

My name is Steven Jenkins and I am speaking as a resident of Long Hanborough. Thank you for giving me the opportunity to speak today. I am pleased to be here but I would prefer to be walking in Pinsley Wood.

I am here to raise concerns about the impact of this development on notable, veteran, and ancient trees within and around the application area. I believe the risk of damage, decline or loss of important trees has not been fully assessed by the Applicant and that there are omissions, and poor presentation and assessment within the application.

My specific concern is for trees that form part of the ancient woodlands in the Central Area at Pinsley Wood, Burleigh Wood, Bladon Heath and Worton Heath. Across the whole Botley West site there are other areas of ancient woodland and an ancient green lane at Dornford impacted. The high value trees contained within hedgerows and boundary lines mark out and form a major element of the setting of this part of Oxfordshire.

I wish to bring the Inspector's attention to the following points drawn from local knowledge, field work and observation of these ancient woodlands and individual high value trees:

1. Volunteer field work confirms veteran and notable trees exist in large numbers within and adjacent to these ancient woodlands.
2. Volunteers have recorded 60 trees in and around the ancient woodlands listed above. These include non-significant, notable and veteran trees.
3. Of these, The Woodland Trust's Ancient Tree Inventory (ATI) lists 25 Oak, Ash and Horse Chestnut trees which have been verified by the Trust's specialist assessors. 10 specimens are verified veteran trees (registration numbers in Appendix 1).
4. A number of the trees listed on the ATI do not appear in the Applicant's submission.
5. Many more trees have been recorded, measured and assessed by volunteers.
6. A significant proportion of the high value trees present exist around the perimeter of the woodlands and as a result are particularly at risk from being directly exposed to the installation of solar equipment and infrastructure, and cable routing.
7. The Applicant proposes cable route options that pass very close, adjacent to and, in some instances, underneath high value trees. Examples of high-risk pinch points within the Applicant's submission are located at:
  - a. Bladon Heath 'spur' near Heath Lane and Manor Road.
  - b. Cassington Lane near Burleigh Lodge.
  - c. Worton Heath boundary with Merton College land where a cable route option runs adjacent to ancient woodland for almost 500m.

The routes and pinch points increase the risk of damage to trees and woodland. Alternative solutions that avoid this increased risk would be preferable.

8. The scale of the proposal creates a situation where ancient woodlands are significantly or completely surrounded. This size of this development is much larger than and isolates the woodlands themselves. Buffer zones and new hedgerows are proposed but there is no

mitigation proposed for the effect of woodland isolation or fragmentation. The Applicant has previously assessed the magnitude of impact on ancient woodland as “no change” without, as far as I can see, producing a robust evidence-based assessment of the impact of the development on ancient woodlands or woodland species that rely on adjacent habitat for dispersal and feeding.

There is a **clear failure to identify threats** in the Applicant’s Veterans Tree Survey Report. The report falls short in several key areas:

- a. Omissions – there are examples of veteran and notable trees located within, adjacent and close to the site that are not included in the report.
- b. Buffer Zones – the report takes a simple standardised approach to buffer zones. This risks encroachment into canopy areas and root protection zones.
- c. Indirect Impacts – there is little attention paid to indirect impact such as hydrological changes, soil degradation, and increased exposure to wind and light – all of which are relevant to sensitive, aged trees.

In short, the report underrepresents the scale and seriousness of risk to irreplaceable trees across the site.

At Appendix 2 I show photographs of 4 veteran Oak and Ash trees standing close to or on field margins and cable route options. The photos on the left in full leaf are taken by local residents. The photos on the right by the developer. Except for the 4th tree – a veteran Oak tree – completely omitted – missed - from the Applicant’s submission. How many more are there?

