 1, Chapter 5: Alternatives</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Considered [EN010147/APP/6.3]. The assessment of the effects of the Project on Agriculture, Land use and Public Rights of Way are presented in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way</p> <p>[EN010147/APP/6.3]. The best and most versatile land comprises Grades 1, 2 and Subgrade 3a (not 3b) of the Ministry of Agriculture Fisheries and Food 1988 ALC System. The results of the Agricultural Land Classification survey show that 36% of the land within the Project comprises best and most versatile land, with the majority comprising lower quality Subgrade 3b land. The proposal will lead</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>to the permanent loss of only approximately 5.5ha of the best and most versatile land associated with the development of the substations and PCS units. The Code of Construction Practice [EN010147/APP/7.6.1] contains an Outline Soil Management plan that includes measures to limit the impacts on soil resources, wherever practicable, through the application of recognised best practice measures in soil management.</p>
<p>(Section 44 consultee) Contact ID 55831</p>	<p>Recreation and Amenity</p>	<p>Define and detail your reasoning that putting solar panels in fields 1.6, 1.7, 1.11, 1.12, 1.13 and 1.14 will improve and also enhance the recreation and amenity facilities over and above that mentioned above</p>		<p>The overall planning balance of benefits and harm are set out in the Planning Supporting Statement [EN010147/APP/7.1]</p>

Table 2: Section 43 Applicant Response Table

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Planning Policy	<p>Based on an initial appraisal it is considered that the following policies are relevant:</p> <p>NPPF 2023 – Paras 156, 157, 160, 163, 180 PPG - Paragraph: 012 Reference ID: 5-012-20140306 (Revision date: 06 03 2014),</p> <p>Adopted Cherwell Local Plan 2015 - Policy ESD 1: Mitigating and Adapting to Climate Change; Policy ESD 5: Renewable Energy; Policy ESD 10: Protection and Enhancement of Biodiversity and the Natural Environment; Policy ESD 13: Local Landscape Protection and Enhancement; Policy ESD 14: Oxford Green Belt; Policy ESD 15: The Character of the Built and Historic Environment; Policy ESD 17: Green Infrastructure.</p>	Yes	<p>The Planning Supporting Statement [EN010147/APP/7.1] contains an up to date analysis of relevant policy and guidance, including the NPS, NPPF, and other Development Plan Policies.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Policy ESD 1 seeks to mitigate the impact of climate change within the district and promotes the adoption of decentralised, renewable, and low carbon energy where appropriate. Policy ESD 5 supports renewable and low carbon energy provision wherever any adverse impacts can be addressed satisfactorily.</p> <p>Potential adverse impacts listed in the policy are:</p> <ul style="list-style-type: none"> • Landscape and biodiversity including designations, protected habitats and species, and Conservation Target Areas • Visual impacts on local landscapes • The historic environment including designated and non-designated assets and their settings • The Green Belt, particularly visual impacts on openness • Aviation activities • Highways and access issues, and • Residential amenity 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Cherwell Local Plan Review 2040 Consultation Draft (Regulation 18) (22 September 2023 – 3 November 2023) – Whilst this is still at an early stage of plan making and only very limited weight can be given to it at present this plan is likely to progress to a more advanced stage or adoption within the timeframe that this project is being considered. Therefore, your attention is drawn to the Core Policies within this draft plan.		
Cherwell District Council	Planning Policy	All chapters of the PEIR need to be updated to account for the recent updated National Policy Statements (published 22 November 2023) and the National Planning Policy Framework (20 December 2023).	Yes	The Planning Supporting Statement [EN010147/APP/7.1] contains an up to date analysis of relevant policy, including the NPS, NPPF, and other Development Plan Policies. See Appendix 5 specifically.
Cherwell District Council	Local Ecology	Policy ESD 10 supports the protection and enhancement of biodiversity. Under the policy, if significant harm resulting from a	Yes	Noted. The Applicant has produced a Planning Supporting Statement (PSS) which draws overall

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then development will not be permitted.		conclusions as to the planning balance in respect of the Botley West Solar Farm [EN010147/APP/7.1] . Appendix 5 addresses CDC planning policy.
Cherwell District Council	Local Ecology	Proposals are expected to incorporate features to encourage biodiversity and retain and where possible enhance existing features of nature conservation value within the site. Existing ecological networks should also be identified and maintained to avoid habitat fragmentation, and ecological corridors should form an essential component of green infrastructure provision in association with the proposal to ensure habitat connectivity.	Yes	Opportunities with respect to enhancement to connectivity have been incorporated into the Ecology Strategy for the site (as set out in the outline Landscape and Ecology Management Plan is provided [EN010147/APP/7.6.3]
Cherwell District Council	Local Ecology	Following the provisions of the Environment Act, the Council now seeks a minimum of 10% net biodiversity gain in relation to development proposals. The emerging Cherwell Local Plan	Yes	Noted. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details of the gain are set out

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Review (as drafted) seeks 20% BNG. We welcome the proposed minimum BNG of 70% which will need adequate provisions in place to ensure that it is managed and maintained in the longer term.		in Appendix 9.13. [EN010147/APP/6.5] The Defra Statutory BNG Metric has been used to demonstrate net gain.
Cherwell District Council	Local Ecology	A number of the areas within the Central site surround the ancient woodlands of Worton Wood and Begbroke Wood, there is therefore the potential for the proposals to result in the deterioration of this irreplaceable habitat. Paragraph 186 of the NPPF and the Conservation of Habitats and Species Regulations (2017) provides that development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodlands, should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.	Yes	The impact of the Project on the areas of Ancient Woodland is considered in the ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.
Cherwell District Council	Local Ecology	CDC's Ecologist makes the following observations and recommendations on the formal consultation and PEIR:	Yes	Noted – see below.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Local Ecology	"The PEIR mentions that metric 4.0 will be used to assess biodiversity impacts and gain following detailed habitat surveys – will this be updated to the Statutory metric?"	Yes	The Statutory Metric has been used in the ES, Volume 3 [EN010147/APP/6.5] Appendix 9.13 BNG Assessment.
Cherwell District Council	Local Ecology	As regards species, the principal impacts appear to be on breeding and wintering birds of which the present assemblages are of County importance. It is not clear at this stage the mitigation/compensation proposed for wintering birds. The plans now include the inclusion of multiple skylark plots across the area of the arrays. Whilst these may be beneficial overall I would request that mitigation plans include some evidence that such plots are likely to function for nesting purposes as stated. When included in arable fields skylark plots do benefit skylarks but it seems unlikely that arrays would function similarly to an open field. Without some examples of where this has been done and the outcomes it would be difficult to conclude that	Yes	The skylark plots are provided within the solar arrays to help improve foraging resources for this (and other) species of bird. Habitat managed for the benefit of breeding skylark comprises large areas of meadow that will be managed specifically for birds as set out in the oLEMP [EN010147/APP/7.6.3] ..

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		these plots could satisfactorily mitigate for the loss of skylark territories (or for other breeding farmland birds).		
Cherwell District Council	Local Ecology	I note the buffers (to ancient woodland, ponds, hedgerows etc..) are proposed to be the minimum recommended width. I would be keen to see buffers greatly increased from this minimum in order to maximise opportunities for biodiversity and strengthen green corridors throughout the site. This would minimise impacts on species, in particular bats.	Yes	The buffers set out are minimum and are exceeded in a large number of locations.. The Applicant has set out other key parameters in Chapter 6 of the ES, as well as measures in the Layout and Design Principles Document [EN010147/APP/7.7] and in the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]
Cherwell District Council	Local Ecology	HDD for cabling is proposed to avoid impacts on protected or priority habitats however clarity should be sought that any potential effects of this will be fully assessed as there	Yes	Consideration is given to the HDD process in Section 6.3 of Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		remains potential for environmental impact from this method.”		The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]
Cherwell District Council	Local Ecology	The proposals should seek to retain valuable trees, woodlands and important hedgerows and secure tree/hedgerow planting in order to provide a resilient biodiverse site.	Yes	All trees, woodland and important hedgerows (with the exception of small areas required for vehicular access) are retained. Significant new hedgerow, tree and woodland planting will occur through the Project as set out in the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] .
Cherwell District Council	Local Ecology	9.1 outlines the project will not require facilitative tree/hedgerow removal as committed within project description Volume 1 Chapter 6.	Yes	Following scheme evolution, a small amount of hedgerow removal will be required (circa 666m). However, this will be mitigated through the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				provision of extensive new hedgerow planting and reinforcement elsewhere on site.
Cherwell District Council	Local Ecology	9.2 highlights a minimum buffer from retained woodlands/trees – the minimum buffer is acknowledged however, this will need to be superseded where required by a construction exclusion zone calculated through an arboricultural impact assessment in line with BS5837:2012.	Yes	The Applicant has set out key parameters in Chapter 6 of the ES, as well as measures in the Layout and Design Principles Document [EN010147/APP/7.7] and in the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]
Cherwell District Council	Local Ecology	Understood that an arboricultural impact assessment and method statement is to be supplied within the DCO submission.	Yes	The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project and a methodology for protecting trees during works and managing them through the operational stage of the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				development. [EN010147/APP/6.5]
Cherwell District Council	Local Ecology	Ancient woodlands, default position is to offer as great a buffer as feasible, minimum buffer acceptable with mitigation. ES referenced as to provide detail on this.	Yes	Buffer to areas of ancient woodland will be 15m minimum and following discussions with Natural England, appropriate buffers will be incorporated into the final design either side of any important bat commuting routes.
Cherwell District Council	Local Ecology	Ancient/Veteran trees – Sufficient buffer required. ES referenced to provide detail on this.	Yes	A survey of veteran trees has been undertaken presented in ES Volume 3, Appendix 9.14 [EN010147/APP/6.5] showing the necessary buffer zones incorporated.
Cherwell District Council	Local Ecology	Tree/hedgerow/woodland planting – hedgerow, individual tree and woodland planting referenced. Further detail on this will be required to allow consideration on suitability, BNG and mitigation.	Yes	BNG for the Project is outlined in the Biodiversity Net Gain Assessment provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13. BNG is implemented and managed under the outline Landscape and Ecology Management

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Plan is provided in [EN010147/APP/7.6.3]
Cherwell District Council	Local Ecology	All items to be submitted (ES, AIA, AMS) within the DCO will be subject to review.	N/A	Noted
Cherwell District Council	Landscape and Visual	<p>This is one of the key issues in considering these proposals.</p> <p>Policy ESD 13 states that proposals will not be permitted if they would:</p> <ul style="list-style-type: none"> • Cause undue visual intrusion into the open countryside • Cause undue harm to important natural landscape features and topography • Be inconsistent with local character • Impact on areas judged to have a high level of tranquility • Harm the setting of settlements, buildings, structures or other landmark features, or • Harm the historic value of the landscape. 	Yes	<p>The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed within the planning balance set out in the Planning Supporting Statement (PSS)</p> <p>[EN010147/APP/7.1]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Landscape and Visual	Our in-house Landscape Architect has previously made recommendations for the inclusion of a number of additional representative viewpoints in the LVIA which are specific to Cherwell district. These were passed on to Jane Betts at RPS who was overseeing the LVIA. It appears that two of CDC's suggested and agreed viewpoints (CD8 (looking east from A44 at Begbroke and either CD4 or CD5 looking west from Public Footpath 124/3/10 at Begbroke which were agreed by an email dated 24 May 2023) have been omitted from the PEIR? These should be included in the assessment.	Yes	All 55 Representative Viewpoints were consulted on and agreed with all host authorities. This has been detailed at Table 8.4 of Chapter 8 giving details of any additions m changes or omissions.
Cherwell District Council	Landscape and Visual	CDC are of the view that, given the topography of the land within the vicinity of the proposals, harm may be difficult to mitigate.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>proposed. Electrical equipment has been considered. [EN010147/APP/6.3]</p>
Cherwell District Council	Landscape and Visual	<p>The following comments have been provided by our in-house Landscape Architect:</p> <p>North 13, I agree with visual description. I note from the Illustrated Masterplan that a Project Substation is proposed near to this View, the Project Substation is included in the visualisation. The visual harm is such a degree as to warrant planting of trees and hedgerow along the section of operations boundary fence to mitigate visual harm along with supporting written narrative. I note RPS response 'Resulting in a Major adverse significance of effect, which is judged to be significant.' 14 I agree with pre-development visual description</p>	Yes	<p>The comments of the Cherwell in-house Landscape Architect are noted, and further inputs since the PEIR have been used to inform additional areas of landscape planting as mitigation measures. Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3] The Applicant has continued to prepare further visualisations to support the ES, which are presented as</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>15 Arrow directed north on RV Fig 8.9, not northeast, otherwise agree with description of current view</p> <p>Central</p> <p>16 I agree with pre-development visual description. The northwestern site boundary between A4095 and VP 17 requires more substantial landscape mitigation planting than a hedgerow and Trees. I recommend a belt of woodland and understory planting</p> <p>17 I agree with pre-development visual description. The visual harm will required a woodland belt – refer to above response for 16. This would enhance Green Infrastructure linking up Mature Woodland/Scrub associated with Rowell Brook with the Mature Woodland adjacent to A4095</p> <p>32 I agree with visual description</p> <p>34 I agree with pre-development visual description/ The transmission line contributes towards visual harm and a visualisation based on VP34 is</p>		<p>photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 [EN010147/APP/6.4]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>required to explain the significant of effect along with the written narrative of analysis.</p> <p>35 Note that there is a discrepancy between Representative Viewpoints Figure 1 where VP 35 is in a different location to the one referred to in the text: in respect of PEIR 8.5.5.21 'Footpath 184/50/20 (Greenbelt Way) (Representative Viewpoint 35) and 184/30/40 run in a generally east to west direction to the northwest of the Southern site of the Project, adjacent to Farmoor Reservoir and along an unnamed road adjacent to the northern boundary. Located within fields 3.1 / 3.3 the Project substation site and NGET substation site adjacent to the northern Project Site boundary. Initially views of solar panels, security fencing and substation would be obtained from these footpaths and other within the local area. Views of pylons and overhead powerlines are currently possible from these footpaths.'</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Actually VP 35 is located on Downs Lane path, west of Yarnton, according to RV Fig 1. However the VRG visual description (pre-development) and location appear to be correct.</p> <p>36 I agree with pre-development visual description.</p>		
Cherwell District Council	Landscape and Visual	<p>Operational Phase Visual Effects Visual Receptor Groups PRoW: Omissions</p> <p>The following visual analysis does not appear to be in the PEIR (I feel that these must be addressed specifically and not lost within a generic response):</p> <p>North VP14 &15</p> <p>Central VP 16, 32, 34, 35 and 36</p>	Yes	<p>Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. Electrical equipment has been considered.</p> <p>[EN010147/APP/6.3]</p> <p>The ES includes assessment from all Representative Viewpoints.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Landscape and Visual	PEIR 8.5.5.2 The proposed ZTV is based on the development of solar panel heights up to 2.5 m high. The ZTV, (Volume 2, Figure 8.7, 8.8, 8.9, 8.10 and 8.11) indicates that the ZTV for all fields (northern, central and southern) is generally kept to the spine of the Project Site with potential highest visibility confined to within 3 km of the Project Site boundary.	Yes	Noted. Maximum height of panels is 2.3m.
Cherwell District Council	Landscape and Visual	The extent of the ZTV to include not only the Solar panels, but the '2 x HV Transformers (secondary substations) which are considerable structures of circa 5m/6m high, 15m long and 8m wide, numerous power convertor stations which would be circa 3m/2.89m high, 12.2m wide and 2.2m deep and extensive security fencing of up to 2.1m high'. In the PEIR the Landscape mitigation should be appropriately and clearly justified in respect of part of the LVIA: clear explanation of the nature and scale of landscape mitigation for the	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. Electrical equipment has been considered. [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		lifespan/operation of this development.		
Cherwell District Council	Landscape and Visual	<p>2 x HV Transformers (secondary substations), numerous power convertor stations and extensive security fencing</p> <p>The landscape consultant is to be fully informed of the detail of the above project elements which are to be clearly and fully explained through drawings of industry standard scale indicating measurements (height above ground level, width etc), cross sections and elevations. Specific site location plans to clearly indicate the position of the 2 x HV Transformers (secondary substations), numerous power convertor stations and the extensive security fencing. The most relevant viewpoints are to be included on plans. This would ensure that the wireframe and visualizations in</p>	Yes	<p>Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. Electrical equipment has been considered.</p> <p>[EN010147/APP/6.3]</p> <p>The Applicant has continued to prepare further visualisations to support the ES, which are presented as photomontages, for winter and summer, at agreed</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>respect of viewpoints can be cross-checked against the detail information provided. This is to ensure that these elements are not lost within a 'representative' assessment of the solar arrays, but judged in respect of their visual harm significance of effect, and also cumulative harm.</p>		<p>representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 [EN010147/APP/6.4]</p> <p>The Landscape and Visual Impact Assessment (LVIA) and photomontages have been produced in accordance with current best practice guidance. Including the Guidelines for Landscape and Visual Impact Assessment (Third Edition) (GLVIA3) and LI TGN 06/19 Visual Representation of Development Proposals.</p>
Cherwell District Council	Landscape and Visual	<p>Recreation The current recreational value for visual receptors, along with visual receptor sensitivity to change must be addressed in the LVIA . There is potential harm on various PRow and these are to be individually assessed in respect of this development.”</p>	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects,

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>and mitigation measures being proposed. [EN010147/APP/6.3]</p> <p>Recreational effects are also reported in the Socioeconomic and Human health chapters (Chapters 16 and 15 respectively)</p>
Cherwell District Council	Historic Environment	Policy ESD 15 states, inter alia, that new development proposals should contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting.	Yes	Where possible, conserving and enhancing of heritage assets, including their settings, has been achieved through the design of the Project as described in Section 7.8 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].

<p>Cherwell District Council</p>	<p>Historic Environment</p>	<p>The proposals are within the vicinity of a number of important landscape features that contribute to local distinctiveness. The Council's Conservation Team have made the following observations:</p> <p>Northern site The northern part of the proposal has a small area located within Cherwell District between Woodstock and the A4260. Here it appears that the proposed installation area will sit within the wider landscape setting of Hampton Gay, Shipton on Cherwell, and Thrupp Conservation Area. There are three Grade II listed structures and buildings on this west side of the conservation area: The Manor and attached outbuildings, Kitchen Garden Walls, and the Church of the Holy Cross. The Deserted Village of Hampton Gay scheduled monument also sits further to the east with the Grade II* Church of St Giles and the Grade II ruins of the Manor House and Manor Farmhouse. It should be noted that these are further away from the installation area, and it is considered that these are less likely to be affected.</p>	<p>Yes</p>	<p>The detailed assessment of likely impacts and effects on heritage assets arising from change within their setting is presented as Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5].</p>
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		<p>Central site</p> <p>The installation area appears to come up to the boundary of the Begbroke Conservation Area and surround it on two sides, therefore the setting of the conservation area will be altered and there is potential for some harm to the significance of the conservation area through development within its setting. Because of the small size of Begbroke Conservation Area and due to their proximity to the installation area the listed buildings of The Old Rectory (Grade II), St Michaels Church (Grade II*) and St Phillips Priory (Grade II) all located within the conservation area and Hall Farmhouse (Grade II) located outside of the conservation area, on the edge of the village, have potential to be affected by the development within their setting.</p> <p>Further south on the central site there is another small amount of the installation area that is located towards the settlement of Yarnton. Yarnton is not a conservation area, and it is considered that the majority of the listed buildings within Yarnton are either too far away or encompassed within the settlement</p>		
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		<p>and therefore will not be affected. However, there are two Grade II listed buildings on the southwest edge of the village that should be highlighted, and more notably the complex of buildings which includes Yarnton Manor (Grade II*) and the Church of St Bartholomew (Grade I) which sit outside of the village. The Yarnton Manor buildings are located with a more rural and potentially historic landscape which is part of their setting and therefore this may make them more susceptible to harm through development within their wider setting.</p> <p>Southern Site There are no comments on this section of the proposal. Although only a small amount of the installation area is located within Cherwell District the overall size of the solar farm will unavoidably change the wider landscape in this area, therefore the potential impact on significance of the individual heritage assets due to development within their setting as a result of the overall proposal should not be overlooked.</p>		
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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Green Belt	<p>Policy ESD 14 seeks to maintain the Oxford Green Belt boundaries within Cherwell District in order to:</p> <ul style="list-style-type: none"> • Preserve the special character and landscape setting of Oxford • Check the growth of Oxford and prevent ribbon development and urban sprawl • Prevent the coalescence of settlements • Assist in safeguarding the countryside from encroachment • Assist in urban regeneration, by encouraging the recycling of derelict and other urban land <p>Under the policy, development within the Green Belt will only be permitted if it maintains the Green Belt's openness and does not conflict with the purposes of the Green Belt or harm its visual amenities.</p>	Yes	<p>Planning Policy including consideration of the Green Belt, is considered within the Planning Supporting Statement (PSS) including the case for Very Special Circumstances at Appendix 8 [EN010147/APP/7.1].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Green Belt	Much of the land subject to these proposals was assessed against the purposes of the Green Belt for the Partial Review Local Plan and the emerging Cherwell Local Plan Review. This evidence is available at https://www.cherwell.gov.uk/downloads/download/375/cherwell-green-belt-study-april-2017-and-addendum-june-2017-part-1	No	Noted, no response required.
Cherwell District Council	Green Belt	Given the scale and type of development there is presently concern that it would result in harm to the Green Belt through loss of openness both visually and spatially and would constitute encroachment into the countryside in conflict with the purposes of the Green Belt. As such it would be inappropriate development and 'very special circumstances' would need to be shown to allow such a development in the Green Belt. Paragraph 153 of the NPPF advises that substantial weight should be given to any harm to the Green Belt and 'very special	Yes	Planning Policy including consideration of the Green Belt, is considered within the Planning Supporting Statement (PSS) including the case for Very Special Circumstances at Appendix 8 [EN010147/APP/7.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>circumstances' will not exist unless the harm is clearly outweighed by other considerations. It is noted that paragraph 156 of the NPPF states that: " When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources".</p>		
Cherwell District Council	Green Belt	<p>Whilst there would be benefits from this scheme it is currently unclear whether these are significant enough to outweigh the harm to the Green Belt.</p>	Yes	<p>Planning Policy including consideration of the Green Belt, is considered within the Planning Supporting Statement (PSS) including the case for Very Special Circumstances at Appendix 8 [EN010147/APP/7.1].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Aviation	The proposal sites a number of solar panel installations in the vicinity of Begbroke immediately adjacent to the London-Oxford Airport runway. The electromagnetic interference and reflected solar glare from the panels could have an adverse impact on the safety and functionality of the airport's aviation activities. The inclusion of a chapter within the Environmental Statement on 'Glint and Glare' is welcomed.	Yes	The application is supported by a Glint & Glare Study, with an aviation annex [EN010147/APP/6.4] . The Applicant has also been in discussions with Oxford Airport and has made amendments to areas of solar panel installation and equipment in proximity to the Oxford Airport runway.
Cherwell District Council	Aviation	The parcel of land to the south of the junction of the A44 and Langford Lane forms part of the overrun area of the airport and should be kept free from development for safety purposes. It is noted that the proposals have evolved since the informal consultation to remove proposed built development to the south of the runway.	Yes	The application is supported by a Glint & Glare Study, with an aviation annex [EN010147/APP/6.4] . The Applicant has also been in discussions with Oxford Airport and has made amendments to areas of solar panel installation and equipment in proximity to the Oxford Airport runway.
Cherwell District Council	Aviation	The views of the London-Oxford Airport operators, Oxfordshire County Council, and the Civil Aviation	Yes	The application is supported by a Glint & Glare Study, with an aviation annex

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Authority should be sought on the potential impacts of this application on the aviation activities arising from the London-Oxford Airport.		[EN010147/APP/6.4] . The Applicant has also been in discussions with Oxford Airport and has made amendments to areas of solar panel installation and equipment in proximity to the Oxford Airport runway.
Cherwell District Council	Agricultural Land	The loss of agricultural land to the project will need to be weighed up against the benefits of the scheme.	Yes	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [EN010147/APP/7.1] .
Cherwell District Council	Agricultural Land	None of the land within CDC's boundary was assessed in the more detailed Agricultural Land Classification (ALC) post 1988 (see: https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::agricultural-land-classification-alc-grades-post-1988-england/about).	Yes	Noted. The assessment of the effects of the Project on agricultural land are presented in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] .

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Cherwell District Council	Agricultural Land	<p>However, our records show that most of the site within CDC's boundary falls under the Moderate Likelihood of the Best and Most Versatile Agricultural Land (BMV) (20-60% area BMV) with a small amount classified as Low Likelihood of BMV (<20% area BMV) based on the circa 2008 ALC Strategic Map (see: http://publications.naturalengland.org.uk/publication/6056482614804480?category=5208993007403008)</p>	Yes	<p>The assessment of the effects of the Project on agricultural land are presented in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3].</p> <p>The best and most versatile land comprises Grades 1, 2 and Subgrade 3a of the Ministry of Agriculture Fisheries and Food 1988 ALC System. The results of the Agricultural Land Classification survey show that 36% of the land within the Project comprises best and most versatile land, with the majority comprising lower quality Subgrade 3b land. The proposal will lead to the permanent loss of only approximately 5.5ha of the best and most versatile land associated with the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				development of the substations and PCS units.
Cherwell District Council	Agricultural Land	To establish the quality of the land affected it is noted that site specific surveys have been made of the soil as outlined in the 'Agricultural Land Use and Public Rights of Way' chapter of the Environmental Statement. This information will be needed in order to assess the loss of agricultural land versus the benefits of the project. It is currently unclear whether the quality and extent of the agricultural land to be lost to the project will be outweighed by its benefits.	Yes	Soil surveys have been undertaken using a hand auger at suitable intervals across the Project site. These soil surveys were carried out in accordance with Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the quality of agricultural land (MAFF, 1988) to identify the quality of agricultural land within the Project site. The methodology and results of the soil surveys are reported in Volume 3, Appendix 17.1: Soil survey auger boring and soil pit information of the ES (EN010147/APP/6.5) .

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Cherwell District Council	Agricultural Land	The provision of a Soil Management Plan to ensure that the quality of agricultural soils is preserved is welcomed and should include details of how the land will be reinstated to its former condition at the end of the use (also providing information about the 'reversibility' of the development, and how quickly, the land could be returned to food production (arable and grazing) once the solar farm has come to the end of its life).	Yes	Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way (EN010147/APP/6.3) . This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management Plan (EN010147/APP/7.6) , which has been submitted with the Development Consent Order (DCO) application. The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project. Reinstatement would be undertaken in accordance with

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				procedures set out in the Soil Management Plan.
Cherwell District Council	Socioeconomics	1) What will be the local economy benefit? How, for example, will this development utilise products and services from within UK and Oxfordshire?	Yes	This is covered in EN010147/APP/6.3 EIA Chapter 15 [Appendix 15.2]
Cherwell District Council	Socioeconomics	2) Are there any opportunities for recruitment to be done locally?	Yes	This is covered in EN010147/APP/6.3 EIA Chapter 15 [Appendix 15.2]
Cherwell District Council	Socioeconomics	3) How will the skills of local workforce be enhanced by such a significant investment – what advance preparations are being made with, for example, the local supply chain and further education providers?	Yes	This is covered in EN010147/APP/6.3 EIA Chapter 15 [Appendix 15.2]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Socioeconomics	4) The energy created will feed into the National Grid: How will the locally-constrained supply from the National Grid directly benefit from this investment?	Yes	Once consented, the Applicant will establish a new retail electricity company and that company will offer BWSF electricity and green power from other suppliers to all of Oxfordshire. Residential customers within the 2km consultation zone will be offered a 5% discount from the Ofgem price cap. -Planning Supporting Statement [EN010147/APP/7.1].
Cherwell District Council	Socioeconomics	1) What would be the impact on the valuable tourism sector and how would it contribute to (or harm) the County's 'dreaming spires in rural setting' image which is a component of attracting international visitors?	Yes	Tourism impacts have been evaluated in the Socio Economic Chapter of the ES, Chapter 15 at Section 15.9.5 [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Socioeconomics	2) Would walkers and cyclists be deterred by landscape and visual impacts of the development and how will these be mitigated?	Yes	Tourism impacts have been evaluated in the Socio Economic Chapter of the ES, Chapter 15, at Section 15.9.5, [EN010147/APP/6.3] A full assessment of the Human Health impacts of the Project, including the impact on recreational habits, is included within Chapter 16 of the ES [EN010147/APP/6.3]
Cherwell District Council	Socioeconomics	Welcome the suggestion of carrying out the most impactful parts of the construction during the off-peak tourist season but would like to see how the 'low-season' period will be established/agreed. The effects during the operational phase would remain however and are still of concern.	Yes	This will be considered further in the emerging detailed Code of Construction Practice, especially in relation to key events in the locality.
Cherwell District Council	Socioeconomics	Note that the development will include new and enhanced facilities for walkers and cyclists but still remain concerned that the substantial changes to the landscape will deter leisure users who would primarily	Yes	Tourism impacts have been evaluated in the [EN010147/APP/6.3] EIA Chapter 15 [Section 15.9.5], recreation impact for local residents is covered

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		being seeking to use the area for its rural/natural appearance. Details of proposed set-backs/buffers for PRowS and permissive paths should be provided and agreed.		elsewhere in [EN010147/APP/6.3] e.g. Human Health, Chapter 16, and Chapter 17, Agriculture, Land use and Public Rights of Way, and in the oOMP [EN010147/APP/7.6.2] and in the Outline Layout and Design Principles Document [EN010147/APP/7.7] .
Cherwell District Council	Climate change	Our climate change framework says that we will reduce our demand for grid electricity and generate our own clean energy. It also says that to halve our emissions by 2030, we need to increase solar by 5 times. Furthermore, analysis undertaken by OCC indicates that local energy generation in the county needs to be between 23% and 52% of all energy by 2050, which is most likely to be in the form of solar PV, requiring 1200 – 2600 of hectares of solar PV. Therefore, it is recognised that these proposals could make a very	Yes	The Applicant agrees. Botley West Solar Farm will make a significant contribution if consented.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		significant contribution towards reducing carbon emissions.		
Cherwell District Council	Ground conditions	Chapter 11: Ground Conditions of the PEIR - based on the information in the report, and given the proposed end use we are happy that no further investigation is required regarding land contamination. Any contamination found during the construction phase can be dealt with by an 'Unexpected Land Contamination' requirement.	Yes	A discovery strategy to be followed in the event of discovery of any unexpected contamination during construction is to be included in the oCOCPP [EN010147/APP/7.6.1].

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Cherwell District Council	Noise and Vibration	Chapter 13: Noise and Vibration of the PEIR - the methodologies for both the construction phase and operational phase are accepted. However, further assessment is required for both phases once further details are known as confirmed in the report.	Yes	See the completed Chapter 13 in the ES ref [EN010147/APP/6.3]
Cherwell District Council	Noise and Vibration	For the construction phase a CEMP will be required. Regarding the hours of working our standard hours for construction works are 07:30 hours to 18:00 hours Monday to Friday, 08:00 hours to 12:30 hours on Saturdays and no working on Sundays, Bank or Public Holidays. Any variation to this will require further discussion and need to be justified with a detailed noise assessment that demonstrates earlier or later working hours would not impact sensitive receptors.	Yes	See the Outline Code of Construction Practice at [EN010147/APP/7.6.1]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	Noise and Vibration	For the operational phase, a detailed noise assessment will be required to demonstrate if acceptable noise levels can be achieved at sensitive receptor locations by plant layout design alone or if additional mitigation measures such as acoustic barriers are also required, as recommended in the report.	Yes	Noted. Noise from the operational phase of the Project is considered fully within the technical information provided in Volume 3, Appendix 13.3: Operational Phase Noise [Doc ref: 7.5]. [EN010147/APP/6.3 and 6.5]
Cherwell District Council	Site selection and alternatives	There is a lack of information on site selections and alternative sites. Is there evidence that these are the optimal locations? And are there any opportunities for utilising existing networks to minimise need for new infrastructure?	Yes	Site Selection and Alternatives are considered within Vol 1, Chapter 5: Alternatives Considered [EN010147/APP/6.3] .
Cherwell District Council	The Consultation Process	CDC supports the scope and extent of the SoCC.	N/A	Noted, thank you.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cherwell District Council	DCO Process	<p>In respect of requirements (akin to planning conditions) to be included on any draft Development Consent Order (DCO) CDC recommend that requirements to cover the following matters are considered:</p> <p>TIMING/PARAMETERS AND APPROVED PLANS/DETAILS</p> <ul style="list-style-type: none"> • Time period for commencement • List of all the agreed/approved plans and documents that the determination of the DCO is based on • Avoidance of bird nesting season • Period of consent • Land to be returned to former use/condition within a specified period of the permission or operation ceasing (whichever the sooner) <p>PRE-COMMENCEMENT</p> <ul style="list-style-type: none"> • Construction Environmental Management Plan (to include: core working hours during construction which are to be agreed with Environmental Protection subject to 	Yes	<p>These matters are addressed with the Environmental Statement [EN101047/APP/6.3] and delivery is via the draft DCO and various management plans as set out in [EN101047/APP/7.6]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>detailed noise assessment) and planning works with biggest visual/noise impacts during off-season for tourism)</p> <ul style="list-style-type: none"> • Outline Construction Traffic Management Plan • Landscape and Ecological Management Plan • Details of construction compounds • Hours of construction/HGV movements • Tree protection • Archaeological investigations • Traffic management and routing agreements • Habitat/wildlife protections (including retention of existing habitats (woodlands, hedgerows, waterbodies/courses and appropriate minimum protected buffers of between 5m and 15m), production of an Outline Code of Construction Practice, details of Skylark plots, creation of corridor along River Evenlode, avoiding cabling routes outside of solar arrays and highway 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>verges)</p> <ul style="list-style-type: none"> • Pre-commencement and Updated Ecology Surveys if delayed start/phases • Soft landscaping plans/agree species (including details of new woodland belts, reinforcement of existing field boundary hedgerows), planting of new hedgerows, meadow grassland and individual trees), seeded vegetation to be provided between rows of panels to mitigate surface water run-off; • Highways/junction improvement works; • Details of temporary roads (including permeable construction) and return land to former condition when no longer required; • Travel Plan for construction period; • Car and cycle parking; • Outline Infrastructure Drainage Strategy (including details of any downstream swales required); • Drainage Strategies for Primary and Secondary substations; 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<ul style="list-style-type: none"> • Hydrogeological risk assessment for cable corridors across watercourses of particular sensitivity; • 10m buffer for watercourses; • HDD for main rivers; • Spoil / materials storage; • Land contamination investigation and remediation strategy; • Soil Management Strategy; • Export of excess minerals off-site for re-use; • Details of lighting and CCTV; • Outline Pollution Prevention Plan; • Construction Noise and Vibration Management Plan; • Dust Management Plan; • Community Employment Plan; • Training and Apprenticeship Strategy; • Public Rights of Way Management Plan; • Site Waste and Resources Management Plan; <p>PRIOR TO PARTICULAR WORKS</p> <ul style="list-style-type: none"> • Details of structures, buildings and 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>materials</p> <ul style="list-style-type: none"> • Insulation of plant/machinery • Details of 'no dig' areas and suspended cable troughs within areas of archaeological interest <p>PRIOR TO OPERATION</p> <ul style="list-style-type: none"> • Provision of information/interpretation/education boards; • Provision of other furniture (benches and signage) for public use; • Provision of access to new public rights of way; • Operational Noise Management Plan; <p>ONGOING REGULATORY</p> <ul style="list-style-type: none"> • Maintenance/management of landscaping • Unexpected contamination (watching brief suggested) • Retention of hedges, trees, boundaries • Operation of lights • Limitation peak daily construction 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		vehicle movements; • Appropriate monitoring of dust deposition;		
Cherwell District Council	Community Benefits	CDC would like to agree a Community Benefit Agreement (CBA) to secure funds to support the community local to the project as well as to provide financial support to deliver the Council's Climate Action Plan agenda. A rate calculated on a £x per MW per year is recommended.	Yes	The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit to be provided by the Applicant. The Project Description, Chapter 6 of the ES [EN010147/APP/6.3] the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000 to £200,000 per annum.
Cherwell District Council	Community Benefits	Further detail on wording of requirements, S106 legal agreement and the CBA should be negotiated by the LPAs with the developer ahead of the application submission.	Yes	The Applicant proposes to deliver the community benefits via a Community Benefits Package. This will be agreed outside the scope of the DCO

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				application, with the relevant local authorities (see Planning Supporting Statement e.g. at paragraphs 3.5.24 and 8.4.71) [EN010147/APP/7.1] .
Cherwell District Council	General	<p>CDC is in broad agreement with the methodologies and assessments set out and detailed in the PEIR for its areas of interest, subject to the resolution of comments/concerns raised in this letter.</p> <p>CDC recognises the benefits of the scheme in terms of meeting climate change targets at district, county and national levels and is cognisant of the presumption in favour of energy NSIPs as per paragraph 4.1.3 of Policy EN-1 Overarching National Policy Statement for Energy.</p> <p>However, CDC is also concerned that the majority of the development would conflict with the purposes of the Green Belt and is likely to result in, and be an agent for, very significant change in a rural part of</p>	Yes	<p>The case for Very Special Circumstances is set out in Appendix 8 to the Planning Supporting Statement [EN010147/APP/7.1]. The Planning Supporting Statement also provides the overall planning balance, including the consideration of benefits. The assessment of the effects of the Project on BMV are considered in Chapter 17 Agricultural Land and PRow [EN010147/APP/6.3]</p> <p>Chapter 8 considers the Landscape and Visual Impacts [EN010147/APP/6.3] and Chapter 7 considers heritage effects. [EN010147/APP/6.3]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Cherwell district. As such, the character and setting of the countryside and local villages could be detrimentally and substantially altered. To summarise our principal concerns:</p> <ul style="list-style-type: none"> • The case for Very Special Circumstances to develop land in the Oxford Green Belt with inappropriate development has yet to be satisfactorily demonstrated. • There is concern about the loss of Best and Most Versatile (BMV) agricultural land within the district. • There is significant concern that the proposal could lead to harmful landscape impacts that could not be satisfactorily mitigated and which would outweigh any benefits of the proposed development. • There is concern that the development could have a detrimental impact upon the significance of heritage assets within the district. 		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<ul style="list-style-type: none"> The proposal currently provides comparatively little benefits for the local community. 		
Oxford City Council	Needs case	It is understood that the vision for the Botley West Solar Farm is to deliver approximately 840 megawatts of clean, affordable power to the National Grid, contributing to reducing	N/A	Noted, this is agreed.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		carbon emissions and improving UK energy security.		
Oxford City Council	Needs case	Despite not having a formal role in the decision-making process for this project, the City Council fully supports the Oxfordshire Strategic Vision to achieve carbon neutral status and a carbon neutral future by 2050, and the Government's commitment to deliver a zero carbon electricity system by 2035. To achieve this aim, the 2018 Oxfordshire Energy Strategy and the subsequent 2021 Pathways to a Zero Carbon Oxfordshire report, both adopted by all six Oxfordshire Councils, set out a requirement for a four-fold increase in installed PV capacity in	N/A	Noted, and this support is welcomed by the Applicant.
Oxford City Council	Needs case	Oxfordshire by 2030 and 13-fold by 2050. Both envisage a significant increase in ground-mounted solar farms such as that proposed within this project, along with other methods such as installations on buildings throughout our urban areas.	N/A	Noted, and this support is welcomed by the Applicant.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxford City Council	Needs case	In this regard a development such as this is an important development for the future energy needs of the county, and the UK.	No	Noted, and this support is welcomed by the Applicant.
Oxford City Council	Needs case	In addition, the developer has confirmed they have secured a grid connection with National Grid, to provide 840MW of energy to the Grid, and that this will involve the installation of additional primary substation capacity to the west of Oxford. The improvement to the electricity infrastructure would be very welcome to Oxford City Council as this would be expected to address very significant network capacity constraints in the central Oxfordshire area. It would help to support increases in local renewable energy generation and the electrification of homes and transport in Oxford.	No	Noted, and this support is welcomed by the Applicant.
Oxford City Council	Needs case	The DCO application will need to provide a strong and robust case for the development of this scale, particularly where it will need to demonstrate exceptional	Yes	The Planning Supporting Statement [EN010147/APP/7.1] sets out the need case, including consideration of strategic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>circumstances case to justify development within the Green Belt; justify impacts on the setting of a number of heritage assets including the setting of the Blenheim Palace World Heritage Site; along with mitigating other environmental impacts.</p>		<p>vision and policies within Oxfordshire, and identifying the public benefits arising from the Project. Appendix 8 sets out the Green Belt case. Chapter 5 of the ES [EN010147/6.3] considers the alternatives and site selection process.</p>
Oxford City Council	Needs case	<p>Having reviewed the section on the 'Need for Botley West' in Phase Two Community Consultation Leaflet and Chapter 5 of the PEIR (Need, National Planning, and Alternatives Considered), both documents focus more on what we would consider to be the general benefits of a development of this scale. Whilst that is important, it would be of benefit if it could provide more detail as to how this responds to the more local context and the strategic vision for the county. The need and benefits from the development need to be made more tangible for the local communities and those throughout</p>	Yes	<p>There is no policy requirement to prove need for nationally significant renewable energy developments. Nevertheless, the Planning Supporting Statement [EN010147/APP/7.1] sets out the need case, including consideration of strategic vision and policies within Oxfordshire, and identifying the public benefits arising from the Project. Chapter 5 of the ES [EN010147/6.3] considers the alternatives and site selection process.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the wider county to understand. It should be supported through practical metrics / graphics to help illustrate what this will deliver in real terms in terms of meeting energy demand, and maybe help quantify what for example you mean by providing an equivalent amount of electricity for up to 330,000 homes (e.g. what does that mean as a proportion of say the City or the towns / villages surrounding the development).</p>		
Oxford City Council	Community Benefits	<p>Whilst the City Council appreciate that the Host Authorities will want to have direct input into the community fund and benefits that come from the project, it would welcome a discussion with the applicant to understand what opportunities there are for the project to benefit the city whether this be through local groups that operate within the city, or other initiatives that the Council is looking to introduce as part of its wider corporate aims surrounding climate change and moving towards net zero.</p>	Yes	<p>The Applicant has a Planning Performance Agreement in place which will allow this subject to be explored in detail.</p> <p>The Applicant proposes to deliver community benefits via a Community Benefits Package. This will be agreed outside the scope of the DCO application, with the relevant local authorities (see Planning Supporting Statement e.g. at</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				paragraphs 3.5.24 and 8.4.71) [EN010147/APP/7.1] .
Oxford City Council	General	In conclusion the City Council recognises that the provision of ground based solar is a key element of the 2018 Oxfordshire Energy Strategy, and that this development would make a	Yes	The Applicant welcomes this support. The Applicant has also produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [EN010147/APP/7.1] . It describes the current shortfall in the Governments solar target to 2035, which is just under 40GW, even allowing for all solar DCO's being granted and operational by 2035.
Oxford City Council	General	significant contribution towards this aim whilst also providing improvements to the electricity infrastructure that will address the network capacity constraints in	Yes	The Applicant welcomes this support. The Applicant has also produced a Planning Supporting Statement (PSS) which draws overall

