

Bladon Village Sir Winston Churchill Memorial Hall trustees oppose the Botley West Solar Farm. It is inappropriate to the location and we urge PINS to direct the developer towards the alternative sites originally considered.

Bladon Village Sir Winston Churchill Memorial Hall

Charity number: 304269

From: [REDACTED] on behalf of the Trustees

Bladon Village Sir Winston Churchill Memorial Hall's Relevant Representation – Botley West Solar Farm

Bladon Village Sir Winston Churchill Memorial Hall (BVHRC) welcomes the opportunity to comment as an interested party for the Botley West Solar Farm development examination.

BVHRC leases land to Bladon Parish Council (BPC) for the provision of recreational services. The facilities BPC provides are used by the school (approx. 100 pupils) for PE classes, after school classes, Forest School, Sports Day and other events. The same facilities are used by the public and the recreation ground's wide-open space is the only suitable location in the village for residents to enjoy community events like the Bladon Feast, the Coronation Celebration, the Queen's Jubilee Celebrations and the annual VE Day celebration.

This land borders the land proposed for the solar farm – see Annex D. See also in the PINS document library:

([https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010147/EN010147-000642-2.4%20Land%20Plans%20\(R%20Rev%201\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010147/EN010147-000642-2.4%20Land%20Plans%20(R%20Rev%201).pdf), map grids 6-01, 6-02, and 6-03)

BVHRC would like to provide the following comments on the application:

BVHRC is concerned about the **loss of amenity** that such a large solar farm will have on Bladon Parish. Bladon directly borders the Blenheim Estate, which means that the recreation ground is the only publicly available open space available to residents. Erecting a solar farm of this size so close to the only recreational area in the village will undoubtedly have a negative impact on **human health**. (Map reference 6-01, 6-02, and 6-03 in the PINS document library). If the proposal is approved, we would like to see these fields removed.

The current buffer zones are insufficient, and the proposed removal of walking paths needs to be looked at again. Part of the permanent changes to the landscape includes the enclosing of hundreds of kilometres of **Public Rights of Way (PRoW)** with 2.1m high fencing. For the residents of Bladon, the proposal will enclose all of the rights of way in the south of Bladon, which is approximately 5.8km of PRoW (refer to Annex C Map). It should be noted that these are the only public PRoWs available to Bladon residents as the village borders Blenheim Place land to the North and although there are permissive paths, which can be revoked at any time, there are no PRoWs. This enclosing will affect the amenity of the PRoWs by creating unattractive corridors that will deter not only local users but also those who would have visited the area to enjoy the countryside.

Even if a significantly increased buffer zone can be achieved and some walking paths retained, BVHRC is concerned about the **negative effect on the Green Belt**. Based on the information provided, it is evident that there will be a detrimental impact on the landscape character of the area and the local biodiversity.

The maps provided as part of the application show that approx. 53% of Bladon Parish (176 hectares) has been earmarked for the development and all of those 176 hectares falls within the Green Belt. Development on the Green Belt around Bladon is **in contradiction to the National Policy Planning Framework (NPPF)** unless exceptional circumstances can be proved.

No acceptable exceptional circumstances have been presented in any of the available documents. BVHRC believes that, given the significant impact on a large area of Green Belt, exceptional circumstances to build here rather than in the **alternative sites of Northfleet, Kent and Cowley, Oxfordshire - apparently summarily rejected** - must be thoroughly justified. The loss of Green Belt is a critical planning consideration and should be afforded substantial weight when reviewing the proposal.

BVHRC feels that **the loss of all Green Belt around Bladon** is unacceptable, and that the Planning Inspectorate should consider this proposal alongside all the **other developments proposed in the area**. These other developments will be removing large areas of open countryside just outside the boundaries of the designated

Green Belt and if the BWSF development is approved, it will result in near-continuous development between Oxford and Woodstock. (refer to Annex B Map)

The predominant land use around Bladon village is for arable farming and a significant amount of this land is classed as Best and Most Versatile Agricultural Land. The use of such land goes against the **NPPF principles of protecting high quality agricultural land from development**. BVHRC is also concerned with the loss of arable production at a time when food security is an issue.

Bladon village is surrounded by rolling farmland and much of the **landscape is open and visually sensitive**. The views southwards out of the village and towards the development have been identified as being important in The Bladon Conservation Area - Conservation Area Character Appraisal. With the information provided, it is clear that the area around Bladon will be physically and visibly changed.

