



BOTLEY WEST SOLAR FARM

OXFORDSHIRE HOST AUTHORITIES RESPONSES FOR DEADLINE 3 | TUESDAY 22 JULY 2025

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

Oxfordshire Host Authorities (“OHAs”)

Botley West Solar Farm (EN01014)

OXFORDSHIRE HOST AUTHORITIES

RESPONSES FOR DEADLINE 3

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

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

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

Purpose of this Submission

The purpose of this submission is to provide written confirmation of the OHA’s comments and response on documents submitted at Deadline 2 (**D2**), comments to the Local Impact Report (**LIR**), responses to First Written Questions (**ExQ1**), draft Statements on Common Ground (“**SoCG**”) and suggested locations for an Accompanied Site Inspection (**ASI**).

Comments on submissions received at D2

REP2-002 – 1.3 Guide to the Application (Clean) (Rev 5)

OHA have no comment to make on the changes to this document currently.

REP2-004 – 3.1 Draft Development Consent Order (Rev3)

Requirement 5. Please see OHA comments below in response to **REP2-025** Page 12. Q1.1.10. 2). and 3).

REP2-006 – 3.3 Explanatory Memorandum (Clean) (Rev 3)

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OHA have no comment to make on the changes to this document currently.

REP2-008 – 3.4 Statement in respect of Statutory Nuisance (Rev 2)

OHA have no comment to make on the changes to this document currently.

REP2-010 – 3.6 Land and Rights Negotiations Tracker (Clean) (Rev 3)

OHA have no comment to make on the changes to this document currently.

REP2-012 – 6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2)

OHA have no comment to make on the changes to this document currently.

REP2-014 – 6.5 Environmental Statement Appendix 7.5: Settings Assessment (Rev 2)

CDC

CDC have no comments on the revised Appendix currently.

VWHDC

1.9.136 - Upper Whitley Farmhouse. The applicant states *the historical, evidential and aesthetic values that contribute towards its heritage significance would not be affected by the Project. The magnitude of impact as a result of the change within its setting is considered to be **no change***. Similarly, at 1.9.180 - Tumbledown Cottage, the applicant states *the magnitude of impact on the heritage significance of this non-designated heritage asset is considered to be **low adverse**. This has been assessed as resulting in a long-term, reversible **minor adverse** effect*.

In contrast, the summary response to the Joint Local Impact Report on page 41 [REP2-026], states *a significant adverse landscape and visual effect has been identified and acknowledged* for the NGET substation.

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VWHDC therefore query whether the Settings Assessment for these two assets is correct, as it is not clear how the scale of the NGET substation results in a significant adverse effect on landscape but has no impact on assets experienced in the same wider context. A structure that large will still be visible in that area.

WODC

The applicant’s Settings Assessment [**REP2-014**] provides useful explanation of the settings of high value heritage assets in West Oxfordshire. The Grade I listed Church of St Peter and St Paul (Church Hanborough) is of high sensitivity/value. The historical and evidential values that contribute towards its heritage significance would not be affected by the Project. There would be impacts on the aesthetic and communal values, but these would only occur through the change in longer views towards the church. The more immediate setting of the church, comprising the churchyard and the nearby buildings and open spaces within the historic core of the village, would not be affected. Where a development might result in an impact on a church tower or spire which is visible in a wider setting ‘such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, The Grade I listed Church of St Peter is of high sensitivity/value. The historical and evidential values that contribute towards its heritage significance would not be affected by the Project. There would be impacts on the aesthetic and communal values, but these would only occur through the change in longer views towards the church. The more immediate setting of the church, comprising the churchyard and the nearby buildings and open spaces within the historic core of the village, would not be affected. Any group values associated with the other historic buildings in the village would remain unchanged.

The applicant’s settings assessment concludes that overall, the heritage significance of the churches at Church Hanborough and Cassington would be barely affected, therefore the magnitude of impact as a result of the change within its setting is considered to be negligible adverse, resulting in a long-term, reversible minor adverse effect.

As the church spires are visible within the surrounding landscape however, the applicant acknowledges that the wider landscape setting of these heritage assets make a reasonable contribution to the heritage significance of the churches.

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The applicants LVIA [**PDB-006**] identifies a number of viewpoints which the OHA regard as particularly important for understanding the impact on the landscape setting of churches at Church Hanborough and Cassington. For Church Hanborough, viewpoint 26 (View looking north from footpath 238/5/20) and viewpoint 39 (View looking west from footpath 152/6/10, near Purwell Farm) and for Cassington, viewpoint 39 (View looking southeast from footpath 152/6/10, near Purwell Farm).

The applicant’s LVIA assesses the significance of effect for each of these viewpoints as moderate to major adverse for winter year 1, reducing to minor to moderate adverse for summer year 15.

Although the heritage significance of heritage assets would be barely affected, the setting of the heritage assets would be affected and this should be acknowledged.

REP2-016 – 7.3.3 Landscape, Ecology and Amenities Plan (Rev 2)

OHA have no comment to make on the changes to this document currently.

REP2-017 – 7.6.2 Outline Operational Management Plan (Rev 1)

2.2 - Operational Activities. OHA welcome the clarification for dealing with replacement infrastructure during the lifetime of the proposed development.

The OHA do not believe that the applicant’s revised OOMP adequately addresses the points made by the OHA in paragraphs 7.10.28-29 of the Joint Local Impact Report [**REP-079**]. The OHA still wish to see a climate risk assessment worked into the applicant’s Outline Operational Management Plan [**REP2-017**] to consider the impacts of extreme weather events on the development.

REP2-019 – 7.6.3 Outline Landscape and Ecology Management Plan (Rev 1)

1.1.8 - Outline Monitoring Programme. OHA welcome monitoring for the lifetime of the proposed development. However, the OHA would welcome clarity as to how the applicant proposes to resource the councils for their role in monitoring the ecological enhancements as this resourcing is usually secured via a Section 106 agreement.

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10.2- Biodiversity Objectives. OHA welcome the change of beehives to read insect hotels.

16.3.1 - Replacement trees. OHA welcome the inclusion of this paragraph, but it should be further amended to cover all trees removed. Furthermore, whilst OCC recognises that the majority of trees removed would not be within the authority of the council, OCC would expect the applicant to plant at least 2 trees for every tree removed in line with Policy 3 of the Tree Policy for Oxfordshire. The OHA also considers it important that the development’s scheme design should seek to avoid the impact on TPO in the first instance before considering replacement planting. In addition, OCC requests that CAVAT (Capital Asset Value for Amenity Trees) assessments should be provided for OCC trees that require removal as part of the development in line with Council’s tree policy.

REP2-021 – 7.6.5 Outline Written Scheme of Investigation (Rev 2)

Oxfordshire County Archaeological Service can confirm that this revised OWSI, dated July 2025 [REP2-021], has been agreed and is an acceptable document.

REP2-024 – 11.5 Compulsory Acquisition (CA) Schedule and Land Rights Tracker (Rev 2)

OHA have no comment to make on the changes to this document currently.

Comments on responses to the Examining Authority’s First Written Questions (ExQ1)

REP2-025 – 12.2 Applicant’s Response to Examining Authority First Written Questions (ExQ1)

Page 6 Q1.1.6 CROW-The OHA note the Cotswolds NL Board response from 25th June 2025 on this matter.

This states that the CNLB has carried out their own assessment on the effects on the CNL and are satisfied that the development will not cause significant adverse effects on the landscape character and special qualities of the CNL. The CNLB considers that new planting/areas for enhancement on the land between the solar PV arrays and the CNL have the potential to provide landscape enhancements, which could be considered to contribute to furthering the purposes of the CNL designation and that these should be secured as part of the DCO should the development be approved.

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The OHA are content to be guided by the CNLB on this matter and support their request for enhancement planting to meet the s85 CROW requirement to further statutory purposes of the National Landscape.

The Illustrative Masterplan suggests that such planting is currently not proposed, and the OHA requests that this is secured as part of the DCO process in liaison with the CNLB.

Page 9 Q 1.1.8 Design Guides

CDC – Agree the applicant response insofar as it states that the Cherwell Adopted Residential Design Guide is not relevant to solar developments. However, the applicant has not mentioned the Cherwell District Council Countrywide Design Summary SPG adopted June 1998 which seeks to guide all new development in the rural areas. The area within which the BWSF project would be located is defined as the ‘Clay Vale of Otmoor’ and includes the settlements of Begbroke, Shipton-on-Cherwell and Yarnton. In this area it identifies a number of implications for new developments which include avoiding loss of hedgerows to prevent the creation of monotonous exposed plains; avoiding undermining or interrupting views and settings of churches; retention of trees and hedgerows which integrate settlements into the landscape and ensuring that new planting maintains existing character.

VWHDC – The Joint Design Guide is not purely residential focused. Its purpose is to improve the standard of design in all developments in South Oxfordshire and the Vale and ensure that only developments of the highest quality and sustainability are delivered. It covers the approach to design for all sites and covers using constraints and opportunities and site assessment as the starting point to site design and is relevant for all scales of development.

WODC – The West Oxfordshire Design Guide is intended to encourage a high standard of design, and to promote new development which respects and fits in with the character of West Oxfordshire. The Guide sets out the characteristics which make West Oxfordshire unique, and which can be used to influence new design that reflects and enhances local character. The central theme linking all parts of the Design Guide is the belief that good design can only result from a comprehensive understanding of, and meaningful response to, local context in all its forms; that each context is unique and merits an individually tailored design response.