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		central Oxfordshire. However, having reviewed the consultation documents and the PEIR, we consider that the needs case could be strengthened to better reflect how this proposal will contribute towards the strategy.		conclusions as to the planning balance in respect of the Botley West Solar Farm [EN010147/APP/7.1] . It describes the current shortfall in the Governments solar target to 2035, which is just under 40GW, even allowing for all solar DCO's being granted and operational by 2035.
Oxford City Council	General	I trust that this response is of assistance in terms of helping you develop your DCO application, and that you appreciate that the comments reflect the indicative nature of the proposals at this stage in the process. The Council would welcome the opportunity to comment further on the proposals at the relevant stages of the process as the DCO application evolves.	N/A	Noted. The Applicant is grateful for the comments received from Oxford City Council.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Climate Change	In principle, OCC supports proposals for green energy providing there are no significant adverse environmental impacts. OCC recognises there is a climate emergency and that the expansion of solar generating capacity in Oxfordshire is needed as part of the transition to net zero. The Pathways to a Zero Carbon Oxfordshire report states that solar generation of 3,900 GWh would be required by 2050 in order to meet net-zero targets; the Botley West proposals could meet a quarter of this identified demand.	Yes	The Applicant welcomes this support. The Applicant has also produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [EN010147/APP/7.1] . It describes the current shortfall in the Government's 2035 solar target , which is just under 40GW, even allowing for all solar DCO's being granted and operational by 2035.
Oxfordshire County Council	Landscape and Visual	Comments to the scoping opinion appear to have been partially taken into account, for example the PEIR includes a Strategic Arboricultural Impact Assessment and Method Statement in appendix 8.3. However, it should be noted that engagement with the County Council's landscape	Yes	All Representative Viewpoints have been consulted on an agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources) [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		officer on methodology, ZTV (Zone of Theoretical Visibility), viewpoint locations and visualisations (method, type, number, locations) as stated in para 8.4.4.2 has not taken place.		The application is also accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project and a methodology for protecting trees during works and managing them through the operational stage of the development. [EN010147/APP/6.5]
Oxfordshire County Council	Landscape and Visual	Notwithstanding the ongoing work, the assessment of landscape and visual effects presented in the PEIR are not considered sufficiently detailed for the scale of the project and a further level of detail and clarification should be provided in the Environmental Statement (ES).	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Landscape and Visual	Overall, the preliminary assessment is considered to underestimate the impacts of the scheme, raising a number of concerns with regard to its methodology, scope and assessment, which are outlined in the following paragraphs. These comments are not a detailed critique of the LVIA but focus on key observations, questions and areas of concerns, supported by examples.	Yes	This is noted. It should be acknowledged that LVIA is a subjective process and as such, difference of opinion is inevitable. Magnitude of impact will differ from one viewpoint to the other given the nature of the landscape.
Oxfordshire County Council	Landscape and Visual	The project description and main elements of the scheme are set out in chapter 6 of the PEIR. The descriptions include dimensions of the various elements of the scheme, but the potential construction impact of these elements is not always clear, e.g. the impacts related to the cabling (i.e. horizontal directional drilling underneath the River Thames, the exact location of the cabling routes along highways and their potential impact on existing trees and hedgerows, need or cabinets etc.).	Yes	Chapter 6 of the ES [EN010147/APP/6.3] provides the Project Description, and the parameters used for assessment purposes, including removal of equipment. Construction effects are described in individual topic chapters of the ES.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Landscape and Visual	With regard to decommissioning para. 6.4.1.2 states that all infrastructure associated with the development will be removed with the exception of all cables in the public highway and the National Grid substation. Clarification is required whether this means that all substations associated with the development will be removed. Clarification should also be provided to what degree mitigation planting introduced as part of this scheme would remain in place in perpetuity.	Yes	Chapter 6 of the ES [EN010147/APP/6.3] provides the Project Description, and the parameters used for assessment purposes, including removal of equipment. The Applicant has also produced an outline Decommissioning Plan which will provide the means by which the details of decommissioning can be agreed and secured [EN010147/APP/7.6.4] .
Oxfordshire County Council	Landscape and Visual	Further project details should be provided in the environmental assessment, so that the impacts of the elements of the scheme can be understood by all.	Yes	Chapter 6 of the ES [EN010147/APP/6.3] provides the Project Description, and the parameters used for assessment purposes.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Landscape and Visual	Table 8.4 (summary of local planning policy relevant to this paper) sets out the relevant local planning policies applicable to the Landscape and Visual Impact Assessment (LVIA). This should also include: <ul style="list-style-type: none"> • WODC Local Plan 2031 Policy EH4: Public realm and green infrastructure • VoWH Local Plan 2031 policy 45: Green Infrastructure • Cherwell Local Plan 2031 policy ESD 17: Green Infrastructure 	Yes	Reference to these local policies have been added where relevant to Chapter 8: Landscape and Visual Resources. [EN010147/APP/6.3] BNG, in respect of Green Infrastructure, is dealt with at Chapter 9: Ecology and Nature Conservation [EN010147/APP/6.3]
Oxfordshire County Council	Landscape and Visual	In addition, Green Belt policies of District Local Plans will need to be addressed either in the ES or in other supporting information.	Yes	The Green Belt case, including the demonstration of Very Special Circumstances is dealt with in the Planning Support Statement [EN010147/APP/7.1]
Oxfordshire County Council	Landscape and Visual	District Local Plan policies relating to the character of the built and historic environment might also be relevant to this chapter when considering the impact on conservation areas and their settings.	Yes	District plan policies relevant to the historic environment (including conservation areas) are identified within Volume 3, Appendix 7.1: Historic environment desk-based assessment of the ES [EN010147/APP/6.5].

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Oxfordshire County Council	Landscape and Visual	Only two Neighbourhood Plans (Cumnor and Eynsham) have been listed in the document but Neighbourhood Plans also exist for Woodstock and Cassington, and the one for Wootton by Woodstock is in development. Whilst these might not include policies specific to landscape character and views, they often include descriptions of the parishes and their valued landscape qualities that should be taken into account in the ES.	Yes	All neighbourhood Plans have been reviewed. Only matters of relevance to Chapter 8: Landscape and Visual Resources have been included in the chapter. The Planning Supporting Statement, that accompanies the ES [EN010147/APP/7.1] contains a full and an up to date assessment of relevant policy and guidance, including the NPS, NPPF, and other Development Plan Policies.
Oxfordshire County Council	Landscape and Visual	The PEIR does not include an assessment against Local Plan policies but this will need to be provided in the ES.	Yes	The Planning Supporting Statement, that accompanies the ES [EN010147/APP/7.1] contains a full and an up to date assessment of relevant policy and guidance, including the NPS, NPPF, and other Development Plan Policies.

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Oxfordshire County Council	Landscape and Visual	The Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) require the scope of assessment to be appropriate, and that methodology, scope, ZTV and viewpoints to be agreed with relevant authority. As outlined above, the methodology and scope of the assessment was not agreed with the County Council landscape officer.	Yes	All Representative Viewpoints have been consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources). The LVIA methodology is in accordance with GLVIA3 and was detailed and agreed to at Scoping.
Oxfordshire County Council	Landscape and Visual	The methodology states "... any effects with a significance level of Moderate or less are not considered to be significant in terms of the EIA Regulations. (para 8.1.8.10)". The methodology should also recognise that this can only be a guide and that multiple moderate effects could also amount to being significant when considered together. For example, this is recognised in relation to viewpoints 37, 38, 39 where is states "... where Moderate significance of effect has been identified at multiple points along the same PRow, sequentially these	Yes	Assessment considers effects from individual Representative Viewpoints. It is acknowledged within the LVIA that, when considered together, effects may be present along lengths of PRow or roads for example.

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		Moderate adverse effects could be considered significant." (para 8.9.1.70). This approach is also relevant to the scheme as a whole.		
Oxfordshire County Council	Landscape and Visual	The assessment is considered to understate the impacts of the development on landscape character and views. One of the main reasons for this is the underestimation of the magnitude of impacts (mostly assessed as being negligible, low or medium) of the development on the landscape and views.	No	This is noted. It should be acknowledged that LVIA is a subjective process and as such, difference of opinion is inevitable. Magnitude of impact will differ from one viewpoint to the other given the nature of the landscape.
Oxfordshire County Council	Landscape and Visual	With regard to landscape impacts, the judgement on magnitude appears to be mainly based on the impact on the local landscape character area as a whole rather than the relevant part, the retention of existing landscape features and an overestimation of the effects of mitigation planting. At the same time insufficient weight is given to the extent and nature of the	No	This is noted. It should be acknowledged that LVIA is a subjective process and as such, difference of opinion is inevitable. Magnitude of impact will differ from one viewpoint to the other given the nature of the landscape.

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		project, its long lifespan and the effects of introducing uncharacteristic elements into the landscape, which will fundamentally change its character.		
Oxfordshire County Council	Landscape and Visual	The magnitude of impacts on views has been underestimated for similar reasons. In addition, the visual assessment often considers only one direction of view from a particular viewpoint and not the wider visual context. For example, the assessment for representative viewpoint 5B considers the magnitude of impact to be medium at year 1 despite this viewpoint being surrounded by solar panels on all sides.	No	This is noted. It should be acknowledged that LVIA is a subjective process and as such, difference of opinion is inevitable. Magnitude of impact will differ from one viewpoint to the other given the nature of the landscape.
Oxfordshire County Council	Landscape and Visual	Another reason for the underestimation of the magnitude of impact is the importance the assessment gives to the reversibility of the development (Para 8.8.7.2). Whilst it is true that the scheme can be reversed, sufficient weight also needs to be given to the very long	No	This is noted. It should be acknowledged that LVIA is a subjective process and as such, difference of opinion is inevitable. Magnitude of impact will differ from one viewpoint to the other given the nature of the landscape.

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		lifespan of the project (35 - 40 years), which exceeds the timescale of a generation and is often considered permanent in landscape and visual assessment terms.		
Oxfordshire County Council	Landscape and Visual	With regard to visual receptors GLVIA3 states that not only users and places should be identified but also an approximate number of people affected should be given. This is relevant as understanding the impact is not only about the significant impacts but also about the number of people experiencing adverse effects. Further detail should be provided in the ES.	Yes	Number of people affected, such as PRoW users, is included in Chapter 15 / 16 of the ES (Socio Economic and Human Health) [EN010147/APP/6.3]
Oxfordshire County Council	Landscape and Visual	The Representative Viewpoints plans indicate the location of 55 viewpoints, which is a rather limited number for a 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, e.g. from travelling in	Yes	Representative Viewpoints were consulted on and agreed with host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources). The number of viewpoints is considered proportionate to the Project.

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		<p>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>		
Oxfordshire County Council	Landscape and Visual	<p>Representative viewpoints should be selected to represent the experience of visual receptors, e.g. on a PRoW (GLVIA3). As such it is important that the LVIA does not base its judgement on a PRoW on one viewpoint but assesses the experience of the receptors travelling through the landscape, which the viewpoint represents. As mentioned above the visual assessment often considers only one direction of view from a particular viewpoint and does not take sufficient account of the surrounding context, e.g. a footpath users might be travelling through fields of solar panels for long periods of time.</p>	Yes	<p>Assessment of effects is of the individual viewpoint locations. They are representative. They have been agreed with the planning authority. However, it is acknowledged that effects would be experienced along the lengths of PRoW and roads for example. – those effects may be the same or different from the assessed effect. It is acknowledged within the text of Chapter 8: Landscape and Visual Resources that different views at different points along the</p>

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				same PRoW for example, may have the same or different effects. All such views cannot be assessed individually; this would not be proportionate.
Oxfordshire County Council	Landscape and Visual	Some of the viewpoints on the same PRoW have been grouped and assessed together. However, some of these appear to have different contexts raising the question whether the impact on these points is really the same. For example, viewpoints 37a, 37b, 38 and 39 have been assessed as having the same sensitivity (high) and impact (no greater than medium) despite vp 38 and vp39 being completely surrounded by solar panels and vp37 being located at the River Evenlode with views of solar development on either side of the river. The ES will need to provide a greater level of detail to make the judgements understandable for all, i.e. viewpoints should be assessed individually	Yes	A number of viewpoints are located in the same location but face different directions. As such, they have been assessed separately. Sensitivity would be the same as they are located in the same location. 31 of the Representative Viewpoints have been visualised (photomontages) in winter and summer. These have been consulted and agreed upon. 31 is considered a proportionate number to the Project. Not all viewpoints would be appropriate to show as a photomontage due to the distance and / or proportion of

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		before being grouped. All viewpoints should also be accompanied by visualisations in line the Technical Guidance Note 06/19 Visual Representation of Development Proposals (TN 06/19).		the Project visible within the view.
Oxfordshire County Council	Landscape and Visual	The PEIR does not include any viewpoints along the cabling routes. This is of concern, as the impact of cabling is not sufficiently understood. There are likely impacts during construction, but it is not clear whether the cabling also requires above ground structures such as cabinets or areas of fencing, which could affect views from PRowS including the Thames Path during operation and after decommissioning.	Yes	Cables are underground except where they pass over important archaeology (the 33kV cable); in those cases the cable will be laid on the surface. In either case no permanent visual effects will arise. A number of the Representative Viewpoints are located in areas where the cable route passes. Effects of the cable route, where present, have been included during construction.

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Oxfordshire County Council	Landscape and Visual	Impacts on conservation areas don't appear to have been assessed on the basis that development is not proposed within the conservation area boundary. However, it is not only the direct impact on conservation areas that need to be considered but also their setting. The development comes in close proximity of several conservation areas, or is potentially visible from them. The impact on conservation areas or their setting does not appear to have been assessed in the Historic Environment chapter or the Landscape and Visual Resources chapter of the PEIR. LVIAs often include representative viewpoints from conservation areas to demonstrate the impact of the development on these designated areas and to demonstrate impacts on residents of these settlements.	Yes	The detailed assessment of likely impacts and effects on heritage assets, including Conservation Areas, as a result of change within their settings, is presented as Volume 3, Appendix 7.5 Settings Assessment of the ES [EN010147/APP/6.5].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Landscape and Visual	<p>The PEIR does not consider private views and states that the need for a Residential Visual Amenity Assessment is going to be determined through the outcome of the ES and through consultation with relevant parties. GLVIA3 (para 6.17) states that in some instances it may be appropriate to consider private viewpoints from residential properties and the scope of this should be agreed with the competent authority. Considering the large extent of the development and its proximity to several residential areas (eg Wootton, Woodstock, Bladon, Church Hanborough, Cassington, Eynsham and Cumnor) as well as individual farmsteads, it is considered important that the impact on residential areas is considered in the ES in some way. Should a Residential Visual Amenity Assessment not be prepared, residential impacts could for example be assessed from PRowS, roads or</p>	Yes	<p>Private views are not automatically considered as part of LVIA as there would be no effects amounting to 'Substantial' effects so as to make a residential property unliveable, which would trigger the need for a Residential Visual Amenity Assessment. A minimum 25 m offset has been included from all residential properties.</p>

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		public open spaces at the edge of settlements.		
Oxfordshire County Council	Landscape and Visual	The PEIR provides limited detail on how the ZTV has been created. Further detail should be provided in the ES including detail on what land use data have been included together with their data source and accuracy.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3] Methods of assessment such as ZTV have been described and accord with applicable guidance.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Landscape and Visual	The LVIA should provide both a ZTV based on bare ground and one that includes other land use data.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3] Methods of assessment such as ZTV have been described and accord with applicable guidance.
Oxfordshire County Council	Landscape and Visual	Table 8.5 (Summary of scoping responses) and Figures 8.9 – 8.11 (Representative viewpoints) suggests that the ZTV is based on a maximum panel height of 2.5m. However, as mentioned previously the scheme also includes many other elements including 156 Power Converter Stations and the HV transformer secondary substations that need to be included in the ZTV modelling.	Yes	The elements of the Project specified in this comment have been included in the ZTV modelling.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Landscape and Visual	The ZTV does not appear to take account of cable routing areas, but no explanation has been provided why these have been excluded. The impact of cabling is not fully explained in the PEIR and further detail is needed. GLVIA3 states the ZTV should be created for all 'projects' of the scheme.	Yes	Cable routes are below ground with the exception of where 33kV cables cross sensitive archaeology in which case they will be laid on the surface.
Oxfordshire County Council	Landscape and Visual	The project is described as being three different sections and the ZTVs should reflect the impact of the different parts of the project (northern section, central section and southern section) separately before combining them into one. The 'creation' of the ZTV should be clearly explained and demonstrated.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, mitigation measures being proposed as well as methods of assessment [EN010147/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Landscape and Visual	The PEIR states that the project seeks to connect to the National Grid NGET station, which is likely to be located at or near Farmoor at the Southern site. The exact location of this NGET station (Dimensions - L165m x W135m x H14m) is yet to be confirmed, however, being mindful of the dependency of the solar farm on the NGET station, the NGET station should be considered as part of the solar development. This should be reflected in the ZTV.	Yes	The NGET substation forms part of the assessment of the development, including the ZTV.
Oxfordshire County Council	Landscape and Visual	Para 8.4.2 states that the Landscape Institute (2019) Technical Guidance Note (01/11) Photography and Photomontage in Landscape and Visual Impact Assessment has been used for the assessment. However, Guidance Note 01/11 was replaced by Technical Guidance Note 06/19 Visual Representation of Development Proposals. It is this later guidance that should be used for visualisations.	Yes	Photomontage methodology is included at Appendix 8.4. Photomontages completed in accordance with LI TGN 06/19 (Type 3 visualisations). References to guidance document(s) have been updated where necessary.

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Oxfordshire County Council	Landscape and Visual	TN06/19 distinguishes between four types of visualisations. Type 1 – Annotated viewpoint photograph is the most basic form of visual representation, which should indicate the extent (i.e. the height, width or outline) of the proposed development in the view. Type 4 – Photomontage/photowire, tend to be used for large planning applications including large energy projects.	Yes	Relevant and applicable guidance have been carefully considered and applied as relevant to the LVIA.
Oxfordshire County Council	Landscape and Visual	GLVIA3 and TN 06/19 require assessments and visualisations to be proportionate to the size and impact of the development. The PEIR does not state what level of visualisations the LVIA is seeking to provide, and clarification should be provided in the ES. It should be noted that TN 06/19 recommends Type 2 – Type 4 visualisations for Environmental Statements.	Yes	As above.
Oxfordshire County Council	Landscape and Visual	The PEIR does not include visualisations for all 55 viewpoints. Where visualisations are provided, they do currently not comply with TN	Yes	As above.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		06/19. The majority of the imagery comprises photographs from representative viewpoints without any annotation or description making it difficult to understand how a particular view is affected. This information is required to ensure that the impact can be understood by all.		
Oxfordshire County Council	Landscape and Visual	Photomontages from 18 representative viewpoints have been provided. Limited information has been given on how the photomontages have been created and further detail should be provided in the ES. Photomontages have so far been provided for Year 1 with imagery for year 15 still outstanding.	Yes	Chapter 8: Landscape and Visual Resources of the ES includes photomontages from 31 Representative Viewpoints at winter (Year 1) and summer (Year 15).
Oxfordshire County Council	Landscape and Visual	Mitigation measures intended to be adopted as part of the project are outlined in section 8.7 of the LVIA. These include the creation of woodland belts, reinforcements of existing field boundary hedgerows, new hedgerow planting, meadow grassland to the perimeter solar array areas and planting of individual trees.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Further detail on these measures should be provided in the ES such as the minimum width of woodland belts and hedgerows.		proposed. [EN010147/APP/6.3] Management is delivered via the oLEMP [EN010147/APP/7.6.3] See also the Landscape Ecology and Amenities Area Plan [EN010147/APP/7.3.3] .
Oxfordshire County Council	Landscape and Visual	Measures mentioned elsewhere in the chapter include a standard buffer of 20m to residential areas and the use of hedgerows to screen the impact of the development on views from PRow. A fixed buffer to residential areas seems an overly simplistic approach that does not take sufficient account of the different landscape contexts	Yes	Minimum 25m buffer from residential properties has been adopted. No Residential Visual Amenity Assessment was triggered as a result of this buffer distance and planting proposed.
Oxfordshire County Council	Landscape and Visual	The PEIR assumes in its assessment not only the successful establishment but also considerable growth to trees and hedgerows to provide visual screening by year 15. Woodland creation and hedgerow establishment	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the

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		<p>take considerably longer than five years to provide any landscape or visual benefits and require long-term management. The proposed short management period is in stark contrast to the proposed 35-42 year lifespan of the proposal. The lifespan of the development would be a more appropriate timescale for management.</p>		<p>overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3]</p> <p>Management is delivered via the oLEMP [EN010147/APP/7.6.3]</p>
Oxfordshire County Council	Landscape and Visual	<p>Chapter 8.10 in the Landscape and Visual Resources Assessment in the PEIR lists a number of projects that are considered as part of a cumulative impact assessment. The methodology being used for identifying schemes lacks detail and further information should be provided in the environmental statement. This should also include a map showing the location of the schemes considered for inclusion in the cumulative assessment.</p>	Yes	<p>Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. Relevant cumulative effects are considered. [EN010147/APP/6.3]</p> <p>An updated review of relevant cumulative schemes was</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>completed prior to submission of the ES. These schemes are considered in the individual technical chapters, and a summary is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3] Chapter 20 includes associated Figures at Appendix 20.1 [EN010147/APP/6.5].</p> <p>These Figures are divided into three parts for ease of reference; West Oxfordshire (Fig. 20.1), Cherwell (Fig 20.2) and Vale and Oxford City (Fig 20.3). The Figure numbers have changed since the PEIR, as there is now an additional Chapter on Air Quality (Chapter 19).</p>
Oxfordshire County Council	Landscape and Visual	GLVIA3 states several ways the study area for cumulative assessment	Yes	Chapter 8 of the Environmental Statement;

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		<p>could be determined and states that the method should be agreed with the relevant authorities.</p>		<p>Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. Relevant cumulative effects are considered. [EN010147/APP/6.3]</p> <p>An updated review of relevant cumulative schemes was completed prior to submission of the ES. These schemes are considered in the individual technical chapters, and a summary is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3] Chapter 20 includes associated Figures at Appendix 20.1 [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>These Figures are divided into three parts for ease of reference; West Oxfordshire (Fig. 20.1), Cherwell (Fig 20.2) and Vale and Oxford City (Fig 20.3). The Figure numbers have changed since the PEIR, as there is now an additional Chapter on Air Quality (Chapter 19).</p>
Oxfordshire County Council	Landscape and Visual	<p>My district colleagues are better placed to comment on cumulative effects with District Council schemes. It is understood that cumulative impacts tend to only consider developments that are at planning application stage, scoping stage or under construction, it is however concerning that the methodology does not allow consideration to be given to allocated development sites in local plans despite their likely significant impact on the landscape resource within the timescale of the project.</p>	Yes	<p>Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. Relevant cumulative effects are considered. [EN010147/APP/6.3]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>An updated review of relevant cumulative schemes was completed prior to submission of the ES. These schemes are considered in the individual technical chapters, and a summary is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3] Chapter 20 includes associated Figures at Appendix 20.1 [EN010147/APP/6.5].</p> <p>These Figures are divided into three parts for ease of reference; West Oxfordshire (Fig. 20.1), Cherwell (Fig 20.2) and Vale and Oxford City (Fig 20.3). The Figure numbers have changed since the PEIR, as there is now an additional Chapter on Air Quality (Chapter 19).</p>

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Oxfordshire County Council	Landscape and Visual	The area between Woodstock, Bladon, Eynsham and Farmoor is subject to a lot of development pressure, which will affect the existing landscape character and local views and will put further affect the landscape character and views and put pressure on the surrounding landscape resource (eg recreational pressure). It therefore seems important that these areas are referred to and recognised in the ES.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. Relevant cumulative effects are considered. [EN010147/APP/6.3]
Oxfordshire County Council	Landscape and Visual	Major allocations within or near the site boundary that should be considered (not an exhaustive list): <ul style="list-style-type: none"> • Salt Cross Garden Village – garden village development north of Eynsham and south of Church Hanborough • West Eynsham SDA (policy EW2) • Land West of Yarnton (LP policy PR9) • Land East of the A44(LP policy PR8) • Land East of Woodstock (LP policy 	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. Relevant cumulative effects are

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		EW3) • Land North of Banbury Road (LP policy EW5) • Land north of the Hill Rise (EW4)		<p>considered. [EN010147/APP/6.3]</p> <p>An updated review of relevant cumulative schemes was completed prior to submission of the ES. These schemes are considered in the individual technical chapters, and a summary is presented in Chapter 20: Cumulative Effects & Interrelationships [EN010147/APP/6.3] Chapter 20 includes associated Figures at Appendix 20.1 [EN010147/APP/6.5].</p> <p>These Figures are divided into three parts for ease of reference; West Oxfordshire (Fig. 20.1), Cherwell (Fig 20.2) and Vale and Oxford City (Fig 20.3). The Figure numbers have changed since the PEIR, as there is now an additional</p>

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				Chapter on Air Quality (Chapter 19).
Oxfordshire County Council	Landscape and Visual	Whilst not strictly an environmental issue, there appears to be no reference to the openness of the Green Belt in the landscape and visual chapter or in the non-technical summary. Considering that a large part of the development is located within the Oxford Green Belt, an assessment on the openness of the impact on the Green Belt is essential and should be provided in the ES.	Yes	The Planning Supporting Statement and Appendix 8 specifically assesses impact upon the Green Belt, including openness [EN010147/APP/7.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Local Ecology	<p>There are a number of species that have been scoped out of survey work for the PEIR , namely otter, dormouse and water vole. These species have not been surveyed on the basis that their potential habitat will be retained and protected. However, we would advise that surveys for these species are undertaken to ensure the plans are informed by up-to-date environmental information, can appropriately identify the value of these species' populations (should they be present) and the magnitude and significance of any indirect impacts. For dormouse and otter, which are protected under the Conservation of Habitats and Species Regulations 2017, survey information is needed to inform an assessment of whether there is a likely impact on the favourable conservation status of the species. A better understanding of the presence of these species and their use of the landscape will also help inform better design of mitigation</p>	Yes	<p>Survey work for dormouse has been completed and is reported in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES. No specific survey work has been completed with respect to otter as no impacts to this species' habitats are anticipated. The scope of survey work was agreed with Natural England during pre-submission consultation.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		and biodiversity enhancements and understanding of potential cumulative impacts. With regard watervoles, it is apparent that there are a number of ditches across the site which should be assessed for their potential to support watervole, as well as the more substantial watercourses.		
Oxfordshire County Council	Local Ecology	The bat surveys are limited to 6 static detectors which is a relatively low number of sampling points for such a large site, these were focussed on hedgerows which are more likely foraging habitat. Bat Conservation Trust Good Practice Guidelines suggest open habitats should be included in surveys as well. Consideration should also be given to recent research specifically on the impacts of ground-mounted solar on bats (Tinsley, E.; Froideveaux, J.S.P; Zsebők, S.; Szabadi, K.L.; and	Yes	Further detailed bat surveys have been undertaken and are reported in in Volume 3 (EN010147/APP/6.5) Appendix 9.4 of the ES. These have been subject to discussion with Natural England during pre-submission consultation.

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		<p>Jones, G. (2023). Renewable energies and biodiversity: Impact of ground- mounted solar photovoltaic sites on bat activity. <i>Journal of Applied Ecology</i> 60, 1752–1762). The surveys suggested nearby roosts of several species. More detailed surveys, in line with Bat Conservation Trust Good Practice Guidelines, would help determine presence of roosts near the project proposals and help inform elements such as lighting design, placement of high voltage transformers (which could have noise impacts), and construction compounds.</p>		
Oxfordshire County Council	Local Ecology	<p>It is apparent from the bird survey reports that there are significant numbers of breeding and wintering farmland birds, including skylark, yellow hammer and corn bunting. It is suggested that reference is made to the Berks, Bucks and Oxon Local Wildlife Sites criteria in helping to assign significance to the</p>	Yes	<p>Noted. The LWS criteria have been used, as necessary - see Volume 3 [EN010147/APP/6.5] Appendix 9.9 and 9.10.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		assemblages of breeding and wintering birds.		
Oxfordshire County Council	Local Ecology	<p>It is noted that skylark plots are proposed as mitigation, however, there is some question as to how successful skylark plots can be within a solar farm, given then solar panels reduce the openness of the landscape and therefore may reduce desirability of the area for nesting skylark due to perceived risk of predation. Notably no specific provision has been suggested for other farmland birds such as yellow hammer and corn bunting. Consideration should be given to continued provision of nesting sites within an open environment, as well as continued food source for seed-eating birds. It is suggested that consideration is given to development of a farmland bird strategy for the proposed development, which should consider the need for any off-site</p>	Yes	<p>Skylark plots are incorporated to provide additional foraging habitat. Additional areas of farmland were removed from the Project shown at PEIR to be managed for farmland bird benefit as set out in the oLEMP [EN010147/APP/7.6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		measures as well as incorporating features for birds within the scheme.		
Oxfordshire County Council	Local Ecology	The report of breeding Nightingales is of interest, since Nightingales have not been recorded breeding in Oxfordshire since 1998 with very few recent sightings. We recommend that provision of habitats for Nightingale is incorporated into the design of the scheme.	Yes	The Project includes the provision of new scrub habitat and 26.5 km of new species rich hedgerow that will increase the habitat available for nightingale.
Oxfordshire County Council	Local Ecology	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. Consideration will need to be	No	Appropriate licensing will be completed (either traditionally, or via District Level Licence, DLL) post consent.

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		<p>given to the need for a GCN licence given proximity of the GCN ponds to the application site; the option to use the Nature Space District Level Licence, which is operational through Oxfordshire County Council could be explored.</p>		
Oxfordshire County Council	Local Ecology	<p>The PEIR appears to have assigned values and sensitivity, as well as assessing magnitude and significance, of impacts based on incomplete, or in the case of otter, dormouse and invertebrates, non-existent, surveys. It is therefore not possible to comment on the appropriateness of these assessments. In terms of assessing impacts on SSSIs and Local Wildlife Sites, reference needs be made to the citations and interest features of these sites rather than grouping these sites and assuming that buffers or lack of direct impacts will be sufficient to mitigate impacts. Whilst considering magnitude and significance, little or no reference has</p>	Yes	<p>The impact assessment contained in the ES Volume 1 at Chapter 9 Ecology & Nature Conservation [EN010147/APP/6.3] has been updated accordingly.</p>

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		<p>been made to the extent of the proposals. This needs to be addressed given the large scale of the proposals.</p>		
Oxfordshire County Council	Local Ecology	<p>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 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</p>	Yes	<p>Impacts to wetland bird species are considered in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Effects on aquatic invertebrates were scoped out on the basis that the Project will have no impact to habitat supporting aquatic invertebrates. Impacts on connectivity have been discussed within the ES. All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained.</p>

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		<p>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. Consideration should also be given to impacts of fencing around the solar panels on movement of wildlife, and fencing permeable to wildlife should be used where ecological surveys indicate that this would be beneficial.</p>		
Oxfordshire County Council	Local Ecology	<p>It is reported in the PEIR that the Horizontal Directional Drilling of cables under Long Mead and Swinford Farm Meadow LWSs would result only in short term disturbance from noise and vibration, it is reported that the impacts would be local, short term, intermittent and reversible. The assessment of impacts needs to address the interest of the Local Wildlife Sites, which is primarily MG4 (floodplain meadow). This habitat is dependent on a specific groundwater</p>	Yes	<p>The Project has been redesigned to avoid the Long Mead and Swinford Farm Meadow LWSs with cable routes now passing to the north before HDDing under the Thames and associated fields.</p>

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		<p>regime, and low nutrient freely draining soils (see Ecohydrological Guidelines for Lowland Wetland Plant Communities). Further information will need to be presented to inform assessment of impacts of the drilling and presence of the cables, which might include long term impacts on groundwater flows, or changes in soil structure/permeability. The risk of pollution incidents during the drilling also needs to be addressed. It is noted that there appears to be an alternative route to cross the Thames to the east of the Local Wildlife Sites – as alternatives that avoid risk of any impacts on the LWSs are available, these should be taken forward in accordance with the mitigation hierarchy.</p>		
Oxfordshire County Council	Local Ecology	<p>It is noted that the scheme is committing to a minimum of 70% biodiversity net gain (BNG), which is welcome. The BNG should be assessed using the current version of the DEFRA biodiversity metric,</p>	Yes	<p>Noted. The Project approach to BNG is set out in Volume 3 [EN010147/APP/6.5] Appendix 9.13. This was agreed with Natural England</p>

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		informed by a UK Habs survey of the red line area, and demonstrate gain across all habitat categories (area, watercourse and hedgerow habitats).		during pre-submission discussions.
Oxfordshire County Council	Local Ecology	Whilst committing to a target level of measured BNG is welcomed, we would encourage the design of BNG in such a way that is makes a meaningful contribution to local nature recovery and is proportionate to the scale of the scheme proposed.	Yes	The Ecology Strategy for the site is set out in the outline Landscape and Ecology Management plan, provided in [EN010147/APP/7.6.3]. This describes the basis for the habitat design included.
Oxfordshire County Council	Local Ecology	We welcome the identification of enhancements along the River Evenlode, we would also suggest enhancements that help deliver the aims of the Blenheim and Ditchley Parks, Oxford Meadows and Farmoor, and Wychwood and Lower Evenlode Conservation Target areas as well as local species populations indicated through the baseline surveys (e.g. farmland birds, nightingales, great crested newts).	No	Noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Local Ecology	It is notable that, whilst excluded from the red line boundary, there are several areas of ancient woodland in close proximity to the scheme, we would encourage opportunities to link and buffer these woodlands within the landscape. The 15m buffer to ancient woodland indicated in the Natural England standing advice is a minimum requirement; opportunities to expand and link these woodlands should be considered. Reference should also be made to Local Wildlife Site and SSSI citations where sites are designated, to understand the particular value of these sites to local species and identify opportunities to enhance the area for them.	Yes	The Ecology Strategy for the site is set out in the outline Landscape and Ecology Management plan, provided in EN010147/APP/7.6.3 . This describes the basis for the habitat design included. This has included the provision of minimum 15m buffers to the ancient woodland and appropriate buffers to be identified to support important bat populations. Adjacent to the site and improving connectivity between them through the inclusion of new hedgerow and buffer corridors.
Oxfordshire County Council	Local Ecology	Alongside monitoring of BNG delivery, it is recommended that monitoring of species is also undertaken, given the unprecedented scale of these proposals in the UK an opportunity is presented to improve understanding of the impact of large-	Yes	A programme of species and habitat monitoring is set out in the Outline Landscape and Ecology Management Plan (oLEMP) provided in [EN010147/APP/7.6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		scale ground mounted solar on wildlife.		
Oxfordshire County Council	Traffic and Transport	The study area has been based on the assumption that all deliveries will arrive and depart the wider area via the A34, however it is also stated that at this time it is not known where deliveries to site will be coming from. The A34 makes connections north south however there are other major roads such as the A40 and A420 which would be the most likely route from other areas and therefore a potential route for HGVs.	Yes	An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO which details the construction access routes for HGVs.
Oxfordshire County Council	Traffic and Transport	Figure 12.1 shows the links that have been assessed however there is no indication as to how vehicles will be limited to these routes i.e. will there be a routing agreement included in the DCO and how would this be enforced.	Yes	An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO which details the construction access routes for HGVs.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Traffic and Transport	This is relevant to some links that have a high level of sensitivity but are currently projected to have low movements such as Link 6. What would prevent vehicles using the A4095 to reach the Lower Road site by avoiding the A40? (which is frequently congested and will be subject to major works in the near future).	Yes	An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO which details the construction access routes for HGVs.
Oxfordshire County Council	Traffic and Transport	The list included in Table 12.8 does not include all public transport operators and therefore services.	Yes	A full assessment of traffic and transport, including baseline environment conditions, is included within Chapter 12 of the ES [EN010147/APP/6.3] and relevant public transport operators and services are included accordingly. A summary of the public transport network for the Project is also set out in Appendix 12.4: Public Transport Network [EN010147/APP/6.5]

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Oxfordshire County Council	Traffic and Transport	Table 12.10 should also include Tackley station as it is close to the northern area.	Yes	A full assessment of traffic and transport, including baseline environment conditions, is included within Chapter 12 of the ES [EN010147/APP/6.3] and relevant public transport operators and services have been updated accordingly. A summary of the public transport network for the Project is also set out in Appendix 12.4: Public Transport Network [EN010147/APP/6.5]
Oxfordshire County Council	Traffic and Transport	The Road Safety Data should be extended to include 2022 and 2023 in order to have 5 years of data that is not impacted by Covid 19 travel restrictions.	Yes	A full assessment of traffic and transport, including highway safety using the most recently available data including 2022, is included within Chapter 12 of the ES [EN010147/APP/6.3] .
Oxfordshire County Council	Traffic and Transport	The descriptions and consideration of Links 13,14 and 16 should be in the context of the committed and commenced developments adjacent to them.	Yes	Since PEIR there has been a greater understanding of the build out of the Northern Gateway committed development. As such, the