The enclosing of the PRoWs will also prevent the free roaming of the wildlife in the area and may cause conflict between users, including those with dogs, and the larger wild animals in the area.

BVHRC believes that the development will have a significant impact on the surrounding communities and, should the development be granted permission, the current suggested community benefits are far from adequate to compensate for such impacts and should be significantly increased.

Originally the community fund of £50,000 per annum (£59 per MW based on 840MW's) was suggested, this has since been increased to £200,000. Neither of these figures is comparable to the community funds that other renewable energy projects have provided.

For example, Tower Hill Solar Farm agreed with Tytherington Parish Council a community fund of £875 index linked per MW per annum for their considerably smaller 6.46MW development. For reference £875 uplifted to Dec 23 price base is approximately £1,189.

Research has shown that the average £'000 per MW for solar developments is £3,000 and it should be noted that £3,000 is an average and there are developments that have agreed £5,000 per MW per annum.

Also, due to the extreme size of this development, it will affect significantly more communities than just one or two villages affected by the Tower Hill Solar Farm, and to expect £200,000 to be shared between approximately 10 other parishes makes the usefulness of the fund redundant.

From the information available, it is not clear how any benefits provided by the creation of solar power under this proposal can outweigh the detrimental impact on the Green Belt and biodiversity, the permanent physical and visible changes to the landscape, the loss of amenities for the public and the loss of BMV agricultural land from arable production.

Further points and more detailed comments are provided in the attached in Annex A, and although the greatest impact felt by Bladon Parish residents will be from the middle section of the proposal, some of the comments below may also be relevant to the whole of the proposal.

ANNEX A

Additional Points and Detailed Comments

1. Buffer Zones & CCTV and PCS

- 1.1 BVHRC does not consider the buffer zones suggested as acceptable due to the impact the proposal will have on the Bladon Conservation area, the recreational facilities in Bladon, the school's use of land for PE and Forest School activities, and the heritage aspect for the thousands who visit Sir Winston Churchill's grave each year.
- 1.2 BVHRC is also concerned with the possible locations of the 81 CCTV that are proposed to be located at the gates and the 4-6 substations proposed within Bladon Parish. It is not clear from the information provided where the proposed gates are to be located and thus where the CCTV is to be located.
- 1.3 The location of the CCTV could impact the users of the PRow's and of Bladon Recreation Ground, notably school aged children as well as the wider public.
- 1.4 BVHRC is also concerned with the location of the PCS and the noise that will be generated from their operation. The PEIR indicates that the noise level will be 67db at 10 metres.
- 1.5 There are several PCS located in Bladon Parish including near the residential areas of Heath Lane and Church Street, in the field adjacent to Bladon Recreation Ground and in close vicinity to many footpaths that run through the development.
- 1.6 BVHRC is concerned that the topography of the Parish has not been considered when assessing the noise impact from these PCS and other noise making pieces of infrastructure. There are many locations around Bladon Village where the topography means that sound bounces around and is magnified.
- 1.7 It is likely that due to this effect that the sound from the PCS will be heard at St Martin's Churchyard and the burial site of Winston Churchill, and by the users of the PRow's.
- 1.8 The locations of the PCS's could affect residential and recreational areas and also the PRow's.

2. Rights of Ways and Fencing

- 2.1 It is proposed that fencing will be erected adjacent to all existing and proposed PRow's within the development. This fencing will create a corridor effect along the PRow's.
- 2.2 It is not possible from the information provided to see how wide the PRow's will be and thus the width of the corridors. BVHRC is concerned that due to Oxfordshire County Council's on-line definitive map not having a record of the widths of many of the PRow's that are identified in the proposal that only the minimal legal requirement for PRow's will be used. These are currently: -
 - Footpaths Cross-field/other 1m
 - Footpaths Field-edge 1.5m
 - Bridleways Cross-field/other 2m
 - Bridleways Field-edge 3m
- 2.3 The creation of narrow corridors with 2.1m fencing either side will impact both the users of the network and the wildlife in the area.
- 2.4 There are concerns about personal safety when walking along the corridors that will be created by the high and continuous fencing.
- 2.5 There are hundreds of kilometres of PRow's throughout the development. There is over 5.8km of PRow's in the development area behind Bladon Village between Bladon Heath and the A44.
- 2.6 This 5.8km represents all of the PRow's available and easily accessible by Bladon residents.
- 2.7 Of the 5.8km of PRow, all but approximately 840m will be surrounded on both sides by solar panels and 2.1m fencing. The remaining 840m will have solar panels and fencing one side. This means that users of the PRow's around Bladon will have not any PRow's available to them that are not surrounded by a continuous view of solar panels and fencing. The only other option for recreational walking is within the grounds of Blenheim Palace.
- 2.8 The amenity of the PRow's network will be impacted and the creation of corridors will make the footpaths no longer attractive to users of the network for recreational purposes. This loss of amenity will have a negative impact on health and wellbeing.
- 2.9 BVHRC requests that development in the proximity of the PRow's is avoided and that if this is not possible then the width of the PRow's should include a considerable sized buffer so that amenity of the PRow's can be preserved.