I also want to raise concerns regarding the Draft Development Consent Order (DCO) as it relates to trees and hedgerows. In the DCO reference APP-015, Part 6, Schedule 38 and Schedule 39 it is proposed that, once issued, the undertaker:

- (38.1) “may fell or lop any tree or shrub near any part of the authorised development or cut back its roots, if it reasonably believes it to be necessary to do so to prevent the tree or shrub from—
- (a) obstructing or interfering with the purposes of the authorised development or any apparatus used in connection with the authorised development; ....
  - (c) obstructing or interfering with the passage of vehicles to the extent necessary for the purposes of construction or decommissioning of the authorised development.

And:

- (39.1) “may fell or lop any tree that is subject to a tree preservation order within or overhanging land within the Order limits or cut back its roots, if it reasonably believes it to be necessary to do so in order to prevent the tree from obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development.”

The powers requested are very wide. They override existing protection and create significant risk to ancient woodlands, high value trees and hedgerows across the site. Recent cases in the media serve to highlight the risk to protected high value trees (for example, the ‘criminal’ Sycamore Gap loss and ‘incompetent’ Toby Enfield Oak loss). I believe the powers requested here are excessive and unnecessary.

**Please will the Inspector raise these issues during the examination and require the Applicant to:**

- **Reassess and carry out robust and comprehensive assessments of high value trees across the site**
- **Reduce risk by pulling development back significantly from ancient woodland boundaries and high value trees across the site**
- **Reassess cable routes and investigate alternatives that avoid risk of damage to high value trees**

- **Reduce development that fragments and isolates ancient woodland, ensuring the maintenance of suitable habitat for woodland species to feed and move freely between wooded areas**
- **Redraft the DCO to reduce risk to ancient woodlands, high value trees and hedgerows**

**Thank you.**

**(Please also see Appendices 1, 2 & 3)**

APPENDICES

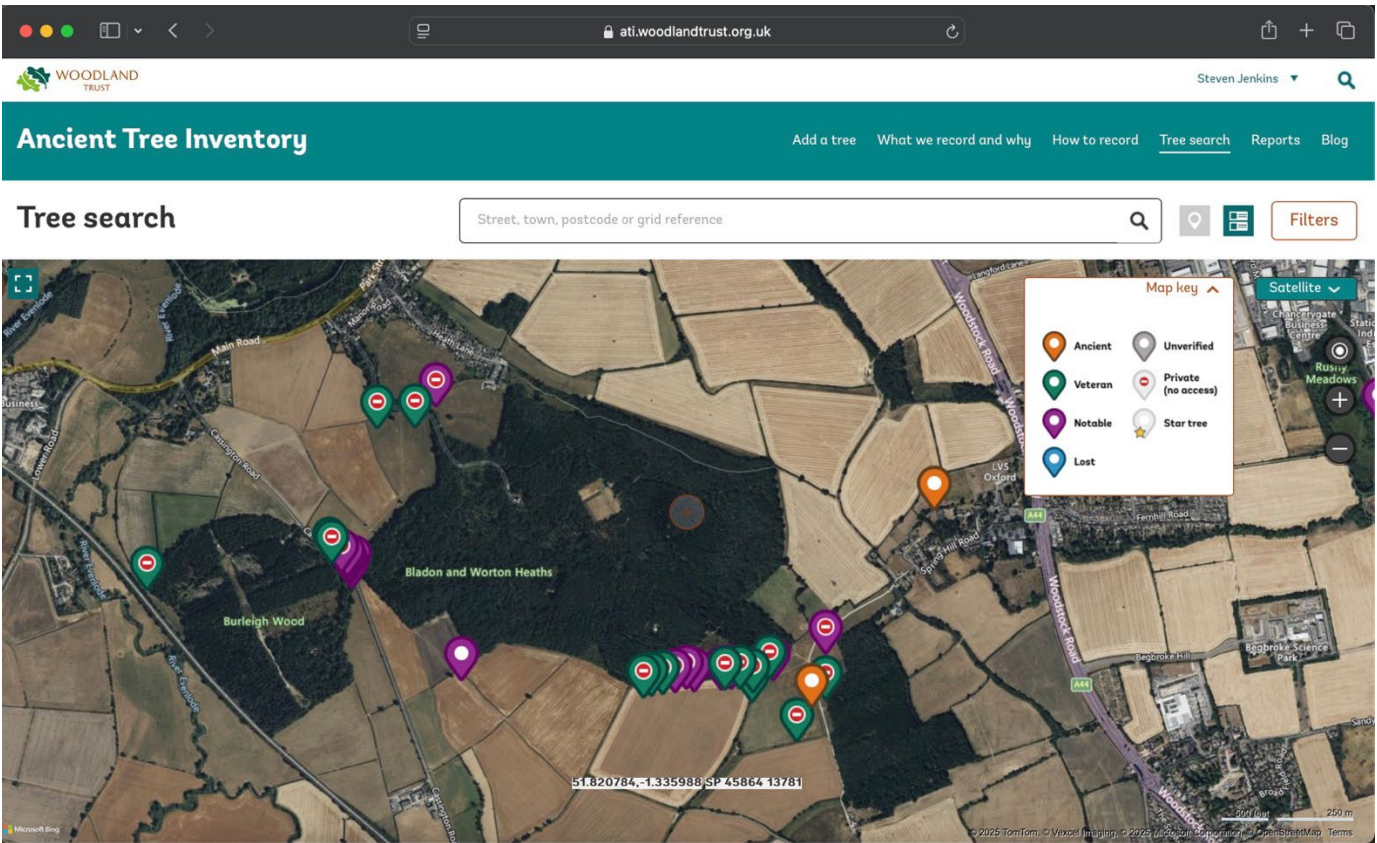
Appendix 1 Woodland Trust Ancient Tree Inventory (ATI)