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				sensitivity of links in the vicinity of this location have been updated. A description of the network links and their sensitivity are set out in Appendix 12.1: Description of network links and sensitivity [EN010147/APP/6.5] .
Oxfordshire County Council	Traffic and Transport	Link 16 has not been taken forward for assessment on a precautionary basis as there are no sensitive receptors identified, however it is adjacent to a Local Plan allocation for which there is a live planning application. Depending on timescales for both projects there could be residential development completed at the time of construction. The cumulative impact of construction traffic relating to both developments could be particularly relevant here.	Yes	An assessment of cumulative effects on traffic and transport during the construction phase is included within Chapter 12 of the ES [EN010147/APP/6.3] .
Oxfordshire County Council	Traffic and Transport	It is not clear exactly where the site access on Link 21 the B4017 Cumnor Road will be however the assessment does not appear to address the significant pinch point at	Yes	A full assessment of traffic and transport, including any mitigation and enhancement measures required, is included within Chapter 12 of the ES

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		<p>Filchampsted where the carriageway is narrow, this will need to be assessed if delivery vehicles are to pass through. It should also be noted that despite the lack of footways pedestrians use this route to access the leisure facilities at Farmoor Reservoir and it is a well used leisure cycling route due to the hill between Cumnor and Farmoor.</p>		<p>[EN010147/APP/6.3]. An Outline Construction Traffic Management Plan [EN010147/APP/7.6.2] will be secured as part of the CoCP requirement within the draft DCO.</p>
Oxfordshire County Council	Traffic and Transport	<p>Specific detailed mitigation measures are still to be determined/designed in detail and the Highway Authority would welcome the opportunity to review these prior to submission.</p>	Yes	<p>The Applicant has undertaken a number of meetings with OCC prior to submission. A full assessment of traffic and transport, including any mitigation and enhancement measures required, is included within Chapter 12 of the ES [EN010147/APP/6.3]. An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Traffic and Transport	The CTMP needs to include a mechanism for how vehicle restrictions would work i.e. identify locations where HGVs can safely layover if they are due to arrive at a restricted time. As highway capacity is limited this should ideally be provided on a suitable area of the site. Overall details of how vehicle movements will be managed through the construction process should be provided.	Yes	An Outline Construction Traffic Management Plan [EN010147/APP/7.6.2] has been prepared will be secured as part of the CoCP requirement within the draft DCO.
Oxfordshire County Council	Traffic and Transport	We welcome any proposed mitigation to enhance the walking and cycling networks adjacent to or through the proposed development area including public rights of way.	Yes	A full assessment of the Human Health impacts of the Project, in terms of land use and recreation, is included within Chapter 16 of the ES [EN010147/APP/6.3]
Oxfordshire County Council	Traffic and Transport	Whist some mitigation involving improved or new walking and cycling routes is proposed, we request more detail on the location and type of improvements. We request further direct engagement between the applicant and OCC in order to understand the detail of the mitigation	Yes	A number of meetings have been held with OCC, including the highways, PRoW officer and Public Health teams. Informed by the on-going dialogue the Applicant has developed illustrative sections for routes – which can be seen

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		measures proposed. It would be useful to meet to ensure that improvements are delivered to a high quality specification and the routes are meaningful for users, that is to say circular leisure routes, or routes that join origins and destinations.		in Figure 7.6.3.2 [EN010147/APP/7.6.3] The Applicant wishes to further advance matters through the emerging Statements of Common Ground.
Oxfordshire County Council	Traffic and Transport	It would be useful on plans to identify the type of existing or proposed PROW e.g. footpath from bridleway; as bridleways can be used for cycling however footpaths should not. There may be need for conversion of some footpaths to bridleways to enable cycling for example. Consider using a numbering system to discuss the proposed improvements to PROW.	Yes	Noted. The Applicant aims to continue to prepare details of the paths and cycleways, in discussion with OCC, to include those areas where any variation from footpath to bridleway may be needed.. The Applicant has developed illustrative sections for routes – which can be seen in Figure 7.6.3.2 [EN010147/APP/7.6.3] The Applicant wishes to further advance matters through the emerging Statements of Common Ground.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Traffic and Transport	<p>North Area:</p> <ul style="list-style-type: none"> • We seek more detail on the proposed new cycle route between Woodstock and Wootton. • NCN 5 and All PROW at the Northern Site will remain open is any enhancement proposed? 	Yes	<p>The Applicant has developed illustrative sections for routes – which can be seen in Figure 7.6.3.2 [EN010147/APP/7.6.3]</p> <p>The Applicant wishes to further advance matters through the emerging Statements of Common Ground.</p>
Oxfordshire County Council	Traffic and Transport	<p>Central Area:</p> <ul style="list-style-type: none"> • A new footpath has been proposed to join onto the existing footpath from Cassington to connect to Church Hanborough. Proposing to upgrade a footpath between Bladon and Begbroke into a cycle route and proposing a new circular walk close to Cassington. Please provide more detail on these. • We welcome the proposal to assist in the delivery of a new off-road shared cycling/walking path along Lower Road which is identified as an important link in Oxfordshire's emerging Strategic Active Travel Network (SATN). A cycle route along 	Yes	<p>Following meetings with the OCC team, the Applicant has developed illustrative sections for routes – which can be seen in Figure 7.6.3.2 [EN010147/APP/7.6.3]</p> <p>The Applicant wishes to further advance matters through the emerging Statements of Common Ground.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Lower Road would provide a key connection between Hanborough Railway Station/ Long Hanborough and the new Salt Cross Garden Village as well as providing important connectivity to the cycle route along the A40 and the B4449/ B4044 – along which a new cycle route is also proposed. We would like to discuss this further.</p>		
Oxfordshire County Council	Traffic and Transport	<p>Southern Area:</p> <ul style="list-style-type: none"> • We note there is no identified preferred route as yet for the cabling across the River Thames at Swinford we request early notification of when this is confirmed in order to assess any implications. • We would like to discuss what the cabling involves in terms of highway impact? Are there opportunities to improve footway cycle way provision off carriageway whilst the cabling work is carried out, particularly on the B4044 between Farmoor and Eynsham? 	Yes	<p>Evaluation of the preferred route will continue to evolve through the pre-examination and examination period, and the Applicant will continue in discussions with OCC about the most appropriate option, management of highway impacts, and off-highway cycling whilst cabling is installed. The Outline Construction Traffic Management Plan forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1] and</p>

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				the Applicant expects to further develop a Statement of Common Ground with the host authorities.
Oxfordshire County Council	Public Rights of Way	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 public rights of way 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 understood that the feel of the local environment from the paths, and the quality of the paths themselves will be significantly affected and so the development needs to ensure what it does onsite and offsite really helps	Yes.	To deal with these points the Applicant reports the effects in detail within the Landscape and Visual Impact Chapter 8 and Human Health Chapter 16 of the ES [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>people still feel a connection to the countryside and can enjoy a countryside experience when using PRow for active travel, leisure and recreation journeys. 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>		
Oxfordshire County Council	Public Rights of Way	<p>Note that these public rights of way comments and mitigation is separate to any highways/active travel requirements.</p>	No	<p>A summary of the base traffic flows which have been used to define a baseline transport position are set out in Appendix 12.3: Base traffic flows [EN010147/APP/6.5]. An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP</p>

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				requirement within the draft DCO.
Oxfordshire County Council	Public Rights of Way	Given the development's role as nationally significant infrastructure it is vital that a sustainable and inclusive approach to public rights of way is taken. The mitigation measures need to be incorporated into specific actions on the ground, and should also inform the next stages of the application and development.	Yes	An assessment of the effects of the Project on Public Rights of Way is set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] , and a Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]
Oxfordshire County Council	Public Rights of Way	All PRoW across the sites that pass through/adjacent to solar fields need to be provided as landscaped 'greenway' public rights of way – with a minimum 15m overall 'corridor' width (additional width to be dedicated), access for small PRoW maintenance vehicles, planted with an appropriate non-injurious/thorny hedge, shrub & tree planting palette. The reason for this provision is so the	Yes	A full assessment of traffic and transport, including any mitigation and enhancement measures required, is included within Chapter 12 of the ES [EN010147/APP/6.3] . An Outline Construction Traffic Management Plan [EN010147/APP/7.6.2] has been prepared to be secured as part of the CoCP

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		visual impact and proximity of fencing and built infrastructure is softened whilst still providing wide clear and accessible paths for people.		requirement within the draft DCO.
Oxfordshire County Council	Public Rights of Way	All fenced-in PRoW need to be stone surfaced to 3m width with 3-4m clear grass verges each side of this and then the 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.	Yes	Noted. No new PRoW routes are proposed, but following meetings with the OCC team, the Applicant has developed illustrative sections for routes – which can be seen in Figure 7.6.3.2 [EN010147/APP/7.6.3] The Applicant wishes to further advance matters through the emerging Statements of Common Ground.
Oxfordshire County Council	Public Rights of Way	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)	Yes	Noted. The Applicant aims to continue to prepare details of the paths and cycleways, in discussion with OCC, to include those areas where any variation from footpath to bridleway may be needed. The Applicant has developed illustrative sections for routes

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>– which can be seen in Figure 7.6.3.2 [EN010147/APP/7.6.3] The Applicant wishes to further advance matters through the emerging Statements of Common Ground.</p>
Oxfordshire County Council	Public Rights of Way	<p>The development should provide a range of bridleway public rights of way to provide alternative routes, to reduce the need to use roads and to increase user safety. These should be provided onsite by developer, provided within the landownership/control boundary (blue line boundary) by the developer/landowner. Other offsite mitigation should take the form of a financial contribution for offsite mitigation undertaken by OCC Countryside Access Strategy working with 3rd party landowners and farmers. The scale of this contribution will depend on what onsite/in-control mitigation is agreed.</p>	Yes	<p>No new PRoW routes are proposed, but following meetings with the OCC team, the Applicant has developed illustrative sections for new permissive routes – which can be seen in Figure 7.6.3.2 [EN010147/APP/7.6.3] The Applicant wishes to further advance matters through the emerging Statements of Common Ground.</p>

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Oxfordshire County Council	Public Rights of Way	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 then disturbance need to be kept to a minimum and safety of users maximised. A way to achieve this could be 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 path and user.	Yes	As explained in Volume 1, Chapter 6: Project Description of the ES [EN010147/APP/6.3] , Horizontal Directional Drilling (HDD) is proposed to be employed as a construction method for laying underground cables when it is not feasible to use the 'open cut' method to cross obstacles such as hedges, rivers, railway lines, public rights of way, roads and sensitive archaeological or ecological areas. The location of HDD crossings are provided in the Crossing Schedules and Plans [EN010147/APP/6.3] .

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Oxfordshire County Council	Public Rights of Way	Phased and planned temporary closures/diversions of PRow only when necessary i.e. if works cannot be undertaken with the PRow open and access made safe by using banksman/fencing etc. Closures should be for a minimal duration to cover the essential works and in all cases an alternative route should be agreed by OCC Countryside Access and provided in advance and maintained for the duration of the temporary closure.	Yes	Measures adopted as part of the Project to mitigate impacts on land use and recreation are provided in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] . This includes preparation of PRow Management Plans in general accordance with the Outline PRow Management Strategy [EN010147/APP/7.6] submitted with the application for development consent. The measures to be implemented as part of the PRow Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g., NCRs, Long Distance Footpaths) during construction of the Project. This includes requirements for temporary closures and diversions of PRow during construction of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				the Project. The outline measures included in the Outline PRow Management Strategy have been shared with relevant local authorities prior to application.
Oxfordshire County Council	Public Rights of Way	No use of PRow other than if essential as a crossing point between fields. All vehicle crossing points to be monitored when active. Crossing point PRow to be protected from HGV by weight spreading mats, appropriate stone reinforcement and making good within 24 hours	Yes	The outline management measures proposed for affected PRow within the Project site are set out in the Outline PRow Management Strategy [EN010147/APP/7.6] . The final measures will be included as part of the detailed PRow Management Strategy post-consent.
Oxfordshire County Council	Public Rights of Way	Offsite/onsite network disjunctions resolved through onsite/applicant's land outside the development boundary provision and/or with a s106 package for negotiation and delivery via 3rd party landowners. e.g. Cassington FP 6	Yes	Noted.

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Oxfordshire County Council	Public Rights of Way	<p>Please refer to the images of the Illustrative Masterplan that have had lines and codes annotated (see Annex 2 of this response, separate attachment). These PRow measures are in addition to, and may also duplicate the general points of principle included above. They are not exclusive and OCC Countryside Access Strategy would welcome the opportunity to survey all areas and paths to further refine requirements.</p> <p>Illustrative Masterplan Plan 01</p> <ol style="list-style-type: none"> 1. Onsite linking footpath 2. Onsite linking bridleway A. Offsite footpath link <p>Illustrative Masterplan Plan 02</p> <ol style="list-style-type: none"> 3. Linking bridleway 4. Linking PRow (Fp/bridleway) 5. Linking PRow (Fp/bridleway) B. Upgrade footpath to bridleway <p>Illustrative Masterplan Plan 03</p> <ol style="list-style-type: none"> 5a. Linking footpath 	Yes	Noted.

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		<p>Illustrative Masterplan Plan 04 6. Linking footpath 7. Linking footpath 8. Linking footpath 9. Linking footpath/bridleway (alternative route and crossing point), also on plan 5 10. Footpath upgraded to bridleway to Cassington (also on plan 5 and 6)</p> <p>Illustrative Masterplan Plan 05 11. Linking/circular link footpath/bridleway (also on plan 6) 12. Linking footpath (also on plan 6) 13. Linking footpath (also on plan 6) 14. Linking bridleways</p> <p>Illustrative Masterplan Plan 06 13a. linking footpath 15. Linking bridleway 16. Linking bridleway and upgrading footpath to bridleway each side of Begbroke Wood to bridleway 124/1</p> <p>Illustrative Masterplan Plan 07 17. Upgrade footpath to bridleway</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		18. Link path and upgrade to bridleway		
Oxfordshire County Council	Public Rights of Way	Correct route of public rights of way: Note that it is the responsibility of the developer to ensure that their application takes account of the legally recorded route and width of any public rights of way as recorded in the definitive map and statement. This may differ from the line walked on the ground and may mean there are more than one route with public access. The legal width of public rights of way may be much wider than the habitually walked or ridden width. The Definitive Map and Statement is available online at www.oxfordshire.gov.uk/definitivemap .	Yes	The assessment of potential impacts on PRoW reported in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] has been informed using definitive PRoW mapping data provided by the relevant local authorities. Further detail regarding the PRoW located within the Project site, including the data sources used is provided in Volume 3, Appendix 17.3: Published Recreational Resources Plan. The outline management measures proposed for affected PRoW is provided in the Outline PRoW Management Strategy [EN010147/APP/7.6] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Public Rights of Way	<p>Protection from breaks in public rights of way and vehicle crossings/use of public rights of way: Many public rights of way are valuable as access corridors and as continuous wildlife and landscape corridors. As a matter of principal, PRow should remain unbroken and continuous to maintain this amenity and natural value. Crossing PRow with roads or sharing PRow with traffic significantly affects wildlife movements and the function of the PRow as a traffic free and landscape corridor. Road crossings of PRow should be considered only as an exception and in all cases provision must be made for wildlife access and landscape, and with safe high quality crossing facilities for walkers, cyclists and equestrians according to the legal status of the PRow. Vehicle access should not be taken along PRow without appropriate assessment and speed, noise, dust and proximity controls</p>	Yes	<p>Please see Volume 3, Chapter 17 Agricultural Land Use and PRow [EN010147/APP/6.3]. See also Outline PRow Management Strategy [EN010147/APP/7.6].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		agreed in advance with OCC Countryside Access		
Oxfordshire County Council	Public Rights of Way	Protection, Mitigation and Improvements of routes. Public rights of way through the site need to be integrated with the development and provided to a standard to meet the pressures caused by the development. Assessments of current condition need to be undertaken along with proposals for onsite mitigation and improvement measures. This may include upgrades to some footpaths to enable cycling or horse riding and better access for commuters or people with lower agility. The package of measures needs to be agreed in advance with OCC Countryside	Yes	For detailed plans regarding PRoW please see Volume 3, Chapter 17 Agricultural Land Use and PRoW [EN010147/APP/6.3] . See also Outline PRoW Management Strategy [EN010147/APP/7.6] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Access. All necessary PRow mitigation and improvement measures onsite need to be undertaken prior to occupation to ensure public amenity is maintained.		
Oxfordshire County Council	Public Rights of Way	Protection of public rights of way and users. Routes must remain usable at all times during a development's construction lifecycle. This means temporary or permanent surfacing, fencing, structures, standoffs and signing need to be agreed with OCC Countryside Access and provided prior to the commencement of any construction and continue throughout. Access provision for walkers, cyclists and horse riders as vulnerable road users needs to be maintained. This means ensuring noise, dust, vehicle etc impacts are prevented.	Yes	The outline management measures proposed for affected PRow within the Project site are set out in the Outline PRow Management Strategy [EN010147/APP/7.6] . The measures to be implemented as part of the PRow Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g., NCRs, Long Distance Footpaths) during construction of the Project. This includes requirements for temporary closures and diversions of PRow during construction of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				the Project. The final measures will be included as part of the detailed PRow Management Strategy post-consent.
Oxfordshire County Council	Public Rights of Way	Temporary obstructions and damage. No materials, plant, vehicles, temporary structures or excavations of any kind should be deposited / undertaken on or adjacent to the Public Right of Way that obstructs the public right of way whilst development takes place. Avoidable damage to PRow must be prevented. Where this takes place repairs to original or better standard should be completed within 24hrs unless a longer repair period is authorised by OCC Countryside.	Yes	The outline management measures proposed for affected PRow within the Project site are set out in the Outline PRow Management Strategy [EN010147/APP/7.6] . The measures to be implemented as part of the PRow Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g., NCRs, Long Distance Footpaths) during construction of the Project. This includes requirements for temporary closures and diversions of PRow during construction of

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				the Project. The final measures will be included as part of the detailed PRow Management Strategy post-consent.
Oxfordshire County Council	Public Rights of Way	Route alterations. The development should be designed and implemented to fit in with the existing public rights of way network. No changes to the public right of way's legally recorded direction or width must be made without first securing appropriate temporary or permanent diversion through separate legal process. Note that there are legal mechanisms to change PRow when it is essential to enable a development to take place. But these mechanisms have their own process and timescales and should be initiated as early as possible – usually through the local planning authority. Any proposals for temporary closure/diversion need to have an accessible, level, safe and	No	The outline management measures proposed for affected PRow within the Project site are set out in the Outline PRow Management Strategy [EN010147/APP/7.6] . The measures to be implemented as part of the PRow Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g., NCRs, Long Distance Footpaths) during construction of the Project. This includes requirements for temporary closures and diversions of PRow during construction of

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		reasonably direct diversion route provided with necessary safety fencing and stand-off to ensure public amenity is maintained for the duration of the disturbance.		the Project. The final measures will be included as part of the detailed PRow Management Strategy post-consent.
Oxfordshire County Council	Public Rights of Way	Gates / right of way: Any gates provided in association with the development shall be set back from the public right of way or shall not open outwards from the site across the public right of way.	Yes	Noted.
Oxfordshire County Council	Public Rights of Way	Hedges/screening: Where hedges/natural vegetation is proposed e.g., on solar farms to shield the public from glint or glare, to coincide with new boundaries or to enhance existing boundaries, a lifetime management regime needs to be agreed with Oxfordshire County Council as local Highway Authority to ensure that public access is not impeded when the vegetation screen is established or during the	Yes	The application is supported by an outline Landscape and Ecology Management Plan [EN010147/APP/6.2] and an outline Operational Management Plan [EN010147/APP/7.6.2] . A Glint and Glare study has been undertaken and can be found at Volume 3, Appendix 4.4, [EN010147/APP/6.5] .

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		development or hedge/screen's lifecycle.		
Oxfordshire County Council	Public Rights of Way	Enclosure: If the line of the right of way is to be enclosed by hedging or fencing, for example to provide security for solar PV arrays, then care is needed over fencing choice. Fencing should not have barbs, razor wire or palisade fencing within the line of the right of way and visual amenity should be maintained. The enclosed path and the hedge/fencing needs to be maintained to provide the full corridor width for the duration of the development.	Yes	The application is supported by an outline Landscape and Ecology Management Plan [EN010147/APP/6.2] and an outline Operational Management Plan [EN010147/APP/7.6.2] , which set out proposals and controls regarding PRoW.
Oxfordshire County Council	Public Rights of Way	Re-diversion for temporary works: If there is any indication that a Solar PV Array is to be on a temporary basis and there is a need to divert a right of way to enable development to proceed then a condition should set out that the developer/owner applies	Yes	The outline management measures proposed for affected PRoW within the Project site are set out in the Outline PRoW Management Strategy [EN010147/APP/7.6] .

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		for a re- diversion of right of way to the original line.		The measures to be implemented as part of the PRow Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g., NCRs, Long Distance Footpaths) during construction of the Project. This includes requirements for temporary closures and diversions of PRow during construction of the Project. The final measures will be included as part of the detailed PRow Management Strategy post-consent.
Oxfordshire County Council	Public Rights of Way	Offsite mitigation: A contribution may be requested to secure off-site improvements to mitigate the loss of visual amenity and to provide alternatives or extensions of routes in the locality. This could include use of the space between the panels and the field edges (shade zone) which	Yes	The Applicant has undertaken discussions with OCC, including the PRow officer and Public Health team, and will continue to develop the approach to public access and the management of rights of way, active travel and mitigation, through the

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		could provide a good opportunity for additional access.		advancement of Statements of Common Ground, prior to examination.
Oxfordshire County Council	Trees and Woodland	It is acknowledged that this proposal covers a very large area and that in section 1.4 of the report it states 'Due to the wide spreading nature of the site and the inherent low impact of solar farm installation, a full site survey was deemed impractical and unnecessary, however, a walkover survey of the proposed cable routes between sites was carried out to help inform the best route for the cable to take'. However, without a detailed survey of all trees and woodlands adjacent to all works that have the potential to impact on these features, it is not possible to make an accurate and detailed arboricultural assessment of the impact of this proposed development. A detailed	Yes	A survey of veteran trees has been undertaken and the necessary buffer zones incorporated. A full survey was not considered necessary as no trees are to be removed. One of the key principles is to avoid loss of trees. The Project has been designed with that in mind. Protection measures are built in and can be found in the Mitigation Measures schedule [EN010147/APP/6.6] Volume 3, Appendix 6.1, the Layout and Design Principles document [EN010147/APP/7.7] which itself refers to various

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		arboricultural survey would need to be completed in order to provide accurate comments on realistic tree related implications of the proposal.		management plans designed to achieve the same ends. Detailed cable route location and design will determine precisely how close the cable is to trees, hedgerow or woodland.
Oxfordshire County Council	Trees and Woodland	As shown within the report, between sections 5.13 – 5.17, each section (1-5) has the potential to have significant impacts, particularly the high voltage cables, where it states tree removal will be most likely.	Yes	The Project has been designed to ensure that no tree removal is necessary, including with respect to the cable routes.
Oxfordshire County Council	Trees and Woodland	It is noted within the report that it refers to Ancient Woodland in section 2.23 and the requirement to provide suitable buffers in accordance with Forestry Commission and Natural England standing advice. The applicant is advised that 15m is a minimum requirement for ancient woodland buffers and the guidance states 'Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone'	Yes	Protection measures are built in and can be found in the Mitigation Measures schedule [EN010147/APP/6.6] Volume 3, Appendix 6.1, the Layout and Design Principles document [EN010147/APP/7.7] which itself refers to various management plans designed to achieve the same ends. Detailed cable route location and design will determine

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		<p>(https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort).</p>		<p>precisely how close the cable is to trees, hedgerow or woodland.</p>
Oxfordshire County Council	Trees and Woodland	<p>It is not clear from reviewing the report if an assessment has been made on whether any veteran or ancient trees will be impacted by the proposal. A detailed arboricultural survey would need to be completed to determine the presence and the precise location of any veteran or ancient trees that may be present on the site and, potentially impacted by the proposals. It is noted that within the key to the plans it refers to a veteran tree buffer 15m offset and veteran tree is shown within the Glossary at Appendix F. However, in accordance with Forestry Commission and Natural England standing advice buffers for ancient and veteran trees should be calculated as: 'For ancient or veteran</p>	Yes	<p>A survey of veteran trees has been undertaken and the necessary buffer zones incorporated. A full survey was not considered necessary as no trees are to be removed. Protection measures are built in and can be found in the Mitigation Measures schedule [EN010147/APP/6.6] Volume 3, Appendix 6.1, the Layout and Design Principles document [EN010147/APP/7.7] which itself refers to various management plans designed to achieve the same ends</p>

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		<p>trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area' (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort).</p>		
Oxfordshire County Council	Trees and Woodland	<p>An assessment of the impacts of the proposal on ancient and veteran trees is therefore essential and the applicant should be aware of section 186c of the NPPF updated December 2023, which states '186. When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats</p>	Yes	<p>A survey of veteran trees has been undertaken and the necessary buffer zones incorporated. A full survey was not considered necessary as no trees are to be removed.</p>

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		(such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;' (https://www.gov.uk/government/publications/national-planning-policy-framework--2).		
Oxfordshire County Council	Trees and Woodland	It is not clear from the information submitted where the exact routes of the high voltage cables will be located. It is noted from reviewing the various plans within the report, it appears to show a wide route located within the roads. However, more specific details of its exact location are required before a detailed arboricultural impact assessment can be made. As locating the cable route in verges would be completely unacceptable due to the significant impact that would have on the roots of a very significant number of trees that are located adjacent to the roads. The routes for cabling between the separate blocks of solar panels also	Yes	The cabling associated with the Project will, for the most part, be located within the roads. Where the cables are to be installed in verges, these will be individually assessed and any mitigation necessary undertaken.

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		<p>don't appear to be shown on the plans. Therefore, the impact of these works is unknown and has the potential to be very significant, being essential that it is accurately assessed.</p>		
Oxfordshire County Council	Trees and Woodland	<p>There also appears to be various areas on the plans where the route for the cables will have significant impacts to tree root protection areas (RPAs), that would appear avoidable by relocating the route to avoid RPAs. Whilst the specific routes have not been confirmed, it has the potential to impact on the following trees, where its shown within the RPAs of the following trees: T92, T94, T95, T96, T110, H16, T160, T161, T173, T175, T178, T185, T186, T187, T199, T204, T206, G42, T215-T217, T222, G46, T229, T230-T234, T237, T238, T248, T249, T271, G60, G59, T279, T283, T284, T286, T287, G70, T394, T395, T404, T405, T406, T407, T408, T410,</p>	Yes	<p>The cable route lies within a broad corridor, which along its course has various physical factors which could change or reduce potential tree root activity in any given situation. Similarly, upon detailed design more attention would be afforded to specific trees and their specific protection requirements. Cable rerouting locally may be one of the solutions to resolve specific tree protection concerns. The missing pages 13 to 16 is a</p>

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		T411, T415, T416-T421, T422-T424, T426, T428-T430, T432, T434, T437, T438, T439-T446, G101, T449, T456, plans to the South of Tree Survey (Page 13 of 16) seem to be missing and therefore, the impact of the route for cables further South is not defined, meaning the impact has the potential to be significant.		potential report collation error and will be resolved.
Oxfordshire County Council	Trees and Woodland	Some of the Tree Protection Protocol found at Appendix C of the report requires amending and supplementing with additional information. Its acknowledged, the scale of this project is very large, and whilst the report includes a comprehensive protocol on tree protection measures, I consider that the information must be more site specific. For example, individual tree protection plans must be provided for all the sites. So, it is clear to the construction team, where exactly tree protection barriers, ground protection, utility routes etc is to be located. This is also a requirement as set out at	Yes	The Strategic AMS seeks to deal with the two connecting cables routes only. Full tree survey data for all solar sites has not been completed at this stage as no trees are intended to be felled and all trees protected. It is therefore not necessary or proportionate to detail tree protection measures and methodologies in all-sites. Within the solar sites themselves, precautionary buffers have been applied to trees,

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		Table B.1 of BS 5837:2012 and is standard practice for protecting trees during construction works.		woodland and hedgerows. The protocols seek to guide protection, not provide specific solutions in all areas.
Oxfordshire County Council	Trees and Woodland	Tree Protection Protocol Scenario 6 is not acceptable. Using machinery to excavate within RPAs is likely to lead to excessive and adverse arboricultural impacts, contrary to section 7.2.1 of BS 5837:2012 which states 'To avoid damage to tree roots, existing ground levels should be retained within the RPA. Intrusion into soil (other than for piling) within the RPA is generally not acceptable, and topsoil within it should be retained in situ. However, limited manual excavation within the RPA might be acceptable, subject to justification. Such excavation should be undertaken carefully, using hand-held tools and preferably by compressed air soil displacement'. NJUG Volume 4 also provides guidance for installing utilities within proximity to trees.	Yes	This scenario is provided only as a last resort, and it means to guide excavation within radial RPA's should they have to occur in any limited or absolute locations. It is the intention that upon full detailed design the project will seek to remove the use of this option in all cases.

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Oxfordshire County Council	Trees and Woodland	Similarly, Tree Protection Protocol Scenario 9 is not acceptable. Strip foundations within the RPA of trees can lead to extensive root loss and should be avoided. Machinery for excavating in RPAs should also be avoided.	Yes	This scenario is provided only as a last resort, and it means to guide foundation design within radial RPA's should they have to occur in any limited or absolute locations. It is the intention that upon full detailed design the project will seek to remove the use of this option in all cases.
Oxfordshire County Council	Trees and Woodland	Specific Policies within the Tree Policy for Oxfordshire that would be applicable where impacts are proposed to Oxfordshire County Council trees, including highway trees, are shown below and are available on the following link: Tree policy for Oxfordshire Oxfordshire County Council	No	No trees are affected on County owned land therefore this is not applicable.
Oxfordshire County Council	Historic Environment	Chapter 7: Historic Environment of the Preliminary Environmental Information Report (PEIR) sets out an appropriate summary of the currently known archaeological baseline for the environs of this project. This chapter has addressed our comments made	No	Noted. No response required.

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		<p>on the scoping opinion and confirms that an archaeological field evaluation will be undertaken in addition to the geophysical survey that has been included in the appendices. This chapter also confirms that the results of this will be incorporated into the ES chapter and that this will also assesses the impact of any decommissioning phase of the project on buried archaeological deposits. We support these proposals.</p>		
Oxfordshire County Council	Historic Environment	<p>Table 7.1 does state that the field evaluation highlighted in the NPS requirement and local plan policies has been undertaken and this is misleading and refers only to the geophysical phase. This chapter does however also make clear that an archaeological trenched evaluation will be undertaken.</p>	No	<p>Geophysical survey is a form of field evaluation. Subsequently further field evaluation in the form of trial trenching has been undertaken within the Project Site.</p>

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Oxfordshire County Council	Historic Environment	The overall submission also states that allowance for preservation in situ of significant remains will be made and areas of high significant archaeological remains identified within the scheme will be removed from the development. This PEIR also sets out that the individual panels will be connected with string invertors rather than individual cable trenches along each line of panels which will reduce the potential impact on below ground archaeological deposits and that the panels themselves can be mounted on concrete shoes where required in order to preserve areas of significant archaeology. This will allow the evaluation phase to be targeted on areas of impact as set out in this document.	No	A total of 43 areas within the Project Site have been identified as containing significant buried archaeological remains. All of these areas have been withdrawn from the developable land and will be retained within the Project Site as managed grassland. It is not proposed to use concrete shoes to preserve areas of significant archaeology as all such areas have been withdrawn from the developable land. This approach is set out within Section 5.8 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3] .

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Oxfordshire County Council	Hydrology and flood risk	The documents have all been reviewed; there are outstanding drawings and documents that needs to submit.	Yes	Hydrology and flood risk is assessed within Chapter 10 of the ES [EN010147/APP/6.5]
Oxfordshire County Council	Hydrology and flood risk	We would advise that there is insufficient information available to comment on the acceptability of the proposed surface water drainage scheme for the proposed development.	Yes	Hydrology and flood risk is assessed within Chapter 10 of the ES [EN010147/APP/6.5]
Oxfordshire County Council	Hydrology and flood risk	Further details of the proposed drainage system must be included. This includes, but is not limited to, the following: a. Calculation of existing greenfield runoff rates from the site area. b. Topography plan c. Detailed Drainage Plans d. As the site is currently greenfield/brownfield, evidence that surface water discharge from the proposed development will not exceed existing greenfield runoff	Yes	A Surface Water Drainage Strategy for the Project has been prepared and details how runoff will be managed throughout the Project, this is included in Volume 3, Appendix 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5] .

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		<p>rates.</p> <p>e. Calculations demonstrating the proposed attenuation has sufficient volume to contain a number of return periods, up to and including the 1 in 100 year, for a range of storm durations, from 15 minutes up to 10080 minutes.</p> <p>f. Further details of the attenuation proposed, including depths and volumes.</p> <p>g. An operation and maintenance plan, including details of every aspect of the proposed drainage system, and details of who will be responsible for the maintenance.</p> <p>h. An exceedance plan demonstrating that flooding will not be routed towards buildings in the event of the proposed drainage system failing.</p>		
Oxfordshire County Council	Hydrology and flood risk	Given the scale of the proposals and that they lie partly within flood zones 2 and 3, OCC would envisage a betterment on current greenfield rates.	No	Noted

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Ground conditions	The proposals lie partly within minerals safeguarding areas. Within these areas, mineral would be sterilised for the duration of the development (35 to 42 years) which could reduce site options for the new Minerals and Waste Plan. In accordance with the adopted Minerals and Waste Local Plan Policy M8, the applicant has provided OCC with a Mineral Resource Assessment which puts forward a case that the need for solar energy outweighs the economic and social need for mineral resource in the applicable areas during this period. The County Council is currently reviewing this document and will respond to it in due course.	No	Response received from OCC Minerals and Waste Authority to first draft of MRA and responses included in revised Mineral Resource Assessment [EN010147/APP/11.14] as part of Environmental Statement.
Oxfordshire County Council	Ground conditions	OCC welcomes that waste is now 'scoped in' to the Environmental Statement, particularly for the decommissioning stage.	No	Noted

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Public Health	We welcome the details supplied within the illustrative masterplan, which include the existing public rights of way as well as proposed landscape elements such as new cycle paths. This reflects our desire to maximise accessibility to the countryside via all means of active travel thereby promoting physical activity and wellbeing. Similarly, we support the proposals set out in the Community Consultation Leaflet, which states that Botley West seeks to increase recreational use and access across the site through the creation of new footpaths and cycle paths.	No	Noted. Positive comments welcomed.
Oxfordshire County Council	Public Health	As referenced in the Community Consultation Leaflet, we are pleased to see that community food growing is being explored as part of the development and welcome the request for feedback on where local people would like these to be located. This document also indicates other proposed improvements to public	Yes	All new active travel infrastructure such as walking routes will be well signposted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		realm such as a new circular walking route close to the village of Cassington. This, and any other new active travel infrastructure, will need to be well-signposted to ensure their use is maximised.		
Oxfordshire County Council	Public Health	It is excellent to see that the development aims to have an environmental legacy with a minimum biodiversity net gain of 70%. Please see comments from our ecologist above.	No	Noted. Positive comments welcomed.
Oxfordshire County Council	Public Health	It is noted that a Preliminary Environmental Information Report (PEIR) includes a chapter on human health. In response to the previous request from OCC that the applicant undertakes a full HIA, this has been declared as having been undertaken in this chapter of the PEIR. It has been reviewed separately against our HIA review checklist.	Yes	Local HIA guidance has been referenced and taken into account. [EN010147/APP/6.3]
Oxfordshire County Council	Public Health	The HIA has provided a thorough legislative and policy context for the project, both at national and local level. The assessor has also	No	Noted. Positive comments welcomed.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		referenced their reasoning with up to date and reliable sources. We welcome the critical assessment of literature sources, such as those pertaining to the loss of agricultural land and the potential impacts this has on the local population.		

Oxfordshire County Council	Public Health	The data sources referenced for this assessment are reputable, however there is no clear use of Oxfordshire's Joint Strategic Needs Assessment (JSNA) data. This is a crucial source of health data which would identify the specific health challenges for the population affected. There is no mention of healthy life expectancy – table 16.14 shows data for 'inequality in life expectancy' across the districts, county and wider areas.	Yes	Noted and agreed we have not been explicit on these evidence sources in our preliminary assessment. The health assessment will incorporate JSNA data and include healthy life expectancy as an indicator. [EN010147/APP/6.3]
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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Public Health	Whilst the assessor has clearly explained where they have sourced the population data from, and on what geographical scale, there is no evidence of the population profile of the study area itself. This could have been shown in the form of tables, graphs or diagrams (for example the age profile of the area). However, it is appreciated that the baseline summary indicators are included in tabular form and split across ward, district, county, region and national level, for ease of comparison.	Yes	Noted. The health assessment can present the population data in this way. We find it helpful to split the baseline data across the assessment so that key indicators are with the relevant determinate of health discussion, rather than all the data as an upfront profile. [EN010147/APP/6.3]
Oxfordshire County Council	Public Health	Children and young people have been identified as having worse than the regional and national averages in terms of certain health outcomes, such as physical activity levels. CAYP have also been identified within the assessment as being a vulnerable group. Actions to show how the scheme could mitigate any negative impacts on health of children and young people or any positive impacts on their well-being need to be	Yes	Noted. The health assessment includes measures that focus on CAYP, relating to route quality, educational elements and NEET training/employment targeting. We will make this focus on CAYP more explicit and develop the detail further. [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		identified as this is a particularly vulnerable group.		
Oxfordshire County Council	Public Health	We acknowledge the inclusion of a thorough noise and vibration assessment as a standalone chapter in the PEIR. This includes assessment of the vulnerability/sensitivity of each receptor as well as mitigations required where necessary. We also note that a Construction Noise and Vibration Management Plan (CNVMP) will be prepared.	No	Noted. Positive comments welcomed.
Oxfordshire County Council	Public Health	Further to our original comments submitted as part of phase 1 of this consultation, we note that additional baseline survey measurements will be undertaken to quantify the noise climate at human and recreational receptors (receptors on public rights of way), where each is necessary, to ensure all relevant noise impact	Yes	Additional noise surveys were undertaken in July 2024 so as to re-in force the data captured in 2023. Details of these measured levels are provide in Volume 3, Appendix 13.1: Baseline Sound Survey [EN010147/APP/6.5]]. Receptors on PRowS are transient receptors, and are

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		criteria are suitably representative following design refinement.		therefore much less sensitive to noise than residential receptors.
Oxfordshire County Council	Public Health	We also note that a Dust Management Plan (DMP) will be prepared and implemented as part of the upcoming application. This will be crucial in particular to reduce the potential impact of dust generated during construction.	Yes	A Dust Management Plan is included within the Outline Code of Construction Practice [EN101047/APP/7.6.1] .
Oxfordshire County Council	Public Health	The health impact assessment of the scheme needs to be revised to include data from Oxfordshire's JSNA and to consider relevant mitigations for vulnerable groups affected.	Yes	JSNA data and further mitigation refinement is set out in the Human Health Chapter

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Oxfordshire County Council	Climate change	The Climate Action Service recognises the important role that solar photovoltaic energy plays in the pathway to net zero carbon. Considering the relevant planning constraints and other considerations, we welcome the potential increase in renewable energy generation capacity provided by this development in Oxfordshire.	No	Noted, and the Applicant welcomes this support.
Oxfordshire County Council	Climate change	Oxfordshire County Council's Climate Action Framework commits us to supporting our communities to own energy projects and retain the benefits locally.	No	No response required
Oxfordshire County Council	Climate change	The Pathways to a Zero Carbon Oxfordshire2 report states that solar generation of 3,900 GWh would be required by 2050 in order to meet net-zero targets; the Botley West proposals could meet a quarter of this identified demand.	Yes	Noted. The Applicant has calculated that the Government's target for solar of 70GW by 2035 is still significantly short of meeting that target, even with the Botley West solar scheme, AND if all the present DCO solar schemes are consented and built before 2035.