- 2.10 Larger wildlife such as Badgers, Foxes and Deer will no longer be able to freely roam across most of the proposal, which includes 176 hectares within Bladon Parish. This inability to free roam will affect their natural pathways and their behaviour and may force many of the larger wildlife out of the area. The loss of larger wildlife will have a negative impact on the biodiversity in the area.
- 2.11 BVHRC also request the negative impact on the larger wildlife be considered in the relevant Environmental Statement (ES) and that mitigation be provided to prevent the loss of this wildlife from the area.

3. Cumulative Effect of other Developments

- 3.1 In response to the EIA Scoping Opinion, BVHRC asks that the developer produces a map to show all of the proposed developments in the surrounding area of the development.
- 3.2 These maps have been provided but it appears that Figure 19.1 Cumulative Developments – Overview does not include the sites shown on Figures 19.2 and 19.3, which show the Cumulative Developments for Cherwell and Vale of the White Horse and Oxford.
- 3.3 This omission means that the full impact of the developments is not illustrated, for example, it does not show the ribbon of development starting at Wolvercote Roundabout and going along most of the A44 into Woodstock. Refer to the map in Annex B which illustrates the ribbon of development.
- 3.4 Table 19.7 in Chapter 19 of the PEIR states that there has been no cumulative effect identified for most of the categories in the table including Landscape and Visual Resources, Ecology and Nature Conservation and Agricultural Land Use and Public Rights of Way.
- 3.5 BVHRC would like to understand how once built, the developments in Eynsham, Begbroke and Yarnton, which will be surrounding the proposal and will remove huge areas of land that are currently shown on the plans as open countryside, does not create a cumulative effect on the landscape, ecology, agricultural land or PRoWs.

4. Ecology and Biodiversity

- 4.1 Due to the lack of information, such as to when the baseline assessment took place, it is not possible to understand how the development will be able to create 70% biodiversity net gain (BNG), especially as, at the moment, the only suggestions are bat and bird boxes, bee hives and log piles.
- 4.2 At various points in Chapter 9 - Ecology and Nature Conservation, the land within the proposal is referred to as 'intensive managed agricultural fields'. It is not clear how the land has been assessed. We would like to see further assessments of the land. The farmer who farmed the area around Bladon had won awards for the way the land was managed, and the ecosystem is flourishing in the area.
- 4.3 Although the PEIR covers the possible impact on certain wildlife it only concentrates on the species that have been identified as important and does not consider the impact on other wildlife in the area such as deer and foxes.
- 4.4 BVHRC believes that the negative impact on the larger wildlife should also be considered when determining the application. Due to the extreme size of the area being affected, there is a high chance that these animals will be displaced and forced out of the area.

5. Heritage & Conservation Area

- 5.1 The Conservation Area Character Appraisal for Bladon's Conservation Area, identifies important views out of the village towards the south and should be considered when assessing the impact of the development on the area.
- 5.2 St Martin's Church in Bladon is of historical significance; St Martin's is the resting place of Sir Winston Churchill, is visited by coachloads of tourists annually, and plays host to several memorial events every year.
- 5.3 BVHRC asks that the impact of the proposal on St Martin's and its visitors is assessed as part of the application.
- 5.4 BVHRC is also concerned that proposal will have detrimental impact on Blenheim World Heritage Site and other historic and heritage sites in the area due to the visibility of the proposal by all visitors approaching the area along the A44.