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Page 9. Q1.1.9. Design choices and functionality, 2) and 3)-OHA consider the applicant has not fully answered this and query whether sheep grazing under panels in such locations could be achieved or whether more shading of the ground and less vegetation establishment would result.

Page 12. Q1.1.10. Outline Layout and Design Principles Document, 2). and 3)- OHA consider the current wording of Requirement 5 of the Draft DCO, Schedule 2 [**REP2-004**] does not cover fencing. Without knowing the details of the fencing and panel design/colour up front the OHA are concerned that the impacts as assessed by the LVIA are difficult to comprehend and cannot be understood prior to determination. The question about the implications of colour finishes on the visual impacts has not been answered. 4). NGET substation. VWHDC do not currently accept the applicant’s assertion that the increase in height will not be significant. It has not been tested. Further LVIA work on the revised NGET substation height of 14m with wireframe evidence is required.

Page 13 Q1.1.11 Minimising glint and glare through design- This question has not been answered and therefore it appears to the OHA that there are no in-built features to reduce glint and glare.

Page 14 Q.1.1.14 Design Principles-OHA consider the Design Principles Document [**REP1-014**] does not adequately reference all design parameters set out in ES Chapter 6 Project Description [**APP-043**]. Other Infrastructure Parameters (Fence heights, CCTV and lighting) specified in table 6.4 of Chapter 6 are not referenced and these are required.

Page 17 Q1.1.16 Decommissioning – general- OHA support the inclusion of a decommissioning fund requirement along the lines of that used for the Oaklands Solar Farm and as specified by the applicant on page 18.

Page 19 Q1.1.17 Decommissioning- Piles and Soil stability- The Applicant has highlighted that all infrastructure (including piles) will be removed. Clarity is still sought on whether this include the piles below 1m? See previous response from the OCC Minerals and Waste Policy and Strategy Team to the ExQ1 questions [**REP2-050**]. If the piles are to be cut of at 1m below ground as has been suggested, then that is potentially 1,600,000 steel piles remaining in the ground below 1m, a proportion of which will fall within Mineral Safeguarding Area. If the pilings are to remain in situ due to the impracticality of removal, this could significantly impact the future viability of the underlying mineral resource. Any subsequent mineral operator would be required to extract and dispose of

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these pilings prior to commencing mineral extraction, resulting in increased operational complexity, resource requirements, potential delays, and additional waste arisings, all of which could adversely affect the economic feasibility of mineral recovery. Conversely, if the pilings are to be removed, this process would likely require substantial force, which could disturb and bring mineral material to the surface, potentially affecting the integrity of the resource.

Page 21 Q1.1.21 Statement of Common Ground – content- OHA welcome the applicant’s proposal to produce a SoCG for health and socio-economic matters.

Page 22 Q1.2.3 Cumulative Impact due to construction overlap- Slight correction that planning application 21/00217/OUT is a West Oxfordshire planning application

Page 28 Q1.3.3 Grampian-style requirement - Given the uncertainty around any separate NGET substation proposal and the lack of clarity in the DCO application on its design, OHA consider that such a requirement is appropriate and necessary as was set out within the LIR [**REP1-072**].

Page 31 Q1.3.4 Reductions – The applicant has proposed a number of changes to order limits and project layout as indicated in Change Request 2 [**REP2-045**] to mitigate impacts on sensitive areas including Blenheim Palace WHS and London Oxford Airport. These relatively minor reductions made in response to representations from Historic England and the Airport, go some way to mitigating landscape, heritage and community safety impacts. There are many additional suggestions for removal of panels, made through relevant representations and written representations, that would result in a reduced size solar farm, but have not been reflected in the applicant’s project layout to date.

Page 34 Q1.3.7 Other substations and PCS units – It is not clear that the noise impacts of the Power Converter Stations on users of public rights of way have been assessed. It is not clear how assessment of impacts other than on residential receptors at the edge of the project site have guided the choice of location for power converter stations throughout the proposed development.

Page 36 Q1.3.11 Mineral and waste resources - The Examining Authority (ExA) posed three specific questions regarding the consideration of Mineral Safeguarding Areas (MSAs) and Waste Sites. However, the Applicant has not provided a response

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to question 2 regarding why this land area was not avoided when designing and locating the proposed development. The question remains.

OCC maintains its position as outlined in the joint LIR [**REP1-079**] that for the proposed development to be compliant with paragraph 5.11.19 of NPS EN-1, all panels and other structures should be removed from Minerals Safeguarding areas within the order limits.

Page 37 Q1.3.12 Field margins- OHA consider the applicant hasn’t really looked at individual impacts and how the scheme could be adjusted to minimise them. This is particularly important for those homes with wide-open views especially from elevated locations such as in the Vale.

Page 41 Q1.4.6 Clarification on calculations – The OHA do not believe that the applicant’s response to this question adequately addresses the points made by the OHA in paragraphs 7.10.28-29 of the Joint Local Impact Report [**REP-079**]. The OHA still wish to see a climate risk assessment worked into the applicant’s Outline Operational Management Plan [**REP2-017**] to consider the impacts of extreme weather events on the development.

Page 66 Q1.6.3 Change Request 1 Outline Written Scheme of Investigation - The applicant has indicated that a revised outline written scheme of investigation (OWSI) has been submitted at Deadline 2. Oxfordshire County Archaeological Service can confirm that this revised OWSI, dated July 2025 [**REP2-021**], has been agreed and is an acceptable document.

Page 68 Q1.6.7 Group Value - An example of Group Value where heritage assets can be seen within the same view and appreciated within their settings is from viewpoint 42. The church spires of the Grade 1 Listed St Peter’s church at Cassington and the Grade 1 Listed St Peter and St Pauls church of Church Hanborough are visible within the view from the Ancient Woodland at Wytham Wood across farmland towards the Ancient Woodlands of Pinsley Wood, Burleigh Wood and Bladon Heath on the horizon

Page 69 Q1.6.12- Response to ICOMOS Relevant Representation [**RR-0413**] and DL1 submission- The OHA and their consultants (LUC) have carried out a joint site visit 15th July 2025 to check viewpoints and suggestions for panel removals that have been put

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forward by the applicant in their Notification of Intention to Submit a Request to Change the Application (dated 1st July) request and ICOMOS’ Revision of Submission Reference Number 36569 (dated 27th June 2025).

Having had limited time since the site visit the OHA kindly requests to respond to this question with a map outlining the OHAs proposed omissions by Deadline 4.

The OHA response to the ExA first written questions **[REP2-050]** (Q1.6.14) indicated that the OHA do not concur with Icomos’ statement that there will be no effect on the OUV of the WHS as a consequence of setting change. This is principally due to the relatively narrow approach to setting taken in the response. The areas of solar array highlighted for omission in the Icomos response are not, in WODC’s view, sufficient to ‘provide sufficient buffer to protect the rural landscape that is important to the setting of Blenheim Palace’.

Page 72 Q1.6.16 Blenheim Palace WHS assessment of setting 2- Historic England Summary of Written Representations **[REP1-085]** paragraphs 1.11 and 1.12 indicate that the development would result in some harm to the OUV and significance of the Blenheim Palace World Heritage Site, Blenheim Palace and RPG. ICOMOS in their Technical Review report from March 2024 similarly highlighted the Scheme would likely have an adverse impact on the property’s OUV. This harm to Blenheim WHS would be a significant effect in EIA terms and in policy terms would mean harm to a designated heritage asset of the highest importance. In NPS terms the harm would be less than substantial in nature and at a modest level.

Page 80 Q1.6.29 - Upper Whitley Farm. - The applicant states that *‘No element of the Project, including the project substation, would be visible in views to or from the listed building’*. VWHDC consider this is incorrect.

Page 86 Q1.6.41 Surface-laid cables – OCC Archaeology is satisfied with the provision for dealing with any archaeological matters related to the provision of surface laid cabling set out in the agreed OWSI **[REP2-021]**.

Page 88 Q1.6.45 Archaeological Investigations – As OCC Archaeology have previously indicated (**[REP1-079]**, **[REP1-068]**) the actual areas needing preservation would need to be agreed based on the final evaluation report and as such the provisions for

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submitting this at Deadline 5 is concerning. This would leave very little time for any further considerations based on this report to be advised upon and taken into account during the Examination.

The Evaluation Report is also likely to affect other consultees and interested parties' own responses to this scheme, as can be seen from Historic England's responses. It is essential that sufficient time is provided following the applicant's submission of the Evaluation Report for it to be read and understood to inform consultee responses.

OCC therefore believe that this report should be submitted at Deadline 4 to allow adequate time for OCC, IPs and the ExA to review the evaluation report and comment on the suitability of the applicant's proposed archaeological exclusion areas.

Page 100 Q1.7.20 Requirement 11- OCC agree with the applicant that OCC as the Highways Authority is the correct body to discharge this requirement.

Page 103 Q1.7.26 Other Consents and Licenses-

Oxfordshire Permit Scheme for Road Works and Street Works (2019) (“the permit scheme”)

OCC welcomes the Applicant's commitment to progress street works in accordance with the permit scheme.

As stated in the Joint Authorities' Response to ExQ1 (response 1.17.11) [**REP2-050**], OCC notes that the latest draft DCO [**REP3-007**] does not apply the permit scheme and OCC considers such application should be included. OCC notes that other DCOs, both recently made and currently being examined, include a provision which applies the relevant local authority's scheme.