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Oxfordshire County Council	Climate change	The Climate Action Service is in favour of any efforts to sell energy locally. By increasing local energy generation capacity, the development may also ease supply constraints on the distribution network which could allow for other energy infrastructure to go ahead e.g. EV charge points, ASHPs etc. It is therefore important that connectivity to the regional distribution network is factored into development plans for the site.	Yes	<p>Community benefit funds are not material considerations in DCO decisions. The Applicant notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant.</p> <p>The Environmental Statement has therefore not attached any significance to this fund when assessing the impact of the development given that the beneficial impacts associated with the community benefit fund are not yet fully known and thus cannot be committed to as part of the DCO.</p> <p>Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.
Oxfordshire County Council	Climate change	The Climate Action Service notes that GHG emissions at decommissioning are considered out of scope as they have been deemed to be insignificant. Given the scale of the development, we feel that decommissioning could still have a considerable impact, e.g., in disposal / recycling and potentially in transport movement and should still be scoped in.	No	Decommissioning effects have been assessed within Volume 1, chapter 14: Climate Change [EN010147/APP/6.3] . Additionally, the scoping report confirmed that The Inspectorate would expect to see a Decommissioning Plan, agreed with the Local Authority, secured through the inclusion of an Outline Decommissioning Plan or similar with the Application. This has been submitted in support of the ES [EN010147/APP/7.6.4] .

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Oxfordshire County Council	Agricultural Land	The PEIR states that construction of the project would lead to the permanent loss of agricultural land, including approximately 5.7ha of the best and most versatile (BMV) agricultural land.	N/A	The potential impacts of the Project with respect to agricultural land, including the disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] .
Oxfordshire County Council	Agricultural Land	The Oxfordshire Food Strategy has been adopted by all county and city/district councils with the overarching aim of building a healthy, fair and sustainable food system for Oxfordshire.	N/A	Noted.
Oxfordshire County Council	Agricultural Land	The Food Strategy identifies that 74% of Oxfordshire's land area is agricultural, mostly cereals, followed by livestock grazing for meat and dairy but only 1% of food consumed in the county was sourced directly from the region.	N/A	Noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Agricultural Land	<p>Most of the UK's fruit and vegetable supply comes from a small number of growing areas in Europe. Access to land for food production in Oxfordshire is difficult. The strategy aims to address some of these issues which include:</p> <ul style="list-style-type: none"> - Land owners aspirations for how the land is used - Improving access to food production - Tenant farmers and their ability to make change 	Yes	<p>The applicant is providing this benefit. These will be secured by the oOMP [EN010147/APP/7.6.2] See also ES Vol 1, Chapter 15, Socio-Economics and the Human Health Chapter 16 [EN010147/APP/6.3]. Up to 30 hectares of land has been set aside for Community Growers and a site allocated for a school visits facility too.</p>
Oxfordshire County Council	Agricultural Land	<p>The Botley West planning documentation states that the majority of the land at the site is used for cereal farming. If granted, the potential loss of 1,300 hectares at the proposed sites (including the permanent loss of 5.7ha of BMV land) would negatively impact on the ambition to grow and consume more food within the county boundary and further reduce the availability of agricultural land.</p>	Yes	<p>The Applicant notes this comment and appreciates the importance of agricultural land in providing food to Britain. The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>[EN010147/APP/6.3]. Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3]. This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6.1], which has been submitted with the Development Consent Order (DCO) application. The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Agricultural Land	The strategy identifies that Oxfordshire's local food economy contributed £2.2bn in turnover, supporting 19,500 jobs and 2,970 enterprises in 2020. Surveys of growers and producers as part of developing the strategy stated that turnover of workers is very high and there is a lack of access to apprenticeships, training and skills for those who wish to pursue careers in food productions and/or farming.	No	Noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Agricultural Land	The application states that currently the land at the site is "farmed on contracting arrangements, with two small areas still operating on farm business tenancy agreements that end by the middle of 2025." (p.19 para 17.5.1.27, Chapter 29 – Land and PRow)	No	The potential impacts of the Project with respect to agricultural land, including the disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] . Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] . This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6.1] , which has been submitted with the Development Consent Order (DCO) application. The measures to be implemented

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project. These measures also include the preparation of a Code of Construction Practice in general accordance with the Outline Code of Construction Practice</p> <p>[EN010147/APP/7.6.1] submitted with the application for development consent. The measures to be implemented as part of the Code of Construction Practice seek to limit disruption to the operation of individual farm holdings through effects on access to land.</p>

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Oxfordshire County Council	Agricultural Land	<p>The potential conversion of the land to a solar farm may, therefore, potentially negatively impact on the number of agricultural employment opportunities within the county. However, the report goes on to state that holdings 2 and 3 will still continue to operate as farming enterprises and diversification as a result of the project may make the businesses more viable.</p>	Yes	<p>The potential impacts of the Project with respect to agricultural land, including the disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3]. Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way (EN010147/APP/6.3). This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management Plan [EN010147/APP/7.6.1], which has been submitted with the Development Consent Order (DCO) application. The measures to be implemented</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project. These measures also include the preparation of a Code of Construction Practice in general accordance with the Outline Code of Construction Practice</p> <p>[EN010147/APP/7.6.1] submitted with the application for development consent. The measures to be implemented as part of the Code of Construction Practice seek to limit disruption to the operation of individual farm holdings through effects on access to land.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Agricultural Land	Two positive mitigation measure are included in Chapter 1: Socio-economic impacts on p.28, noting that the proposed development will "provide space for at least two community agricultural groups to operate on the project site, including on behalf of Cutteslowe Larder and Cherwell Collective, by means of an Agricultural Licence Agreement". A second mitigation is the intention to provide seed funding for a Community Benefit Fund to create a community growing scheme. This would directly support the ambition in the Oxfordshire Food Strategy to foster short, local supply chain, improve access to healthy and sustainable food; and align with the ambition to promote educational opportunities that build connections, skills and knowledge. These initiatives could be extended to include new allotments for all who want to rent space. Of the 1,300 hectares, perhaps 20 hectares could	No	These will be secured by the oOMP [EN010147/APP/7.6.2] See also ES Vol 1, Chapter 15, Socio-Economics and the Human Health Chapter 16 [EN010147/APP/6.3] . Up to 30 hectares of land has been set aside for Community Growers and a site allocated for a school visits facility.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		be allocated to community agriculture of one form or another, probably with no loss of output at the solar farm ³ .		
Oxfordshire County Council	Agricultural Land	Moreover, a revised scheme design and exclusion of development from areas of best and most versatile agricultural land would minimise negative impacts on soil resources.	Yes	Justification for the location of the Project, including the design and environmental constraints considered is provided in Volume 1, Chapter 5: Alternatives Considered of the ES [EN010147/APP/6.3]. The potential impacts of the Project with respect to agricultural land, including the temporary and permanent loss of best and most versatile land and disruption to farm holdings are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>[EN010147/APP/6.3]. Measures adopted as part of the Project to mitigate potential impacts on agricultural land are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3]. This includes the preparation of a Soil Management Plan in general accordance with the Outline Soil Management Plan (EN010147/APP/7.6), which has been submitted with the Development Consent Order (DCO) application. The measures to be implemented as part of the Soil Management Plan seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Project.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Impact on School Sites	Oxfordshire County Council (OCC) Property manages land that is located within 1km distance from the central proposed photovoltaic (PV) solar farm site. The land currently contains buildings, which are occupied by Yarnton Pre-School and William Fletcher Primary School.	N/A	Noted. Please see detailed responses below to regarding specific issues raised.
Oxfordshire County Council	Impact on School Sites	Oxfordshire County Council also manages land that is located within 1km distance from the southern proposed PV solar farm site. The land is currently being used as a playing area for the Cumnor C of E Primary School. The school is also maintained and controlled by Oxfordshire County Council.	N/A	Noted. Please see detailed responses below to regarding specific issues raised.
Oxfordshire County Council	Impact on School Sites	The safeguarding of children is essential and is a requirement for all schools operating in Oxfordshire. This is set out in the Keeping Children Safe in Education 2023, which is guidance issued by the Department of Education and explains that all school staff have a duty to establish and maintain a safe environment for	N/A	Noted. Please see detailed responses below to regarding specific issues raised.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		children, where they are encouraged to communicate with each other and take part in activities.		
Oxfordshire County Council	Impact on School Sites	Whilst OCC Property supports the proposed scheme in-principle, as it will assist the Government with meeting their goal of delivering new renewable and low carbon energy infrastructure, they wish to raise concerns in relation to several matters which arise primarily from the effects the proposed scheme would have on the preschool and primary schools in terms of noise and glint and glare impacts during the operation of the development. Specifically, there are fears that this development could potentially prevent them from carrying out their educational duty.	Yes	Noise at receptors surrounding the site are assessed in Volume 3: Appendix 13.3: Operational Phase Noise [Doc ref: 7.5]. This assessment identifies that the operational phase noise impact is minor adverse which is not significant at residential receptors. These residential receptors are located closer to the Project than any school, and so the noise impact at schools will be less than is shown in the noise assessment. The Glint and Glare Study has been updated to reflect changes to the solar array layout and provided at Volume 3, Appendix 4.4 [EN010147/APP/6.6]. No

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				significant adverse effects we found on School sites.
Oxfordshire County Council	Impact on School Sites	OCC Property has reviewed the contents of the Glint and Glare Report (Volume 3, Appendix 4.4) and has some concerns regarding the impact of the proposed solar panels creating glint and glare issues to the playing area and building of both the preschool and primary school.	Yes	Noted. The Glint and Glare Study has been updated to reflect changes to the solar array layout and provided at Volume 3, Appendix 4.4 [EN010147/APP/6.6] . No significant adverse effects we found on School sites.
Oxfordshire County Council	Impact on School Sites	The technical study has not identified either the pre-school or primary schools as sensitive receptors, and therefore it is difficult to ascertain whether the proposed scheme will produce solar reflections that will have a detrimental impact on the staff and children of the primary schools and pre-school. Children spend a considerable amount of time outside, and it is therefore critical to ensure	Yes	A Glint and Glare Study was provided at PEIR stage and has been updated to reflect changes to the solar array layout and provided at Volume 3, Appendix 4.4 [EN010147/APP/6.6] No significant adverse effects we found on School sites.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		that the playing areas for the primary schools and preschool will remain a safe space for the children.		
Oxfordshire County Council	Impact on School Sites	Paragraph 193 of the NPPF highlights that under the 'agent of change' principle, those responsible must do all they can to ensure that new development will not have an adverse impact on the facilities of the primary schools and preschool and the children that are under their care. Therefore, OCC Property would need to be satisfied that the overall level of intensity of solar glare observed by children and school staff would be limited.	Yes	A Glint and Glare Study was provided at PEIR stage and has been updated to reflect changes to the solar array layout and provided at Volume 3, Appendix 4.4 [EN010147/APP/6.6] No significant adverse effects we found on School sites.
Oxfordshire County Council	Impact on School Sites	As a consequence, OCC Property would appreciate if the technical study that was undertaken to inform the Preliminary Environmental Information Report could be updated in order to assess the glare and glint impacts on the Yarnton Preschool, William Fletcher Primary School,	Yes	A Glint and Glare Study was provided at PEIR stage and has been updated to reflect changes to the solar array layout and provided at Volume 3, Appendix 4.4 [EN010147/APP/6.6]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Cumnor C of E Primary School and their associated playing areas to ensure that they will not be adversely impacted by the scale and proximity of the proposed scheme.		No significant adverse effects we found on School sites.
Oxfordshire County Council	Impact on School Sites	OCC Property would also like to note that there is a planning application (21/03522/OUT) and appeal APP/C3105/W/23/3329587) that are currently awaiting decision, which concern the land immediately to the north of the William Fletcher Primary School. Should either the planning application or appeal succeed, then approximately 1.7 hectares of playing pitches and amenity space will be provided to the William Fletcher Primary School to enable its expansion.	Yes	Noted. The Applicant will continue to monitor the situation.
Oxfordshire County Council	Impact on School Sites	OCC Property would therefore be grateful, if the technical study were to also assess the glare and glint impacts on the land that is being proposed to form the new playing area of the school. OCC Property will not support proposals, where they	Yes	A Glint and Glare Study was provided at PEIR stage and has been updated to reflect changes to the solar array layout and provided at Volume

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		could prevent William Fletcher Primary School from fulfilling its educational functions, including potentially expanding its facilities on the land that is shaded purple below.		3, Appendix 4.4 [EN010147/APP/6.6]
Oxfordshire County Council	Impact on School Sites	OCC Property has also reviewed the contents of Volume 3 Appendix 13.2 Construction Noise and Vibration and Figure number 13.3 (Operational Noise Study Area) and notes that the primary schools, preschool buildings and play areas are located within the 1 km study area that was drawn for the operational noise assessment associated with this development.	No	Noise at receptors surrounding the site are assessed in Volume 3: Appendix 13.3: Operational Phase Noise [Doc ref: 7.5]. This assessment identifies that the operational phase noise impact is minor adverse which is not significant at residential receptors. These residential receptors are located closer to the Project than any school, and so the noise impact at schools will be less than is shown in the noise assessment

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Impact on School Sites	OCC Property considers that the primary schools, pre-school buildings and play areas should also be indicated as sensitive receptors of noise generated from the future operation of the development, as the development may result in levels of noise during its construction and operation that could disturb teachers and pupils during class hours. OCC Property would therefore appreciate, if the construction noise and vibration assessment that has been included in the Environmental Information Report for this development was updated to consider impacts on the primary schools, preschool and their associated play areas.	Yes	Noise at receptors surrounding the site are assessed in Volume 3: Appendix 13.3: Operational Phase Noise [EN010147/APP/6.5]. This assessment identifies that the operational phase noise impact is minor adverse which is not significant at residential receptors. These residential receptors are located closer to the Project than any school, and so the noise impact at schools will be less than is shown in the noise assessment.
Oxfordshire County Council	Community Benefits	Whilst OCC support the principle of a community benefits fund, the proposed figure of £50,000 is insufficient and falls significantly below that being offered by schemes elsewhere. Engagement with OCC and the other host authorities on this matter is requested. An index linked	Yes	Community benefit funds are not material considerations in DCO decisions. The Applicant notes that a community benefit fund is not a requirement, but is an optional benefit to be provided by the Applicant.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		rate per MW per year needs to be agreed.		<p>The Environmental Statement has therefore not attached any significance to this fund when assessing the impact of the development given that the beneficial impacts associated with the community benefit fund are not yet fully known and thus cannot be committed to as part of the DCO. Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Community Benefits	Creation of a retail energy company, essentially a trading opportunity that would increase the economic returns of the solar farm, should not be considered as part of the community benefits package.	Yes	<p>Although this is discussed in EN010147/APP/6.3 EIA Chapter 15 Table 15.25, it is not considered as part of any community benefits package. The chapter states that if a mechanism could be put into place to allow people living within the vicinity of the project to pay a reduced rate for electricity this could improve the residual effect of the development.</p> <p>Once consented, the Applicant will establish a new retail electricity company and that company will offer BWSF electricity and green power from other suppliers to all of Oxfordshire. Residential customers within the 2km consultation zone will be offered a 5% discount from the Ofgem price cap.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Planning Supporting Statement [EN010147/APP/7.1] .
Oxfordshire County Council	Community Benefits	Biodiversity Net Gain is cited as an on-site benefit to local communities but for the avoidance of doubt this is a separate requirement which should not be considered as part of the community benefits package.	Yes	A Biodiversity Net Gain report has been produced outlining the Applicant's approach - it can be found in [EN010147/APP/6.5] Appendix 9.13.
Oxfordshire County Council	Community Benefits	A number of helpful suggestions for community benefits are set out in the following article: The proposal for Europe's largest solar farm; Carbon Commentary (January 2024): OCC supports the following suggestions from the above article: Allow local people in Oxfordshire to invest in the scheme to realise additional local economic benefits. Oxfordshire County Council's Climate Action Framework commits us to supporting our communities to own energy projects and retain the benefits locally (see section 10 on Climate Action above).	Yes	Community benefit funds are not material considerations in DCO decisions. The Applicant notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant. The Environmental Statement has therefore not attached any significance to this fund when assessing the impact of the development given that the beneficial impacts associated with the community benefit fund are not yet fully known

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Create spaces for local agriculture, including allotments and commercial market gardens in the areas around the panels. Local fresh food is in increasing demand and also many people want to become horticulturalists but cannot find land on which they can work. The Botley West development could also provide allotments for all who want to rent space. See also the comments in section 11, Agricultural Land. The developer could develop a package of energy efficiency measures (including low cost PV installations and batteries to allow</p>		<p>and thus cannot be committed to as part of the DCO. Nevertheless, as described in Table 6.2 of the Project Description, Chapter 6 of the ES [EN010147/APP/6.3] in terms of changes to the Project since the PEIR, the Applicant is introducing a mechanism whereby electricity energy costs will be reduced in the region. The Applicant is also increasing its annual contribution to a Community Benefit Fund from £50,000-00 to £200,000-00 per annum.</p>
Oxfordshire County Council	Community Benefits	<p>We would welcome engagement on community benefits with Photovolt and the other host authorities.</p>	Yes	<p>Chapter 3 outlines the "Consenting and Consultation Process" [EN010147/APP/6.3], furthermore a "Consultation Report" and further consultation detail carried out to date can be read in the Employment and Skills Plan</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				found in the appendices [EN010147/APP/6.5]
Vale of White Horse District Council	General	<p>VWHDC raise no objection in principle to solar farm development but cannot support the proposal for the following reasons:</p> <p>The case for Very Special Circumstances to develop land in the Oxford Green Belt with inappropriate development has yet to be satisfactorily demonstrated.</p> <p>There is concern on the loss of Best and Most Versatile (BMV) agricultural land within the Vale.</p> <p>There is significant concern the scale of the proposal will lead to harmful landscape impacts that outweigh any benefits of the proposed development.</p>	Yes	<p>The case for Very Special Circumstances is set out in Appendix 8 to the Planning Supporting Statement [EN010147/APP/7.1] The Planning Supporting Statement also provides the overall planning balance, including the consideration of benefits. The assessment of the effects of the Project on BMV are considered in Chapter 17 Agricultural Land and PRoW [EN010147/APP/6.3] and Chapter 8 considers the Landscape and Visual Impacts [EN010147/APP/6.3]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		The proposal currently provides little benefit to the local community.		
Vale of White Horse District Council	PEIR	All chapters need to be updated to account for the recent updated National Policy Statements (published 22 November 2023) and the National Planning Policy Framework (20 December 2023).	Yes	Noted and chapters have been updated
Vale of White Horse District Council	PEIR	VWHDC supports the scope and extent of the PEIR and subsequent EIA.	No	Noted.
Vale of White Horse District Council	Site selection and alternatives	VWHDC consider this chapter lacks information on what alternative sites have been assessed and explored.	Yes	Site Selection and Alternatives are considered within Vol 1, Chapter 5: Alternatives Considered, and are summarised in Tables 5.1 and 5.2 of that Chapter. [EN010147/APP/6.3.]
Vale of White Horse District Council	Site selection and alternatives	VWHDC agree Green Belt very special circumstances can be assessed in the separate Planning Supporting Statement to accompany the application.	Yes	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				[EN010147/APP/7.1] . At Appendix 8 to the PSS is the very special circumstances case in respect of the Project.
Vale of White Horse District Council	Historic Environment	VWHDC agree with the scope and extent of the PEIR so far in respect of built heritage and is satisfied that the chapter has identified known designated heritage assets within a reasonable radius of the application site.	No	Comment noted. No further response required.
Vale of White Horse District Council	Historic Environment	The PEIR suggests no non-designated heritage assets of local interest have been identified by VWHDC (Section 7.5.3), but it is not clear if the Cumnor Conservation Area Appraisal 2011 has been referred to, which does include some locally interesting buildings within the designated area that should be included for assessment. The document can be accessed via the VWHDC website and should be included in an updated ES.	Yes	The Cumnor Conservation Area Appraisal 2011 was referenced in Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the PEIR, and is similarly referenced in Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES [EN010147/APP/6.5] . The scoping exercise described within Volume 3, Appendix

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				7.5: Settings Assessment of the ES [EN010147/APP/6.5] found that the construction, operation and maintenance, and decommissioning of the Project would not have any impact on the significance of the Cumnor Conservation Area. The same assessment applies to any buildings of local interest within that Conservation Area.
Vale of White Horse District Council	Historic Environment	It is agreed there would be no direct impacts to designated heritage assets (built heritage only, excluding archaeology). The landscape character changes as evidenced by the ZTV indicates that there is likely to be an impact to heritage assets and the way they are understood and experienced within their setting, given the topography of the site and its open, rural character. Refinement of the final scheme, specifically the scale, design, and location of the substation, will influence the scale of	Yes	The assessment in respect of the NGET substation is based on the parameters set out in Volume 1, Chapter 6: Project Description of the ES [EN010147/APP/6.5], and takes account of the mitigation proposed within the Outline Landscape and Ecology Mitigation Plan (oLEMP) [EN010147/APP/7.6.3].

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		impacts and relevant mitigation needed. Whilst direct physical impacts are not anticipated, the overall level of impact will still need to be assessed in the context of a refined final scheme.		
Vale of White Horse District Council	Landscape and Visual	Numerous issues were raised on landscape matters in our consultation response to Scoping and some of these concerns are still present or are not clarified in the PEIR and will therefore need to be addressed when producing the EIA.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3]
Vale of White Horse District Council	Landscape and Visual	The methodology section of the PEIR refers to the relevant Methodology in the Guidance Documents such as GLVIA 3, Technical Guidance Note 02/21, Assessing	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Landscape Value Outside National Designations and Technical Guidance Note 06/19 Visual Representation of Development Proposals. However, there is still limited detail on how some of these Guidance Documents are applied to the Botley West proposal.</p>		<p>overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3]</p> <p>Detailed methodology in accordance with GLVIA3 given within LVIA chapter and supplied separately to Vale of White Horse and OCC as part of the Statement of Common Ground consultations. Assessment follows methodology. Photomontage methodology given at Appendix 8.4 accompanying the Landscape Resources Chapter. Photomontages have been done in accordance with LI TGN 06/19 and are classed as Type 3.</p>
Vale of White Horse District Council	Landscape and Visual	<p>Whilst the following comments regarding landscape are predominately focused on the Vale of the White Horse District Council area,</p>	Yes	<p>Noted. Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the</p>

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		they will also be applicable to the whole assessment of the proposal.		Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3]
Vale of White Horse District Council	Landscape and Visual	The Cumnor Parish Neighbourhood Development Plan, Landscape Character Assessment, December 2018 is also not referenced in the report, especially regarding the Landscape Character Section. Reference to the Cumnor Parish Neighbourhood Plan Important View Report (CNPIVR), February 2021 is limited and the viewpoints in this report need to be included in the EIA.	Yes	Cumnor Parish Neighbourhood Plan Important Views (Feb. 2021) has been reviewed. Many of the important views are not focused towards Botley West and have therefore been discounted. A number of Representative Viewpoints included within the LVIA are equivalent to or as near to (at publicly accessible locations) published important views. Final Representative Viewpoints were consulted on and agreed to with all host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources).

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Vale of White Horse District Council	Landscape and Visual	<p>Technical guidance Note 06/19 Visual Representation of Development Proposals classifies EIA as a Category A report where the appropriate visualisation types would be either Type 2 3D wireline/ model: Type 3 photomontage/ photo wire: or Type 4 photomontage/ photo wire (survey/scale verifiable). It is not clear what Type of visualisation is proposed for the EIA. Due to the scale and public interest of the project, VWHDC would expect all viewpoint plans to be annotated with key features and have Photo wires to highlight the areas of the proposed solar arrays (but not necessarily full modelling of the arrays) so areas and extent of the proposal can be easily understood by all. The Visualisations should be photomontages. A map extract to indicate the location of the view is also useful and recommended by guidance.</p>	Yes	<p>Photomontage methodology is detailed at Appendix 8.4. Photomontages have been completed in accordance with LI TGN 06/19 and are Type 3 visualisations.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Vale of White Horse District Council	Landscape and Visual	Some of the Viewpoint Photography is currently poor in quality and over dark, making it harder to see landscape features, they would benefit from the photographs being retaken.	Yes	Viewpoint photography was taken in clear conditions with good visibility. Changes in weather on site have unavoidably been captured in some views but they are still considered fit for purpose.
Vale of White Horse District Council	Landscape and Visual	Some of the viewpoints and visualisations do not cover the whole extents of the view of the solar farm from that viewpoint for example VP48.	Yes	Views are in accordance with LI TGN 06/19, in respect of the width of the view at A1. It is not possible to show full extent of the Project within close views. Representative Viewpoints have been consulted on and agreed with host authorities.
Vale of White Horse District Council	Landscape and Visual	Clarification of representative viewpoints is required, as it is usual to have both summer and winter views, so the worst case is illustrated. Only year 15 summer assessment is mentioned but winter 15 year should also be provided.	Yes	Representative Viewpoint photographs Have been completed for winter and summer from all 55 Representative Viewpoints and included within the ES. [EN010147/APP/6.4]
Vale of White Horse District Council	Landscape and Visual	It is difficult to pick up the extra features in the visualisations such as the proposed 156 number Power	Yes	All main built elements within the Project, including the 156no. PCS units an 4 to 6 no.

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		Converter stations and the 4 to 6 number HV transformer secondary substation. Clarity is required on whether these elements form part of the Visualisation modelling.		Secondary substations, have been modelled as part of the photomontages. [EN010147/APP/6.4]
Vale of White Horse District Council	Landscape and Visual	The sharpness of the visualisation is poor with pixelization. It is accepted however that this may be an issue with PDF formatting of documents.	Yes	This could be as a result of the PDF conversion and / or printing. All PDF have been produced at a resolution that will allow readability while keeping overall file size usable with consideration for uploading and web transfer; hopefully the issue is now resolved.
Vale of White Horse District Council	Landscape and Visual	The range of viewpoints are still limited, such as views from the road users of Eynsham Road, the wider footpath network such as to the north and east of the site and the residential properties especially those along both Eynsham Road and Cumnor Road. GLVIA expects the identification of the people within the area who will be affected by the	Yes	All Representative Viewpoints have been consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources). [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		changes in views and visual amenity including residents many of the views from the footpaths could also be used to represent views for the residents.		
Vale of White Horse District Council	Landscape and Visual	There are several places where views have not been taken, including those highlighted in the Cumnor Neighbourhood Plan such as Viewpoint 5b, 12, 23, 7, 12 and 17. These are highlighted on the plan extract below along with additional Prow, roads, and the Wytham permitted path network. Additional viewpoints are requested from these locations. Once the Substation ZVT is undertaken there may also be additional viewpoints that need to be included.	Yes	All Representative Viewpoints have been consulted on and agreed with the host authorities. Any suggested additional / alternative views were considered and either recorded and added or discounted. Detail given within consultation table in LVIA (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources). [EN010147/APP/6.3]
Vale of White Horse District Council	Landscape and Visual	The EIA needs to ensure that it is using the representative viewpoints and visualisations to explain the impact of the scheme on the landscape and receptors such as roads, Prow routes etc rather than just spot points.	Yes	Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects,

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				<p>and mitigation measures being proposed.</p> <p>[EN010147/APP/6.3] The Applicant has continued to prepare further visualisations to support the ES, which are presented as photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 [EN010147/APP/6.4]</p> <p>The Landscape and Visual Impact Assessment (LVIA) and photomontages have been produced in accordance with current best practice guidance. Including the Guidelines for Landscape and Visual Impact Assessment (Third Edition) (GLVIA3) and LI TGN 06/19 Visual Representation of Development Proposals</p>

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Vale of White Horse District Council	Landscape and Visual	It is noted that Hill End, an Environmental Outdoor Education Centre that has been running for over 100 years, is not covered as a potential receptor to the scheme. Hill End has numerous locations on its site which have clear views to the south and should be covered by the assessment.	No	Hill End is not a publicly accessible site so would not normally have been considered. The ZTV has also indicated that the intervisibility would be limited. Viewpoint 46 has been taken from PRoW at the edge of Eynsham Road, near to the Hill End Centre, so these views would be representative of the limited views available, possibly from the access road to Hill End near Eynsham Road.
Vale of White Horse District Council	Landscape and Visual	There is limited information given with regards to ZTV methodology. A bare earth ZTV should also be provided, together with a clear explanation and methodology of how the ZTV has been modelled and created.	Yes	The ZTV has been amended to include all built elements.
Vale of White Horse District Council	Landscape and Visual	The ZTV is calculated using the panel height of 2.5m. This does not represent the full scheme, the proposed 156	Yes	The ZTV has been amended to include all built elements. The maximum panel height has been reduced to 2.3m.

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		number Power Converter Stations and the 4 to 8 number HV transformer secondary substations should also be included within ZTV modelling.		
Vale of White Horse District Council	Landscape and Visual	Both the Project substation and the proposed NGET with their associated infrastructure should also be included in ZTV modelling. They should have their own ZTV to help understand which views will be impacted by these features, which are proposed to be 12 to 15m high. Additional viewpoints may be required to take account of ZVT of the substations. Cumnor Neighbourhood Plan viewpoints 12, 23, 24, 7 and 17 are all likely to have views of the Substation.	Yes	The ZTV has been amended to include all built elements. The viewpoints where the NGET is visible are identifiable and have been covered by photomontages also which has aided the assessment.

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Vale of White Horse District Council	Landscape and Visual	Section 8.7 covers mitigation measures intended to be adopted as part of the project including Primary mitigation such as modifications to the location or design of the development. However, the layout of the scheme does not indicate that there has been much modification to the design of the scheme to minimise impacts in response to receptors and constraints. For example, small areas of solar panels within the southwestern area of the site either side of the footpath and adjacent to the ancient woodland are retained rather than a broader look at the project at a landscape and project scale to see if it would be more appropriate not to include these small areas of solar. Again, small areas of solar arrays are formed once servicing constraints are added south of Denman's Farm. It may be more appropriate due to the proximity to the Prow and the residential property	Yes	The layout and design of the Project has evolved over a number of years responding to important environmental constraints. This evolution in layout is described in Chapter 5: Alternatives Considered of the ES [EN010147/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		not to have these small areas under solar panels.		
Vale of White Horse District Council	Landscape and Visual	Furthermore, the scale of the mitigation is not at the similar scale of the proposed solar farm to help mitigate the impacts. Only small-scale landscaping interventions are proposed, such as the planting of a hedgerow to screen views of the solar panels, but this not at a scale to break up the mass of the panels in other views, such as linking areas of ancient woodlands.	Yes	Mitigation includes new lengths of hedgerows, new trees, gapping up of existing hedgerows and areas of woodland to be planted which will help to link areas of existing ancient woodland as part of the GI. Mitigation has evolved since the PEIR, as part of the ongoing iterative design process through the EIA. Details are included in Chapter 8: Landscape and Visual Impact Assessment of the ES [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Vale of White Horse District Council	Landscape and Visual	The Illustrative Masterplan of the site should be reviewed to seek to break up the mass of development across slopes and link areas of ancient woodland blocks.	Yes	The layout and design of the Project has evolved over a number of years responding to important environmental constraints. This evolution in layout is described in Chapter 5: Alternatives Considered of the ES [EN010147/APP/6.3]. Regard was had to break up views of the development, and the landscaping proposals and evolution of the layout has responded accordingly. There have been several iterations to the design, many of which involved removing panels for high ground e.g. near Purwell Farm in the Central Area
Vale of White Horse District Council	Landscape and Visual	The impact of mitigation on views also needs to be carefully considered in the assessment. Many available views are large scale over the wider landscape. Screening a view so solar panels or other development cannot be seen also has the potential	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		significant impact that the large landscape scale view is no longer obtainable. This potential impact of mitigation should be covered in the assessment of views.		The assessment of effects has followed best practice LVIA methods of assessment and guidance.
Vale of White Horse District Council	Landscape and Visual	It is noted that section 8.9.2.1 refers to landscape management being required for a period of five years following the completion of the project. 15 years is often the assessment timescale used for vegetation to mature and have a meaningful impact and this needs to be included for the management and monitoring of the site. The lifespan of the development would be more appropriate for a management plan.	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. The proposed management and maintenance regime is set out in the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.4].
Vale of White Horse District Council	Landscape and Visual	VWHDC have concerns about the Methodology and Assessment of the Landscape Character and Visual Impacts of the scheme.	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				The assessment of effects has followed normal LVIA methods of assessment and guidance.
Vale of White Horse District Council	Landscape and Visual	It is considered the PEIR underplays both the Landscape and Visual Effects of the proposal, especially regarding the Magnitude of impact criteria.	Yes	This has been noted. The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. The assessment of effects has followed best practice LVIA methods of assessment and guidance. It should be understood that LVIA is a subjective process which may lead to differences of opinion. The LVIA and photomontages have been produced in accordance with current best practice guidance, including the Guidelines for Landscape and Visual Impact Assessment (Third Edition) (GLVIA3) and LI TGN 06/19

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				Visual Representation of Development Proposals.
Vale of White Horse District Council	Landscape and Visual	The following examples predominately cover the Operation Phase, but these themes are also relevant for Construction and Decommissioning. The underlying Methodology of the assessment. Section 8.1.8.10 states "For the purpose of this assessment, any effects with a significance level of Moderate or less are not considered to be significant in terms of the EIA Regulations." However, assessment is not as simple as this statement. When the assessment results in multiple negative effects, cumulatively this would result in a significant impact. Each assessment of an effect should not be looked in isolation and discarded as not significant, they should be looked at holistically.	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. The assessment of effects has followed best practice LVIA methods of assessment and guidance.
Vale of White Horse District Council	Landscape and Visual	This principle of multiple negative effects is acknowledged in the report but not pulled through and applied to the assessment of the project as a	Yes	The landscape and visual effects are assessed and reported in Chapter 8: Landscape and Visual Impact

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>whole. Section 8.9.1.70 "These effects are not judged to be significant. However, where Moderate significance of effect has been identified at multiple points along the same PRow, sequentially these Moderate adverse effects could be considered significant."</p>		<p>Assessment of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. The assessment of effects has followed best practice LVIA methods and guidance. In accordance with accepted methodology, representative viewpoints have been selected, and agreed with the authority, to assess the Project. The Applicant's findings are reported within the Chapter 8. It appears that a further layer has been added to accepted assessment methodology. The attempt to draw conclusions in the manner described is fraught with difficulty and risks misrepresenting the landscape</p>

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				and visual effects if the Project.
Vale of White Horse District Council	Landscape and Visual	<p>This proposed solar farm has a timescale of approximately 40 years, which should be considered permanent. Section 8.8.6.2 states that the Project is considered fully reversible, and this has an influence on the assessment values. VWHDC has concerns to how this is being applied to the assessment of effects. i.e., 8.9.1.64 "The magnitude of impact, for those parts of the PRow where views are available, would be Medium. Resulting in a Moderate adverse significance of effect. Considering users' High sensitivity, reversibility of the solar farm and proposed mitigation, albeit not yet established. This effect is judged to be not significant."</p>	Yes	<p>The Applicant notes the authority's view on permanence. For 37.5 years the Project will be producing urgently needed renewable energy which will assist in the delivering upon the authorities own declared Climate Emergency and assist in meeting the UK Government's targets of delivering Critical National Priority infrastructure to decarbonise the UK's electrical system by 2035 and help meet its Net Zero obligations by 2050. Whilst producing renewable energy only temporarily, this is nonetheless extremely important. Arguably the UK</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>needs many more of these projects and on a permanent basis.</p> <p>Despite only being in existence temporarily, what will be permanent is continued agricultural use of the land beneath the arrays, and a significant enhancement to the landscape and biodiversity of the area. The Project will have some adverse effects on the landscape but none are considered to be so significant as to outweigh the considerable benefits arising from the Project. As set out in the Planning Supporting Statement [EN010147/APP/7.1], the planning balance overwhelmingly supports the Project.</p>

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Vale of White Horse District Council	Landscape and Visual	A recent appeal decision regarding solar development in the Greenbelt covers this issue and 40 years was judged not to be "temporary". APP/A1910/W/23/3317818 Little Heath Lane, Little Heath, Berkhamstead	Yes	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [EN010147/APP/7.1]. At Appendix 8 to the PSS is the very special circumstances case in respect of the Project. The Applicant notes the authority's reference to the Little Heath appeal decision, but each case is to be considered on its own merits, in the balance. No two cases are identical. There are a number of differentiating factors to consider, but one is the introduction into national planning policy of Critical National Priority (CNP) infrastructure (NPS EN-1 2024, paragraph 4.2.4). This

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				component of Government Policy was not before the Inspector when that decision was made.
Vale of White Horse District Council	Landscape and Visual	At present the level of detail of the submitted landscape information is not detailed enough to cover the scale of the area of the application or to understand how assessments have been made. VWHDC therefore expect that much more detail will be present in the EIA.	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. Much more information is now contained in the LVIA.
Vale of White Horse District Council	Landscape and Visual	The project has 4 areas of development: the Northern, Central and Southern Section and the associated substations but the Character Assessment is not detailed enough at present in how they assess these. i.e., 8.9.1.61 "The Project would be located within LCA 4: Eastern Parks and Valleys; LCA 11: Eynsham Vale; LCA LM19: Whiteley Copse to Chawley Corallian Limestone Ridge with Woodland and LCA LM20: Farmoor to Botley	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. The method of assessment adopted follows accepted guidelines. The Project is located within multiple landscape character areas /

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		<p>Corallian Limestone Ridge with Woodland. It would change the character of a relatively large area of these LCAs. The development of a largescale solar farm within generally well contained farmland would cause a Low magnitude of impact upon the LCA as a whole, with any change in character confined to the Project Site of Medium to High sensitivity and result in Minor adverse significance of effect, which is not significant." This raises concern about methodology as landscape effects should be assessed against the relevant part of the character area, the extent likely to be affected either directly or indirectly, this is often based on the extent of the area from which the development is potentially visible rather than the whole entirety of the character area. Localised harm to an area of a LCA does not mean it is not significant harm.</p>		<p>types, as derived from the available local authority landscape character assessment(s). There would be a Minor to Moderate adverse (not significant) significance of effect upon those landscape character areas as a whole within which the Project is located. At a local level, landscape characterising effects upon the Project site, within a small part of the LCA(s) is considered to be Moderate adverse (not significant). The assessment has taken account of the landscape baseline situation, with the essential landscape structure in terms of existing vegetation being retained, protected and enhanced as part of the Project.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Vale of White Horse District Council	Landscape and Visual	The Landscape assessment does not seem to acknowledge the role the site plays within the wider Character Area, such as the loss of openness of introducing built form on to the site and how it would be perceived from a number of directions and distances.	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. On balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer term benefit reinforcing the landscape character of the local landscape.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Vale of White Horse District Council	Landscape and Visual	There is also concern about the assessment of views, for example Representative Viewpoint 48: View looking south from footpath 184/15/30, Oxford Green Belt Way, section 8.9.1.119. This footpath will pass through an area of solar panels, with areas of panels to the west, south and west. However, this is assessed as having a Low magnitude of impact at completion, which results in a Moderate adverse significance of effect at completion, which would not be significant. This is an example to indicate our concern about the assessments submitted in the PIER especially if it is pulled through in a similar form to the EIA.	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. Although the LVIA assesses the individual Representative Viewpoints, it is acknowledged that effects are not isolated and would be present along lengths of PRoW for example. They are however 'representative' which is the normal and accepted method of assessing such effects. Notwithstanding, it has been acknowledged throughout the text of Chapter that other viewpoints and effects may be different at different locations.
Vale of White Horse District Council	Landscape and Visual	This is a large-scale project over multiple areas and the EIA needs to acknowledge this and cover these	Yes	The landscape and visual effects are assessed and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>impacts in sufficient detail for all the areas so the journey from baseline to the assessment of effect can be clearly understood for all areas of the project.</p>		<p>reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. The Project is located within multiple landscape character areas / types, as derived from the available local authority landscape character assessment(s). There would be a Minor to Moderate adverse (not significant) significance of effect upon those landscape character areas as a whole within which the Project is located. At a local level, landscape characterising effects upon the Project site, within a small part of the LCA(s) is considered to be Moderate adverse (not significant).</p>