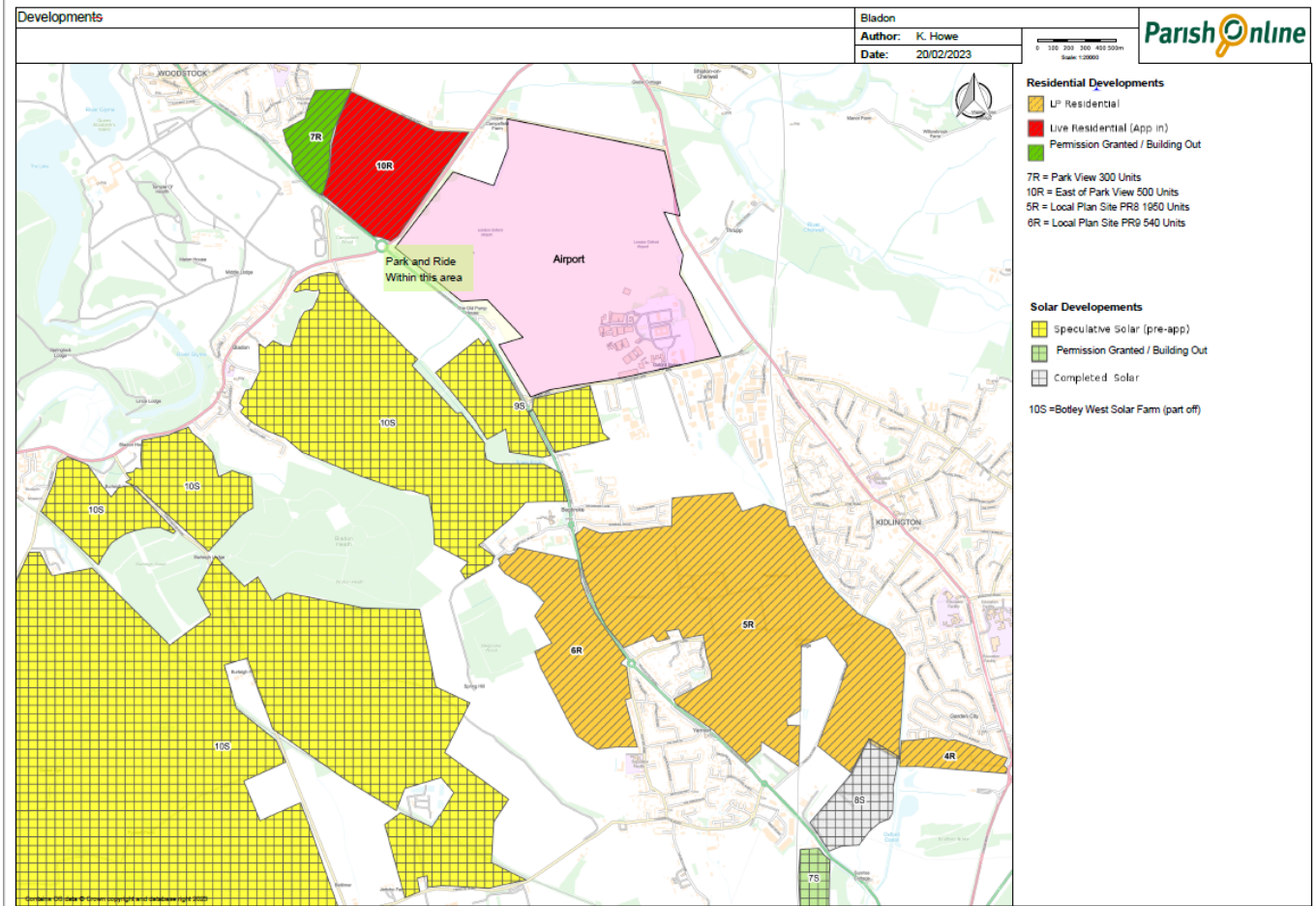
6. Community Benefits including Improvements to Rights of Ways

- 6.1 The suggested value of the community fund is considerably lower than funds created from other renewable energy developments. Also, to expect such a low sum to be shared with so many parishes makes the fund redundant and worthless.
- 6.2 It is not clear which groups have been approached for input into possible community projects or the outcomes of those discussions. For example, have local allotment groups or parish councils been contacted to see if there is a demand for more allotments in their areas?