For example, in respect of the former, article 12 (application of the permit schemes) of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) provides that the “permit schemes apply to the construction of the authorised development and will have effect in connection with the exercise by the undertaker of any powers conferred by [Part 3 (streets)]”. Under that DCO, the “permit schemes” are “any scheme made under Part 3 of the Traffic Management Act 2004 as in force at the date on which this Order is made including the Traffic Management (Essex County Council) Permit Scheme Order 2015 as varied by The Essex County Council (Permit Scheme) (Variation) Order 2015”.

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In respect of the latter, the latest version of the Fenwick Solar Farm draft DCO [REP3-007] includes article 8A (application of permit scheme), where the scheme is the Traffic Management (Doncaster Borough Council) Permit Scheme Order 2019, and the latest version of the draft Tillbridge Solar Order [REP7-008] includes article 9 (application of the relevant permit scheme), where the relevant permit scheme means the Lincolnshire Permit Scheme for Road Works and Street Works Order 2016 or the Nottinghamshire County Council Permit Scheme Order 2020, depending on the location of the proposed works.

OCC would welcome the inclusion in the instant Order of a provision similar to that included in the Bramford to Twinstead Order.

Section 278 agreements

OCC welcomes the Applicant’s commitment that “section 278 Agreements will be progressed ... post consent”.

As stated in the Joint Authorities’ LIR [**REP1-072**], officers are concerned “by the scope of the powers proposed under Part 3 [street works of the draft DCO]; however, it is possible most concerns can be addressed by making the proposed works under Part 3 subject to an agreement drafted in line with OCC’s standard highways agreement ...”.

OCC would further welcome the inclusion in the draft Order of a provision which requires a section 278 agreement to be entered into before highway works can be commenced. If such a provision is not included, it is not clear how the section 278 agreement (which the Applicant states it is committed to entering into) can be secured. OCC would suggest a new article along these lines is included at the end of Part 3 –

“16A The undertaker will not commence any works under this Part 3 prior to entering into an agreement under section 278 of the Highways Act 1980 in respect of them”.

A similar provision is included in article 23(3) (agreements with street authorities) of the Sizewell C (Nuclear Generating Station) Order 2022. OCC would obviously be open to discussing alternative drafting which achieved the same aim.

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Page 105 Q1.8.3 Substations in the Environmental Statement- Consideration of the impact of construction lighting in relation to substations will need to be revisited when updated bat survey data has been provided by the applicant.

Page 107 Q1.8.5 Buffer Zones- The locations and width of ‘appropriate’ buffers to bat roosting areas and flightlines are still to be identified through further survey. The OHA therefore question how these can be secured via the outline Code of Construction Practice as the applicant has indicated.

Page 107 Q1.8.6 Skylarks- The applicant agrees that skylarks are unlikely to nest within the panel arrays and have clarified that the skylark plots are intended to provide foraging habitat for skylark nesting within the surrounding landscape and in the archaeology areas.

However, it is likely that the archaeology areas do not provide sufficiently large open areas to support nesting skylark – Defra advice on providing habitat for skylarks suggests the land parcel needs to be over 10ha to reduce predation risk. Whilst it is understood that the ‘archaeology areas’ cover 36ha, these are dispersed across the site amongst the solar panels, and the size of individual grassland areas is not apparent.

It is unclear that the provision of skylark plots within grassland of the solar array areas is necessary or effective in improving foraging opportunities for skylark; skylark plots are designed for provision within winter cereals to increase accessibility to invertebrate prey within the crop, it is unclear that such a role is needed within a grassland habitat.

228 pairs of skylarks were recorded in the breeding bird survey in 2024. Natural grassland has an average density of 0.27 skylark territories per ha (see CIEEM In practice 117 Sep 2022). If the 36ha archaeology grassland areas are large enough to accommodate skylark, they can only be expected to support around 130 territories, meaning at least 100 skylark territories would be expected to be lost to the scheme. But given that it is likely that many of the ‘archaeology areas’ are too small to be suitable skylark nesting habitat, it is likely that all skylark nesting habitat will be lost, resulting in the loss of 228 skylark territories.

As previously stated, **[REP1-079]** this would have a significant impact on a priority species and OHA request that further off-site mitigation is provided to compensate.

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More than 60ha of grassland habitat (on land where skylarks are currently absent) would be needed to compensate for the loss of 228 skylark territories.

Page 108 Q1.8.7 Wintering bird assemblage- The OHA recommend that a farmland bird strategy is required to deliver compensation for the moderate adverse effect on wintering birds.

Page 109 Q1.8.10 Monitoring- There is a lack of evidence of the impacts of a change to solar over such a significant area in the UK. The OHA advocate for the applicant to commit to long term monitoring to understand the impacts, both positive and negative, and would recommend the value of collaborating with universities to improve sectoral understanding of the impact of large scale solar on ecology in the UK.

Page 109 Q1.8.11-12 Piling in the Environmental Statement- In relation to both this and question 1.8.12 The OHA have concerns particularly in relation to the lack of otter survey data and the potential for piling and other construction noise to disturb otters that could be breeding or resting in the area.

Page 111 Q1.8.17 Licensing- The SoS has a legal duty to have regard to the requirements of the Conservation of Species & Habitats Regulations 2017 (as amended). It is apparent that further survey information is needed for bats and otter to inform the examiner as to whether the 3 derogation tests under these regulations would be met and therefore understand whether a licence would be likely to be granted.

Pages 111-117 Q1.9.1 Baseline methodology and scope of assessments -

VWHDC

Comments about Landscape Methodology input by the VWDHC are given in Response to Issue Specific Hearing 1, Action Point 17 **[REP1-074]**. VWHDC scoping comments were not included in the PEIR table and there has been little change to methodology in response to comments given since.

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The applicant states that *LI TGN-2024-01 further clarifies this approach stating that “...if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not.”* However, the applicant does not clearly cover in the methodology or receptor assessments why a moderate effect is significant or not, it classifies all moderate responses as not significant. This is highlighted by their response to Q1.9.1 *“For the purposes of the Botley West Solar Farm Project, those effects of Moderate adverse or below are considered to be not significant. Taking the proportionality approach to the assessment, it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors”.*

Pages 126-127 Q1.11.1-Q1.11.4 Loss of Agricultural Land – The OHA do not agree with the applicant’s assessment that the development is only temporary as set out in the OHA Joint LIR [**REP1-072**]. Therefore, the loss of large areas of Grade 2 and 3A BMV land to solar panel arrays should be reviewed and reduced where possible to retain these areas for food production.

Pages 132-133 Q 1.11.17-Q 1.11.18 Best and Most Versatile Land – The applicant has not provided specific justification for the use of land by grade.

Page 135 Green Belt – Alternatives – CDC note that BMV could be preserved ‘in-situ’ under the proposed panels but remain concerned about the extended period that the highest-grade land would not be available for food production whilst the solar farm is in operation. This concern may be substantially resolved if the anticipated amended plan referenced in the change request [**REP2-023**] removes the area of Grade 2 land from the south of London-Oxford Airport/east of A44 thereby retaining it for agricultural purposes.

Page 139 Green Belt – Begbroke and Kidlington – CDC welcomes the change request ([**REP2-023**] which purports to remove proposals for panels and cabling from the parcel south of London-Oxford Airport) if it retains the last undeveloped piece of land between Kidlington and Begbroke.

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Page 149 Q1.13.5 Cycle Route Connectivity- OCC seek determination of cycle route connectivity during Examination so that there is no delay to the benefits (however marginal) being realised for the communities being impacted by the solar farm. OCC have yet to engage in detailed conversations about cycle route connectivity (beyond just ‘new cycle provision with the Project, between Bladon and Campsfield and Sansom’s Farm’) with the Applicant. OCC would welcome discussions with the applicant on this issue.

Page 151 Q1.14.4 Residential Visual Amenity Assessment-OHA note views submitted for ASV illustrate that there is potential for private views to be adversely affected, especially where there are level changes such as in the Vale. This also relates to concerns on how settlements and their communities have been covered in the LVIA and that anything that has been assessed as Moderate or below has been assessed as not significant. OHA cover concerns with regards to the RVAA and the limited assessment of effects on settlements and communities, in the Joint LIR **[REP1-072]**, see paragraph 7.3.117 and paragraphs 2.41-2.42 in the associated Appendix 1].

In this Appendix, LUC not only raise concerns about the appropriateness of a standard 25m buffer to residential areas but also explain why they consider step 4 of the RVAA assessment approach outlined in TGN 2/19 not to have been applied correctly (para 2.43).

Page 152 Q1.14.5 Methodology relating to duration and reversibility- The OHA’s view on duration and reversibility is outlined in the OHA’s Joint LIR **[REP1-072]**. Further to this, OHA queries how the proposed development is fully reversible for LVIA purposes when elements such as the NGET substation will be permanent. Furthermore, proposed mitigation will change the character of the landscape. It will considerably change open views across a landscape to views considerably restricted by mitigation planting (once and if it establishes). OHA therefore cannot agree that such mitigation planting, by nature, is beneficial and will balance the adverse effects attributable to energy infrastructure elements and that planting will continue to provide a positive permanent contribution to the landscape. The ability to experience the landscape from the PROW routes will be lost, due to mitigation planting blocking views.