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				<p>The assessment has taken account of the landscape baseline situation, with the essential landscape structure in terms of existing vegetation being retained, protected and enhanced as part of the Project.</p> <p>No likely significant effects are predicted during construction, operation and maintenance or decommissioning of the Project on landscape character areas within the 5 km study area.</p> <p>No likely significant effects are predicted during construction, operation and maintenance or decommissioning of the Botley West Project on nationally designated landscapes, including the Cotswolds National Landscape.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				On balance, it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer term benefit reinforcing the landscape character of the local landscape.
Vale of White Horse District Council	Local Ecology	VWHDC is generally satisfied with the approach and scope of assessment to the ecological and biodiversity implications of the proposed scheme to be taken forward to the subsequent EIA.	Yes	Noted and reported in the Ecology Chapter of the ES Volume 1 [EN010147/APP/6.3]
Vale of White Horse District Council	Local Ecology	It is noted that some ecological surveys were still ongoing at the time of writing the PEIR, as such these	Yes	All land within the Order Limits has been subject to appropriate surveys, reported

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		comments should be viewed as preliminary and may be subject to change depending on the results of forthcoming surveys.		in ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. and Volume 3 [EN010147/APP/6.5] Appendix 9.1-9.14 of the ES
Vale of White Horse District Council	Local Ecology	Depending on the timeline for the formal submission of the proposal, updated ecological surveys may be required to ensure that information complies with CIEEM guidance on the age of ecological information.	Yes	Noted. All land within the Order Limits has been subject to appropriate surveys, reported in ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. and Volume 3 [EN010147/APP/6.5] Appendix 9.1-9.14 of the ES
Vale of White Horse District Council	Local Ecology	It is important that any forthcoming Environmental Statement (ES) ensures that the full extent of works area is subject to ecological assessment. Figures appear to have omitted land close to Swinford, south of the river Thames, which may be subject to enabling works.	Yes	All land within the Order Limits has been subject to appropriate surveys, reported in ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. and Volume 3 [EN010147/APP/6.5] Appendix 9.1-9.14 of the ES.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Vale of White Horse District Council	Local Ecology	<p>The PEIR assesses impacts on statutory and locally designated sites but appears to have not considered the potential for some indirect impacts which may undermine the conservation objectives or special interest of Wytham Woods Site Special Scientific Interest (SSSI) or Farmoor Reservoir Local Wildlife Site (LWS). Both the SSSI and LWS have notable invertebrate interest and there is a body of evidence to suggest that large arrays of solar PV panels can, through the reflection of polarised light, attract insects (particularly those dependent on water for their lifecycle) and result in reduced fecundity and increased mortality. Specific to the LWS, there are concerns that arrays of solar PV panels can confuse waterbirds, mistaking them for areas of water. Increases in mortality or energy expenditure could have the potential to harm the identified ecological interest of the LWS. These potential</p>	Yes	<p>Impacts due to the 'lake effect' on ecology receptors have been considered within the ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.</p>

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		impacts should be explored in the EIA.		
Vale of White Horse District Council	Local Ecology	VWHDC also have concerns with the proposed approach to skylark mitigation. Conventional knowledge suggests that skylark plots are only successful when provided on unenclosed sites of 5ha or more. The provision of skylark plots closely surrounded by tall solar PV panels will mean that success is unlikely. It would likely be more appropriate to secure offsite compensation through including additional land and managing these areas for the benefit of skylarks.	Yes	The skylark plots are provided within the solar arrays to help improve foraging resources for this (and other) species of bird. Habitat managed for the benefit of breeding skylark comprises large areas of meadow that will be managed specifically for birds. Details will be set out in detailed LEMPs to be produced in accordance with the oLEMP [EN010147/APP/7.6.3] .
Vale of White Horse District Council	Local Ecology	Great Crested Newts (GCN) have been recorded in a pond within Saddle Copse, c.90m away from the proposed development site. Whilst VWHDC is satisfied that significant population level impacts are unlikely	Yes	Noted. Appropriate surveys have been undertaken Volume 3 Chapter 9 [EN010147/APP/6.5] Appendix 9.5 and the necessary licenses will be

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		to occur, it remains a distinct possibility that a derogation licence may be required to make works lawful closer to the pond. The applicant is advised to reach out to the Nature Space partnership to see if the NSIP can be covered under the district level licence for GCN which is in operation in Vale of White Horse district.		obtained post consent (either traditionally from Natural England, as a European Protected Species Mitigation Licence or via the DLL).
Vale of White Horse District Council	Local Ecology	The updated biodiversity net gain assessment should make use of the recently published statutory metric, which will be used for BNG purposes from January 2024 onwards.	Yes	Noted. The Statutory Metric has been used in the ES, Volume 3 [EN010147/APP/6.5] Appendix 9.13 BNG Assessment.
Vale of White Horse District Council	Hydrology and flood risk	VWHDC agree with the scope and extent of the PEIR and subsequent EIA.	Yes	Noted. Chapter 10 [EN010147/APP/6.3] addresses hydrology and flood risk.
Vale of White Horse District Council	Ground conditions	VWHDC agree with the scope and extent of the PEIR and subsequent EIA.	Yes	Noted. Chapter 11 [EN010147/APP/6.3] addresses ground conditions.
Vale of White Horse District Council	Traffic and Transport	VWHDC defer to comments from Oxfordshire County Council as local Highway Authority for this Chapter.	N/A	Noted. Chapter 12 [EN010147/APP/6.3]

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				addresses traffic and transportation matters.
Vale of White Horse District Council	Noise and Vibration	VWHDC agree with the scope and extent of the PEIR and subsequent EIA.	Yes	Noted. Chapter 13 [EN010147/APP/6.3] addresses noise and vibration effects..
Vale of White Horse District Council	Agricultural Land	VWHDC agree with the scope and extent of the PEIR and subsequent EIA.	Yes	Noted, and the agreement welcomed. Chapter 17 [EN010147/APP/6.3] addresses agricultural land use and public rights of way (PRoW).
Vale of White Horse District Council	Public Rights of Way	VWHDC agree with the scope and extent of the PEIR and subsequent EIA.	N/A	Noted and the agreement supported by the Applicant.
Vale of White Horse District Council	Cumulative Impacts	VWHDC disagrees with the summary finding that there is no cumulative impact on landscape and visual resources and considers cumulative effects relating to landscape and visual resources need to be reviewed in the light of adjoining solar farm proposals within the Vale.	Yes	Noted - however, at the time of the Botley West DCO submission the Red House Farm solar application has been withdrawn and therefore moved to Tier 2.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Vale of White Horse District Council	Cumulative Impacts	There are potential sequential Cumulative Impacts with other existing and proposed solar development in the Oxford Green Belt, especially those sites that the Oxford Green Belt Way passes. The scheme itself produces sequential Cumulative Impacts to local receptors such as local road users and the Prow network and that should also be covered under the EIA assessment. The application is effectively 4 projects, the Northern, Central and Southern Areas of Solar Panels and the associated project and proposed NGET substations, and this needs to be covered in the assessment.	Yes	In EIA terms this is one Project. Its dispersed nature assists in reducing conflict with the Green Belt. Cumulative effects are considered in each chapter, and summarised in Chapter 20 of the ES: Cumulative Effects and Interrelationships [EN010147/APP/6.3]
Vale of White Horse District Council		Red House Farm, Botley is now a live application and should be moved into Tier 1 Projects. P23/V2624/FUL.	Yes	At the time of the Botley West DCO submission the Red House Farm application has been withdrawn, and therefore moved to Tier 2.
Vale of White Horse District Council	Summary of Significant Effects	VWHDC are in broad agreement with the preliminary summary of Significant Effects, subject to addressing comments made on	Yes	Noted and the agreement welcomed by the Applicant.

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		Historic Environment, Landscape and Visual Resources and Ecology and Nature Conservation.		
Vale of White Horse District Council	The Consultation Process	VWHDC supports the scope and extent of the SoCC.	Yes	Noted and the support welcomed by the Applicant.

<p>Vale of White Horse District Council</p>	<p>DCO Process</p>	<p>In respect of requirements (akin to planning conditions) to be included on any draft Development Consent Order (DCO) VWHDC request requirements on the following matters:</p> <ol style="list-style-type: none"> 1. Time limit for commencement 2. Approved Plans 3. Detailed Design approval 4. Phasing 5. Landscaping details 6. Landscape implementation and management 7. Vehicular access 8. Construction traffic management plan 9. Construction Hours 10. Community Employment Plan 11. Archaeological watching brief 12. Implementation of archaeological works 13. Construction environmental management plan 14. Tree protection 15. Visibility splays 16. Sustainable drainage scheme 17. Archaeology protection 18. Flood risk 19. Wildlife protection measures 20. External lighting 21. Enclosure details 22. Temporary permission 	<p>Yes</p>	<p>The Applicant has addressed all these matters within the draft DCO [EN010147/APP/3.1] and in the proposed Management Plans that form part of the Project [EN010147/APP/7.6].</p>
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		<p>23. Removal of unused panels and equipment</p> <p>24. Decommissioning method statement</p>		
Vale of White Horse District Council	Community Benefits	VWHDC will also require a Community Benefit Agreement (CBA) to secure funds to support the community local to the project as well as to provide financial support to	Yes	The Applicant proposes to deliver the community benefits via a Community Benefits Package. This will be agreed outside the scope of the DCO

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		<p>deliver the Council's Climate Action Plan agenda. The rate sought will be £500 per MW per year.</p>		<p>application, with the relevant local authorities (see Planning Supporting Statement e.g. at paragraphs 3.5.24 and 8.4.71) [EN010147/APP/7.1]. The Project in its own right, without providing annual payments to the Council, will contribute significantly towards delivering upon the Council's Climate Action Plan agenda. PVDP's investment in renewable energy in the County is already vast and directly and positively addresses local, national and global climate change needs.</p>
<p>Vale of White Horse District Council</p>	<p>Community Benefits</p>	<p>Further detail on wording of requirements, S106 legal agreement and the CBA is to be negotiated by the LPAs and with the developer ahead of the application submission.</p>	<p>Yes</p>	<p>The Applicant proposes to deliver the community benefits via a Community Benefits Package. This will be agreed outside the scope of the DCO application, with the relevant local authorities (see Planning Supporting Statement e.g. at</p>

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				paragraphs 3.5.24 and 8.4.71) [EN010147/APP/7.1] .
West Oxfordshire District Council	Needs case	This consultation response does not focus on the need case for the proposed solar farm, although it is noted that the Applicant will need to demonstrate exceptional circumstances, to justify development in the Green Belt as part of their DCO application. The need for utility scale solar generation schemes is likely to form part of the argument for justifying development in the Green Belt.	Yes	The Planning Supporting Statement (PSS) sets out the overall need case [EN010147/APP/7.1] . The PSS also sets out the Very Special Circumstances as to why those parts of the Project within the Green Belt should be supported (Appendix 8).
West Oxfordshire District Council	Project Description	It isn't clear from the information presented whether the proposed NGET substation would still be delivered in the absence of the proposed Botley West Solar Farm. Improvements to the electricity infrastructure would be welcome as these would help to support increases in renewable energy generation and the electrification of homes and transport in West Oxfordshire. There are examples of solar farms in West	Yes	The Environmental Statement confirms the approach and assumptions in respect of the delivery of the NGET substation, but based on the Transmission Entry Capacity Register the proposal is still there for NGET to provide a point of connection in the vicinity of the Botley West / Farmoor site, even without the Botley West Project.

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		Oxfordshire that have been consented but haven't got an agreed grid connection. Delivery of infrastructure could help to facilitate connections of other solar farms locally.		
West Oxfordshire District Council	Historic Environment	Although development is excluded from the Scheduled Monument and mitigation measures have been proposed to accommodate development in areas of archaeological interest, additional buffering in areas affecting the setting of the Scheduled Monument, Listed Buildings and Akeman Street may be beneficial. Land slopes down to the south from bridleway 416/21/10 east of Milford Bridge to Akeman Street making the landscape more prominent and open in this location. Limiting development in this area could further reduce the magnitude and significance of impacts against a range of sensitive receptors in this location.	Yes	More than 17 hectares of land around the Scheduled Monument at Sansom's Platt have been removed from the developable land and will be maintained as open grassland within the Project Site. This has been done to avoid and/or reduce likely impacts on buried archaeological remains and on the setting of the Scheduled Monument. This is indicated on the Masterplan Fig 1.2 [EN010147/APP/6.4].

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West Oxfordshire District Council	Landscape and Visual	Development locations to the north east of Woodstock are predominantly located within Cherwell district. It is noted that the applicant has identified the potential for significant negative impacts arising from development east of Banbury Road, primarily related to the scale of the proposed substation and proximity to the public rights of way network. From a West Oxfordshire perspective, development in this location would be sufficiently distant and screened to avoid significant detrimental impacts on heritage assets, although there would be significant negative impacts on sensitive receptors such as users of the PROW network.	Yes	<p>Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.</p> <p>Effects upon PROW can be found in the Human health Chapter [EN010147/APP/6.5] and the Agriculture, Land use, and Public Rights of Way Chapter [EN010147/APP/6.5]. The detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented as Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5]. This includes assessment of the likely impacts and effects on the Church Hanborough Conservation Area.</p>

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West Oxfordshire District Council	Landscape and Visual	It is noted that there are residential properties in close proximity to the project area in the Northern Site. Serious consideration should be given as to whether a minimum buffer distance between development and residential properties would be appropriate to minimise impacts on residents.	Yes	A minimum 25m buffer from the boundary of residential properties has been adopted. This is judged as being sufficient to avoid likely significant adverse effects.
West Oxfordshire District Council	Cumulative Impacts	WODC regard the Central Area as being particularly sensitive to new development with potential for impacts on landscape, heritage, ecology, mineral deposits, Green Belt, amenity and agricultural land. There is also potential for cumulative impacts in combination with other strategic development in the area including the strategic allocation at Salt Cross Garden Village.	Yes	These factors are assessed within individual topic chapters in the Environmental Statement [EN010147/APP/6.3] . Cumulative impacts are also assessed in Chapter 20.
West Oxfordshire District Council	Local Ecology	There are other plans and strategies that are relevant to the area including the Wychwood Forest Project, Blenheim World Heritage Site Management Plan and Evenlode Catchment Management Plan and so	Yes	Regard has been had to relevant Plans and Policies at local level. The assessment of impacts and effects arising from changes within the settings of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>consideration should be given as to whether development in this area is consistent with their objectives, particularly those for landscape and ecological protection and enhancement.</p>		<p>designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5]. This includes assessment of likely impacts and effects on the Bladon Conservation Area. A detailed assessment of likely impacts and effects on the Blenheim Palace World Heritage Site is presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment of the ES [EN010147/APP/6.5].</p> <p>In addition, the Applicant's case is that there are significant long lasting ecological and landscape benefits that accruing from the development of the Project –</p>

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				see Landscape, Ecology Amenities plan [EN010147/APP/7.3.3] and the Landscape, Ecology Management Plan [EN010147/APP/7.6.3] .
West Oxfordshire District Council	Landscape and Visual	WODC suggest that removal of development areas from the visually exposed and prominent valley sides to the west of Lower Road and valley sides of the River Evenlode could minimise negative impacts of the proposal. This will reduce potential for negative landscape character impacts by restricting development in visually prominent and exposed locations and minimise impacts on the setting of Church Hanborough Conservation Area.	Yes	The detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented as Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5] . This includes assessment of the likely impacts and effects on the Church Hanborough Conservation Area.
West Oxfordshire District Council	Landscape and Visual	WODC also suggest that development be restricted from land to the north of Cassington. Although the masterplan indicates that development would be set back from the edge of the settlement in this location, land rises steeply to the	Yes	An assessment of the landscape and visual effects of the project, since the project was conceived in 2018/19, has had a significant influence on the layout and design of the Project. To that extent it

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		<p>north of the settlement making any development in this location prominent and visually exposed. This area is also within the Green Belt, which performs particularly well in this location in terms of protecting the historic character of settlements and safeguarding the countryside from encroachment.</p>		<p>has been a 'landscape-led' solution, keeping off of high ground, creating buffers from sensitive receptors and working with, not against, the existing landscape structure of the area.</p> <p>Views north from Cassington do, in large part, benefit from existing landscape screening but further planting is proposed by the Applicant in this location.</p> <p>On balance, it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects. In</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>addition, proposed planting would have a longer term benefit reinforcing the landscape character of the local landscape.</p> <p>Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.</p> <p>Impacts upon the Green Belt are assessed within the Planning Supporting Statement, Appendix 8 [EN010147/APP/7.1].</p>
West Oxfordshire District Council	Landscape and Visual	It is noted from the masterplan that there is a proposed buffer zone to the south of Bladon to mitigate against potential landscape and visual impacts. There are a number of key sensitivities in this location including	Yes	The assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings

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		<p>proximity of residential properties, proximity to the Bladon Conservation Area and the setting of the Blenheim World Heritage Site. WODC consider that the proposed buffer area should be substantially increased to minimise impacts on sensitive receptors in this location.</p>		<p>Assessment of the ES [EN010147/APP/6.5]. This includes assessment of likely impacts and effects on the Bladon Conservation Area. A detailed assessment of likely impacts and effects on the Blenheim Palace World Heritage Site is presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment of the ES [EN010147/APP/6.5]. The buffer zone south of Bladon serves to not only avoid any adverse landscape and visual effects, but it is also significantly larger than other buffer zones near residential properties in order to help reduce encroachment and reduce the effect upon the openness of the Green Belt in this location</p>

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				[EN010147/APP/7.1], Figure GB 1 and GB 2.
West Oxfordshire District Council	Landscape and Visual	Proposed buffers adjacent to Ancient Woodlands and Public Rights of Way should be increased in this area to reduce impacts on the PROW network and provide opportunities for further woodland creation. The applicant is proposing a 15m buffer around Ancient Woodlands in accordance with Natural England guidance. WODC understand that proposed buffer distances are designed to protect the root structure of trees rather than protecting the visual importance and sensitivity in the landscape of those woodlands and presenting real enhancement opportunities. Opportunities should be sought to increase woodland cover in the area where possible. There are two public rights of way	Yes	The Applicant has produced a Layout and Design Principles Document [EN010147/APP/7.7], which together with the Management Plans referred to in that document, show how landscape, ecology and heritage assets, amongst others, have been protected. Enhancement measures/benefits are intrinsic in what the Applicant is proposing, and beneficial effects are, for example, reported in the landscape, biodiversity and heritage chapters of the Environmental

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		along the eastern side of Bladon Heath. Stepping development away from these would mitigate the impacts on sensitive users of the public rights of way network and reduce the corridor effect of moving through large areas of solar panels over large distances.		Statement. These are also described in the Planning Supporting Statement [EN010147/APP/7.1] . The Planning Supporting Statement [EN010147/APP/7.1] contains an up to date recital of relevant policy and guidance, including the NPS, NPPF, PPG, and other Development Plan Policies.
West Oxfordshire District Council	Public Rights of Way	Impacts arising from proposed fencing over a significant distance within and around the development need to be considered for their impacts on wildlife movements and public amenity use of the countryside, including use of the Public Rights of Way network.	Yes	Landscape and visual Impacts to wildlife are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Public Rights of Way	Restricting development in proximity to public rights of way that connect historic settlements and long distance trails such as the Green Belt Way and Wychwood Way would mitigate impacts on the setting of landscape and heritage assets and visual impacts on sensitive receptors such as users of public rights of way. The proposed development includes the erection of fencing adjacent to all public rights of way where panels are situated, and WODC consider that this may have amenity impacts on people no longer attracted to using the public rights of way network for recreation.	Yes.	The potential impacts of the Project with respect to public rights of way are identified and assessed in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way (EN010147/APP/6.3). Measures adopted as part of the Project to mitigate potential impacts are set out in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way (EN010147/APP/6.3).
West Oxfordshire District Council	Local Ecology	A key area of concern here is the impact of the Local Wildlife Sites including the impact of the proposed cable route at Long Mead Meadow. The applicant's assessment should ensure that any proposed routing of the cable corridor or method of trenching or horizontal directional drilling does not undermine the	Yes	The Project has been redesigned to avoid the Long Mead LWS with cable routes now passing to the north before using Horizontal Directional Drilling cable laying methods under the Thames and associated fields.

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		integrity of rare habitats within the Thames valley.		
West Oxfordshire District Council	Landscape and Visual	Further consideration of the constraints and opportunities and site topography in relation to the project area, should guide further revisions to the design and layout of the proposed development. Such revisions could result in a reduced scale of project, but would help to minimise the magnitude and significance of effects on a sensitive environment. The fact that the cable run routes appear to be flexible means that less sensitive sites could potentially be swapped in to compensate for reduced development in sensitive areas.	Yes	<p>An assessment of the landscape and visual effects of the project, since the project was conceived in 2018/19, has had a significant influence on the layout and design of the Project. To that extent it has been a 'landscape-led' solution, keeping off of high ground, creating buffers from sensitive receptors and working with, not against, the existing landscape structure of the area.</p> <p>On balance, it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape.</p> <p>Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.</p>
West Oxfordshire District Council	Landscape and Visual	Map 1 below illustrates a number of key constraints within and in close proximity to the Applicant's proposed	Yes	The design and layout evolution of the Project is set

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>areas for solar panel development. Although the design and layout of the proposed solar farm has been somewhat shaped by the environmental sensitivities and the topography of the land to date, WODC consider that there is still potential for significant adverse impacts as a result of the development.</p>		<p>out in Chapter 5 [EN010147/APP/6.3]. Any adverse effects arising from the Project are identified and assessed in the Environmental Statement and summarised in the Summary of Significant Effects chapter, no.21. The mitigation measures are described in the Mitigation Measures schedule, Appendix 6.1 [EN010147/APP/6.5].</p>
West Oxfordshire District Council	Historic Environment	<p>There are a number of heritage assets within and in close proximity to the proposed site boundary, as confirmed by chapter 7 of the PEIR. WODC consider that the desk based assessment and field surveys undertaken by the applicant provide an adequate overview of the baseline heritage conditions as they relate to the proposed development area.</p>	N/A	<p>Chapter 7 of the ES [EN010147/APP/6.3] addresses the impacts arising from the Project on heritage assets. Tables 7.19 and 7.20 of that chapter summarises the environmental effects.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Historic Environment	It is noted that there is further assessment to be undertaken in this regard, to fully understand the impact on the setting and significance of heritage assets.	Yes	The likely impacts and effects of the Project on the significance of heritage assets is assessed within Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3]. A detailed assessment of likely impacts and effects on heritage assets as a result of change within their setting is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5].
West Oxfordshire District Council	Historic Environment	Key to this will be the impact on the Blenheim Palace World Heritage Site. The Blenheim Palace World Heritage is an internationally significant heritage asset and makes a significant contribution to the historic character and cultural heritage of West Oxfordshire as well as being of key importance to the local economy.	Yes	A detailed assessment of the likely impacts and effects of the Project resulting from changes within the setting of the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage

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				Impact Assessment of the ES [EN010147/APP/6.5].
West Oxfordshire District Council	Historic Environment	Paragraph 7.9.4.1 of the PEIR recognises that the Blenheim Palace WHS does not have a formally identified buffer zone, but as with any heritage asset it has a setting and changes within that setting may harm the significance of the asset.	Yes	A detailed assessment of the potential impacts of the Project resulting from changes within the setting of the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES [EN010147/APP/6.5].
West Oxfordshire District Council	Historic Environment	It should be noted that the reason for Blenheim Palace WHS not having a formally identified buffer zone is that the WHS is already provided with a high degree of protection for the protection of the WHS Outstanding Universal Value (OUV). Given the strong statutory and local plan protections for heritage assets, the presence and extent of the Oxford Green Belt and natural environment	Yes.	These points are addressed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES [EN010147/APP/6.5] and also within Volume 1, Chapter 5: Alternatives Considered of the ES [EN010147/APP/6.3].

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		features such as the Cotswolds National Landscape, coupled with the robust policies set out in the West Oxfordshire Local Plan 2031, an additional level of designated protection such as a buffer zone is regarded as unnecessary.		
West Oxfordshire District Council	Historic Environment	Regard should therefore be had to whether development proposals within the landscape surrounding the WHS and whether development in the Green Belt in particular would undermine the additional policy protection provided for the setting of the Blenheim Palace WHS.	Yes	These points are addressed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES [EN010147/APP/6.5] and also within Volume 1, Chapter 5: Alternatives Considered of the ES [EN010147/APP/6.3]. The Planning Supporting Statement provides the very special circumstances case for those parts of the Project that fall within the Green Belt [ENEN010147/APP/7.1], Appendix 8.

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West Oxfordshire District Council	Historic Environment	WODC cannot comment on the suitability and effectiveness of proposed mitigation planting at this stage and will await details of the Outline Landscape and Ecology Management Plan. The applicant should have regard to comments made on the proposed masterplan, to identify where mitigation and enhancement measures should be focused, to minimise negative impact on the historic environment and heritage assets.	Yes	The details of the proposed mitigation planting for the Project are set out in the oLEMP [EN010147/APP/7.6.3], and in the Landscape, Ecology and Amenities Plan [EN010147/ALL/7.3.3]. The proposed planting has been considered within the mitigation measures used for the assessment of impacts and effects presented in Section 7.9 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3], also within Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5].

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West Oxfordshire District Council	Historic Environment	It is recognised that further archaeological assessment is required to assess the required mitigation of impacts on buried archaeological remains. It is the view of the council that in order to minimise harm to archaeological remains, further areas should be avoided and sufficiently buffered.	Yes	A total of 43 areas containing significant buried archaeological remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES [EN010147/APP/6.4]. The mitigation measures established for the avoidance and/or reduction of potential impacts on significant archaeological sites are set out within Section 7.8 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3].
West Oxfordshire District Council	Historic Environment	WODC are concerned that the proposed mitigation measures will not be sufficient to adequately address the impacts on the significance of heritage assets.	Yes	The assessment of likely impacts and effects on heritage assets is presented in Sections 7.9 and 7.10 of Volume 1, Chapter 7: Historic Environment of the ES [EN010147/APP/6.3]. No likely

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				significant effects have been identified.
West Oxfordshire District Council	Historic Environment	Although development has been removed from the conservation areas at Bladon and Church Hanborough, WODC consider that there is likely to be a residual impact on heritage assets in these locations, particularly on the setting of the conservation areas and listed buildings. The fact that Churchill's grave is situated in Bladon Church should be also given due consideration.	Yes	Chapter 7 of the ES [EN010147/APP/6.3] addresses the impacts arising from the Project on heritage assets. Tables 7.19 and 7.20 of that chapter summarises the environmental effects. The assessment of likely impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5] . This includes impacts and effects on Conservation Areas and listed buildings. The presence of Churchill's grave in the churchyard at Bladon is highlighted within that assessment.

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West Oxfordshire District Council	Historic Environment	<p>In terms of the Church Hanborough Area, the proposed masterplan includes opportunities for enhancement within the Conservation Area, although it is not clear what the nature of the enhancements might be at this stage. The applicant proposes a permissive path to the south of the Conservation Area which will improve connectivity through the countryside and linking to existing public rights of way to the east of Lower Road. As such, according to the proposed masterplan, it will be possible to move between the Conservation Areas at Church Hanborough and Cassington through an almost unbroken arrangement of panels.</p>	Yes	<p>Chapter 7 of the ES [EN010147/APP/6.3] addresses the impacts arising from the Project on heritage assets. Tables 7.19 and 7.20 of that chapter summarises the environmental effects. The Illustrative Masterplan is presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES [EN010147/APP/6.4]. It shows a proposed permissive path along the southern edge of the Church Hanborough Conservation Area, with managed grassland to the north (within the Conservation Area) and solar panels to the south, separated from the permissive path by a new hedgerow. The permissive path continues on the eastern side of Lower Road, passing between two areas of solar panels with new hedgerows on either side of</p>

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				<p>the path. The permissive path then enters the floodplain of the River Evenlode and crosses two channels of the river via new footbridges before linking to the existing public rights of way network. Where solar panels are proposed within land adjacent to the public rights of way, new hedgerows would be planted and existing ones reinforced where gaps currently exist. The proposed permissive path therefore establishes a new link between the Conservation Areas at Church Hanborough and Cassington.</p>
West Oxfordshire District Council	Historic Environment	<p>Regard should be had to the impact of the setting of the conservation areas and Grade 1 Listed churches at both Cassington and Church Hanborough as a result of the scale and extent of the proposed development within the Central Area.</p>	Yes	<p>Chapter 7 of the ES [EN010147/APP/6.3] addresses the impacts arising from the Project on heritage assets. Tables 7.19 and 7.20 of that chapter summarises the environmental effects.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				The assessment of likely impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5] . This includes impacts and effects on Conservation Areas and listed buildings.
West Oxfordshire District Council	Historic Environment	The PEIR Non-Technical Summary (Para 6.2.15) explains that the effects on designated heritage assets as a result of change within their setting have been assessed as not significant. These effects are fully reversible in that they would cease following decommissioning of the Project.	Yes	Chapter 7 of the ES [EN010147/APP/6.3] addresses the impacts arising from the Project on heritage assets. Tables 7.19 and 7.20 of that chapter summarises the environmental effects. The assessment of likely impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES [EN010147/APP/6.5] . No

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				significant adverse effects have been identified. All impacts would be fully reversible following decommissioning of the Project.
West Oxfordshire District Council	Historic Environment	WODC is concerned that there will be negative impacts on the setting of Conservation Areas and Listed Buildings at Church Hanborough and Cassington. Consideration should be given to how these impacts can be minimised or effectively mitigated, having regard to the comments on the masterplan set out above.	Yes	Chapter 7 of the ES [EN010147/APP/6.3] addresses the impacts arising from the Project on heritage assets. Tables 7.19 and 7.20 of that chapter summarises the environmental effects. Negative impacts on the settings of designated heritage assets at Church Hanborough and Cassington, including Conservations Areas and listed buildings, have been minimised through the design of the Project as indicated in the Illustrative Masterplan presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES [EN010147/APP/6.2] . This has included removal of

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				solar panels from certain areas and also mitigation planting as set out in the oLEMP [EN010147/APP/7.6.3] and the Landscape, Ecology and Amenities Plan [EN010147/APP/7.3.3].
West Oxfordshire District Council	Landscape and Visual	WODC wish to emphasise that due to the huge scale of the proposal (890 Ha of development) the nature of the proposal (a Nationally Significant solar energy generating station) the sensitivity of the landscape (attractive, largely unspoilt rural landscape) and the extent of the proposed development within the Green Belt, that landscape and visual impacts are key to the assessment of the suitability of this proposal.	Yes	Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. As part of the LVIA assessment, a comprehensive suite of recommendations have informed the design, location, and mitigation for the Project, which has all resulted in LVIA effects that have been managed to appropriate level, given the Site's location and context.

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West Oxfordshire District Council	Landscape and Visual	It is recognised that the applicant has undertaken some landscape and visual impact assessment to date, but an assessment has not been undertaken for each of the representative viewpoints. Photomontages and visualisations are only available for 18 of the 57 representative viewpoints at this time, which presents a serious degree of uncertainty in assessing the landscape and visual impacts, both positive and negative as a result of development.	Yes	Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3] . 31 of the Representative Viewpoints have been visualised (photomontages) in winter and summer. All 55 Representative Viewpoints were consulted on and agreed with all host authorities. This has been detailed at Table 8.4 of Chapter 8 giving details of any additions, changes or omissions. 31 is considered proportionate to the Project. Not all viewpoints would be appropriate to show as a photomontage due to the distance and / or proportion of the Project visible within the view.

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West Oxfordshire District Council	Landscape and Visual	The LVIA makes no reference to tranquillity of the landscape. WODC feel that this should be a consideration in assessing the impacts of the proposal on the landscape character, due to the noise impacts of the 156 Power Converter Stations distributed throughout the development site.	Yes	Whilst tranquillity is not expressly referenced in the Landscape Chapter, noise effects have been. Chapter 13 considers noise and vibration effects [EN010147/APP/6.3] . It is concluded that there will be no likely significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases, nor in combination with other developments.
West Oxfordshire District Council	Landscape and Visual	WODC consider that the Landscape and Visual Resources chapter of the PEIR identifies the relevant landscape character evidence relevant to establishing the baseline landscape character for the development site. Appendix 8.1 of the PEIR provides comprehensive details of the relevant landscape character	Yes	Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3] .

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		<p>areas and types at national, regional and local level that are relevant to the project area.</p>		
<p>West Oxfordshire District Council</p>	<p>Landscape and Visual</p>	<p>Appendix 8.2 of the PEIR sets out factors relating to landscape quality, including a range of factors that can be considered when identifying landscape value. In our view there are omissions from this assessment that contribute to the misunderstanding of landscape quality across the development site, particularly in terms of cultural heritage. Regard should be had to the following plans and evidence in further refining development proposals;</p> <ul style="list-style-type: none"> • There is a draft Nature Recovery Network for Oxfordshire² which covers significant areas of the project area. Opportunities should be sought to improve ecological connectivity within the Nature Recovery Network and avoid fragmentation of habitats. • There is a Catchment Management 	<p>Yes</p>	<p>Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. Reference is made to relevant policies and plans. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.</p> <p>Ecology and nature conservation impacts and effects are reported in Chapter 9 of the ES [EN010147/APP/6.3]. Reference is made to relevant policies and plans.</p> <p>Chapter 10 sets out the assessment of effects upon heritage assets including The</p>

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		<p>Plan in place for the River Evenlode³. Consideration should be given to how compatible the development plans are with the vision and objectives of the Evenlode Catchment Management Plan</p> <ul style="list-style-type: none"> • There is a comprehensive assessment of natural capital and ecosystem service provision available for the whole project site. Regard should be had to how habitats perform in the provision of ecosystem services within the development site. • The Wychwood Project Area covers a significant area of the site. Regard should be had to the aims of the Wychwood Project area, particularly in terms of restoring the landscape character and mix of habitats associated with the Royal Hunting Forest of Wychwood. • The Bladon Conservation Area is covered by a Conservation Area Character Appraisal which identifies important views out of the village to the south towards the development 		<p>Blenheim Palace World Heritage Site. A separate Heritage Impact Assessment (HIA) has been undertaken for the Blenheim Palace WHS, in accordance with the appropriate guidance produced on behalf of the United Nations Educational, Scientific and Cultural Organisation (UNESCO). This is presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES. The HIA identified that the construction, operation and maintenance, and decommissioning of the Project would result in a minor negative impact on one of the seven defined attributes which contribute towards the Outstanding Universal Value (OUV) of the WHS. On this</p>

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		<p>site.</p> <ul style="list-style-type: none"> • Blenheim WHS Management Plan 2017 – Appendix 3 : Setting Study – Provides useful information on the setting of Blenheim Palace WHS, key views into and out of the park and potential forces for change. 		<p>basis, the magnitude of impact on the significance of the WHS is predicted to be negligible adverse. This impact would be time-limited and fully reversible.</p>

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West Oxfordshire District Council	Landscape and Visual	<p>WODC considers that much of the proposed development area is within a highly valued and high quality landscape with limited capacity to accommodate significant change, particularly at the scale currently proposed. The council have suggested measures to reduce the impacts and mitigate the potential harms of the proposal. Further detailed assessment of a refined project design will be necessary to understand whether the benefits of utility scale solar development in West Oxfordshire would outweigh the harms.</p>	Yes	<p>An assessment of the landscape and visual effects of the project, since the project was conceived in 2018/19, has had a significant influence of the layout and design of the Project. To that extent it has been a 'landscape-led' solution, keeping off of high ground, creating buffers from sensitive receptors and working with, not against, the existing landscape structure of the area.</p> <p>On balance, it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects. In</p>

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				<p>addition, proposed planting would have a longer term benefit reinforcing the landscape character of the local landscape.</p> <p>Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3]. A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.</p> <p>The Project is located within multiple landscape character areas / types, as derived from the available local authority landscape character assessment(s). There would be a Minor to Moderate adverse (not significant) significance of effect upon those landscape character areas as a whole within which the Project is located. At a</p>

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				<p>local level, landscape characterising effects upon the Project site, within a small part of the LCA(s) is considered to be Moderate adverse (not significant).</p> <p>The assessment has taken account of the landscape baseline situation, with the essential landscape structure in terms of existing vegetation being retained, protected and enhanced as part of the Project.</p> <p>No likely significant effects are predicted during construction, operation and maintenance or decommissioning of the Project on landscape character areas within the 5 km study area.</p> <p>No likely significant effects are predicted during construction, operation and maintenance or decommissioning of the Botley West Project on nationally</p>

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				designated landscapes, including the Cotswolds National Landscape.
West Oxfordshire District Council	Landscape and Visual	The Non-Technical Summary of the PEIR (Para 6.3.11) confirms that a number of potential impacts upon landscape and visual resources associated with the construction, operational and maintenance, and decommissioning phases of the Project, were identified. In terms of landscape, effects would be limited.	Yes	Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3] . A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter.
West Oxfordshire District Council	Landscape and Visual	The applicant asserts that when considering the landscape character of the Project site and landscape character areas / types of the wider study area, significant landscape characterisation effects are unlikely. WODC questions this assertion and considers that the project would result in very significant landscape characterisation effects, both as a result of the project itself and	Yes	Landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3] . A summary of the effects is contained in Tables 8.24 and 8.25 of that chapter. The Project is located within multiple landscape character areas / types, as derived from the available local authority landscape character

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		cumulatively with other proposed developments in proximity to the site.		<p>assessment(s). There would be a Minor to Moderate adverse (not significant) significance of effect upon those landscape character areas as a whole within which the Project is located. At a local level, landscape characterising effects upon the Project site, within a small part of the LCA(s) is considered to be Moderate adverse (not significant).</p> <p>The assessment has taken account of the landscape baseline situation, with the essential landscape structure in terms of existing vegetation being retained, protected and enhanced as part of the Project.</p> <p>No likely significant effects are predicted during construction, operation and maintenance or decommissioning of the Project on landscape</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>character areas within the 5 km study area.</p> <p>No likely significant effects are predicted during construction, operation and maintenance or decommissioning of the Botley West Project on nationally designated landscapes, including the Cotswolds National Landscape.</p> <p>On balance, it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer term benefit reinforcing the landscape character of the local landscape.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Local Ecology	WODC considers that the assessment of baseline characteristics presented in the PEIR may be adequate, in terms of identifying designated sites for ecological and geological conservation importance. The PEIR also includes comprehensive assessment of protected habitats and species across the project area. WODC considers that the baseline assessment and identification of relevant data sources and survey findings is acceptable in terms of defining the baseline, although additional assessment will be required to support future biodiversity net gain calculations.	Yes	Ecology and nature conservation impacts and effects are reported in Chapter 9 of the ES [EN010147/APP/6.3]. BNG for the Project is outlined in the Biodiversity Net Gain Assessment provided in Volume 3, Appendix 9.13 [EN010147/APP/6.5]. BNG is implemented and managed under the outline Landscape and Ecology Management Plan is provided in [EN010147/APP/7.6.3]. The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG.
West Oxfordshire District Council	Local Ecology	There are questions about the proposed mitigation and enhancement measures where they relate to ecology and nature conservation however. It is not possible at this stage to take a fully	Yes	Ecology and nature conservation impacts and effects are reported in Chapter 9 of the ES [EN010147/APP/6.3]. Mitigation measures can be

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		informed view on the magnitude and significance of impacts on ecology and nature conservation without more detail on what is proposed in terms of the design of the project and details on implementation and management of environmental enhancements.		found in the Mitigation Measures schedule, Volume 3, Appendix 6.1 [EN010147/APP/6.3], and the Landscape and Ecology Management Plan [EN010147/APP/7.6.3]
West Oxfordshire District Council	Local Ecology	In terms of the impact on ground nesting and wintering bird assemblages, the baseline assessment identifies a number of protected species to be present some of conservation importance. The Applicant's masterplan indicates a substantial number of skylark plots across the development area, to mitigate against the loss of accessible habitat. It is unknown at this stage whether such measures will be adequate to compensate for the loss of habitat.	Yes	An impact assessment and any necessary mitigation are included in Volume 1 (EN010147/APP/6.3) Chapter 9: Ecology and Nature Conservation of the ES that address impacts on ground nesting and wintering birds.