- 6.3 It is not clear why Cherwell Collective and Cutteslowe Community Larder have been approached and not similar charities in West Oxfordshire. The Cherwell Collective and the Cutteslowe Community Larder do not currently serve residents in West Oxfordshire.
- 6.4 The suggested change of footpaths 132/2/10, 265/26/10 and 124/12/10 to create a cycle path will require a legal order to allow cycling along the route which is not acknowledged in the application.
- 6.5 BVHRC is concerned that the change of the footpath into a cycle route will cause conflict between cyclists and both the existing vulnerable users of the path and the regular vehicles which use the road to access the properties along the lane. It should be noted that the start of the proposed cycle route is continuously used by children and parents accessing the school and that the remainder of the path is used extensively for recreation.
- 6.6 It may be appropriate to improve the bridleway that runs from Heath Lane directly to Begbroke to make it more accessible to cyclists, which are allowed to cycle on a bridleway.

ANNEX B

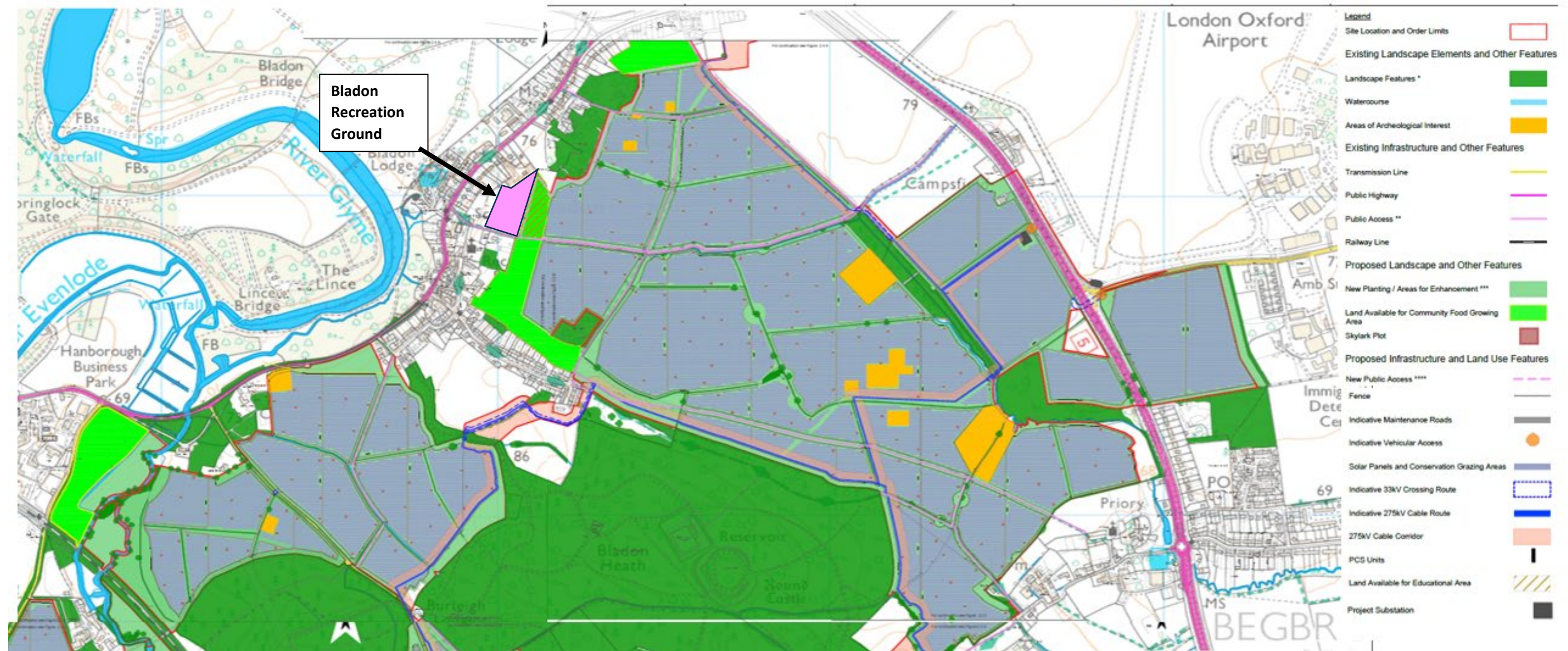
Map of Developments Along the A44



ANNEX C

Public Rights of Way





Getting involved in the preliminary meeting

After the registration period has closed, you will be sent a letter called the rule 6 letter, telling you when and where the preliminary meeting will be held. This is to talk about how the application will be examined. It will also include a draft timetable for the examination of the application.

Recreation Ground

Location of Bladon