Page 153 Q1.14.6 Viewpoints and Photomontages- Following on from OHAs reply to this question at D2 the OHA undertook a site visit on 15th July with their consultants (LUC). Below is an initial list of areas that were found to be ‘under-represented’ and which

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were visited on the 15th of July. The OHA do not consider this an exhaustive list given the uncertainty around vegetation removal and cable route options, and as further work is ongoing following the site visit. Further updates will be provided at D4:

- Hill End Outdoor Education Centre – it is evident that panels and the substation will be clearly seen within panoramic views to the south. This will be the case from the car park (446497, 206480) and within the grounds of the Education Centre, particularly from elevated positions in the north such as the ‘fairy ring’ (446709, 206847). The elevated views are also representative those likely to be experienced from along the edge of Wytham Woods. Significant effects are likely, given the high sensitivity of receptors and the extent of panels covering the relatively steep slopes of the hillside to the south which forms a prominent backdrop in the views.
- Oxford Greenbelt Way along the River Thames (near Swinford Bridge) – a location east of Swinford Lock (444771, 208728) was visited. It is important that the likely impacts resulting from the construction works of the proposed underground cable (including Directional Drilling works) are fully understood and are adequately covered. Therefore, a viewpoint within this area should be considered by the applicant.
- PRow junction north of Shipton Slade Farm (446543, 217810) which forms part of a circular route of PRowS extending from the northeast corner of Woodstock, and which is used locally. From this location there are open views across a large ‘prairie’ field that panels are proposed within. There will also be clear and very close views from properties and their domestic curtilages within the farmstead itself (446538, 217444) that are likely to experience significant effects. A RVAA was scoped out of the ES and the effects on properties has not been considered in the LVIA. As raised previously, the OHA considers this to be an omission.
- Edge of Farmoor village – in summer, vegetation screens views in the direction of the site of the proposed solar panels from the edge of this settlement. There may some filtered views of the proposed development during winter but significant effects from the panels are considered unlikely. The key issue here is the installation of the buried cable along the side of the road and the effect that it would have on roadside verges, hedgerows and trees. How wide would the proposed cable corridor be? – can it be accommodated in verges or is a wider clearance corridor required.

In addition, it is considered that the LVIA should explore visual effects from the following areas, which still appear not to be covered by existing viewpoints:

- Effects of the proposed cable corridor to the east of Eynsham. How wide would the proposed cable corridor be and can it be accommodated in verges or is a wider clearance corridor required? Would the clearance corridor affect the allotments to the east of the road?
- Locations with more open views from within Blenheim Park. There will be some filtered views of the proposed development during winter, and it will be important to determine if any of these would be significant. It is possible to see the Column of Victory from the area of proposed panels to the north of Shipton Slade Farm, and the ZTV indicates visibility in this area. The ZYV indicates the potential for visibility from the area to the south of Woodstock – Lower Park.
- Potential visibility from the Wychwood Way and Park Road – East End area to the east of Combe, in the National Landscape – the panels on the escarpment to the northwest of Cassington are likely to be the key part of the development with wider visibility, in views from the National Landscape in this area.
- East side of Woodstock, in the area around Shipton Road south of the existing VP15.
- High land to the south of Wootton where the ZTV indicates the potential for longer distance views, looking to the northeast over the northern area of the proposed development (high point at 113m).
- High land to the north of Wootton where the ZTV indicates the potential for longer distance views looking to the east over the northern area of the proposed development (high point at 119m).

Page 154 Q1.14.8 Lighting- As referred to in appendix 1 of the OHA's Joint LIR [REP1-072], the OHA requested lighting, including temporary lighting, to be considered as part of the LVIA.

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The applicant has not addressed this request on the basis that no permanent lighting is proposed. However, temporary lighting required during construction or maintenance also has the potential to adversely affect landscape character and views, especially in rural settings. As limited detail has been provided in relation to lighting it remains difficult to judge potential effects.

Furthermore, OHA wish to see PIR motion lighting omitted altogether from the proposed development.

Page 155 Q1.14.9 Suggested areas to be omitted from the proposed development- OHA are disappointed that the applicant has not produced the drawings as requested by the ExA.

The OHA and their consultants (LUC) have carried out a joint site visit 15th July 2025 to check viewpoints and suggestions for panel removals that have been put forward by the applicant in their *Notification of Intention to Submit a Request to Change the Application* (dated 1st July) request and ICOMOS’ *Revision of Submission Reference Number 36569* (dated 27th June 2025).

OHA and their consultants will collate the results of this site visit and look to produce a map showing the areas of panels, which the OHA believe should be omitted to mitigate impacts on Landscape and Heritage. OHA will submit this map by D4.

Page 155-157 Q1.14.10 Levels of Significance in LVIA Methodology- The applicant refers to only a small part of the LCA/ LCT may be directly impacted. This approach to assessment does not seem to acknowledge the role the application site plays within the wider Character Area. Many special characteristics that contribute to the Landscape Character Area will be lost or impacted on both the site and the surrounding wider landscape. The proposed development will completely change the character of sections of Character Areas.

The applicant refers to whether the whole of the proposed development is visible. As previously stated in the Joint LIR [**REP1-072** para 7.3.60] the application is effectively three separate sites and due to their scale, there would not be viewpoints that would be able to see the whole site. It is therefore the impact of the development on the view that should be assessed. OHA concerns about how the site has been assessed are therefore still relevant, and this is highlighted by the applicant’s response to Q1.9.1.

Page 157 Q1.14.11 Landscape Effects: Construction. - As outlined in the OHA’s LIR [**REP1-072**] the Oxfordshire Local authorities consider the impacts on landscape character inadequately assessed and underestimated.

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OHA considers the applicant’s response further highlights our concerns on the overall LVIA assessment. There will be compounds, temporary compounds, fencing, vehicle movements, piling with associated plant and drilling machinery. These are all elements that would have an impact on the landscape character of an area which conflict with the statement ‘*the inherent landscape characteristics and physical framework of the landscape would be retained.*’

Page 158 Q1.14.12 Landscape Effects: Operation- As outlined in the OHA’s LIR [**REP1-072**] the Oxfordshire Host Authorities consider the impacts on landscape character inadequately assessed and underestimated. The applicant’s response does not address those concerns

Further to this, VWHDC disagrees with the statement *The low-lying nature of the Project, the retention of the main structural landscape elements, and the large scale of the agricultural fields, ascertain that although the change within the landscape would be noticeable, this would not be out of scale or at odds with the character of the area. The perceivable effects would be on a limited scale and to a limited extent. The perceivable scale of the proposed development would not take over the existing landscape elements or the skyline.* Landscape character changes throughout the proposed development site, and for the south area with large scale fields, open nature and elevation of the landscape, means that the change in landscape would be out of odds with the character of the area. There is also the NGET substation connection which at a proposed 14m height, is not low-lying in nature.

Page 158 Q1.14.13 Residential Properties- The OHA have voiced their concern regarding the lack of assessment of residential receptors (properties, settlements and communities) in paras 2.41ff and para 2.72 (4th bullet point) of appendix 1 of the OHA’s Joint LIR [**REP1-072**].

The applicant has stated that ‘The LVIA [**APP-045**] has included reference to settlements, and they are included as part of the overall assessment of effects.’. However, there is very little description of how the development will impact on residential properties, and areas of settlement such as Filchampstead. This is covered within the OHA Q1.14.6 response to Viewpoints and Photomontages [**REP2-050**].

Page 16 Q1.14.16 Retention of Hedgerows following Decommissioning- OHA consider the applicant has not fully addressed this question. Where hedge lined footpaths exist, they tend to relate to routes which contain farm track. Rights of way through fields add

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variation and interest to walking routes and this element will be lost by the proposed development, changing the character and availability of views.

Furthermore, the planting of hedging close to PRow can lead to other physical effects on the users of the PRow. The proposed hedges will require constant maintenance, even following the decommissioning of the scheme, to ensure that they do not encroach onto the usable width of the PRow. Many native hedge species (such as blackthorn) which undoubtedly bring ecological benefits, are thorny and can result in injury to users of the PRow. To avoid this, 5m+ needs to be the clear surfaced/grassed width of PRow- with hedges etc outside of that in a green corridor of around 11m width.

Page 173 Q1.16.21 - Education facility –OCC’s Public Health Team were consulted on the impacts of the development on human health as set out in ES - Appendix 16.1 Human Health Consultation and Engagement [**APP-219**]. Mitigation proposed in ES Chapter 16: Human Health [**APP-053**] includes an educational facility. The concept of educational opportunities, including children being active outdoors, is supported. However, none of the OHAs have been involved in any detailed discussions about the proposed educational facility or its recently proposed location in Change Request 2 [**REP2-045**]. The OHAs have concerns with this location including impact on the Green Belt, landscape impact and access which do not appear to have been considered within the applicant’s Environmental Statement.

Page 188 Q1.18.8 Compliance with NPS EN-1- OCC do not consider that the Applicant has adequately addressed the ExA’s question concerning compliance with the requirements of National Policy Statement (NPS EN-1) in relation to the safeguarding of mineral resources. Furthermore, the Applicant has not demonstrated that appropriate mitigation measures have been proposed to protect these resources.

NPS EN-1 5.11.19 clearly states that applicants should safeguard any mineral resources present on the proposed development site, as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place. Whilst the Applicant asserts that the site will be fully decommissioned at the end of the project’s operational life, no further detail is provided.

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The proposed development affects approximately 6.87 million tonnes of primary aggregate, a significant resource that could contribute to meeting the County’s mineral supply needs over the next 40 years—well beyond the current Local Plan period ending in 2031.

Additionally, the impact of piling associated with the solar panel infrastructure remains unclear. As has been outlined by OCC in the response to the applicant’s response to paragraph 7.6.10 of the LIR, if pilings extending below 1 metre are to remain in situ post-decommissioning, this could significantly compromise the ability to access and utilise the safeguarded mineral resource in the future.