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West Oxfordshire District Council	Local Ecology	The Applicant's masterplan indicates that statutory designated ecological sites will be excluded from the development, but WODC considers that habitats and species will be affected by development, particularly at the scale proposed. The applicant has stated an intention to achieve at least 70% biodiversity net gain across the project, but full details as to how this will be achieved will be reserved for the Environmental Statement. Such significant gains in biodiversity would be supported, particularly where they would contribute to meeting nature recovery objectives and build resilience to climate change, but it is not possible to comment on the suitability of measures proposed at this stage, due to the lack of information provided.	Yes	BNG for the Project is outlined in the Biodiversity Net Gain Assessment provided in Volume 3, Appendix 9.13 [EN010147/APP/6.5]. BNG is implemented and managed under the outline Landscape and Ecology Management Plan is provided in [EN010147/APP/7.6.3]. The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG.
West Oxfordshire District Council	Local Ecology	WODC considers that buffers to ancient woodlands should be increased and opportunities for further woodland enhancement could be identified, in order to increase	Yes	Opportunities with respect to enhancement to connectivity have been incorporated into the Ecology Strategy for the site (as set out in the outline

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		habitat connectivity within the development site.		Landscape and Ecology Management Plan is provided in [EN010147/APP/7.6.3].
West Oxfordshire District Council	Local Ecology	It is anticipated that converting intensive agricultural land to other habitat may be a significant contributor to achieving 70% BNG across the site. Any calculations would need to demonstrated through completion of the DEFRA Metric.	Yes	BNG for the Project is outlined in the Biodiversity Net Gain Assessment provided in Volume 3, Appendix 9.13 [EN010147/APP/6.5].
West Oxfordshire District Council	Hydrology and flood risk	It is recognised however that the location and design of many of the infrastructure features of the project including the Primary Sub Station, Power Converter Stations and Transformers are yet to be determined and is not available to inform this stage of the PEIR.	Yes	Chapter 10, Hydrology and Flood risk identifies and assesses relevant environmental effects [EN010147/APP/6.5]. Information on hydrology and flood risk within the study area was collected through desk review, a site-specific FRA and conceptual drainage strategy see Volume 3 Appendix 10.1 Flood Risk Assessment and Volume 3 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5]. As well

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				as hydraulic modelling exercise for the Central Site Area see Volume 3 Appendix 10.2 Hydraulic Modelling Report [EN010147/APP/6.5] and a Surface Water Modelling Report for Cassington in Volume 3 Appendix 10.5 Surface Water Modelling Report [EN010147/APP/6.5] .
West Oxfordshire District Council	Hydrology and flood risk	It is not possible to comment of the suitability and effectiveness of mitigation measures at this stage while the detailed design and layout of the project are yet to be finalised.	Yes	Chapter 10, Hydrology and Flood risk identifies and assesses relevant environmental effects [EN010147/APP/6.5] . Information on hydrology and flood risk within the study area was collected through desk review, a site-specific FRA and conceptual drainage strategy see Volume 3 Appendix 10.1 Flood Risk Assessment and Volume 3 10.2 Conceptual Drainage

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Strategy [EN010147/APP/6.5]. As well as hydraulic modelling exercise for the Central Site Area see Volume 3 Appendix 10.2 Hydraulic Modelling Report [EN010147/APP/6.5] and a Surface Water Modelling Report for Cassington in Volume 3 Appendix 10.5 Surface Water Modelling Report [EN010147/APP/6.5].</p>
West Oxfordshire District Council	Hydrology and flood risk	Areas of potential concern and likely necessary locations for flood risk mitigation will be the foot of south facing slopes where solar panels are orientated downhill. The area of land to the north of Cassington is an area of particular focus where surface water impacts may need to be mitigated and managed.	Yes	<p>Chapter 10, Hydrology and Flood risk identifies and assesses relevant environmental effects [EN010147/APP/6.5]. Information on hydrology and flood risk within the study area was collected through desk review, a site-specific FRA and conceptual drainage strategy see Volume 3 Appendix 10.1 Flood Risk</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Assessment and Volume 3 10.2 Conceptual Drainage Strategy [EN010147/APP/6.5]. As well as hydraulic modelling exercise for the Central Site Area see Volume 3 Appendix 10.2 Hydraulic Modelling Report [EN010147/APP/6.5] and a Surface Water Modelling Report for Cassington in Volume 3 Appendix 10.5 Surface Water Modelling Report [EN010147/APP/6.5]. Note, the Applicant is proposing a surface water attenuation pond and bunding to relieve the worse effects of the intermittent flooding the village experiences. This is an enhanced mitigation measure, not necessary for the Project, but nevertheless beneficial for the village.</p>

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West Oxfordshire District Council	Hydrology and flood risk	Also within the Evenlode Valley where the Catchment Management Plan seeks to reconnect the river channel with the flood plain, development proposals should not undermine such plans.	Yes	Chapter 10, Hydrology and Flood risk identifies and assesses relevant environmental effects [EN010147/APP/6.5] . The Project will not undermine the Council's plans.
West Oxfordshire District Council	Ground conditions	WODC note the scope and extent of the PEIR and support the ongoing consultation with Oxfordshire County Council as the Minerals and Waste Authority, to assess possible impacts on sterilisation of mineral reserves as a result of the project.	Yes	Response received from OCC Minerals and Waste Authority to first draft of MRA and responses included in revised Mineral Resource Assessment, Appendix 11.14 [EN010147/APP/6.5] , issued as part of the Environmental Statement.
West Oxfordshire District Council	Traffic and Transport	The Applicant has obtained base traffic flow data from Oxfordshire County Council and the Department for Transport for the project area and WODC consider this to be representative of current conditions. Construction traffic flows have been estimated using reasonable	Yes	Noted. A full assessment of traffic and transport, including any mitigation and enhancement measures required, is included within Chapter 12 of the ES [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		assumptions and are considered to be suitable for assessment purposes.		
West Oxfordshire District Council	Traffic and Transport	WODC note the assessment of baseline traffic conditions for the project site, although it should be highlighted that the AADT data presented in table 12.11 of the PEIR appears to be quite dated, covering the period 2018/19. The applicant should ensure ongoing consultation with Oxfordshire County Council in the preparation of the Construction Traffic Management Plan to ensure that all relevant data is accurate and up to date.	Yes	A summary of the base traffic flows which have been used to define a baseline transport position are set out in Appendix 12.3: Base traffic flows [EN010147/APP/6.5] . An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO.
West Oxfordshire District Council	Traffic and Transport	WODC agree that the construction phase of the project is likely to generate the greatest number of vehicle movements.	Yes	A full assessment of traffic and transport, including any mitigation and enhancement measures required, is included within Chapter 12 of the ES [EN010147/APP/6.3] . An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				been prepared to be secured as part of the CoCP requirement within the draft DCO.
West Oxfordshire District Council	Traffic and Transport	WODC look to Oxfordshire County Council as local Highway Authority for comments on the PEIR. WODC recognise that there will be traffic increases during the construction phase of the project and that cable trenching in the highway could cause traffic delays. The impacts of increased traffic movements and delays caused by trenching within the highway should be mitigated as far as possible, by restricting peak time HGV movement and concentrating trenching within highway verges where possible. The need for a comprehensive traffic management plan is vital in this regard.	Yes	A full assessment of traffic and transport, including any mitigation and enhancement measures required, is included within Chapter 12 of the ES [EN010147/APP/6.3] . An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO.
West Oxfordshire District Council	Noise and Vibration	It is noted that the maximum design parameters for the power converter stations (Table 6.1: Solar design parameters) indicate a noise level of 67db at 10m distance.	Yes	Chapter 13 of the ES considers noise and vibration effects [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Noise and Vibration	<p>The indicative masterplan shows the location of 156 power converter stations around the site. PCS have the potential to generate significant noise levels (98db indicated at table 1.2 of Appendix 13.3 of PEIR) during the operational phase of the project. This is an area of concern for WODC as it is considered that the number of proposed PCS required and the likely close proximity to sensitive receptors mean that noise impacts are unlikely to be totally mitigated. The volume and frequency of noise generated by PCS will result in likely significant detrimental impacts on human health, amenity use of the countryside, tranquillity of the countryside and wildlife over a wide area.</p>	Yes	<p>Chapter 13 considers noise and vibration effects [EN010147/APP/6.3]. The assessment includes a consideration of operational phase noise impacts. The assessment identifies that operational phase noise will cause a minor adverse impact at receptors, which is not significant. Furthermore, the PCS units are evenly distributed around the Project, and have been located and positioned to avoid or minimise any adverse impact on receptors. Noise from the operation of the Project is considered fully within the technical information provided in Volume 3, Appendix 13.3: Operational Phase Noise [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Noise and Vibration	It is noted that an Operational Noise Management Plan (ONMP) will be prepared to identify the noise limits for the operation of the Project and the measures for how these limits would be monitored. It will be informed by a full assessment of operational noise to be undertaken once the plant design is complete. WODC cannot comment further at this stage.	Yes	Chapter 13 considers noise and vibration effects [EN010147/APP/6.3]
West Oxfordshire District Council	Climate change	WODC consider that without parallel increases in energy storage capacity and opportunities to support local energy networks, the payback period may be longer than 10 years.	No	'Payback' if it meant in the financial sense is not a planning matter. In climate change terms, whilst it is important that energy storage capacity is scaled over the coming decade in addition to other external factors such as demand, this is still uncertain at present and outside of the scope of the methodology used for assessing the carbon payback period of the development. Chapter 14 in

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				the ES [EN010147/APP/6.3] considers climate change effects.
West Oxfordshire District Council	Climate change	WODC have no comments to make on this assessment at this stage.	N/A	Chapter 14 in the ES [EN010147/APP/6.3] considers climate change effects.
West Oxfordshire District Council	Socioeconomics	The effects associated with providing employment opportunities as part of the Project have been assessed during all phases of development (construction, operation and maintenance and decommissioning). The employment generation associated with each phase of works has been independently assessed with all phases considered to have a beneficial impact. It is noted that the	Yes	Details of Socio-economic effects are identified and assessed within Chapter 15 [EN010147/APP/6.3] . See also the Applicants Outline Skills, Supply Chain & Employment Plan – Volume 3, Appendix 15.2 [EN010147/APP/6.5] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		loss of jobs in the agricultural sector is assessed as		
West Oxfordshire District Council	Socioeconomics	not significant but is unclear as to whether new jobs would be locally or nationally generated.	Yes	Details of Socio-economic effects are identified and assessed within Chapter 15 [EN010147/APP/6.3] . See also the Applicants Outline Skills, Supply Chain & Employment Plan – Volume 3, Appendix 15.2 [EN010147/APP/6.5] .
West Oxfordshire District Council	Socioeconomics	All other potential effects associated with key receptors were assessed as being not significant with the exception of the potential impact on the visitor economy during construction which has been assessed as adverse. This is, however, based on the information currently available and this aspect will be further assessed in the ES based on additional survey work which is currently being carried out.	Yes	Details of Socio-economic effects are identified and assessed within Chapter 15 [EN010147/APP/6.3] .

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West Oxfordshire District Council	Socioeconomics	WODC has no further comments to make on the socio-economic assessment at this stage.	No	Noted.
West Oxfordshire District Council	Human Health	It is not clear whether the substantial increase in CCTV and surveillance infrastructure has been included in this assessment in terms of amenity and loss of privacy.	Yes	Fencing, lighting and security systems are proposed to enclose and secure the main Project infrastructure components. The fencing will be for operational security purposes. Lighting and CCTV will be installed too, but only within limited areas of the development, generally around the high voltage infrastructure for safety and security. Chapter 6, Table 6.4 [EN010147/APP/6.3] provides details. On the basis of location and limited provision, amenity and loss of privacy is not expected to be material.
West Oxfordshire District Council	Human Health	WODC support measures to improve the health and well being of communities including increasing the	Yes	Human health effects arising from the Project are assessed

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		public rights of way network within and around the development site.		<p>in Chapter 16 of the ES [EN010147/APP/6.3]. Table 16.29 in the chapter presents a summary of the potential impacts, measures adopted as part of the Project and residual effects in respect to human health. Overall, it is concluded that there will be no likely significant adverse effects on human health during the construction, operation and maintenance or decommissioning phases of the Project. This is supported by the contribution of the Project in securing new recreational routes, including permissive paths, cycleways and Green Ways, to mitigate potential adverse effects on public health associated with changes in the use of the PRow network. Additionally, the inclusion of an outdoor educational area and growing</p>

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				spaces offers substantial benefits. These areas provide opportunities for community engagement, environmental education, and access to fresh produce, further enhancing overall well-being and fostering a healthier lifestyle for the local population over time.
West Oxfordshire District Council	Agricultural Land	The Applicant identifies a range of significant cumulative effects that are likely to occur with respect to agricultural land and public rights of way including permanent adverse cumulative effect as a result of the permanent loss of Best and Most Versatile agricultural land during construction of the Project and temporary adverse cumulative effect on public rights of way, including footpaths and bridleways arising from disruption and reduced access during construction of the Project and other projects/plans.	Yes	An updated assessment of cumulative effects of the Project on agricultural land and Public Rights of Way is provided in Volume 3, Chapter 17: Agricultural Land Use and Public Rights of Way of the ES [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Agricultural Land	WODC consider that a revised scheme design and exclusion of development from areas of best and most versatile agricultural land will minimise negative impacts on soil resources. The suggested revisions to the project design and development area suggested in section 4 of this response would significantly reduce the area of BMV agricultural land included in the project and would reduce impacts on the public rights of way network in proximity to settlements.	Yes	The design and layout of the Project has evolved, and been refined since 2019, in response to community feedback and the Applicant's own environmental assessment work. The evolution of the design and how the Applicant has taken into account planning and environmental constraints is set out in the Environmental Statement, particularly in Chapter 5, Alternatives Considered [EN010147/APP/6.3] and in the Layout and Design Principles Document [EN010147/APP/7.7] . BMV has been avoided where possible. The assessment of effects in respect of BMV is set out in Chapter 8 of the ES and section 4.3 of this PSS. A

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>Soil Management Plan is proposed [EN010147/APP/7.6.1]. The Applicant has considered the effect of the Project upon existing rights of way (Please refer to Chapter 17– Agriculture, Land Use and PRow and Health Chapter 16 [EN010147/APP/6.3]). Some adverse effects are predicted in the short term only.</p>
West Oxfordshire District Council	Air quality	WODC support the implementation of appropriate dust control measures during the construction phase to minimise significant effects with respect to air quality during the project.	Yes	<p>A dust management plan has been prepared so that dust emissions during construction are mitigated to a level that is not significant. It forms part of the Outline Operational Management Plan [EN/010147/APP/7.6.1].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Community Benefits	It is noted from the information provided in the Phase 2 Community Consultation Leaflet, that the Applicant is proposing a range of community benefits and opportunities beyond solar.	Yes	The Applicant proposes to deliver the community benefits via a Community Benefits Package. This will be agreed outside the scope of the DCO application, with the relevant local authorities (see Planning Supporting Statement e.g. at paragraphs 3.5.24 and 8.4.71) [EN010147/APP/7.1] .
West Oxfordshire District Council	Community Benefits	WODC support the provision of community benefits arising from the scheme and will seek to secure a Community Benefits Agreement (CBA) with the Applicant, to support the delivery of community benefit and environmental improvement projects in the area.	Yes	The Applicant proposes to deliver the community benefits via a Community Benefits Package. This will be agreed outside the scope of the DCO application, with the relevant local authorities (see Planning Supporting Statement e.g. at paragraphs 3.5.24 and 8.4.71) [EN010147/APP/7.1] .
West Oxfordshire District Council	Community Benefits	In terms of financial benefits and the opportunity for a community benefit fund, WODC consider that a £/MW/Annum contribution would be	Yes	Once operational the Project will set up a Community Fund which will receive £200,000-00 from SolarFive Ltd every year.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		appropriate to reflect the scale of the scheme and to secure benefits over the lifetime of the project.		That is the equivalent of approximately £7,500,000 over the lifetime of the Project (expected to be approx. 37.5 years). The Community Fund would be administered by a body comprising representatives from PVDP, The Blenheim Estate and local community leaders. It is expected that grants will be made to local causes and organisations. The Community Fund will be delivered as part of a Community Benefits Package agreed outside the scope of the DCO application, with relevant local authorities.
West Oxfordshire District Council	Community Benefits	WODC consider that the scheme needs a substantial financial mitigation package, to address the physical and environmental impacts and harms associated with the development and to support opportunities to address the Council's declared Climate Emergency.	Yes	The Applicant has designed and laid out the development in a way that already has embedded mitigation measure within it e.g. buffer distances from sensitive receptors [EN010147/APP/6.5] . That

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>and other mitigation measures are captured in Management Plans [EN010147/APP/7.6] and linked to Requirements in the draft DCO. In the Environmental Statement the Applicant has applied the mitigation hierarchy to avoid or minimise any adverse effects arising from the Project. Those mitigation measures, which for landscape, ecology, and heritage also include substantial enhancement measures [EN010147/APP/7.6.3 and 7.7]. The Project represents a unique (by reason of scale and associated environmental benefits) opportunity to address all host authority's declared Climate Emergency's.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Community Benefits	Any associated legal agreement to secure community benefits will also need to address how the scheme will be decommissioned at the end of the project lifetime, e.g. bonds, sinking funds etc to secure remediation.	Yes	The Applicant proposes to deliver the community benefits via a Community Benefits Package. This will be agreed outside the scope of the DCO application, with the relevant local authorities (see Planning Supporting Statement e.g. at paragraphs 3.5.24 and 8.4.71) [EN010147/APP/7.1] . No bonds or 'sinking funds' are considered necessary for the decommissioning phase. Decommissioning will be delivered and controlled by the Decommissioning Plan [EN010147/APP/7.6.4] .

Table 3: Section 42 Applicant Response to targeted consultation on a series of proposed boundary changes between June and July 2024

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Landscape	It does not appear that any of the changes proposed have been made to avoid landscape or visual impacts. Without further detail it is difficult to assess any further impacts that the changes may have. Our previous comments still stand; a development of such exceptional scale and impact requires exceptional mitigation that goes beyond the planting of hedgerows and woodland belts to soften views from selected vantage points. A landscape-scale approach should be taken comprising a landscape and green infrastructure masterplan that matches the scale and ambitions of the project and leaves a legacy of a strengthened, more resilient, and more biodiverse landscape.	Yes	<p>The Targeted Consultation focused on specific changes to the Project Site boundary (indicative Order Limits), primarily with small, but numerous, increases in land area – but also decreases in some areas. These changes were driven by a range of matters including engineering, cable laying and highway requirements, and corrections based on mapping and ownership details that arose through due diligence reviews.</p> <p>The Applicant notes that the County Council's comments on landscape and visual impacts made previously in respect of the PEIR still stand, and these, along with the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				changes made to the scheme post PEIR, are considered in the main S42 Table and in Chapter 8 of the ES on Landscape and Visual Impact [EN010147/APP/6.3]
Oxfordshire County Council	Ecology	Change 28. Incorporates a section of ancient woodland, an irreplaceable habitat, with ecological connectivity to Bladon Heath Local Wildlife Site. Measures should be taken to avoid impact on the ancient woodland and trees (including tree root protection) and opportunities to expand, buffer and link woodland habitat should be taken into consideration. These measures should be informed by survey and the Local Wildlife Site citations.	Yes	Change 28 relates to one of two cable route options, but if this route is used the affected narrow section of Ancient Woodland would be avoided through the use of HDD techniques, and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]
Oxfordshire County Council	Ecology	Change 29. Has potential to impact ancient woodland, an irreplaceable habitat, found in Burleigh Wood Local Wildlife Site and Bladon Heath Local Wildlife Sites. Measures should be taken to avoid impact on the ancient woodland and trees (including tree root protection) and opportunities to expand,	Yes	Change 29 has been made to provide sufficient space for the HDD compound needed to avoid the use of trenching that would otherwise affect the Ancient Woodland, and which will be in line with the cable laying methodology set

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		buffer and link woodland habitat should be taken into consideration. These measures should be informed by survey and the Local Wildlife Site citations.		out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]
Oxfordshire County Council	Ecology	Change 30. Rivers are habitats of principal importance under Section 40 of the NERC Act 2006, the impact of pipe laying beneath the River Evenlode and any impacts of the installation of bridges on the river habitats and associated species will need to be assessed through the EIA and taken into account in the biodiversity net gain calculations for the application.	Yes	Change 30 relates to utilising an existing agricultural bridge. No new bridges are proposed. The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5] including HDD beneath the River Evenlode.
Oxfordshire County Council	Ecology	Changes 34, 35, 37 and 39. Rivers are habitats of principal importance under Section 40 of the NERC Act 2006, the impact of pipe laying beneath the River Evenlode and any impacts of the installation of bridges on the river habitats and associated species will need to be	Yes	The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		assessed through the EIA and taken into account in the biodiversity net gain calculations for the application.		methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]
Oxfordshire County Council	Cable Route	Change 50. Avoidance of Long Mead Local Wildlife Site through removal of these sections for routing of cables is welcomed.	Yes	This comment from OCC is noted.
Oxfordshire County Council	Arboriculture	OCC's previous arboricultural comments continue to apply. In addition, the proposed changes have the potential to have further arboricultural impacts, including impacts to trees, hedgerows and to woodlands, including ancient woodlands which is an irreplaceable habitat. Without the detailed arboricultural information requested in our previous comments an accurate assessment cannot be made.	Yes	The Applicant notes that OCC's previous comments in regard to arboriculture, and impacts on trees, hedgerows and woodlands, including their habitat value, continue to apply. These issues are assessed in Chapter 8 Landscape and Visual Impact and Chapter 9 Ecology and Nature Conservation of the ES [EN010147/APP/6.3] and in Appendix 8.3 Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project and a methodology for

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>protecting trees during works and managing them through the operational stage of the development. [EN010147/APP/6.5]</p>
Oxfordshire County Council	Traffic and Transport	<p>The changes are subject to previous highway comments provided by Oxfordshire County Council. Adequate visibility must be provided at all access and egress points with improvements expected to Public Rights of Way (PROW) and active travel routes. The county council would welcome further engagement around these improvements. Whilst no specific transport comments are made on the proposed changes, the county council will need to see further detail before we can comment on the acceptability of the proposal. We would a meeting to discuss the points raised previously.</p>	Yes	<p>This comment is noted. A full assessment of traffic and transport is included within Chapter 12 of the ES [EN010147/APP/6.3] which contains an integrated Transport Statement to consider the potential impacts and effects on the operation of the highway network arising from the Project. A number of the changes featured in the Targeted Consultation were expressly made to facilitate safe access and visibility. An Outline Construction Traffic Management Plan [EN010147/APP/7.6.2] has been prepared to be secured as part of the Outline CoCP</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>requirement within the draft DCO. An Outline PRoW Management Strategy is provided as an appendix to the Outline CoCP [EN010147/APP/7.6.1]</p>
Oxfordshire County Council	Public Rights of Way	<p>Regarding the focussed consultation, more detail is requested on the changes identified as affecting Public Rights of Way, in particular along Dornford Lane, before an assessment of the potential impact can be made.</p> <p>The proposed directional pipe ramming for cables/pipes is of concern where it is located next to, across or near to bridleways that carry horses. We would expect assessments of noise and dust and an update to the Environmental Assessment to ensure there is no impact or that suitable mitigation is provided. We would also expect protection of the PRoW when it comes to the trench necessary to get the right depth for both ends of the drilling rig.</p>	Yes	<p>Chapter 17 of the ES contains a detailed assessment of the effects of the development on Public Rights of Way, including Dornford Lane, during and post construction [EN010147/APP/6.3] The application is also supported by an Outline Code of Construction Practice, which includes an Outline PRoW Management Strategy [EN010147/APP/7.6.1], and an Outline Operational Management Plan [EN010147/APP/7.6.2] These seek to mitigate and manage any potential conflict of PRoW users, and identify</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				the methods associated with the construction and operational requirements, with priority given to users of the PRowS.
West Oxfordshire District Council	Public Rights of Way	<p>Change 1. WODC have concerns about the impact on the Public Rights of Way (PRow) and users of the PRow network in this location. There is potential for conflict of uses in this location, particularly the sharing space between regular users of the bridleway and motorised vehicles. It is recognised that the route will not be utilised during the construction stage and will only be used for maintenance. No further detail is provided on the type of maintenance that will be undertaken and whether it relates to the development and technology within the site, or landscape maintenance or both. The type of maintenance being undertaken will determine the frequency of use and the types of vehicle utilising the track.</p> <p>The council will expect to see further detail and clarity on the code of construction</p>	Yes	<p>Chapter 17 of the ES contains a detailed assessment of the effects of the development on Public Rights of Way, during and post construction [EN010147/APP/6.3] and the application is supported by an Outline Code of Construction Practice, which includes a PRow Management Strategy [EN010147/APP/7.6.1], and an Outline Operational Management Plan [EN010147/APP/7.6.2]</p> <p>These seek to mitigate and manage any potential conflict of PRow users, including the use of Dornford Lane as a footpath and National Cycle Path, and identify the methods associated with the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>practice to ensure that the health of users of the PROW is properly considered and any potential impacts sufficiently mitigated.</p> <p>Dornford Lane is a classified Public Right of Way (365/20/40) and is also a designated part of the National Cycle Network (Route 5 – Shakespeare Way). It is recognised that vehicular access to Upper Dornford Farm and Cottages is currently served from this route.</p> <p>Proposed change #1 overlaps with proposed change #3 and it is not clear whether these amendments are being consulted on separately. The character of Dornford Lane alters dramatically along its length from a wide, open track in the northern section to one which is more enclosed and vegetated on both sides south of Dornford Cottage. Vehicular access to the north is likely to result in less conflict and potential impacts to the north of Dornford Cottage.</p> <p>Impacts of PROW network should be detailed in the appropriate chapter of the</p>		<p>construction and operational requirements, with priority given to users of the PROWs.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Environmental Statement and measures to mitigate the impacts on users of the PRow network should be detailed in the Public Rights of Way Management Plan.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Ecology	<p>Change 2. Proposed change #2 is adjacent to an area of deciduous woodland which is classified as priority habitat. Care should be taken to avoid any negative impacts on priority habitat within and in proximity to the proposed development.</p> <p>WODC understand that the Project has been designed to avoid any removal of hedgerows, woodlands or waterbodies/courses. It is not clear from the map or the description of development whether removal of vegetation in this location will be required. If the proposed change is to facilitate the movement of construction traffic, it is anticipated that removal of vegetation may be necessary.</p> <p>An ecological assessment of any vegetation proposed for removal and impact on priority habitats should be undertaken prior to any works and details of proposed changes and details of any mitigation detailed in the Landscape and Ecology Management Plan and relevant</p>	Yes	<p>Change 2, to allow for a variation to the construction access to this part of the Site, specifically seeks to avoid impacts on the woodland, and the removal of hedgerows. Across the Project trees, hedgerows and woodlands have been protected, with the exception of some limited areas of hedgerow removal required for vehicular access points and visibility safety splays. Ecological assessment of those affected hedgerows has been undertaken, and the details are set out in Chapter 9 of the ES on Ecology and Nature Conservation [EN010147/APP/6.3] and this Chapter also considers the Nature Recovery Network. The works will be managed in accordance with the Outline Code of Construction Practice</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>chapter of the Environmental Statement.</p> <p>The proposed change is situated within the Recovery Zone of the Oxfordshire Nature recovery Network, an integral part of the Oxfordshire Nature Recovery Strategy. The recovery zone is where new habitat creation and habitat restoration should be focussed. Habitat creation and restoration in this zone will better link parts of the Nature Recovery Network.</p>		<p>[EN010147/APP/7.6.1] and the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]</p>
West Oxfordshire District Council	Cultural Heritage	<p>Change 2.</p> <p>The proposed boundary change is on the north eastern edge of the Wootton Conservation Area. Any proposed changes should have regard to impacts on the heritage and historic character of the area, particularly where they may result in the removal of vegetation and potential changes to the landscape.</p>	Yes	<p>Chapter 7 on Historic Environment considers the setting of the Conservation Area and listed buildings in Wootton [EN010147/APP/6.3].</p> <p>Change 2, to allow for a variation to the construction access to this part of the Site, specifically seeks to avoid impacts on the woodland, and the removal of vegetation.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				The approach to careful management of the construction access along a short part of the footpath is set out in the PRow Management Strategy [EN010147/APP/7.6.1]
West Oxfordshire District Council	Public Rights of Way	<p>Change 3. This proposed change covers a considerable length of Dornford Lane extending north-south and extending to the west to Dornfield Cottage.</p> <p>The Public Rights of Way to the south of Upper Dornford Cottages and to the east of Dornfield Cottage are bound on both sides by mixed vegetation including trees, hedgerows and scrub. WODC understand that the Project has been designed to avoid any removal of hedgerows, woodlands or waterbodies/courses. It is not clear from the map or the description of development whether removal of vegetation in this location will be required.</p> <p>WODC have concerns about the impact of</p>	Yes	<p>Change 3 provides flexibility for the proposed cable connections, through the wider incorporation of the Dornford Lane route. The application is supported by an Outline Code of Construction Practice, which includes a PRow Management Strategy [EN010147/APP/7.6.1], and an Outline Operational Management Plan [EN010147/APP/7.6.2] These seek to mitigate and manage any potential conflict of PRow users, including the use of Dornford Lane as a footpath and National Cycle Path, and identify the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the PROW and users of the PROW network in this location. There is potential for conflict of uses in this location, particularly the sharing space between regular users of the bridleway and motorised vehicles. It is recognised that the route will be utilised during both construction and maintenance.</p> <p>The potential impacts of the proposed 'dynamic pipe ramming process' are not clear, but anticipated that these are likely to include increased noise and vibration. The significance of impacts both positive and negative on the amenity and safety of users of the Public Rights of Way network and local residents should be understood and detailed in the Environmental Statement along with details of any proposed mitigation measures.</p> <p>No further detail is provided on the type of maintenance that will be undertaken and whether it relates to the development and technology within the site, or landscape maintenance or both. The type of</p>		<p>methods associated with the construction and operational requirements, including maintenance, with priority given to users of the PROWs. Appendix 8.3 Strategic Arboricultural Impact Assessment and Method Statement provides a survey of trees affected by the Project and a methodology for protecting trees during works and managing them through the operational stage of the development.</p> <p>[EN010147/APP/6.5] The cable laying methodology is set out at Volume 3 Appendix 6.2</p> <p>[EN010147/APP/6.5]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>maintenance being undertaken will determine the frequency of use and the types of vehicle utilising the track.</p> <p>The council will expect to see further detail and clarity presented in the code of construction practice and PRow Management Plan, to ensure that the health of users of the PRow is properly considered and any potential impacts sufficiently mitigated.</p>		
West Oxfordshire District Council	Noise and Vibration	<p>Change 3. The impacts of increased noise and vibration on local ecology should also be assessed and detailed in the Environmental Statement along with any proposed mitigation.</p>	Yes	Chapter 13 considers noise and vibration effects on receptors and Chapter 9 considers the effects of the development upon ecology [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Ecology	<p>Change 4. WODC understand that the Project has been designed to avoid any removal of hedgerows, woodlands or waterbodies/courses. This proposed change suggests otherwise. The location of the proposed access is not precise, so it is unclear as to whether significant amount of hedgerow will be required for removal. It is recognised that the hedgerow to the east of the A4260 is gappy in parts, so significant areas of removal may not be required.</p> <p>An ecological assessment of any vegetation proposed for removal and impact on priority habitats should be undertaken prior to any works. Details of proposed changes and details of any mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.</p>	Yes	<p>Across the Project trees, hedgerows and woodlands have been protected, with the exception of some limited areas of hedgerow removal required for vehicular access points and visibility safety splays.</p> <p>Ecological assessment of those affected hedgerows has been undertaken, and the details are set out in Chapter 9 of the ES on Ecology and Nature Conservation [EN010147/APP/6.3]</p>
West Oxfordshire District Council	Traffic and Transport	<p>Change 4. Regard should be had to highways safety impacts of creating access for construction traffic from the A road.</p>	Yes	<p>Change 4 is to ensure that suitable provision can be made for a required safe</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				construction access from the A road.
West Oxfordshire District Council	Cultural Heritage	Change 5. The northern boundary extension on the Eastern side of the B4027 is adjacent to the Wootton Conservation Area boundary. Regard should be had to the impact of hedgerow removal on the historic and landscape character of the locality.	Yes	Chapter 7 on Historic Environment considers the setting of the Conservation Area in Wootton [EN010147/APP/6.3]
West Oxfordshire District Council	Traffic and Transport	Change 5. The proposed access points identified during the first statutory consultation were to the north and south of Stratford Lane and south of Hordley House. It is unclear whether additional access points re proposed from the B4027. Regard should be had to highway safety impacts at all proposed access points and details of impacts and mitigation set out in the Code of Construction Practice and Construction Traffic Management Plan.	Yes	Change 5 seeks to provide improved flexibility for the access proposals, to include safety and visibility. Details of the access plans are provided with the application on the Streets, Access and Rights of Way Plans [EN010147/APP/2.2] The application is supported by an Outline Construction Traffic Management Plan which forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Ecology	Change 5. Ecological impact assessment will be required to identify important / priority habitats and surveys required to understand impacts on protected and priority species. Details of impacts as well as details of any proposed mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.	Yes	The effects of the Project upon ecology are assessed in Chapter 9 of the ES [EN010147/APP/6.3] . An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1 .
West Oxfordshire District Council	Noise and Vibration	Change 6. Dynamic pipe ramming process is likely to be disruptive to neighbouring land uses in proximity to the site. Oxford School of Drama require a quiet working environment to facilitate activities at the school. The potential noise impacts of the Dynamic Pipe Ramming process should be assessed and mitigation detailed in the Code of Construction Practice.	Yes	Chapter 13 considers noise and vibration effects on receptors, including Sansoms Barn which is in close proximity to the Drama School [EN010147/APP/6.3] . It is concluded that there will be no likely significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases, nor in combination with other developments.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Public Rights of Way	Change 6. Sensitive receptors in this location include the students and staff at the Oxfordshire School of Drama and users of the public right of way. Although impacts are likely to be temporary, details of how impacts will be mitigated should be set out in the Code of Construction Practice.	Yes	Building on the comment in the response provided above, details of the construction processes are set out in the Outline Code of Construction Practice in EN010147/APP/7.6.1. and will be further advanced in detailed management plans.
West Oxfordshire District Council	Access	Change 7. The proposed change amends the site boundary to widen access and to provide appropriate visibility splays. It is unclear whether this proposed change relates to the access points identified though the last round of consultation, where potential access points were identified to the north and south of Stratford Lane.	Yes	Access points to the north and south side of Stratford Lane have changed since the PEIR stage, and amendments made to omit areas of development in order to protect archaeology. The Illustrative Masterplans show the access arrangement now proposed [EN010147/APP/6.4]
West Oxfordshire District Council	Ecology	Change 7. Ecological impact assessment will be required to identify important / priority habitats and surveys should be undertaken to understand impacts on protected and priority species in the locality. Details of	Yes	The effects of the Project upon ecology are assessed in Chapter 9 of the ES [EN010147/APP/6.3]. An outline Landscape and Ecology Management Plan is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>impacts as well as details of any proposed mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.</p>		<p>provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1.</p>
<p>West Oxfordshire District Council</p>	<p>Construction</p>	<p>Change 7. Regard should also be had to the potential impact on existing electricity infrastructure in the locality, including the presence of overhead power lines.</p> <p>The applicant should consider the potential amenity and operational impacts of activities at the Oxfordshire School of Drama, arising from horizontal directional drilling and other construction activities, as well as maintenance.</p>	<p>Yes</p>	<p>The relationship with existing electricity infrastructure and other infrastructure assets has been considered in developing the Works Plans [EN010147/APP/2.3] and Illustrative Masterplans [EN010147/APP/6.4] Consideration is given to the amenity of nearby receptors in the development of the Outline Code of Construction Practice in [EN010147/APP/7.6.1.]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Ecology	<p>Change 9. Care must be taken not to undermine the route structure of established vegetation in the locality. An assessment of the ecological value of vegetation potentially affected by the dynamic pipe ramming process should be undertaken and the impact on any priority habitats and species assessed. Proposed mitigation should be set out in the Landscape and Ecology Management Plan and detailed in the relevant chapter of the Environmental Statement.</p> <p>The proposed change is situated within the recovery zone of the NRN, an integral part of the Oxfordshire Nature Recovery Strategy. The recovery zone is where new habitat creation and habitat restoration should be focussed. Habitat creation and restoration in this zone will better link parts of the nature recovery network.</p>	Yes	<p>Change 9 seeks to provide for the potential for HDD or pipe ramming, in order to avoid woodland areas and features of archaeological sensitivity. The approach to the depth of the process, taking account of the size and value of vegetation, will be in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]</p> <p>Impacts on Oxfordshire Nature Recovery Strategy zones are considered in Chapter 9 of the ES on Ecology & Nature Conservation [EN010148/APP/6.3]</p> <p>The Chapter states that the Project has been designed to ensure that it delivers significant new habitat creation, delivering biodiversity benefit at the</p>

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				landscape scale. The location of features and their design has been informed by the draft Oxfordshire Nature Recovery Network (Wild Oxford 2020) to ensure that the Project complements the strategic biodiversity goals of Oxfordshire.
West Oxfordshire District Council	Public Rights of Way	Change 9. WODC is concerned about the amenity impacts on users of the PRow network, particularly as a result of noise and vibration. WODC recognises that these impacts will only be temporary in nature however. Proposed mitigation should be set out in the code of construction practice and referenced in the Environmental Statement.		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Access	<p>Change 10. The proposed change is to allow construction access to one of the proposed cable corridors. It is assumed that construction vehicles will utilise the existing field access, but it is unclear from the proposed change whether widening of the field access or removal of vegetation will be required as part of the change.</p> <p>Assessment of highway impacts may be necessary if existing field access is to be utilised for construction or maintenance access.</p> <p>Previous consultation did not indicate any access point in this location.</p>	Yes	Access requirements have been developed, including areas required for access to install cables, which is the nature of the requirement under Change 10. The cable route options and the access and highway impacts are assessed within the ES [EN010147/APP/6.4]
West Oxfordshire District Council	Ecology	<p>Change 13. It is unclear from the proposed change how much hedgerow will need to be removed to facilitate construction vehicle access to the fields.</p> <p>Ecological impact assessment will be required to identify important / priority habitats and surveys should be undertaken</p>	Yes	The effects of the Project upon ecology are assessed in Chapter 9 of the ES [EN010147/APP/6.3] . An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		to understand impacts on protected and priority species in the locality. Details of impacts as well as details of any proposed mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.		Practice in EN010147/APP/7.6.1.
West Oxfordshire District Council	Ecology	<p>Change 15. It is unclear from the proposed changes what the extent of any vegetation removal will be. The last round of consultation indicated that the field to the east (field 1.16) would accommodate a project substation, the scale of which would require vegetation screening to mitigate the landscape and visual impacts of the proposed development.</p> <p>The potential for more significant landscape and visual impacts arising from the removal of vegetation should be assessed. The significance of impacts and proposed mitigation should be detailed in the Landscape and Ecology Management Plan and Environmental Statement.</p>	Yes	The substation proposed at the PEIR stage has been relocated – approximately 370m to the north east. The reason for this relocation was to reduce the visual impacts of the substation, in particular upon the PRoW that was in close proximity to the previous location.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Assessment of impacts on priority habitats and species should be undertaken prior to any works and details of mitigation included in the Landscape and Ecology Management Plan and detailed in the Environmental Statement.		
West Oxfordshire District Council	Public Rights of Way	Change 15. The area of the proposed change is at the junction of a number of public rights of way. The amenity and safety impacts of construction activity and traffic movements in this vicinity should be assessed, with impacts and proposed mitigation detailed in the site management plan and Environmental Statement.	Yes	The highway safety impacts of construction activity and movements are the basis for the change, required to facilitate safe visibility splays for construction traffic.
West Oxfordshire District Council	Traffic and Transport	Change 15. Impacts of highways safety arising from construction traffic movements should be detailed in the site management plan and transport statement.	Yes	The impacts of the construction traffic movements upon highway safety are considered in Chapter 12 of the ES [EN010147/APP/6.3] The application is supported by an Outline Construction