Verified veteran trees registration numbers:

GRID REFERENCE (SP)	SPECIES	ATI TREE NUMBER:
46089 13349	Oak	268355 listed as VETERAN tree in ES Vol 3 App 9.15: Veteran Tree Survey Report (T69)
44662 13770	Oak	268298 ignored by Applicant
44654 13777	Horse Chestnut	268301 ignored by Applicant
45721 13328	Oak	268314 ignored by Applicant
45747 13334	Pedunculate Oak	268316 listed as VETERAN tree in ES Vol 3 App 9.15: Veteran Tree Survey Report (T70)
45786 13339	Oak	268317 ignored by Applicant
45996 13357	Oak	268340 ignored by Applicant
46046 13360	Oak	268344 ignored by Applicant
44814 14224	Common Ash	268352 listed as VETERAN tree in ES Vol 3 App 9.15: Veteran Tree Survey Report (T42)
44941 14229	Oak	268353 listed as VETERAN tree in ES Vol 3 App 9.15: Veteran Tree Survey Report (T41)

Map - Woodland Trust Ancient Tree Inventory

Area to the south of Bladon including Burleigh Wood, Bladon Heath/Worton Heath and Begbroke Wood (in the Central area of the Botley West Solar Farm proposed site). All of the trees in the table above are shown on this map amongst other recorded Ancient, Veteran and Notable specimens.





Written Representation by Steven Jenkins  
Registration identification number is: 20055190  
Botley West Solar Farm

## Appendix 2 Photographs of 4 veteran Oak and Ash trees standing close to or on field margins and cable route options





Written Representation by Steven Jenkins  
Registration identification number is: 20055190  
Botley West Solar Farm



Developer Image  
Not recorded Veterans Tree Survey Report

No Developer Report  
or Image

### **Appendix 3 Responses to questions raised by the ExA at OH2 on 14<sup>th</sup> May 2025**

**Q1 You mentioned about woodland fragmentation and isolation. Could you just explain to me how the existing woodland coexists with other areas of similar woodland and the movements and interactions between them?**

**Q1 Response** In the Central area of the Botley West site the ancient woodland areas at Pinsley Wood (circa 1000m west of Burleigh Wood), Burleigh Wood (touches Bladon Heath to the east), Bladon Heath/Worton Heath (contiguous areas) and Begbroke Wood (<250m south west of Worton Heath) run west to east across the lower valley of the River Evenlode.