Responses to comments on LIRs

REP2-026 – 12.3 Applicant’s Responses to Local Impact Reports submitted at Deadline 1

Page 5-Revisit Heritage Impact Assessment- OHA still consider this is required.

Page 15-16- Waste and Resources- In response to the Examining Authority’s First Written Questions [**REP2-049**] and within the Local Impact Report [**REP1-072**], Oxfordshire County Council Minerals and Waste Policy & Strategy team highlighted that whilst an Outline Site Resources and Waste Management Plan [**APP-233**] had been prepared which sets out the estimated types and quantities of waste that would be generated during the construction process, together with measures for how the construction waste will be managed, there was not this level of detail on Operational and Decommissioning waste. In relation to projected arisings, timescales and management routes during both operation and decommissioning.

Due to the size and scale of this development and the potential future waste arisings, we consider that this would have a significant impact on waste management infrastructure and have implications that should be considered within Oxfordshire’s future Minerals and Waste Local Plans. We therefore request that the detail on projected waste arisings and management facility requirements during both operation and decommissioning should be provided prior to any consent being granted.

This information has still not been provided.

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Within the applicant’s response to paragraph 7.14.11 the Applicant notes that Requirement 12 of the draft DCO [REP1-005] states that prior to the final commissioning for any part of the authorised development, an operational management plan will be agreed by the relevant planning authority, in consultation with the planning waste authority and relevant highway authority.

Whilst we acknowledge that the Requirement 12 requires an operational management plan, it also says that it must be substantially in accordance with the outline operational management plan, we do not feel that the information currently contained within the Outline Operational Management Plan [APP-234] is sufficient. Even when combined with the [APP-233] Outline Site Resources and Waste Management Plan there is still insufficient information for the implications of the potential future waste arisings and management requirements to be adequately considered.

In response to paragraph 7.14.7 of the LIR the Applicant also maintains that details on the waste arisings during decommissioning will be set out in the future Decommissioning Management Plan (as set out in the Outline Decommissioning Plan [APP 236]), which we also consider does not provide sufficient information for its impact to be considered.

The Applicant states in response to paragraph 7.14.11 of the LIR that “*The Applicant notes that there are existing facilities within the UK that currently recycle photovoltaic panels. The number of recycling facilities is likely to increase with the expansion of solar power. The number of panels to be replaced during the operation and decommissioning phases of the Project represent a proportion of the national figure. With this in mind, the Applicant considers there will be facilities in place to manage this waste stream*”

The Applicant has acknowledged that the “*number of recycling facilities is likely to increase*” and “*there will be facilities in place to manage this waste stream*”.

Oxfordshire County Council are the Waste Planning Authority for Oxfordshire and must plan for the management of future waste arisings. This is why we have sought information on the projected quantities and types of waste arisings, so that we can potentially plan for this future waste arising and explore facility demand to meet this future need sustainably and most efficiently.

However, the Applicant goes on to state in response to paragraph 7.14.14 of the LIR that “*The identification of specific waste management facilities that will be used by the Project are subject to confidential commercial discussions and therefore, are not*

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included within the ES or DCO application documents. However, the Applicant confirms that facilities are already established and in operation to manage the key waste streams from the Project.”

The Waste Planning Authority seek clarity on this issue. If the Applicant believes there are facilities already in place, this conflicts with the statement that “*the number of recycling facilities is likely to increase*” as stated in their response to paragraph 7.14.11 of the LIR.

It also demonstrates that to know facilities are already established and in operation, they must have details of the amount of waste arisings and assessed the expected management route. This information should be provided as part of the decision-making process. If the applicant considers that facilities are already established to manage the key waste streams, but are confidential, we will hope the ExA requests to see these to ensure that they are managing their projected waste arisings most sustainably.

The projected waste arisings and their management from this large scale and significant development, both during operation and decommissioning, should be a key consideration in determining this application.

The Minerals and Waste Policy and Strategy Team therefore remain of the view that there is currently insufficient information within the application to ascertain its impact, particularly on existing waste infrastructure and to plan for the management of the waste arisings from this development over future plan periods.

Page 17- Mineral Safeguarding- OCC agree that within Oxfordshire’s Minerals and Waste Local Plan Part 1: Core Strategy, Oxfordshire’s minerals planning vision for 2031 includes ensuring a sufficient supply of aggregate materials available to meet both local development needs and wider demands. This supply is to be sourced from:

- Secondary and recycled aggregates (where practicable);
- Locally produced sharp sand and gravel, soft sand, limestone, and ironstone; and
- Import of materials such as hard crushed rock that are not available locally.

While the vision prioritises secondary and recycled aggregates, it explicitly qualifies this with “where practicable,” recognising that these sources alone cannot meet all aggregate needs. Oxfordshire supports maximising the use of recycled and secondary aggregates through Policy M1, which promotes the development of appropriate facilities to increase their contribution.

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The use of recycled and secondary aggregates is inherently limited by the scale of construction and demolition activity within the county and the nature of available feedstock. These materials often vary in quality and are not suitable for all applications, particularly those requiring high-specification aggregates, such as load-bearing concrete, where land-won primary aggregates remain the only viable option.

According to the Minerals Products Association, it is estimated that recycled and secondary materials constitute approximately 28% of total aggregate supply. In Oxfordshire, the three-year average sales of recycled and secondary aggregates is estimated at 0.469mtpa, compared to 2.368mtpa for primary aggregates, indicating that recycled and secondary sources accounted for roughly 20% of the county’s aggregate supply over the past three years.

In addition, the annual LAA considers this contribution of secondary and recycled aggregate towards Oxfordshire’s supply when establishing the Aggregate Provision Rate for primary minerals to ensure an adequate and steady supply.

Therefore, while Oxfordshire is committed to increasing the use of recycled and secondary aggregates, the continued availability and safeguarding of primary aggregate resources remains essential to meet current and future demand.

Quantity of Material

In response to the applicants detailed response located in the section **Mineral Safeguarding Ground Conditions**, we highlight that the Mineral Resource Assessment Section 5 [**APP-195**] specifically explores the Extent of Potentially Viable Mineral Resources on the Site and sets out the Total volume of potentially viable mineral resource.

Paragraph 5.1.1 [**APP-195**] sets out that “The sand and gravel deposits underlying the project represents the potentially viable mineral resource that could be of commercial interest for mineral extraction”.

Table 5.1 [**APP-195**] and supporting text specifically comments that there is “potentially viable (i.e extractable) Sharp Sand and Gravel mineral resource... approximately 3,581,000m³”

As previously set out within the Local Impact Report [**REP1-072**] this would equate to around 6.87 million tonnes of primary aggregate, which could assist in meeting the County’s mineral requirements over the life of the proposed development, so the next

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40 years, not just the current Local Plan period (2031). Further, the need for mineral safeguarding is supported by the NPPF, which requires Local Authorities to safeguard mineral resources, ‘whilst not creating a presumption that the resources defined will be worked’ (paragraph 223 c).

Whilst it is recognised that there is potential overburden within the site that will need to be removed before the sand and gravel can be extracted, and there is a requirement for potential buffer zones, the demand for future minerals may be such that with the suggested overburden the site is considered commercially viable over the next 40 years. In addition, this safeguarded mineral resource area has historically already seen mineral working, as a previously worked quarry (now restored) falls between areas 2.120 and 2.114 of the application area, known as City Farm. This clearly demonstrates that operators find extraction in this area viable.

Adverse effects on Minerals Resource

In response to the Examining Authority’s First Written Questions **[REP2-049]**, Oxfordshire County Councils Minerals and Waste Policy and Strategy Team sought clarification regarding the treatment of the proposed 3m pilings following decommissioning, as the submitted reports did not clearly specify whether they would be removed or left in situ.

If the pilings are to remain in situ due to the impracticality of removal, this could significantly impact the future viability of the underlying mineral resource. Any subsequent mineral operator would be required to extract and dispose of these pilings prior to commencing mineral extraction, resulting in increased operational complexity, resource requirements, potential delays, and additional waste arisings, all of which could adversely affect the economic feasibility of mineral recovery.

Conversely, if the pilings are to be removed, this process would likely require substantial force, which could disturb and bring mineral material to the surface, potentially affecting the integrity of the resource.

Given these implications, clarification was requested to fully understand the potential impact on future mineral safeguarding and resource viability.

Within the applicant’s response to paragraph 7.6.10 of the LIR, the applicant has reiterated that decommissioning of the Project will be undertaken in line with the Outline Decommissioning Plan **[APP-236]**. *“All above ground infrastructure will be removed. All below*

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ground infrastructure, which are not practicable to remove without major disturbances, will be cut to 1m below the surface to enable future ploughing. All piles are to be removed.”

This still does not provide sufficient clarity on whether the piles will be cut of at 1m or totally removed. If all below-ground infrastructure situated below 1 metre is to remain in situ, it raises the question of whether the remaining 2 metres of the 3-metre pilings will also be left in place. If so, this could have a significant impact on the future viability of working the safeguarded mineral resource.

Alternatively, if the full length of the pilings is to be removed, this could be considered to cause major disturbance, and force required to extract them could disturb or damage the underlying mineral deposit. In either scenario, the implications for future mineral extraction are considerable, and further clarification is therefore essential.

Page 21 - Hydrology and Flood Risk-OCC: The applicant has outlined that updated versions of the OCoCP and OOM will address OCC’s concerns with regards to surface water drainage during construction and the maintenance of ground conditions beneath the panels during the operational phase. Whilst this is welcomed, OCC as the LLFA believe that this information should have formed part of the Flood Risk Assessment and Surface Water Drainage Strategy.