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Traffic Management Plan which forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]
West Oxfordshire District Council	Public Rights of Way	<p>Change 16. The last round of consultation indicated that vehicular access to fields 1.17 and 1.18 would be served from the north. Vehicular access would be via the public right of way network.</p> <p>Proposed change will primarily affect public right of way 342/6/10 (footpath). Traffic movements in this area have potential to cause conflicts with users of the public rights of way network. Any measures to mitigate these impacts should be detailed in the Public Rights of Way Management Plan and Code of Construction Practice.</p> <p>Amenity impacts may also arise as a result of the construction process and dynamic pipe ramming process. Any measures to mitigate these impacts should be detailed</p>	Yes	The assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] , and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		in the Code of Construction Practice and relevant chapter of the Environmental Statement.		
West Oxfordshire District Council	Ecology	Change 16. It is unclear whether updated access arrangements will require the removal of any vegetation. Ecological impact assessment will be required to identify important / priority habitats and surveys should be undertaken to understand impacts on protected and priority species in the locality. Details of impacts as well as details of any proposed mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.	Yes	The effects of the Project upon ecology, including the removal of sections of hedgerow required in locations to provide improved access or visibility, are assessed in Chapter 9 of the ES [EN010147/APP/6.3] . An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1 .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Public Rights of Way	<p>Change 18. This proposed change has potential to impact the existing bridleway (415/5/50) as well as the existing footpath (342/6/10). Amenity impacts on users of the PRow network are likely to arise due to noise and vibration arising from horizontal directional drilling and dynamic pipe ramming.</p> <p>Significance of impacts should be assessed and proposed mitigation detailed in the Code of Construction Practice and relevant chapter of the Environmental Statement.</p> <p>Amenity impacts on local residents should be assessed and any proposed mitigation detailed.</p>	Yes	The assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] , and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1] Chapter 13 of the ES considers noise and vibration effects on residential receptors [EN010147/APP/6.3] .
West Oxfordshire District Council	Ecology	<p>Change 18. It is unclear from the proposals whether any additional vegetation removal will be required to facilitate access.</p>	No	It is not anticipated that Change 18 will require any additional vegetation removal.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Ecology	<p>Change 21. The expansion of the boundary to the west of Upper Campsfield Road indicates that accommodation of the HDD compound is likely to affect an established tree belt and hedgerow. Figure 3.2a Volume 3 Appendix 9.1: Desk Study of the PEIR identifies this boundary as deciduous woodland.</p> <p>It is unclear from the change note whether any vegetation will be removed to accommodate construction or maintenance works. WODC understand that the Project has been designed to avoid any removal of hedgerows, woodlands or waterbodies/courses.</p> <p>Ecological impact assessment will be required to identify important / priority habitats and surveys should be undertaken to understand impacts on protected and priority species in the locality. Details of impacts as well as details of any proposed mitigation should be detailed in the Landscape and Ecology Management Plan</p>	Yes	<p>The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project and a methodology for protecting trees during works and managing them through the operational stage of the development.</p> <p>[EN010147/APP/6.5] The effects of the Project upon ecology are assessed in Chapter 9 of the ES [EN010147/APP/6.3]. An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		and relevant chapter of the Environmental Statement.		
West Oxfordshire District Council	Ecology	Changes 23 and 24. It is unclear from the change note the extent to which any vegetation will be removed although it does highlight hedgerow removal and ecological impact as a potential risk. An assessment of the ecological value of any vegetation should be undertaken prior to removal to assess the potential impacts on any priority habitats or species. Significant impacts should be avoided. The details of any impacts as well as any proposed mitigation measures should be detailed in the Environmental Statement.	Yes	The effects of the Project upon ecology, including the removal of sections of hedgerow required in locations to provide improved access or visibility, are assessed in Chapter 9 of the ES [EN010147/APP/6.3] . An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1 .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Public Rights of Way	Change 23 and 24. Proposed access will cross an existing cycle track from the A44 corridor, so an assessment of highway safety impacts will be necessary. Any potential conflicts with vulnerable road users such as cyclists should be mitigated, with any proposed mitigation detailed in the relevant management plan and Environmental Statement.	Yes	The comments in the Information change Note highlight that the extents of the areas relating to the A44 and Langford Lane are to provide flexibility, but that the impacts on highway users including cyclists on the A44 corridor will require further detailed evaluation as the Project progresses. An Outline Code of Construction Practice including an Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared within the draft DCO, from which a detailed CoCP and Construction Traffic Management Plan will be prepared in consultation with relevant consultees.
West Oxfordshire District Council	Access	Change 27. PEIR consultation indicated proposed access adjacent to Burleigh Lodge, east of	Yes	An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Burleigh Wood. Potential for social and environmental impacts in Cassington Road corridor will be dependent on location of construction and maintenance activities within the corridor.</p>		<p>been prepared to be secured as part of the CoCP requirement within the draft DCO, from which a detailed Construction Traffic Management Plan will be prepared in consultation with relevant consultees.</p>
<p>West Oxfordshire District Council</p>	<p>Ecology</p>	<p>Change 28. The proposed change is in a sensitive area and show the site bisecting an area of Ancient Woodland. The PEIR consultation indicated that all Ancient Woodland would have a 15m buffer as per Natural England guidance and that the Project site boundary had been drawn to avoid blocks of woodland (both broadleaved and designated ancient woodland).</p> <p>The proposed change note does not highlight the potential impacts on ecology, but WODC are concerned about any development that may impact on the integrity of Ancient Woodland.</p> <p>Ecological impact assessment will be</p>	<p>Yes</p>	<p>Change 28 relates to one of two cable route options, but if this route is used the affected narrow section of Ancient Woodland would be avoided through the use of HDD techniques, and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		required to identify important / priority habitats and surveys should be undertaken to understand impacts on protected and priority species in the locality. Details of impacts as well as details of any proposed mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.		
West Oxfordshire District Council	Construction	Change 28. It is not clear from the proposed change note what types of construction and maintenance activities will take place in the proposed area of change, but assessments of potential social and environmental impacts should be undertaken with details of proposed mitigation set out in the relevant studies and recorded in the Environmental Statement.	Yes	Change 28 relates to one of two cable route options, so this land is only required for the construction phase, and may not be required at all if the alternative route is pursued. If this option is pursued works at the Heath Lane end will involve the removal of a 5m section hedge to allow a cable trench to be created, and the hedge replanted (rather than undertaking HDD in close proximity to residential properties) Works at the western end involve a narrow

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				section of Ancient Woodland, which would be avoided through the use of HDD techniques, and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]
West Oxfordshire District Council	Ecology	<p>Change 29. It is unclear from the change note whether any vegetation will be removed to accommodate construction or maintenance works. WODC understand that the Project has been designed to avoid any removal of hedgerows, woodlands or waterbodies/courses.</p> <p>Assessment of impacts on priority habitats and species should be undertaken prior to any works and details of mitigation included in the Landscape and Ecology Management Plan and detailed in the Environmental Statement.</p>	Yes	Change 29 has been made to provide sufficient space for the HDD compound needed to avoid the use of trenching that would otherwise affect vegetation including the Ancient Woodland either side of Cassington Road, and which will be in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]
West Oxfordshire District Council	Human Health	<p>Change 29. The proposed changes are directly adjacent to Burleigh Lodge. An assessment of the potential amenity and</p>	Yes	The impacts of noise and vibration from construction upon residential receptors is assessed in Chapter 13

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		health impacts of local residents should be undertaken with any impacts sufficiently avoided or mitigated. Proposed mitigation measures should be detailed in the relevant chapter of the ES and relevant documentation in support of the application.		[EN010147/APP/6.3].A full assessment of the Human Health impacts of the Project, in terms of land use and recreation, is included within Chapter 16 of the ES [EN010147/APP/6.3]
West Oxfordshire District Council	Hydrology and Flood Risk	Change 30. Regard needs to be had to impacts of flood risk and fluvial environment as a result of HDD across the Evenlode floodplain.	Yes	Consideration is given to the HDD process in Section 6.3 of Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5] . The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5] including HDD beneath the River Evenlode, and the River Thames.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Ecology	Change 32. Ecological impact assessment will be required to identify important / priority habitats and surveys should be undertaken to understand impacts on protected and priority species in the locality. Details of impacts as well as details of any proposed mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.	Yes	The effects of the Project upon ecology are assessed in Chapter 9 of the ES [EN010147/APP/6.3] . An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1 .
West Oxfordshire District Council	Construction	Change 36. Potential for social and environmental impacts in Lower Road corridor dependant on location of construction and maintenance activities within the corridor.	Yes	Change 36 was introduced primarily to allow for further flexibility in the cabling and connection points between array areas. The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Construction	<p>Change 40. Proposed changes are shown in proximity to Cassington Sewage Treatment Works. Applicant should engage with Thames Water to ensure that no proposed changes, construction or maintenance works undermine proposals to expand or upgrade Cassington Sewage treatment Works.</p>	No	Change 40 was based on a realignment of boundaries following due diligence checks of the ownership plans – and do not impact Thames Water assets.
West Oxfordshire District Council	Ecology	<p>Change 40. Changes also include an area of woodland to the south of Cassington STW. It is unclear whether any vegetation will be required for removal to facilitate HDD.</p> <p>An assessment of the ecological value of any vegetation should be undertaken prior to removal to assess the potential impacts on any priority habitats or species. Significant impacts should be avoided. The details of any impacts as well as any proposed mitigation measures should be detailed in the Environmental Statement.</p>	No	It is not anticipated that Change 40 involves any effects on vegetation – it was a realignment of boundary lines based on due diligence checks of the ownership plans.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Ecology	<p>Change 44. It is unclear from the proposed change how much vegetation will be required for removal. An assessment of the ecological value of any vegetation should be undertaken prior to removal to assess the potential impacts on any priority habitats or species. Significant impacts should be avoided. The details of any impacts as well as any proposed mitigation measures should be detailed in the Environmental Statement.</p>	Yes	<p>The effects of the Project upon ecology, including the removal of sections of hedgerow required in locations to provide improved access or visibility, are assessed in Chapter 9 of the ES [EN010147/APP/6.3]. An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1.</p>
West Oxfordshire District Council	Construction	<p>Change 46. Potential for social and environmental impacts in Yarnton Road corridor dependant on location of construction and maintenance activities within the corridor.</p>	Y	<p>Change 40 in the Yarnton Road corridor was introduced primarily to allow for further flexibility in the cabling and connection points between array areas. The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>[EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2</p> <p>[EN010147/APP/6.5]</p> <p>The Outline Operational Management Plan indicates the overall approach to maintenance.</p> <p>[EN010147/APP/7.6.2]</p>
West Oxfordshire District Council	Construction	<p>Change 47.</p> <p>It is unclear how the boundary change will avoid having to cross the railway.</p>	No	<p>Change 47 incorporates land on the north east side of the railway embankment / cutting that would allow for connection between the array areas to the north side of the Cotswold Line, and only relying, therefore, on one HDD crossing of the railway corridor, rather than two.</p>
West Oxfordshire District Council	Ecology	<p>Change 48.</p> <p>It is unclear whether any vegetation will be removed to facilitate access for construction and maintenance traffic.</p> <p>An assessment of the ecological value of</p>	Yes	<p>The effects of the Project upon ecology, including the removal of sections of hedgerow required in locations to provide improved access or visibility, are</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>any vegetation should be undertaken prior to removal to assess the potential impacts on any priority habitats or species. Significant impacts should be avoided. The details of any impacts as well as any proposed mitigation measures should be detailed in the Environmental Statement.</p>		<p>assessed in Chapter 9 of the ES [EN010147/APP/6.3]. An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1.</p>
<p>West Oxfordshire District Council</p>	<p>Cable Route</p>	<p>Change 50. WODC support the reduction in the number of Cable Route Options from this locality, giving greater certainty regarding potential for significant effects arising from development.</p> <p>WODC support the removal of the cable route option from Long Mead Meadow. WODC highlighted this area as one in which potential significant negative ecological impacts were possible through the PEIR consultation. WODC recognise however that there will be equally valuable habitats in the locality and potentially in the newly identified cable corridors.</p>	<p>Yes</p>	<p>This comment from WODC is noted.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Ecology	<p>Change 50. It is unclear at this stage whether land proposed for new cable corridors is ecologically valuable and sensitive.</p> <p>Ecological impact assessment will be required to identify important / priority habitats and surveys should be undertaken to understand impacts on protected and priority species in the locality. Details of impacts as well as details of any proposed mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.</p>		<p>The effects of the Project upon ecology, including the sensitivity of the Thames meadows, are assessed in Chapter 9 of the ES [EN010147/APP/6.3]. An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1.</p>
West Oxfordshire District Council	Public Rights of Way	<p>Change 50. HDD processes are likely to result in amenity impacts to users of the PROW network and Eynsham allotments.</p>	Yes	<p>The Outline Code of Construction Practice includes an Outline Public Rights of Way Management Strategy [EN010147/APP/7.6.1] The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				[EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]
Vale of White Horse District Council	Cable Route	VWHDC welcomes the change made at location 50 to reduce the number of cable routes and to avoid adverse impacts on areas of species rich grassland. VWHDC has no comment to make on the other red line changes listed at locations 51 to 57 within its boundary.	Yes	This comment from VWHDC is noted.
Vale of White Horse District Council	General	Other feedback from VWHDC relates to their feedback submitted to the first statutory consultation in February 2024.	No	This comment from VWHDC is noted.
Cherwell District Council	Landscape	CDC has concerns about the landscape and ecological impacts of the change to the boundary at location 23 which would result in the loss of additional hedgerow. CDC's Landscape Architect requests that a full assessment is made of the impacts of the additional hedge loss within the Environmental Impact Assessment with particular reference to visual/landscape receptors. In respect of the cumulative changes across the entire site/all districts it	Yes	The comments in the Information change Note highlight that the extents of the areas relating to the A44 and Langford Lane are to provide flexibility, but that the impacts would involve some hedgerow removal for visibility and vehicle safety purposes. The impact of the removal of hedges has been considered,

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		is also observed that the additional loss of established hedgerow and trees, which have been part of the landscape and providing wildlife corridors for hundreds of years will be impossible to fully mitigate in the short to medium term.		in terms of the impacts on ecology, as part of Chapter 9 of the ES [EN010147/APP/6.3]
Cherwell District Council	General	Other feedback from CDC relates to their feedback submitted to the first statutory consultation in February 2024.	No	This comment from CDC is noted.
HSE	Construction	<p>The major accident hazard site is HSE reference H1423, Thames Water Authority, Swinford Water Treatment Works, nr Eynsham, Oxon.</p> <p>The major accident hazard pipeline is Southern Gas Networks, Charlbury/Tackley (P079) Pipeline, HSE reference 7078, Transco reference 1349.</p> <p>The Applicant should make contact with the above pipeline operator, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:</p>	Yes	<p>The Applicant has been in direct consultation with Thames Water and Southern Gas Network in relation to their assets, respective protective provisions, and the intention to develop Statements of Common Ground with these undertakers for agreement prior to examination.</p> <p>The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in</p>

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		<p>I. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.</p> <p>II. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.</p> <p>III. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.</p> <p>HSE's Land Use Planning advice is dependent on the location of areas where people may be present. Based on the information in the 30 November 2023 PEIR it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent</p>		<p>line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5] The Outline Operational Management Plan indicates the overall approach to maintenance. [EN010147/APP/7.6.2]</p>

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		<p>planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.</p>		
HSE	Human Health	<p>There is no indication within the Preliminary Environmental Information Report that there are hazardous materials which are likely to require Hazardous Substance Consent will be required. However, the HSE would like to highlight that the presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will require Hazardous Substances Consent ['HSC'] under the</p>	Yes	<p>This comment from the HSE is noted. The used of hazardous substances above controlled quantities that will require an HSC is not envisaged, at this stage, particularly as the Project does not include Battery Energy Storage Systems.</p>

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		<p>Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended. Further information on HSC should be sought from the relevant Hazardous Substances Authority.</p>		<p>Details will be advanced through the Detailed Design Stage, by the EPC and the Applicant, and any HSC requirements encountered in the detailed design stage will be advised to the relevant authorities.</p>
HSE	Human Health	<p>In the PEIR it was not clear if there was consideration of risk assessments arising from the development's vulnerability to major accidents. We would advise this is considered further in line with Advice Note 11 Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive taking account of the following: "it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses."</p>	Yes	<p>The Applicant will have to undertake risk assessment as part of the detailed design stage of the project, which will be undertaken by the Engineering Procurement and Construction phase (EPC). As part of this design development, risk assessment will have to be undertaken, by the designers, for the inherent risks associated with the construction, operation, and dismantling of the scheme.</p>

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				Therefore, one of the Risk Assessments required, will be the risk of major accidents, and this will have to be taken into account in the detailed design stage of the project, prior to commencement of construction.
OCC Fire Safety	Human Health	<p>This site currently does not show any buildings that the fire safety order would apply too. However if this does then it is taken that where required these works will be subject to a Building Regulations application and subsequent statutory consultation with the fire service, to ensure compliance with all the functional requirements of The Building Regulations from B1 to B5.</p> <p>It is taken that the sites will have the correct signage for emergency contacts in the event of an emergency.</p>	Yes	Noted – there are no buildings currently associated with the Project, other than a roofed (open sided) shelter being considered for an Educational Area. The Applicant will keep this matter under review in terms of the requirements of the Building Regulations.
Eynsham Parish Council	Traffic and Transport	It is noted that the cable route will impact Lower Road, north of Eynsham. This is a busy road that local residents use to access Hanborough Rail Station and other	Yes	The impacts of the Project upon local traffic and transport are assessed in Chapter 12 of the ES

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		amenities, and we wish to object to this route being used.		<p>[EN010147/APP/6.3]. An Outline Code of Construction Practice including an Outline Construction Traffic Management Plan</p> <p>[EN010147/APP/7.6.1] has been prepared within the draft DCO, from which a detailed CoCP and Construction Traffic Management Plan will be prepared in consultation with relevant consultees. The Applicant has made allowance for the incorporation of the Salt Cross to Hanborough Station active travel route, which was a pre-existing requirement of the Salt Cross AAP – and would be delivered by the Salt Cross developer.</p>

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Eynsham Parish Council	Public Rights of Way	<p>Walkers access the countryside, Wharf Stream Way and Eynsham Allotments by crossing the B4449 to/from PROW 206/5 Bitterell. It is noted that a cable route is no longer planned for the B4449 at this location (which is positive), however access to the footpath at the Allotments location and beyond will be detrimentally impacted.</p> <p>Information about Eynsham's art trail 'Wharf Stream Way' is available at https://eynsham-pc.gov.uk/variable/organisation/171/attachments/Wharf-Stream-Way-Leaflet_UpdatedOct2021.pdf. Of particular note, 'The Railwaymen' appear to be in the centre of the proposed cable route and we wish to be contacted at your earliest opportunity about how the art will be protected from development and the art trail kept open should permission for the proposal be granted.</p> <p>We note on page 27 of Chapter 17 the PRowWs that could be affected by the</p>	Yes	<p>An Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared to be secured as part of the CoCP requirement within the draft DCO, from which a detailed Construction Traffic Management Plan will be prepared in consultation with relevant consultees.</p> <p>The assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3], and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]</p>

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		<p>proposals. In regards to Eynsham:-</p> <p>Bridleways 206/23/20 – Access from Eynsham Allotments north via Mead Lane to Cassington Road. 206/23/30 – Provides access to Eynsham Allotments. 206/8/20 – Popular path for children to Eynsham Primary School. 206/8/30 – Very well used path for daily recreation.</p> <p>Footpaths 206/5/10 – Hazeldene/Bitterell footpath – Very well used path for daily recreation. Provides access to Oxford Road Playing Field (North) and Oxford Road Play Area/Skate Park. 206/6/20 – Leads from Pumping Station/Hazeldene to 206/23/20 and 206/23/10 – Heavily used path for daily recreation which links to Eynsham Allotments footpath and Wharf Stream Way (206/5/20).</p>		

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		<p>Should HDD 5 Option C or HDD 6 be pursued, it is requested that under no circumstances should the development impact Eynsham Parish Council's Allotment site or Public Rights of Way which are accessed via Wharf Road and footpaths. We wish to be contacted at the earliest opportunity should allotment holders' access to their plots be impacted whatsoever.</p>		

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London Oxford Airport	Design	<p>We would like to see the following points addressed:</p> <ol style="list-style-type: none"> 1. A study of potential electrical interference to ground based or airborne radios, radio aids, compasses and electrical systems that might arise as a result of the proposed development; 2. A study of the effect of heat radiation from the proposed solar panels which might create air turbulence adversely affecting safety or comfort of flight; 3. A study of how the proposed development might affect, displace, encourage or harbour wildlife hazardous to aviation, both ground based and airborne; 4. A specified methodology and workable plan for swiftly isolating power such that emergency services might safely reach a stricken aircraft landing anywhere on the solar farm site and then safely deploy water-based fire-fighting media as required; 5. An alteration to the proposed layout sufficient to safeguard and area of land under the approach and departure route south of the airport in order to allow for the 	Yes	<p>The Applicant has been in direct discussions with London Oxford Airport about the points raised in relation to safeguarding.</p> <p>The Applicant met London Oxford Airport on 2nd October 2024 to discuss previous communications and the Technical Aerodrome Safeguarding Report produced by Pager Power provided as Appendix 4.4 in Volume 3 of the ES [EN010147/APP/6.5].</p> <p>The Applicant is still in discussions with the Airport about an Emergency Protocol for swiftly isolating power and then safely deploy water-based fire-fighting media as required, and the possibility of an obstruction-free corridor through the solar</p>

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		safe emergency landing of an aircraft afflicted by insurmountable technical issues and for the airport Rescue and Fire Fighting Service to access then land in order to deliver its Obligated Response.		<p>development, which would be available for aircraft to use in the event of an emergency landing.</p> <p>It is not anticipated that there would be any displacement of wildlife from the Project site to the airport. The Project is providing large areas of habitat that will be managed specifically for bird benefit. Aerodromes are required to comply with the UK Regulation (EU)139/2014 Implementing Rule ADR.OPS.B.020 Wildlife Strike Hazard Reduction; extensive CAA guidance on this is also provided within CAP772 Wildlife Hazard Management at Aerodromes. On this basis, it is assumed that the airfield is being managed to specifically reduce its attraction to wildlife,</p>

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				birds in particular. As such, if there is any displacement (which is not anticipated), it would be to surrounding agricultural fields, not to the airport.
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust	Ecology	<p>A significant number of the boundary changes appear to result in the loss of hedgerow, much of which is likely to be hedgerow priority habitat. This is disappointing and concerning. Whilst we note that hedgerow habitat is being created as compensation, such compensation cannot fully address the loss of mature hedgerows, especially those that have been in place a considerable time. We therefore consider that the changes involving hedgerow loss should all be re-assessed and all possible actions taken to considerably reduce the loss that results from these changes.</p> <p>We note in item 50 that the change will</p>	Yes	<p>During Project design, subsequent to the submission of the PEIR, the need to remove small lengths of hedgerow to facilitate access was identified, in particular for visibility splays for site access, and in some locations for open trenches where the use of HDD would be unsuitable. Paragraph 6.4.20 in Volume 1, Chapter 6 Project Description [EN010147/APP.6.3] explains the approach in detail. A crossing schedule had been produced detailing planned</p>

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		remove previously expected impact on species-rich grassland, so we welcome this change to the plans.		crossing point by location, method and if applicable length of hedgerow lost [EN010147/APP/7.3.9] The total length of hedgerow to be removed is circa 622 m across 75 locations. However, there is still proposed to be 26.5km of new hedgerow planting, and 22km of hedgerow reinforcement / gapping up. The Applicant notes that BBOWT welcomes Change 50, in terms of removal of species-rich grassland.
Cumnor Parish Council	The Consultation Process	Cumnor Parish Council believes that the consultation is inadequate.	No	The Applicant undertook its consultation, including the Targeted Consultation, in compliance with commitments made in its published Statement of Community Consultation, which in turn was informed through consultation with relevant local authorities. This is

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				<p>described in Section 6 (Preparation for Statutory Consultation) of the Consultation Report [EN010147/APP/5.1]. The Targeted Consultation focused on specific changes to the Project Site boundary (indicative Order Limits), primarily with small, but numerous, increases in land area – but also decreases in some areas. These changes were driven by a range of matters including engineering, cable laying and highway requirements, and corrections based on mapping and ownership details that arose through due diligence reviews. This has been made clear in the Targeted Consultation Change Notes.</p>
Cumnor Parish Council	General	Cumnor Parish Council assesses that they have a low degree of confidence in the 10	No	The comments of Cumnor Parish Council are noted.

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		changes that state they are unlikely to lead to significant adverse environmental effect.		
Cassington Parish Council	The Consultation Process	It is surprising that this Targeted Consultation is needed following the consultation in December 2023 / January 2024. This first official Public Consultation presented a vast quantity of (unindexed) information begging the question of why a second Targeted Consultation presenting 57 changes, is needed. Cassington Parish Council can only conclude that the first official Public Consultation was rushed, meaning that the information presented now was missing, unrefined or inaccurate. This suggests that the First Consultation was indeed inadequate.	No	<p>Following the close of the phase two (statutory) consultation, the Applicant continued to refine the proposals for the Project in preparation for submitting a DCO application. This refinement was informed by further design work and due diligence, consideration of consultee feedback, and responding to the results and data from environmental assessments.</p> <p>This resulted in a series of specific amendments to the proposed Project site boundary (indicative order limits) – both increases and decreases – compared to the Project boundary presented in the PEIR and for phase two consultation.</p>

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				<p>The Applicant undertook further statutory consultation targeted on these specific changes to ensure communities and consultees had an opportunity to comment on the full proposed Project boundary prior to a DCO application being submitted.</p> <p>This is described in Section 10 of the Consultation Report [EN010147/APP/5.1].</p>

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Cassington Parish Council	The Consultation Process	<p>The information provided provides comments on 57 boundary changes along with thumbnail maps showing where boundary changes are proposed. These maps and associated descriptions of the changes to the proposed scheme were wholly inadequate, in many cases lacking important detail or left so open as to leave the reader unable to assess what likely impacts were going to be (for example, making a substantial boundary change for a cable crossing point somewhere within the designated area). Examples of inadequate information included:</p> <ul style="list-style-type: none"> • Not showing the actual rights of way on thumbnail maps. • Not providing any information on the environment other than general habitat types that may be affected in some cases. This was of material consideration as it left the reader unable to assess neither the amount of habitat lost nor the quality or the habitat (i.e. whether or not a hedgerow is "ancient"). • Not showing local designations for nature 	No	<p>The Applicant published a Targeted Consultation Information Change Note to provide details of the consultation and to present each specific change to the proposed Project boundary. This included a description of each proposed change and confirmation of any potential changes to the environmental effects presented within the PEIR. A copy of the Targeted Consultation Information Change Note is included as Appendix 5.1.8: Targeted consultation materials [EN010147/APP/5.1.8].</p> <p>The Applicant's approach to undertaking this phase of targeted consultation was discussed host local authorities, as described in</p>

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		<p>recovery or habitats of national significance even though these are available on national databases and environment maps.</p> <ul style="list-style-type: none"> • Not showing nearby heritage assets so that potential impacts on archaeological sites for example can be assessed (e.g. Sansom's Platt). • In one case maps being so ambiguous that it is not possible to identify where the proposed change is (see 35 below). <p>This significantly lowers the value of the consultation as the nature of the proposed changes are not clear to the public as well as the environmental, amenity and heritage impacts. This suggests that as with the First Public Consultation, this second Targeted Consultation is inadequate, being deficient in the information it presents to the point where the public are unable to comment on many aspects.</p>		<p>Section 10 of the Consultation Report [EN010147/APP/5.1].</p>

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Cassington Parish Council	Ecology	<p>1. Dornford Lane, an ancient drover's track will be included in the scheme to be used for maintenance vehicle traffic. This is currently a public right of way. At the northern end the lane forms a track. However, as it nears the southern end, and junctions with other footpaths such as Akeman Street it narrows to one or two feet wide, with wide swathes of vegetation, bushes, hedging and trees, etc. It would be impossible to drive vehicles down this path without causing massive damage so it is assumed the developer will therefore have to remove these hedges. It is likely they are older than 1845 making them "ancient hedgerows". The most ancient parts of the hedgerow along this track include ash and oak trees and can be 15 to 20 feet across. The small Roman town of Sansom's Platt is also in the immediate vicinity of Dornford Lane.</p>	Yes	<p>No hedgerow removal is anticipated to be necessary along Dornford Lane. The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5]. The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3]. It is not proposed to drive vehicles down the path, but only to cross it at suitable places. An assessment of the effects of the Project on Public Rights of Way is set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] and an Outline Public Rights of Way Management Strategy forms part of the Outline Code</p>

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				of Construction Practice [EN010147/APP/7.6.1]
Cassington Parish Council	Ecology	5. Hedgerow removed along the B4027 to allow construction and maintenance of solar arrays and delivery of power converters. The applicant states (as in 4) that any protected species will be safeguarded. It is difficult to imagine how you can safeguard a protected species within a hedge that is due to be removed especially if the species is dependent on the environment provided by the hedge.	Yes	The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5]. The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3]. Details of the principles of how protected species would be safeguarded during clearance are set out in the Code of Construction Practice [(EN010147/APP/7.6.1].
Cassington Parish Council	Ecology	7. Widening of the boundary along Stratford Lane which may lead to loss of hedgerows.	Yes	The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5]. The impact of the Project on

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Cassington Parish Council	Public Rights of Way	9. Change in the project boundary to allow cable to be placed underground. Will potentially impact the Glyme Valley way and National Cycle Route 5.	Yes	An assessment of the effects of the Project on Public Rights of Way, including National Routes, is set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] , and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]
Cassington Parish Council	Ecology	13. Change of boundary to allow access from the Banbury Road for construction and maintenance traffic. Will result in loss of hedgerows of indeterminate age.	Yes	The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5] . The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .

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Cassington Parish Council	Ecology	15. Potential widening of the boundary along Banbury Road to the north of Hensington. This may result in the loss of hedgerows but there is insufficient information here to evaluate ecological impact.	Yes	The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5] . The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Cassington Parish Council	Public Rights of Way	16. Use of a track for a 33kV cable connecting arrays. This may result in the loss of a public right of way or impact its use during construction.	Yes	The assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] . and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]
Cassington Parish Council	Ecology	18. A site boundary change that may impact on several major Oxfordshire footpaths including the Greenbelt Way, the Eynsham and Thames Path Promoted	Yes	Public Rights of Way and other Promoted Routes (including national routes) are illustrated in the ES at Figure 17.5 [EN010147/APP/6.4]

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		Routes. Disruption to the use of these footpaths may occur during construction.		The assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] , and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1] .
Cassington Parish Council	Public Rights of Way	18. There is no further information on likely impacts to ecology.	Yes	The effects of Change 18 upon Ecology and Nature Conservation are considered in Chapter 9 of the ES [EN010147/APP/6.3]
Cassington Parish Council	Cultural Heritage	21. A boundary change to reduce potential impacts on archaeology. This would appear to be a beneficial change in terms of heritage.	Yes	This comment from Cassington PC is noted. The changes to the development area to protect features of archaeological significance are assessed in Chapter 7 of the ES on Heritage Assets [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cassington Parish Council	Ecology	23. Access to construction site to the east of Langford Lane. This will result in the loss of mature hedgerow.	Yes	The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5] . The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Cassington Parish Council	Public Rights of Way	24. Disruption to the cycle and footpath running along the A44 for cable laying during construction. It is noted that this is the main foot and cyclepath connecting Woodstock / Bladon to Begbroke, Yarnton and Oxford. This route is in daily use by cycling commuters into Oxford, the villages between Woodstock and Oxford and to the Begbroke Science Park.	Yes	The comments in the Information change Note regarding Change 24 highlight that the extents of the areas relating to the A44 and Langford Lane are to provide flexibility, but that the impacts on highway users, including commuting cyclists on the A44 corridor, will require further detailed evaluation as the Project progresses. An Outline Code of Construction Practice including an Outline Construction Traffic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Management Plan [EN010147/APP/7.6.1] has been prepared within the draft DCO, from which a detailed CoCP and Construction Traffic Management Plan will be prepared in consultation with relevant consultees.
Cassington Parish Council	Traffic and Transport	27. Change in boundary to allow for cable laying across the Cassington (Burleigh) Road. This road is now a busy route taking a lot of local rush hour traffic moving between Oxford / Yarnton and from the A40 through Cassington to the Bladon / Long Hanborough Road (A4095). Any disruption to this route will cause considerable inconvenience to local road users and also will likely result in heavier traffic in the surrounding area (e.g. traffic from Yarnton going instead through Cassington or up the A44 and through Bladon, a route already heavily congested. The mature hedges along this road are also not mentioned here and presumably they will also be damaged or a part removed for this work.	Yes	The impacts of the construction phase on local traffic are considered in Chapter 12 of the ES [EN010147/APP/6.3] An Outline Code of Construction Practice including an Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared within the draft DCO, from which a detailed CoCP and Construction Traffic Management Plan will be prepared in consultation with relevant consultees.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Cassington Parish Council	Public Rights of Way	28. This is a rather non-specific boundary change, the impacts of which are not possible to determine because the precise cabling route for which the change is made is yet to be determined. It is another example of where the information provided in the Targeted Consultation is insufficient to allow assessment of impacts, in this case on Heath Lane, Bladon and on a Bridleway.	Yes	Change 28 relates to one of two cable route options, so this land is only required for the construction phase, and may not be required at all if the alternate route option is pursued. If this option is pursued works at the Heath Lane end will involve the removal of a 5m section hedge to allow a cable trench to be created, and the hedge replanted (rather than undertaking HDD in close proximity to residential properties) Works at the western end involve a narrow section of Ancient Woodland, which would be avoided through the use of HDD techniques, and in line with

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				the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]
Cassington Parish Council	Ecology	29. Boundary change potentially causing loss of trees and hedgerow along Cassington Road to allow for cabling. We note that this may effect the edge of Burleigh Wood, an area of ancient woodland (see PEIR, Chapter 9, P17). This wood was already damaged by a tornado on the 31st October, 2021. As with (27) we note the disruption to traffic this may incur along the Cassington Road.	Yes	Change 29 has been made to provide sufficient space for the HDD compound needed to avoid the use of trenching that would otherwise affect vegetation, including the Ancient Woodland either side of Cassington Road, and which will be in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5] All areas of ancient woodland outside of the Project site will be protected by a minimum 15m buffer, as set out in the oCoCP [EN010147/APP/7.6.1] . The impacts of the construction phase on local traffic are considered in Chapter 12 of the ES [EN010147/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>An Outline Code of Construction Practice including an Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared within the draft DCO, from which a detailed CoCP and Construction Traffic Management Plan will be prepared in consultation with relevant consultees.</p>
Cassington Parish Council	Ecology	<p>29. Boundary change potentially causing loss of trees and hedgerow along Cassington Road to allow for cabling. We note that this may effect the edge of Burleigh Wood, an area of ancient woodland (see PEIR, Chapter 9, P17). This wood was already damaged by a tornado on the 31st October, 2021. As with (27) we note the disruption to traffic this may incur along the Cassington Road.</p>	Yes	<p>The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5]. The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3]. All areas of ancient woodland outside of the Project site will be protected by a minimum 15m buffer, as set out in the</p>

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				<p>oCoCP [EN010147/APP/7.6.1]. An Outline Code of Construction Practice including an Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared within the draft DCO, from which a detailed CoCP and Construction Traffic Management Plan will be prepared in consultation with relevant consultees</p>
Cassington Parish Council	Ecology	32. Again, removal of hedges with no detail of how mature these are or of details of removal.	Yes	<p>The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5]. The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Cassington Parish Council	Public Rights of Way	<p>34. The proposal here is for a footbridge over the river Evenlode. The positioning of this footbridge would seem to connect land to the west of the Evenlode to land surrounded by the river as it splits in two to the north and reconnects to the south. A priority identified in the Cassington Neighbourhood Plan is connecting the footpath from Cassington via Purwell Farm which ends at the River Evenlode just north of Goose Eye Farm, potentially opening a pedestrian and cycling commuting and amenity route between Cassington and Long Hanborough (see Cassington Neighbourhood Plan). This footbridge does not seem to achieve this goal although it may if the additional footbridge (35) is positioned on eastern loop of the River Evenlode in this location. Unfortunately, the maps provided with the Targeted Consultation are not clear on this matter (see 35 below). Although impacts to the River Evenlode and surrounding meadows would be less than the bridge described in (30) nonetheless care would need to be taken in design and</p>	Yes	<p>Change 34 relates to utilising an existing agricultural bridge. No new bridges are proposed. The approach to construction of the Project will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5] including HDD beneath the River Evenlode. The Illustrative Masterplans [EN010147/APP/6.4] confirm the Applicant's proposal to create new permissive paths that will connect Cassington and Church Hanborough, and the existing footpath network, as well as make allowance for the Salt Cross Active Travel route proposed in the original</p>

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		construction of the footbridge given the sensitive nature of the habitats in this area (see 30 above).		Salt Cross AAP, to make just such a connection that the Cassington Neighbourhood Plan seeks to promote. The detailed design of the paths will be subject to further work, but illustrative sections are provided as part of the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]
Cassington Parish Council	Public Rights of Way	35. It is completely unclear where this footbridge is located as no arrow points from the (35) box on P9 of the Targeted Consultation document to the river crossing point. A location at the end of the footpath from Cassington, crossing the River Evenlode north of Goose Eye Farm, before the River splits in two would make most sense. It is also likely that this was the historic crossing point of the river and the footpath probably continued to the west. If this is the location of the proposed footbridge it would be compatible with the proposal in the Cassington Neighbourhood Plan and the footbridge described in (34)	Yes	Change 35 relates to an existing bridge to the south side of the 'island' in the Evenlode flood plain. As for the response to Change 34 above, the Illustrative Masterplans [EN010147/APP/6.4] confirm the Applicant's proposal to create new permissive paths that will connect Cassington and Church Hanborough, and the existing footpath network, as well as make allowance for the Salt Cross Active Travel

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		<p>un-necessary. This will only be a useful ProW if the additional footpaths are put in place to the west of the River Evenlode connecting Cassington to Church Hanborough or (preferably) Long Hanborough. Although here we point out that amenity of such a footpath and benefits in terms of exposure to green countryside will be considerable detracted from given the covering of much of the land around the route by solar arrays. Again, although impacts to the River Evenlode and surrounding meadows would be less that the bridge described in (30) nonetheless care would need to be taken in design and construction of the footbridge given the sensitive nature of the habitats in this area (see 30 above).</p>		<p>route proposed in the original Salt Cross AAP, to make just such a connection that the Cassington Neighbourhood Plan seeks to promote. The detailed design of the paths will be subject to further work, but illustrative sections are provided as part of the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]</p>
Cassington Parish Council	Traffic and Transport	<p>36. As with the Cassington (Burleigh) Road, Lower Road takes a significant load of local rush hour traffic from the A40 and the southern stretch of the B4449 (linking to Oxford via the Swinford Bridge) to Long Hanborough. Any disruption of this route will lead to significant congestion in the area and likely traffic overspill into</p>	Yes	<p>The impacts of the construction phase on local traffic are considered in Chapter 12 of the ES [EN010147/APP/6.3] An Outline Code of Construction Practice including an Outline</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Cassington. The mature hedges along this road are also not mentioned here and presumably they will also be damaged or a part removed for this work.		Construction Traffic Management Plan [EN010147/APP/7.6.1] has been prepared within the draft DCO, from which a detailed CoCP and Construction Traffic Management Plan will be prepared in consultation with relevant consultees. The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Cassington Parish Council	Ecology	40. The note identifies boundary changes to reflect land ownership and to give the project more "engineering flexibility". We note that the area including both the boundary to Cassington Sewage Farm, the access track to it and the boundaries of the railway line comprise a lot of mature hedgerow and semi-wooded habitat. Many birds use these areas for nesting or foraging opportunities. Any loss of these habitats will entail an impact on plant, insect, bird and other diversity.	No	Change 40 was based on a correction to the red line boundary following due diligence checks of the ownership plans. It is not anticipated that Change 40 involves any effects on vegetation – it was solely a realignment of boundary lines based on due diligence checks of the ownership plans.

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Cassington Parish Council	Traffic and Transport	42. The boundary of the scheme has been modified to include the private access road to Purwell Farm. It is assumed that there will be no need to alter the boundaries of this track which comprise mature hedgerows to allow access for the power converter units. What is a significant concern is the route by which the Power Converter units will be delivered to this site. Coming from Yarnton the route includes a narrow bridge which is likely to be unsuitable for HGVs. This leaves access either from the A40 via Cassington, which has a weight limit through the village, reflecting the proximity of buildings (included listed buildings) to the roadway and its narrowness. Another route would be via the A4095 but again through Bladon the road is extremely narrow.	Yes	Change 42 allows for the use of the private access road. The route for construction traffic and large loads is assessed in Chapter 12 of the ES [EN010147/APP/6.3] and the application is supported by an Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5] . The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Cassington Parish Council	Ecology	43. There is no identification of impacts in the Targeted Consultation documents, but it is noted that an area of woodland borders this change which is an environmentally sensitive habitat.	Yes	The impacts of the Project to all ecology receptors (including ancient woodlands) are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature

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				Conservation. Furthermore, the approach to mitigation is set out in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. This includes a minimum 15m buffer to ancient woodlands bordering the Project.
Cassington Parish Council	Ecology	44. This is likely to involve loss of mature hedgerows (see 5, above and notes below).	Yes	The value of hedgerows across the Project site is described in ES Appendix 9.3 Hedgerow Survey Report [EN010147/APP/6.5] . The impact of the Project on hedgerows is assessed in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] .
Cassington Parish Council	Traffic and Transport	44. This raises concerns about the transport via HGVs along roads which are likely to be suitable for such large vehicles.	Yes	The route for construction traffic and large loads is assessed in Chapter 12 of the ES [EN010147/APP/6.3] and the application is supported by an Outline Construction

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				Traffic Management Plan [EN010147/APP/7.6.1]
Cassington Parish Council	Public Rights of Way	46. The boundary of the scheme will be adjusted to include the maintenance track to the Sewage Works. This track is also part of a public footpath which is used by walkers (including dog walkers), joggers and for commuting from Cassington to Begbroke Science Park. Disruption to this footpath during construction along the highlighted area, as well as the footpath beyond the concrete track will be a major inconvenience to walkers who often use this route.	Yes	The use of this track by the Applicant is expected to be infrequent, but the assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] . and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]
Cassington Parish Council	Traffic and Transport	46. It is noted that additional traffic during construction and for maintenance will be on top of the relatively light use of the current track for traffic to / from Cassington Sewage farm and fields connecting to this track.	Yes	The use of the route for construction access is assessed in Chapter 12 of the ES [EN010147/APP/6.3] and the application is supported by an Outline Construction Traffic Management Plan [EN010147/APP/7.6.1] The use for maintenance access is likely to be equally

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				light, as compared to the Sewage Farm traffic.
Cassington Parish Council	Ecology	47. As above (40), we note that the area including both the boundary to Cassington Sewage Farm, the access track to it and the boundaries of the railway line comprise a lot of mature hedgerow and semi-wooded habitat. Many birds use these areas for nesting or foraging opportunities. Any loss of these habitats will entail an impact on plant, insect, bird and other diversity.	Yes	Change 47 incorporates land on the north east side of the railway embankment / cutting that would allow for connection between the array areas to the north side of the Cotswold Line, and only relying, therefore, on one HDD crossing of the railway corridor, rather than two. The area is to allow for HDD, and would not affect vegetation on the boundaries of the railway line. The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5]

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Cassington Parish Council	Traffic and Transport	47. It is also not understood why this change refers to highway when it lies around the railway line running from Oxford.	Yes	This was an error – the word 'highway' should have said 'railway'.
Cassington Parish Council	Traffic and Transport	48. The boundary change is to improve the visibility line to the north to enable safe access of vehicles presumably along the track to Cassington Sewage Farm. This access already comprises a considerable splay of concrete to enable vehicles to enter or leave this track. The Cassington – Yarnton road in this area is lined by mature hedgerows which would be impacted if changes are made to increase visibility from the track to the road.	Yes	The detail of the visibility splays required are assessed in the Traffic and Transport Chapter 12 [EN010147/APP/6.3] and illustrated on the Streets, Access and Rights of Way Plans [EN010147/APP/2.2]
Cassington Parish Council	Ecology	50. Land classified as species-rich grassland is removed from this scheme which is positive. However, the boundary is increased elsewhere to the south of the Cassington Road and to the west of Cassington Canal. This land is in the existing core nature recovery network and is also identified as Priority Habitat Inventory Coastal and Floodplain Grazing Marsh (see Magic maps and Cassington Neighbourhood Plan's Green Infrastructure	Yes	The Applicant notes this comment, and has been in discussions with Natural England and the host authorities, including in regard to nature recovery network opportunities that the development can bring. The approach to HDD and avoidance of the main river meadows, has evolved

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		<p>Plan). 97% of this type of habitat was lost between 1930 and 1984 (Wildlife Trusts, 2012) so it is nationally scarce community of plants and animals. It is also concerning that land adjacent to Eynsham Allotments is also included in the boundary as this includes a complex of hedgerows and wooded habitat. Overall, the land identified for entrenching the cable is entirely unsuitable given its ecological sensitivity. This is unsurprising as there is a complex of such habitat running along the north bank of the Thames in this area (see Cassington Green Infrastructure Plan).</p>		<p>directly from feedback received at the PEIR stage. The approach to construction will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5] including HDD beneath the River Thames.</p>
Cassington Parish Council	Public Rights of Way	<p>57. Denman's Lane is a significant public footpath connecting Cumnor with Eynsham Road and also including a circular walk from Cumnor which also connects to the Oxford Greenbelt Way. Entrenching a cable along this footpath will lead to significant public inconvenience, even if temporary. There are no details of likely environmental impacts of this part of the scheme</p>		

<p>Cassington Parish Council</p>	<p>Ecology</p>	<p>Some loss of hedgerows will be incurred as a result of new access areas and other activities proposed as part of the targeted consultation. Mitigation for this is proposed as the replanting of 25.5km of new hedgerow as part of the scheme. It is noted that this is significantly less (~12%) than proposed in the PEIR, Chapter 9 (29km of new hedgerow with a further 28km of hedgerow reinforced). Cassington Parish Council asks why there has been a 12% decrease in the planting of hedgerows between the First Public Consultation and this Targeted Consultation? Is it because information was incorrect in the materials presented in the First Public Consultation or have the applicants deliberately reduced hedge planting and if so why?</p> <p>As previously identified by Cassington Parish Council the UK has lost over 50% of its hedgerow matrix post world-war II and that of the remaining hedgerows, 60% are classified as being in a poor condition. Consequently, the Hedgerow Regulations (1997) were introduced to halt the removal/ degradation of what remains of the resource. In particular, Ancient Hedgerows are of concern for nature conservation and as part of our heritage in terms of preserving the landscape of the</p>	<p>Yes</p>	<p>The total length of hedgerow to be removed is circa 622 m across 75 locations. However, there is still proposed to be 26.5km of new hedgerow planting, and 22km of hedgerow reinforcement / gapping up. The effects of the Project on ecology and habitat are assessed in ES Chapter 9: Ecology & Nature Conservation [EN010147/6.3]. Detailed hedgerow surveys are provided in ES Appendix 9.3 Hedgerow Surveys [EN010147/6.5].</p>
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		<p>English countryside. Ancient hedgerows, which tend to be those which support the greatest diversity of plants and animals, are generally defined as those which were in existence before the Enclosure Acts, passed mainly between 1720 and 1840 in Britain. These hedgerows are protected as Important Hedgerows under the Hedgerow Regulations (1997) and it is estimated that something like 70% of the U.K.s hedgerows are classified as “Important”. Such hedgerows need permission from the Local Planning Authority to be removed and although the Botley West proposal is submitted to the Planning Inspectorate, it is assumed the LPA will still need to be consulted over removal of Important Hedgerows.</p> <p>Cassington Parish Council also notes the recommendation of the UK Climate Change Committee who indicate that hedgerow cover will need to be increased by 40% by 2050 to help deliver our net zero target – in essence this requires the planting of 200,000 km of new hedgerows. We therefore contest any development which proposes to remove hedges, even temporarily, because of the high negative landscape impacts of this activity and the counter-intuitive nature of their removal in line with net zero aspirations.</p>		
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		<p>Whilst negative impacts of hedgerow loss are assumed to be mitigated because of the planting of new hedgerow (whether this is 25 or 29km is not clear and nor is the location), emphasis must be placed upon the fact that proposed changes are losing a long-established, biodiverse habitat in exchange for a brand new one. As with many aspects of the impacts of solar power stations on the environment and biodiversity, the effects of hedgerow age on species richness and abundance are poorly studied (Tresise et al., 2021). However, scientific peer-reviewed literature indicates that the biodiversity of hedgerows relates to their age, and the expected recolonisation time for biodiversity depends on the groups of species involved as well as other factors (e.g. location). Hedge biodiversity estimates (species richness or diversity measures) are often based on the plant species they host, and they can be especially important for woodland species in agricultural landscapes where much of ancient woodland has been lost (e.g. Litza & Dieckman, 2018; Montgomery et al., 2020). In southern Britain, the number of species in a 30m length of hedgerow is approximately one per hundred years of age (Pollard et al., 1974 in Montgomery et al., 2020). Newly established hedges can</p>		
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		<p>generate a high species richness in a relatively short time although species tend to be dominated by grasses and ruderal species (i.e. early colonisers of disturbed land or weedy species) whereas ancient hedgerows are dominated by stress-tolerant woodland species (Montgomery et al., 2020; see also Litza and Dieckman, 2018). At least one study in Oxfordshire has demonstrated that abundant and diverse spider and beetle populations can develop in well-managed and newly planted hedgerows in five years (Pywell et al., 2005).</p> <p>Taking this together we assume that any replanted hedgerow may not necessarily replace habitat and associated biodiversity lost as a result of the changes outlined in the Targeted Consultation, especially if they are ancient hedgerows and possibly not if they are Important Hedgerows (older than 30 years or regarded as important for other reasons). Even where new hedges successfully establish it is unlikely their biodiversity will match that of Important hedges for many decades and for ancient hedges, perhaps centuries.</p>		
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Environment Agency	Hydrology and Flood Risk	<p>We have no major concerns with the changes proposed within this consultation. However, these changes must follow the environmental protection and enhancement principles set out in our letter dated 05 February 2024. We draw particular attention to the following amendments affecting watercourses:</p> <p>Table 30 – HDD and cabling beneath watercourse Table 34 – Footbridge over watercourse Table 35 – Footbridge over watercourse Table 39 – HDD and cabling beneath watercourse</p> <p>Additionally, these amendments may affect your permit applications. You should therefore ensure that these changes are factored into your application with our Thames area Consenting Team.</p>	Yes	<p>A technical note has been prepared responding to the PEIR comments received from the EA. This was submitted on the 24 June 2024 and a meeting was held on the 16th July 2024. An updated technical note with additional supporting information requested from the EA was submitted on the 12th August 2024. The Applicant will continue to develop a Statement of Common Ground with the EA.</p>

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CPRE Oxfordshire	Public Rights of Way	<p>We are concerned about the multiple proposed impacts on the local Public Rights of Way (PRoW) Network. Of particular concern are:</p> <ul style="list-style-type: none"> • Change 1, which would impact Dornford Lane, an ancient drovers' road, and the Sustrans national cycle route NCR5. • Change 3 which would impact both the above, plus Wootton BR21, an east-west green lane linking Wootton to Dornford Lane • Change 9 which would impact Sustrans NCR5 as well as the Glyme Valley Way • Change 18 There is a clear error in the applicants' document as the text re Change 18 refers inter alia to Eynsham where in fact most of Change 50 is located. The Thames Path/OGBW are, of course, on the other side of the river in Cumnor. However, Change 18 may still affect public rights of way, as, while it is unclear whether it refers to the bridleways themselves or a strip of land alongside them, it follows Woodstock BR5/Shipton-on-Cherwell BR3, a green lane following the current perimeter of the built-up area 	Yes	<p>The assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3], and an Outline Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]</p>

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		<p>and Shipton-on-Cherwell BR2 towards Shipton village. Given the harm that would be caused, we object to cable-laying within the surface of the bridleways.</p> <ul style="list-style-type: none"> • Change 16: impacting Woodstock FP6, part of an easy and popular circular walk from Woodstock, which goes through a beautiful tunnel of trees and well established hedges. • Change 28: impacting Bladon BR5, part of Shakespeare's Way and an important route out of Bladon village into woodland known as Bladon Heath and towards Begbroke and Yarnton. 		
CPRE Oxfordshire	Public Rights of Way	<p>Surface deterioration - Laying cables under the surface of green lanes in the Oxfordshire Cotswolds would be undesirable for rights of way users as their topsoil tends to get sticky, not to say very muddy, when wet. In so far as they are reasonably satisfactory to use at the moment is due to the fact that their surfaces have been compacted by decades, if not centuries of regular use. For these surfaces now to be excavated would therefore inevitably lead to them</p>	Yes	<p>The treatment, including compaction, of material following open cut trenching as may affect any Public Rights of Way will be advanced through detailed management plans, informed by the Outline Code of Construction Practice and its appendices [EN010147/APP/7.6.1]. The details will be advanced</p>

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		becoming softer than previously and more susceptible to mud problems.		through the discharge of Requirements to be approved by the host authorities, including Oxfordshire County Council.
CPRE Oxfordshire	Public Rights of Way	Cumulative impact – although some of the impacts are listed as temporary, multiple interventions across the area could put much of the local PRow Network out of action at the same time, which would be hugely detrimental to the amenity of local residents.	Yes	The assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] and each Chapter considers cumulative effects. Chapter 20 provides the Summary of Significant Effects and Cumulative Effects and Inter-relationships [EN010147/APP/6.3] .The application is also accompanied by an Outline Public Rights of Way Management Strategy, which forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]

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CPRE Oxfordshire	Public Rights of Way	Whilst the new footbridge provided under Change 34 would improve the connectivity of the local path network, it would be at the expense of the total destruction of the countryside which this path network serves.	Yes	Change 34 relates to utilising an existing agricultural bridge. No new bridges are proposed. The approach to construction of the Project will be advanced, through detailed methodologies, based on the Outline Code of Construction Practice [EN010147/APP/7.6.1] and in line with the cable laying methodology set out at Volume 3 Appendix 6.2 [EN010147/APP/6.5] including HDD beneath the River Evenlode. The Illustrative Masterplans [EN010147/APP/6.4] confirm the Applicant's proposal to create new permissive paths that will connect Cassington and Church Hanborough, and the existing footpath network, as well as make allowance for the Salt Cross Active Travel route proposed in the original

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				Salt Cross AAP, to make just such a connection that the Cassington Neighbourhood Plan seeks to promote. The detailed design of the paths will be subject to further work, but illustrative sections are provided as part of the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]
CPRE Oxfordshire	Ecology	<p>Change 50 - We are pleased to note the dropping of the proposed cable routes that would have directly impacted the Long Mead Wildlife Site. However, the remaining routes would still directly impact very important restoration meadows and in our view it would be difficult to mitigate or compensate for this harm.</p> <p>Putting cabling under the river and towpath would be undesirable wherever it is located as it would be likely to destabilise the riverbank and thus increase the risk of towpath erosion. With the recent increased tendency to flooding the banks are already</p>		<p>The HDD of the cable under the River Thames has been planned to also take it underneath all of the surrounding meadows with the cable entry and exit points to be in arable land to the north/south.</p> <p>The process of HDD means that there is no interaction between the river, riverbank nor surrounding meadows as the drill is bored well below the level of any of them.</p>

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		under increased pressure and so erosion is more likely and cable-laying would be only likely to exacerbate this situation.		
Gardens Trust	Public Rights of Way	In the northern section, we have concerns regarding the cabling along Dornford Lane as well as vehicular access for construction and maintenance phases. This is concerning because the lane is in effect a linear landscape with thick ancient hedgerows either side and the proposals will directly affect Dornford Lane itself, not just the surrounding fields. Oxfordshire CC describes it as of special interest : 'Dornford Lane is an ancient green lane, coming into existence around the year 1100 for the purpose of carrying supplies from the royal demesne farm at Steeple Barton to the royal manor of Woodstock. It is very different from Akeman Street, following the valley as much as it can, curving when it suits it and having high ancient hedges alongside it.' At certain points the PROW narrows to pedestrian width, and this would mean presumably	Yes	Chapter 17 of the ES contains a detailed assessment of the effects of the development on Public Rights of Way, including Dornford Lane, during and post construction [EN010147/APP/6.3] The application is also supported by an Outline Code of Construction Practice, which includes an Outline PRow Management Strategy [EN010147/APP/7.6.1] , and an Outline Operational Management Plan [EN010147/APP/7.6.2] These seek to mitigate and manage any potential conflict of PRow users, and identify the methods associated with the construction and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		removal of hedgerows to allow for vehicular access, but the amendments also suffer from a lack of detail. We would also draw your attention to the lower part of the lane which passes Lower Dornford Farm. This is a non-designated landscape, despite having been designed by Capability Brown, and the setting of this would be adversely impacted.		operational requirements, with priority given to users of the PRowS.
Gardens Trust	Cable Route	The boundary changes in the central and southern areas do not address the concerns we raised at the Stage 2 consultation, with the exception of the cable route under the Thames which affected rare historic floodplain meadows. The alternative route, further east through Smith's Changeable Furlongs, is preferable. We welcome the removal of the cable route from the rare floodplain meadows at Long Mead and Swinford (farm) meadow LWS. However, the Nature Recovery Network has a lease from Smiths of two of these fields adjacent to the Thames for meadow restoration and the community has recently planted a boundary hedgerow and other meadow	Yes	The comments of the Garden Trust are noted in relation to the changes, and the concerns that remain from their comments received at the PEIR stage – which are considered elsewhere in this table.

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		plants in these fields. These should be protected.		
National Highways	Traffic and Transport	<p>We have reviewed the available consultation documentation and are able to conclude that there will unlikely be any impact to the A34 from the proposed changes.</p> <p>We look forward to engagement with the applicant and Oxfordshire County Council on the preparation of a Transport Statement to be submitted in support of the application for Development Consent. Based on what is known about the development proposals, it is highly likely that the A34 will be impacted by the development, particularly during construction. Therefore, we would recommend that the applicant contacts us to determine any requirements we may have for the scope of the Transport Statement.</p> <p>We understand that an Outline</p>	Yes	<p>The comments of National Highways are noted. The Applicant has been in detailed discussions with Oxfordshire County Council in relation to highway and transport impacts, and the use of the A34, in particular for the routing of abnormal loads. Chapter 12 of the ES assesses the traffic and transport effects [EN010147/APP/6.3] and the application is supported by an Outline Construction Traffic Management Plan [EN010147/APP/7.6.1]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Construction Traffic Management Plan (CTMP) will be submitted in support of the application for Development Consent. This should properly assess the impact of construction traffic on the A34, we look forward to engagement from the applicant to develop the Outline CTMP.</p>		
ICOMOS UK	Cultural Heritage	<p>ICOMOS-UK considers that the proposed Botley West Solar Farm would not have a direct impact upon the OUV of Blenheim Palace and Park WHS or its setting. (The setting as identified by the map 'Character of Setting of WHS' on page 50 of Appendix III of the Management Plan).</p> <p>The 1000 ha park is enclosed by a high wall and continuous tree belt so that there are only two outward views from the park. A southerly view from the Palace to Bladon Church is terminated by woodland on high ground only a kilometre beyond the church. An easterly view from the Column of Victory ends at the nearby houses of Woodstock, a view which also incorporates</p>	Yes	The Applicant notes and welcomes ICOMOS-UK's conclusion.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the view of Woodstock church beyond the Grand Bridge. The three proposed solar farms to the N-E and south of Blenheim Park are beyond these terminations. The setting map also identifies an Area of High Scenic Value outside the south-west of the Park, which would be unaffected by the Solar Farm, though the N-W corner of the central block of the Solar Farm is not far away.</p>		
ICOMOS UK	Cultural Heritage	<p>The ICOMOS-UK Cultural Landscapes and Historic Gardens Committee has an interest in sustaining the quality of the rural landscape in the UK. The attractive countryside which would be affected by the three blocks of the proposed Botley West Solar Farm is sensitive to downgrading. The Northern and Central blocks are not far from Blenheim WHS, while the Central and Southern blocks are in the NW of Oxford's Green Belt. While the Committee understands that it is national policy to provide solar farms as a contribution to counteracting global warming, it is surprising that there appears to be little national policy as to how suitable sites</p>	Yes	<p>Cultural Heritage has been addressed in Chapter 7: Historic Environment [EN010147/APP/6.4].</p> <p>As part of ongoing work with Historic England, a number of additional Representative Viewpoints and visualisations are to be completed to specifically look at potential effects on the Blenheim World Heritage Site.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>should be selected, so that in the perceptive words of The Gardens Trust: the choice of energy sites is currently unplanned and opportunistic.</p> <p>In this case the Committee has asked one of its members – Hal Moggridge OBE VMH PPLI FIHORT RIBA AADIP - to assess the current proposals – an assessment endorsed by the committee - on an assumption that, in part at least, Botley West Solar Farm might be constructed. The assessment suggests that parts of the current proposals are unacceptable because they impinge too closely upon adjacent villages, including the new Salt Cross village proposal. The proposals also appear to have ignored topography in a landscape with some significant escarpment and steep slopes, though river valleys have been respected.</p>		
ICOMOS UK	Cultural Heritage	The majority of the proposal for the Northern Solar Farm is on arable farmland with gentle slopes in locations which are not very visible from outside locations. Tall boundary hedges and wide vegetation	Yes	The landscape and visual effects are assessed and reported in Chapter 8 of the ES [EN010147/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>beside footpaths should substantially obscure most of the solar farm. An exception to this is around Hordley and Sansom farms, near the B4027 road, where the land is dome shaped and visibly sloping. Therefore bay 1.11 (except its NW corner), bays 1.12 and 1.13 and the northern part of 1.14 should be omitted from the proposal.</p>		<p>A summary of the effects is contained in Table 8.24 and 8.25 of that chapter. On balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
ICOMOS UK	Cultural Heritage	<p>The Central Solar Farm is in three separate areas, not far apart, which might come to dominate the landscape south of Blenheim Park, unless arranged to avoid being too obvious by being set away from adjacent villages and important landscape features. This whole area is in Oxford Green Belt.</p> <p>The north-eastern block fills most of the 2 km of farmland between Bladon and Begbroke villages, with ancient Bladon Heath wood to its south and Oxford airport to the N-E beyond the A44. The proposal already leaves an unoccupied 100m wide strip along the eastern edge of linear Bladon village, which would effectively separate the solar arrays from the houses. In contrast arrays are shown imposing upon Begbroke village; therefore much of bays 2.13 and 2.14 and certainly the whole of bay 2.15, where panels on ground rising from 'Shakespeare's Way' recreational route would be obtrusive, should be omitted from the proposal. Other footpaths criss-crossing this area would need spacious enclosure within hedged routes,</p>		<p>Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed.</p> <p>[EN010147/APP/6.3].</p> <p>A summary of the effects is contained in Table 8.24 and 8.25 of that chapter. On balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>a practice which should be applied equally everywhere else in the solar farms.</p> <p>Much of the 3km long middle block on either side of a minor road, including the slightly detached surroundings of a sewage works, is on a kind of plateau of gently rising ground where solar arrays could be made comparatively inconspicuous from without if surrounded by tall wide dense hedges. This applies also to its detached northern end which does not impinge upon the nearby 'high scenic value' land S-W of Blenheim Park. However, there are two very unsatisfactory parts of this proposal. Solar arrays are proposed far too close to Cassington village. There should be wide open fields between the NW edge of the village and dense new hedges planted along the solar array boundary. Much of bays 2.100, 2.102 and 2.110 should be excluded from consideration for development.</p> <p>It is also unacceptable to place solar panels on the steep west facing</p>		<p>The case for development in the Green Belt is made within the Planning Supporting Statement (PSS), including the case for Very Special Circumstances, which is included within Appendix 8. [EN010147/APP/7.1.]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>escarpment along the east side of Evenlode valley, itself wisely excluded from proposed development. It is as if the topography of the landscape has not been analysed, as if no independent landscape mind has been involved. To conserve this important landscape feature, identified on the Salt Cross spatial framework as panoramic views, the small bays 2.74/5, 2.80/81, 2.82, 2.86, 2.89, 2.94, 2.105, 2.106 and 2.108 should be excluded from consideration for solar farm development.</p> <p>The 1.75 km long western block is more sensitive to the impact of the proposed solar farm, being part of the lovely Evenlode valley and rising in the west to the edge of Church Hanborough village, and to the south impinging upon the Salt Cross panoramic views. As well as the area already excluded, solar arrays should be excluded from consideration for development in bays 2.92, 2.97, 2.111/112, 2.113, 2.114, 2.115 sloping west part, 2.118, 2.119 and 2.120.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
ICOMOS UK	Cultural Heritage	At least half of this proposal is on exposed north facing arable slopes, which would be highly visible. It would almost certainly be obvious from Farmoor reservoir recreation area. The site is in the Oxford Green Belt with footpaths useful to the population of the nearby city, being accessible by bus. This site is an unsuitable place for a solar farm and should be omitted from the proposal. However, the substation site is well chosen in a fold of the land.	Yes	<p>Noted. Chapter 8 of the Environmental Statement; Landscape and Visual Impact Assessment provides a detailed assessment of the Project, and indicates the overall significance of effects, and mitigation measures being proposed. [EN010147/APP/6.3].</p> <p>A summary of the effects is contained in Table 8.24 and 8.25 of that chapter. On balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects.</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				The case for development in the Green Belt is made within the Planning Supporting Statement (PSS), including the case for Very Special Circumstances, which is included within Appendix 8. [EN010147/APP/7.1.] .
ICOMOS UK	Landscape	a. The developer is PVDP – Photovolt Development Partners – <i>“Our team comprises highly qualified engineers and technicians with experience of designing and constructing solar parks worldwide ...”</i> However there seems to be an absence of a named <u>independent</u> landscape consultant, to ensure that the interests of local people and this attractive landscape receive proper consideration.	Yes	A Statement of Expertise provided in support of the application – as an Annex to Chapter 4 on the Approach to EIA [EN010147/APP/6.3]
ICOMOS UK	Landscape	b. No mention is made of space desirable around public footpaths. The land surrounding the existing wooded east/west footpath across the northern solar farm proposal is sufficient to seclude the path from adjacent land and to include mature trees; it is 25m wide. Beside the Withy	Yes	The assessment of the effects of the Project on Public Rights of Way are set out in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [EN010147/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		Clump footpath outside Bladon, it is 7-10 m from the outside of the adjacent thick hedge to the edge of the wood beside the path. These dimensions suggest that footpaths should, as a standard requirement, run in an unobstructed width of 20-25m between the access tracks outside the fences around solar arrays.		and a Public Rights of Way Management Strategy forms part of the Outline Code of Construction Practice [EN010147/APP/7.6.1]
ICOMOS UK	Landscape	c. The value of nearby houses would undoubtedly be reduced if this solar farm proceeds; compensation for this should be paid.	No	The effects of development upon the value of property is not a material planning consideration.
ICOMOS UK	Landscape	d. Carbon expenditure in the manufacture and installation of solar units and loss of carbon storage by disturbance of soil might result in a less climate positive outcome than hoped for; this could be checked by application of the 'Pathfinder' tool. Unlike energy from wind, solar panels are less efficient in winter when demand for electricity is at its greatest.	Yes	Climate Change Chapter 14 of the ES assesses the overall carbon cost and balance of the development [EN010147/APP/6.3]
ICOMOS UK	Landscape	e. In solar farms already built in this region heavy vehicles used during installation have tended to result in footpaths and adjacent ground (and presumably also land beneath the solar panels) being	Yes	The Code of Construction Practice [EN010147/APP/7.6.1] contains an Outline Soil Management plan that

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		compressed and chewed up; this should be avoided by proper landscape specification and supervision.		includes measures to limit the impacts on soil resources, wherever practicable, through the application of recognised best practice measures in soil management.
ICOMOS UK	Landscape	f. Page 17 of the November 2023 Leaflet states <i>"a minimum 5m buffer zone for hedgerows, trees, ponds and woodland ..."</i> ; <i>this</i> is far too little to protect the roots of existing trees.	Y	The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project and a methodology for protecting trees during works and managing them through the operational stage of the development. [EN010147/APP/6.5]
ICOMOS UK	Landscape	g. Quality of farmland might be an issue. <i>"In assessing land use and agriculture, we have been conducting a number of Agricultural Land Classification surveys - 62% 3b; 38% 3a +."</i> (November 2023 Leaflet p19) but apparently not externally verified.	Y	The assessment of the effects of the Project on Agriculture, Land use and Public Rights of Way are presented in Chapter 17 of the ES - Agricultural Land Use and Public Rights

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>of Way [EN010147/APP/6.3]. The best and most versatile land comprises Grades 1, 2 and Subgrade 3a of the Ministry of Agriculture Fisheries and Food 1988 ALC System. The results of the Agricultural Land Classification survey show that 36% of the land within the Project comprises best and most versatile land, with the majority comprising lower quality Subgrade 3b land. The proposal will lead to the permanent loss of only approximately 5.5ha of the best and most versatile land associated with the development of the substations and PCS units.</p>
ICOMOS UK	Landscape	h. Maintenance of the land beneath the panels and long-term retention of soil quality would be an important issue. This	Yes	An Outline Operational Management Plan (oOMP) is provided as part of application for development consent

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		issue should be addressed at an early stage.		<p>[EN010147/APP/7.6.2]. Detailed OMP's, to be developed in line with Outline OMP and agreed with relevant stakeholders. Detailed OMP's, are to be secured as DCO requirement. The oOMP sets out management and monitoring during the operation and maintenance phase of the Project.</p> <p>The outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project.</p>
ICOMOS UK	Landscape	i. Dense reasonably tall hedgerow plantations should be a standard treatment along all the edges of the solar panel arrays.	Yes	<p>Details of planting palettes and a management plan for them are set out in the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
ICOMOS UK	Landscape	j. A new footpath along the conserved open space imaginatively proposed for Evenlode valley would be a desirable additional feature.	Yes	The Applicant notes and welcomes ICOMOS-UK's comment.
ICOMOS UK	Landscape	k. <i>"At the end of Botley West's operational life the land will return to its original use, and not become brownfield land ..."</i> (November 2023 Leaflet p19). This is good policy which needs legally binding documentation. However to make a significant contribution to countering global warming, any benefits of this electricity generation should surely not come to an end in the foreseeable future.	Yes	An Outline Decommissioning Plan [EN010147/APP/7.6.4] has been prepared as part of the application. It will be developed into a detailed management plan, and form a Requirement for approval and discharge as part of any DCO approval.

Table 4: Section 42 Applicant Response further targeted consultation on a single proposed boundary change between August and September 2024

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Oxfordshire County Council	Veteran Tree	<p>Specifically in relation to the above proposed change, as no tree survey or arboricultural impact assessment has been submitted in relation to this, it has not been possible to determine accurately the impact that the proposal will have on the adjacent veteran tree. As a result, it has not been possible to assess the impact that this change would have in relation to compliance with Forestry Commission and Natural England standing advice in relation to veteran trees shown below and section 186 of the NPPF. The consultation material states that the previous proposals had assumed the underground cable would be installed beneath the veteran tree; this would be contrary to the standing advice and NPPF section 186 and cannot be supported.</p> <p>Standing Advice: 'For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of</p>	Yes	<p>The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project, including the Veteran Tree that is the subject of this 2nd Targeted Consultation, and a methodology for protecting trees during works and managing them through the operational stage of the development [EN010147/APP/6.5].</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area'</p> <p>The proposed change may also affect the ancient woodland to the north and the impacts on this woodland should also be assessed. The applicant should be aware of the following standing advice in relation to ancient woodland buffers:</p> <p>'For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic'</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
West Oxfordshire District Council	Veteran Tree	<p>West Oxfordshire District Council considers that the proposal to run the cable route around the Veteran tree is preferable to running the cable directly under it.</p> <p>In line with the Government Guidance on Ancient woodland, ancient trees and veteran trees (advice for making planning decisions), as a minimum for ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.</p> <p>Although the resolution of the images presented in the information change note is low, it appears that a proposed buffer area has been identified around the veteran tree.</p> <p>Aerial photography shows the presence of further vegetation to the north of the veteran tree and the proposed expansion</p>	Yes	<p>The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project, including the Veteran Tree that is the subject of this 2nd Targeted Consultation, and a methodology for protecting trees during works and managing them through the operational stage of the development.</p> <p>[EN010147/APP/6.5]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>of the project boundary would extend towards the Ancient Woodland and woodland boundary.</p> <p>An ecological assessment of any vegetation proposed for removal and impact on priority habitats should be undertaken prior to any works. Details of proposed changes and details of any mitigation should be detailed in the Landscape and Ecology Management Plan and relevant chapter of the Environmental Statement.</p> <p>It would also be preferable to consider the use of non-dig methods in proximity to the Veteran Tree and Ancient Woodland as a precautionary measure.</p>		
Begbroke Parish Council	The Consultation Process	The council believes that the maps within the consultation materials are not clear.	N	The comment of Begbroke PC is noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				<p>The Applicant published a Targeted Consultation Information Change Note to provide details of the consultation and to present each specific change to the proposed Project boundary. This included a description of each proposed change and confirmation of any potential changes to the environmental effects presented within the PEIR. A copy of the Targeted Consultation Information Change Note is included as Appendix 5.1.8: Targeted consultation materials [EN010147/APP/5.1.8].</p> <p>The Applicant's approach to undertaking this phase of targeted consultation was discussed host local authorities, as described in Section 10 of the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Consultation Report [EN010147/APP/5.1].
Begbroke Parish Council	Veteran Tree	It would appear therefore that neither of the choices for the cable corridor will avoid damaging the tree and its roots. There are also a number of other similar trees in the area which would be very close to the cable and its trench.	No	The comment of Begbroke Parish Council is noted.
Woodstock Town Council	Veteran Tree	<p>Woodstock Town Council (WTC) would like to add support to the response provided by Bladon Parish Council on this consultation.</p> <p>WTC mirrors Bladon Parish's concern that the root protection area (RPA) around the tree is not large enough to protect the tree and its roots from possible damage caused by the cable route.</p> <p>WTC also feels that it is not clear from the information provided what the RPA will be or how it has been calculated. Although, there is a scale on the map having the measurements on a table would have been more useful. It is also not clear from the</p>	Yes	<p>The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project, including the Veteran Tree that is the subject of this 2nd Targeted Consultation, and a methodology for protecting trees during works and managing them through the operational stage of the development.</p> <p>[EN010147/APP/6.5]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>images/maps what the various lines and circles represent as there is no key.</p>		
Bladon Parish Council	Veteran Tree	<p>It is not clear how the proposed amendment will avoid or minimise the environmental effect on the veteran tree. Even with the proposal to change the cabling route to avoid this tree, there is clearly a significant risk that the cable route is still far too close to the tree and therefore considerable potential for damage to the tree and its root system.</p> <p>As mentioned below, the information provided in this consultation does not contain any measurements so it is not clear if it meets British Standard 5837, which defines root protection areas (RPA),</p>	Yes	<p>The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a survey of trees affected by the Project, including the Veteran Tree that is the subject of this 2nd Targeted Consultation, and a methodology for protecting trees during works and managing them through the operational stage of the</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>or if the additional standing advice from the Government has been followed.</p> <p>BPC would hope that the developers are using the Government's standing advice, which increases the RPA for ancient and veteran trees beyond the requirements of the British Standard. Under the standard method, the RPA radius is currently capped at 15m.</p> <p>The British Standard method to calculate the radius of the RPA circle for a single stem tree is: - the diameter of the tree's trunk at 1.5m above ground level multiplied by 12.</p> <p>Volunteers have been to the tree and measured both the crown of the tree and the circumference of the tree at 1.5m above ground level.</p> <p>The crown measured 9.8m and the circumference of the tree was 2.33m.</p>		<p>development. [EN010147/APP/6.5]</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		<p>Using these measurements, a 2.33m circumference gives a diameter of 0.7416m. Using this measurement the radius of the RPA circle would be 8.9m (0.7416m x 12)</p> <p>In England, the Woodlands Trust's recommendations for greater root protection for ancient trees and veteran trees are supported in guidance for making decisions on planning applications. The standing advice from the Government suggests a 'buffer zone' around ancient or veteran trees of at least 15 times the tree's diameter, or 5m from the edge of the tree's canopy if that area is larger.</p> <p>Taking this advice into account, the radius of the RPA should be 14.8m rather than 8.9m. 14.8m being the larger of a) the tree diameter (0.7416m) x 15 which is 11.1m and b) the size of the crown (9.8m) + 5m which is 14.8m.</p>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		As mentioned below the size of the proposed RPA has not been included in this consultation.		
Bladon Parish Council	The Consultation Process	<p>BPC would also like to comment on the lack of details provided as part of this consultation.</p> <p>Firstly, the images provided in Appendix 1 and Appendix 2 are not clear and are blurry.</p> <p>Additionally, apart from a reference in Appendix 2 that the additional land area proposed is shaded blue on the map there is no key explaining the other coloured lines or shapes on the map.</p> <p>There are double blue lines, thick orange lines, black lines, black rectangles, as well as yellow and black circles on the maps with no explanation of what they represent.</p> <p>Not only do the maps/images not clearly show the location of the veteran tree, but no measurements have been provided regarding the size of the veteran tree. There is no reference to its stem circumference or its crown size.</p>	No	<p>The Applicant published an Information Change Note to provide details of the consultation and proposed change to the Project boundary. A copy of this document is included in Appendix 5.1.8: Targeted consultation materials [EN010147/APP/5.1.8]. The approach this targeted consultation is described in Section 11 of the Consultation Report [EN010147/APP/5.1].</p> <p>The application is accompanied, at Appendix 8.3, by a Strategic Arboricultural Impact Assessment and Method Statement, which provides a</p>

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		There are also no details on the proposed size of the RPA or how it has been calculated.		survey of trees affected by the Project and a methodology for protecting trees during works and managing them through the operational stage of the development. [EN010147/APP/6.5]