The applicant indicates that they will work in collaboration with the LLFA to develop a detailed Surface Water Management Strategy later and that this collaboration is secured via the DCO. OCC would welcome clarity on how the DCO secures this collaboration with the LLFA being as Requirement 9 of the DCO only outlines that the relevant planning authority for each drainage strategy will have to approve that strategy before it can be implemented. The Requirement does not secure collaboration with the LLFA, and likewise the DCO does not in any way ensure that the LLFA will be adequately resourced for the collaboration.

Page 22 -Hydrology and Flood Risk- OCC: The LLFA do not believe that the applicant’s commitment to a detailed OMP later is sufficient to address the LLFA’s concerns regarding the ongoing maintenance of the ground beneath the panels. The LLFA would like the Outline Operational Management Plan to specifically make provision for ongoing maintenance of the area beneath the panels for the purposes of maintaining drainage. The commitment to maintain the grassland beneath the panels contained within the OLEMP [REP2-019] is not sufficient to address these concerns.

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Page 23 -Hydrology and Flood Risk- OCC: The LLFA believe that assessments of historic flooding should be used in conjunction with other information to understand the flood risk of the proposed development. Information on local flooding should be used in conjunction with modelling and other information to assess the current flooding risks associated with the site to form the baseline upon which the assessment of the development’s impacts will be assessed against.

Page 24- Hydrology and Flood Risk- OCC maintains its position in relation to the DCO’s drafting with regards to drainage consenting, as laid out within section 8 of the joint Local Impact Report [**REP1-072**]. OCC see no reason for the DCO to alter the consenting timescales as they are set out in the Land Drainage Act. The OHAs are set up to consent under the provisions of the Land Drainage Act and as such consenting under a different regime may result in delays or refusals of consent that could be avoided if the applicant were to alter the provisions of the DCO. OCC has yet to have direct engagement with the applicant on this issue but would welcome a dialogue with the applicant.

Page 29- Ecology, Nature Conservation and Trees- The OHA would welcome the applicant signposting how the DCO secures individual tree surveys and protective regimes at detailed design stage. If the DCO does not adequately secure these then it is the opinion of the OHA that they should be produced pre-consent to provide certainty that they will be factored into the detailed design.

Page 30- Ecology, Nature Conservation and Trees- response to paragraph 7.4.9: The applicant doesn’t address the need for a precautionary approach to avoidance and mitigation given the unprecedented scale of the proposals for this type of development. Instead, they have described how they have sought to deliver enhancements.

Page 31- Ecology, Nature Conservation and Trees- response to paragraph 7.4.14: The applicant has acknowledged that bat survey data is still subject to analysis and not available to inform the assessment of impacts on this nationally important assemblage, and that whilst the project has committed to ‘appropriate buffers’ these have not been defined and therefore have not informed design of the scheme. Concerns about the impact of large solar arrays on foraging, or vibration, noise and lighting have not been addressed.

Page 31 - Ecology, Nature Conservation and Trees- response to paragraph 7.4.16-19- The applicant has acknowledged that their assessment of impacts on otter and water vole has been made without being informed by any survey for these species.

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With reference to Natural England’s standing advice for otters, we consider that survey should be undertaken on the basis that otters are known to be present across Oxfordshire, and the development will affect habitats near a water body through environmental effects, such as creating noise or light.

Similarly, with reference to Natural England’s standing advice for water voles, we consider that survey should be undertaken on the basis that water vole do occur on watercourses throughout Oxfordshire. No assessment has been provided within the ES to indicate that watercourses throughout the site are unsuitable for water vole, given the applicant’s assumption they are present it is assumed they have not been discounted due to lack of suitable habitat. Therefore, in line with standing advice, water vole surveys should be undertaken.

As the applicant will have ecologists surveying the watercourses to inform the BNG assessment, it would not seem unreasonable to request that they also undertake a survey for field signs of otter and water vole at the same time.

Page 32- - Ecology, Nature Conservation and Trees- response to paragraph 7.4.24: The applicant agrees that skylarks are unlikely to nest within the panel arrays and have clarified that the skylark plots are intended to provide foraging habitat for skylark nesting within the surrounding landscape and in the archaeology areas.

However, it is likely that the archaeology areas do not provide sufficiently large open areas to support nesting skylark – Defra advice on providing habitat for skylarks suggests the land parcel needs to be over 10ha to reduce predation risk. Whilst it is understood that the ‘archaeology areas’ cover 36ha, these are dispersed across the site amongst the solar panels, and the size of individual grassland areas is not apparent.

It is unclear that the provision of skylark plots within grassland of the solar array areas is necessary or effective in improving foraging opportunities for skylark; skylark plots are designed for provision within winter cereals to increase accessibility to invertebrate prey within the crop, it is unclear that such a role is needed within a grassland habitat.

228 breeding skylarks were recorded in the breeding bird survey. Natural grassland has an average density of 0.27 skylark territories per ha (see CIEEM In practice 117 Sep 2022). If the 36ha archaeology grassland areas are large enough to accommodate skylark, they can only be expected to support around 130 territories, meaning that around 100 skylark territories

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would be expected to be lost to the scheme. But given that it is likely that many of the ‘archaeology areas’ are too small to be suitable skylark nesting habitat, it is likely that all skylark nesting habitat will be lost, resulting in the loss of 228 skylark territories. More than 60ha of grassland habitat (on land where skylarks are currently absent) would be needed to compensate for the loss of 228 skylark territories.

As we previously stated this would have a significant impact on a priority species, and we request that further off-site mitigation is provided to compensate.

Page 32- Ecology, Nature Conservation and Trees- response to paragraph 7.4.26: The applicant has dismissed our request for a 50m buffer to ancient woodland, referencing that Natural England standing advice is for provision of a 15m buffer. The standing advice indicates that 15m is the minimum requirement and that buffer zones should vary depending on the scale and type of development, and its effect on ancient woodland as well as the character of the surrounding area. Given the scale of the scheme, the rarity of the bats using the woodlands, and the identification of these areas for improving woodland connectivity in the emerging LNRS The OHA are of the view that more than the 15m minimum buffer should be applied and recommend a 50m buffer in line with good practice from the Woodland Trust.

Page 33- Ecology, Nature Conservation and Trees- The OHA note that buffers for individual ancient and veteran trees could be larger than that of ancient woodland. As such it is important that the applicant clarify whether ancient woodland contain ancient and veteran trees, as this may require alterations to the layout and design of the scheme which must be secured prior to the end of Examination

Page 34 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.43/44 – The fact that the survey data on bats is not yet available to allow assessment of the significance of the effect of the proposals, or the proposed mitigation, for the nationally important bat assemblage is concerning. The OHA are unable to comment further as we are not party to the discussions with Natural England that have been referenced by the applicant.

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Page 34 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.45- Whilst reference is made to the Bat Conservation Trust and Institution of Lighting Professionals guidelines within the oCoP, the OHA still consider that it would be helpful to flag that where there are particularly sensitive flightlines or foraging areas for bats within the oCoP.

Page 35 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.46- The applicant refers to providing ‘appropriate buffers’ for otters, but Natural England standing advice is clear that the size of a buffer along the stretch of water will vary depending on how otters use the area. Without survey information it is not possible to determine what buffer is appropriate.

Survey for both otter and water vole should be undertaken to ensure that the proposals are compliant with the legislation protecting these species, and to ensure the SoS can fulfil their Duty under the Natural Environment and Rural Communities Act 2006 to further the conservation and enhancement of these species. Regarding this latter point, knowledge of the presence/absence and indication of the size of any populations of these species could inform specific conservation and enhancement measures. For example, should water vole be using the watercourses, then there is an opportunity to introduce targeted management of mink within the large area covered by the scheme. This is known to be a key element in recovering water vole populations and the scale of the scheme could be an excellent opportunity to manage the mink population in a strategic way.

Page 35 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.47-50- The applicant has not addressed the suggestion of providing aquatic habitats for GCN (and other species) within the scheme. There is a notable lack of proposals for pond creation - a missed opportunity. Reference is made by the applicant to the provision of floodplain habitats, GCN are less likely to be supported within the floodplain. We recommend that a matrix of pond habitats is provided for across the site both to enhance habitats for GCN and benefit a wide range of other aquatic species.

Page 35 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.51-53- The applicant agrees that skylarks are unlikely to nest within the panel arrays and have clarified that the skylark plots are intended to provide foraging habitat for skylark nesting within the surrounding landscape and in the archaeology areas.

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However, it is likely that the archaeology areas do not provide sufficiently large open areas to support nesting skylark – Defra advice on providing habitat for skylarks suggests the land parcel needs to be over 10ha to reduce predation risk. Whilst it is understood that the ‘archaeology areas’ cover 36ha, these are dispersed across the site amongst the solar panels, and the size of individual grassland areas is not apparent.

It is unclear that the provision of skylark plots within grassland of the solar array areas is necessary or effective in improving foraging opportunities for skylark; skylark plots are designed for provision within winter cereals to increase accessibility to invertebrate prey within the crop, it is unclear that such a role is needed within a grassland habitat.

228 pairs of breeding skylark were recorded in the breeding bird survey in 2024. Natural grassland has an average density of 0.27 skylark territories per ha (see CIEEM In practice 117 Sep 2022). If the 36ha archaeology grassland areas are large enough to accommodate skylark, they can only be expected to support around 130 territories, meaning around 100 skylark territories would be expected to be lost to the scheme. But given that it is likely that many of the ‘archaeology areas’ are too small to be suitable skylark nesting habitat, it is likely that all skylark nesting habitat will be lost, resulting in the loss of 228 skylark territories.

As the OHA previously stated this would have a significant impact on a priority species **[REP1-079]** and request that further off-site mitigation is provided to compensate.

Page 36 - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.54- Lake effect – the OHA note the applicant's response but remained concerned that there is a lack of evidence of the impacts of a change to solar over such a significant area in the UK. The OHA advocate for the applicant to commit to long term monitoring to understand the impacts, both positive and negative, and would recommend the value of collaborating with universities to improve sectoral understanding of the impact of large scale solar on ecology in the UK.

Page 37- Trees- The applicant has indicated that should consent be granted, and once detailed design drawings are available then full tree surveys can be scoped. However, the OHA are concerned that this means the applicant will wish to discharge Requirement

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5 prior to the commissioning of any tree surveys. This would mean that should the tree surveys identify harm as a result of the proposed design the applicant will not be able to change the design/layout of the scheme to avoid this harm. The OHA would welcome clarity from the applicant as to how the drafting of the DCO prevents this situation occurring.

Page 38- - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.71- There is scope to specifically aim habitat management to be appropriate for dormice and nightingale which have specific requirements.

For dormouse: Create and/or enhance a suitable network of connecting habitats e.g. coppice, woodland, and/or thick hedgerows (these should connect to the original site where the Hazel Dormouse was recorded). Retain trees which have cracks, crevices, and deadwood and retain woody species like blackthorn and hazel in sunny, open areas. Ensure that there are arboreal connections across woodland rides at least every 50-100m and erect dormouse boxes and/or tubes to encourage nesting opportunities. Retain woodland understories in winter and avoid clear felling in known dormouse locations. Consider managing woodland through traditional coppice of non-adjacent coupes.

For nightingale: Introduce coppicing to woodlands and manage it so that all stages of the coppice lifecycle are always present in the woodland. To do this, coppice coupes (groups of trees) that are cut on rotation. Within woodlands, encourage dense layers of shrub to develop (including bramble) and control deer where necessary to prevent them from eating the shrub layer. On woodland edges allow dense scrub and shrubs to develop to offer feeding and nesting habitat and create woodland rides and glades that have space for a scrub zone. Re-wet woodlands to improve invertebrate presence and food supply for these birds. Connect existing suitable habitats with tall, thick hedges.

Page 38- Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.72- The applicant has amended their description to ‘insect hotels’ this is welcome. However, as per our previous comments [**REP1-079**], The OHA suggest further diversity in habitats for pollinators could be incorporated through the LEMPs.

Page 38- - Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.73- The applicant has not addressed the point raised, which is not about the benefits of the scheme with respect to ecology, but with respect to wider environmental net gains. Any

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consideration of this aspect is still missing from the scheme (for clarification wider environmental net gains refer to benefit derived from the natural environment such as climate mitigation/adaptation, reduced flood risk, improved water quality and benefits to health and well-being).

Page 39-Ecology, Nature Conservation and Trees- in response to paragraphs 7.4.77- More detail is included in the BNG Assessment than in the oLEMP, including outputs from the biodiversity metric and baseline plans. It is usual practice to agree, as a minimum, the baseline biodiversity value of a site at time of the planning application. The OHA therefore suggest that it is appropriate to reference the BNG Assessment in the requirement.

Page 40 - Milestone on the Oxford Road (NHLE number 1181978). VWHDC still consider protection is required. As a minimum protective fencing should be erected given the tight spaces that large machinery will be working in this location.

Page 47- Traffic Transport and Access-OCC: The Applicant states that “the proposals at the B4044 Eynsham Road/ B4017 Cumnor Road junction...have taken account of LTCP policy 1 – Transport User Hierarchy and policy 15 – Vision Zero to ensure the most vulnerable road users are prioritised...offering highway safety improvements to all road users including cyclists”. It is unclear from paragraph 12.7.18 of ES volume 1, Chapter 12 **[APP-049]** and at Appendix 12.8 Accesses and highways drawings Part 4 of 4 **[APP-209]**, how safe provision at the B4044 Eynsham Road/ B4017 Cumnor Road junction for people cycling is being achieved. Widening of junctions (including the B4044 Eynsham Road/ B4017 Cumnor Road junction), as is referred to in paragraph 12.7.18 of ES volume 1, Chapter 12 **[APP-049]** puts people cycling at greater risk (especially with the introduction of more HGVs on this route) without appropriate measures to protect people cycling (as per LTN 1/20). More information, including drawings is required to understand how safe cycling at this junction will be achieved. If it has not been considered, then it must be.

Page 49-Rights of Way- The applicant has outlined that a full and detailed PRow management plan is secured via the requirements of the DCO. OCC has raised concerns around the content of the outline PRow Management Plan in both the joint LIR **[REP1-079]** and the council’s response to question 1.7.27 of ExQ1 **[REP2-049]**. OCC also note that there has yet to be any

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engagement with the applicant on this issue since December 2024 and would welcome further meaningful and constructive engagement with the applicant.

Page 51-52-Rights of Way-OCC: The Applicant states that it ‘is continuing to engage with OCC regarding the implementation of the proposed cycle routes as part of this project’. The Applicant has not been forthcoming with engagement and OCC has not engaged with the Applicant since December 2024 on this. OCC is keen to have further discussions with the applicant on this matter.

VWHDC: Greenways are referred to in the Landscape and Ecology Management Plan [**APP-235**] but there is no clear indication of where these will be located. For the south site in Vale for example, it states ‘various woodlands in the Southern Site Area including the SSSI at Wytham.’ There is however no PROW in the vicinity of Wytham, and it is noted ‘greenways’ are not keyed on the Landscape, Ecology and Amenities Plan [**APP- 228**].

Page 59- Proposed new requirement (2) - Grampian condition- OHA remain of the view this is required as the applicant has yet to provide clear evidence the substation will be delivered under the TCPA pursuant to EN-1 para 4.11.8 and 4.11.9. An application to VWHDC has yet to be made and there is no guarantee planning permission will be forthcoming given the significant landscape, heritage and Green Belt concerns identified with the applicant’s proposed development in this location.

Page 60- LVIA not clear in how it has been used to inform siting, scale and design.

OHA consider the change request does not cover the concerns with regards to the proposed siting, scale and design of the proposed development.

Page 60-Proposed mitigation methods such as hedges around Public Rights of Way- The information does not clearly present the changes to PROW from proposed mitigation. The OHA would draw the applicant’s attention to comments within the joint LIR [**REP1-079**], in which the OHA voiced concerns about the proposed mitigation around the PROW and the need to avoid a tunnelling effect for users of the PROW.

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Page 64-Landscape Sensitivity- Concerns about the LVIA remain. GLVIA 5.30 states *‘Individual components of landscape, including particular features, and notable aesthetic or perceptual qualities can be judged on their importance in their own right, including whether or not they can realistically be replaced. They can also be judged on their contribution to the overall character and value of the wider landscape. For example, an ancient hedgerow may be high value on its own right but also be important because it is part of a hedgerow pattern that contributes significantly to landscape character.’*

The applicant states *“a core principle of the Project is that existing landscape features are to be retained. The removal of hedgerows has been avoided as far as practicable (paragraph 6.4.20 of Chapter 6: Project Description [APP-043]). In addition, the proposed landscape mitigation follows the management guidelines for the landscape character areas. As such, the inherent characteristics and physical landscape features would be unaffected. Based on this, the overall sensitivity of the landscape receptors is evaluated as having a medium-low sensitivity to the type of development proposed.’*

Page 64-Representative Viewpoint Locations-OHA concerns remain as previously stated about the Landscape Character Assessment of the site. [REP1-074] covers correspondence with regards to representative viewpoints. It is noted that representative viewpoints did not change after comments given at Scoping, and PEIR stages of the application with regards to area where additional viewpoints were requested. It should be noted that ZTV which included the substation was not issued to OHA until after the PEIR. As stated early on the process the information needs to be accessible for the general public to understand the scheme. Other NSIPs for example that include extents and labels of the Viewpoints include Cottam, Fenwick, Mallard Pass, One Earth and Springwell NSIPs.

Page 68- Compensate- At least 26.5km of new species-rich hedgerows are proposed and at least 26km of existing hedgerow reinforced. The proposal for new hedgerow is predominately related to creating hedgerows between existing rights of way and the site. This is not an indication of ‘Short lengths of PROW impacted’. GLVIA para 6.27 covers a range of issues that can be helpful to consider including in the last bullet point *‘the nature of the changes, which must be judged individually for each project, but may include. For example, changes in the existing skyline profile, creation of a new visual focus in the view, introduction of new man-made objects, changes in visual simplicity or complexity, alteration of visual scale, and change to the degree of visual enclosure’.*

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Page 72-The LVIA information is not easily accessible-OHA note that additional plans have been submitted, but they do not contain a Masterplan layout to aid use. The applicant states that the extent of the visualisations will be reviewed and where relevant revised and reissued. In reply, the full extent of change at a viewpoint should be represented in associated Photomontage. The Representative Viewpoint 48 for example clearly illustrates that views would be achieved to west. This is like the view the Greenbelt Way will achieve as it travels southwards towards the solar arrays, but a Photomontage has not been produced to illustrate the extent the solar arrays and the NGET substation can be seen to the west.

Page 83-Section 9, OHA's summary and conclusions-The applicant considers OHA has failed to undertake a balancing exercise. In reply OHA draw the applicant's attention to National guidance NSIP: Advice for Local Authorities which states *The LIR should include a statement of positive, neutral and negative local impacts. However, it does not need to include a balancing exercise between positive and negative. The Examining Authority will carry out a balancing exercise of relevant impacts, including local impacts specifically reported in the LIR. it does not need to include a balancing exercise between positive and negative.*

REP2-027 – 12.4 Applicant's Responses to Written Representations submitted at Deadline 1

VWHDC

Page 8- Lack of clarity on NGET substation- National Grid has provided an indicative timetable [outlined in Cumnor Parish Council's response to ExQ1, **REP2-048**] in conflict with the applicant's delivery programme. VWHDC therefore remain concerned over the lack of clarity with this element of the proposed development.

Page 8-Landscape and Visual Impact - VWHDC stands by its requirement for the complete removal of the southern site. The applicant quotes LUC as not requiring the whole removal of the southern site. LUC were providing an initial example list of where panels could be removed. It is not a finite list. The OHA will be providing further information at D4.

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Page 9- Inappropriate Development in the Green Belt-VWHDC simply disagree with the applicant on this. Critical National Priority (CNP) was referenced in the LIR. If the applicant’s view is now reliant on CNP where the starting point is Very Special Circumstances (VSC) are met, why does the applicant then justify VSC with further assessment.

In respect of VSC cited by the applicant, VWHDC fails to see what educational benefit is derived from the proposed development to justify development in the Green Belt. Reference to sub-station capacity is also misplaced as the sub-station does not yet exist to amount to a VSC for locating solar development here. Furthermore, the southern site is not well screened for the reasons set out in previous VWHDC responses.

Page 10- Points 74 to 78 – VWHDC considers it is incorrect for the applicant to state *All viewpoints were agreed with the local planning authorities* for the reasons set out in previous responses.

Page 10- Planning Balance- VWHDC has not omitted the benefits of the scheme. Paragraph 78 states *in favour of the proposed development, very significant weight is attributed to the need to provide additional energy from renewable sources and the considerable wider environmental benefits associated with increased production from renewable sources*. Furthermore, there is no need for VWHDC to undertake an assessment of compliance with an NPS. This assessment will be carried out by the ExA.

REP2-028 – 12.5 Applicant's Responses to D1 Submissions submitted at Deadline

VWHDC

Page 8-Switchgear building- The applicant’s response cites table 8.19 of the LVIA [**APP-045**] as the maximum design scenario that has been tested. Table 8.19 states *NGET substation maximum height assumed to be 12 to 12.5 m*. VWHDC wish to see further LVIA work on the revised NGET substation height of 14m, including wireframe analysis.

REP2-029 – 12.6 Applicant's Response to Rule 17 Letter

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Para 1.1.34 - There is very little under the Avoid section.

Para 1.1.40 - Representative viewpoints were not agreed.

Para 1.1.43 - *'The type of construction activities proposed is not notably discordant in nature within the agricultural landscape.'* This type of statement just highlights OHA concerns about the overall assessment. The installation of a solar farm is not visually similar to agricultural use of the land.

Para 1.1.47 - There is no description of how much each footpath has been impacted to conclude *'will be experienced within a short period of time, even during the operational phase. We therefore consider these provided assessments stating the maximum level of magnitude of not greater than Medium to be sufficient and adequate'*.

Paragraph 1.1.48 -The statements do not match with what is seen in the viewpoints and photomontages. Very little of the description in this paragraph matches what is seen in the Vale.

Para 1.1.52 - It is not clearly explained why their professional judgement appears to be counter to the matrices in the LVIA document.

Additional Photomontages for Historic Environment Assessment

It is noted new viewpoints for the southern site are not provided. Given VWHDC queries on whether the Settings Assessment is correct in respect of Tumbledown Cottage and Upper Whitley Farmhouse, the applicant should review this.

Hedgerow Removal Plans

VWHDC

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VWHDC object to the extent of removal of H13.01 and H13.04 – the removal of hedgerow, particularly along the B4017 public highway, is considered excessive and detrimental to the landscape and public realm.

REP2-045 – Applicant’s Change Request 2 Notification

OHA welcome the reduction and removal of panels, but the changes do not go far enough to address concerns raised. It is queried how MW generation of the proposed development is not affected by the removal of some 87Ha of panels (cumulative removal of installation areas identified in change 1, 2, 4 and 5). The OHA would like clarification from the applicant as to how many more panels could be removed without significantly reducing the operating capacity of the development.

Further to this, the OHA outlined at section 6 of the Local Impact Report [**REP1-079**] that the full 840MW capacity proposed by the scheme is not required in order to meet the County’s targets for solar generation. Whilst the applicant has outlined that the NPSs for energy place no upward limit the generating capacity of any given solar scheme, the OHA once again re-iterates its position that areas of panels should be removed from the scheme where they cause significant harm to Landscape, Heritage Assets, Minerals Safeguarded Areas, Arboricultural and Ecological assets and Public Rights of Way. The OHA have also previously indicated that further reductions to the scheme are required to remove minerals safeguarding areas from the scheme, and to ensure adequate buffers around ancient and veteran trees and ancient woodland [**REP1-079**].

Given that the applicant has indicated that approximately 87 hectares of panels could be removed from the scheme without impacting the original estimate of generating capacity, the OHA believe that the applicant must consider removing other areas of panelling where this removal would mitigate harm as, in light of Change Request 2, these omissions may not significantly impact the generation capacity of the project.

The applicant on numerous occasions has outlined that harm identified as being caused by the scheme is outweighed by the significant positive weight attributed to delivering Critical National Priority Infrastructure. However, if the applicant can deliver the same or similar level of positive benefit with omissions that significantly reduce the level of harm then the OHA question how much

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weight can be given to CNP and question how the applicant has demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated in line with paragraph 4.2.11 of NPS EN-1.

Change 1 and 2- The OHA view the removal of the panels within the two areas indicated as an opportunity to address the impact on nesting skylarks as the fields in which the arrays have been removed could be used to secure necessary compensation for loss of skylark breeding habitat. Further provision of open habitats is likely still needed to compensate for those lost to the scheme. Over 60ha of grassland where skylarks are currently absent is likely needed to support the 228 pairs of skylarks recorded in 2024).

Change 2 – Reduction of solar installation near Oxford Airport. CDC welcome a reduction in the extent of panels and cabling proposed to the south of the airport which, subject to the submission of a plan identifying the area to be removed, would potentially address concerns relating to public safety (aviation activities), Green Belt, coalescence and loss of an area of Grade 2 BMV agricultural land.

Change 8- In principle OCC support the use of the definitive map for plotting Rights of Way within the order limits and recognise that the applicant is attempting to alleviate OCCs concerns around doglegs within the PRoW network.

However, OCC is concerned that unrecorded public rights may subsist on the non-definitive (walked) lines that are in use on the ground if they have been used ‘as of right’ by the public for 20 years or more without challenge. This may result in a situation whereby the walked route on the ground is added to the Definitive Map following a successful claim for public rights, resulting in two routes running parallel to each other, the legal line and the walked route.

This may cause the applicant to unintentionally put panels across routes in use on the ground on which currently unrecorded public rights exist. If these are subsequently claimed as PRoW and added to the Definitive Map, the legal line would then be obstructed. OCC would oppose any development obstructing the PRoW.

OCC believes that the simplest solution is as outlined in response to question 1.17.20 at ExQ1 [**REP2-049**] in so far as the applicant should divert sections of the legal line that do not align with the walked route as originally proposed but expand the order limits to prevent dog legs in the PRoW. OCC would be happy to engage with the applicant on this issue and would also be able to share the relevant PRoW GIS data to assist the process

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Change 10 – Educational facility- None of the OHAs have been involved in any detailed discussions about the proposed educational facility or its proposed location in Change Request 2. The OHA have concerns with this location including impact on the Green Belt, landscape impact and access which do not appear to have been considered within the applicant’s environmental statement.

Change 11 – NGET Substation. VWHDC consider that until the detail of the revisions proposed are known, it cannot be concluded that there are no new or materially different likely significant environmental effects that would arise a result of this change. The increase in height of the substation to 14m has yet to be tested to demonstrate visual impacts are not significant. Further LVIA work is therefore required to accompany this change.

A statement of progress on SoCG that remain outstanding and submission of SoCG completed since D2 (if required)

OHAs continue to work with the applicant on SoCG. Updated drafts are to be provided by the applicant.

Comments on the suggested locations to be included in any ASI.

CDC

CDC supports the nominations by Bruce Windwood [REP2-091] and Stop Botley West [Appendix 1, REP2-082]

VWHDC

VWHDC supports the nominations by Cumnor Parish Council [REP2-047], Ben Prior [AS-043], Stop Botley West [Appendix 1, REP2-082] and Bill McGill [REP2-088].

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WODC

WODC supports the nominations of Cassington Parish Council **[REP2-046]**, Historic England **[REP2-055]**, Bladon Village Hall and Recreation BVHRC **[REP2-066]**, Stop Botley West **[REP2-082]**, David Beaumont **[REP2-095]**, David Foster **[REP2-096]**, David Sherrat **[REP2-097]**, Dustin Sean Dryden **[REP2-105]**, Harry St John **[REP2-108]**, Julie Hutton **[REP2-112]**, Malcolm and Jayne Harding **[REP2-118]**, Michael Brown **[REP2-121]**, Ninon Linell **[REP2-124]**, Pauline Briggs **[REP2-126]**, Roger and Dianne Parker **[REP2-133]** and Simon and Dawn Leedham