The woodlands form a chain of similar habitat with small gaps between each woodland currently utilised as farmland for crops and grazing. Some of the inner areas of the woodlands are commercially managed.

The open countryside provides feeding and dispersal opportunities. The proximity of adjacent areas of woodland provides cover and helps to reduce risk of isolation, wildlife inbreeding and local extinction events. The connected chain of undisturbed landscape forms a network of similar habitat across the valley (and beyond) allowing animal movement and plant dispersal, maintaining ecological balance. To the north, the ancient woodlands of High Park and the River Glyme at Blenheim are circa 1000m away across open fields from the northern fringe of Burleigh Wood and Bladon Heath providing wildlife corridors for birds, animals and insects to move freely across a large area dominated by ancient woodland. To the south there is a large expanse of open farmland stretching >2000-2500m to the south/south east toward Cassington and the River Thames.

Whilst it is known that fragmented woodland settings can still interact, I fear the quality of each ancient woodland will be degraded if the proposal goes ahead at the scale and position proposed.

**Q2 You mentioned about a number of trees that had not been included in the report. Are you able to show those trees to us which you feel should have been but were not assessed?**

**Q2 Response** Appendix 1 above lists 10 verified veteran trees including ATI Tree Numbers and Grid References. A map is provided. Of these, 6 trees have been ignored by the Applicant and omitted from the Veteran Tree Survey Report despite being in critical locations adjacent to proposed cable route options. Whilst, in this sample, 4 trees have been included it is significant that important trees with similar characteristics have been missed. Volunteers with very limited resources have been able to easily identify a number of specimens that should have been included in the Applicant's Veteran Tree Survey Report.

Whilst not yet formerly recorded on the ATI, during site visits the presence of veteran and ancient Hawthorn trees in the southern boundary line of Worton Heath with the adjacent University of Oxford/Merton College farmland has been suggested by specialist assessors.

I am very concerned that the Applicant has not paid attention to the issue and the ES Vol 3 App 9.15: Veteran Tree Survey Report is inaccurate, incomplete and insufficient for the purposes of this planning application.

**Q3 We have a glint and glare assessment provided by the applicant. Could you just enlighten me in terms of additional light, how that affects ancient and veteran trees? What are the consequences?**

**Q3 Response** Increased light pollution can negatively affect ancient and veteran trees, though the damage is often indirect and occurs through changes to ecological processes – such as disruption to tree-associated wildlife, changes to circadian rhythms and stress amplification (increasing cumulative stress burdens from drought, soil compaction and pollution rather than immediate physical harm).

It is essential to acknowledge and properly assess the adverse effects of increased artificial lighting on ancient and veteran trees—features of irreplaceable ecological, cultural, and historical value. These trees are recognised as nationally significant biodiversity assets under the National Planning Policy Framework (NPPF) and are afforded specific protections under Natural England's Standing Advice and the UK Biodiversity Action Plan.

### 1. Ecological Disruption from Lighting Intrusion

Ancient and veteran trees serve as keystone structures within the landscape, supporting a rich assemblage of species, many of which are legally protected or of conservation concern. Artificial lighting associated with construction compounds, access roads, security fencing, substations, and operation phases introduces a pervasive nocturnal disturbance. Such lighting interferes with: Bats - many of which are European Protected Species under the Conservation of Habitats and Species Regulations 2017, through disruption of commuting routes and foraging grounds in tree corridors; Invertebrates (notably nocturnal pollinators) - leading to breakdowns in pollination networks around trees; and Birds - particularly those reliant on undisturbed roosting and breeding conditions in tree cavities.

These impacts are cumulative, extending well beyond the immediate footprint of the infrastructure due to the dispersive nature of light, particularly blue-rich and upward-emitting light sources.

### 2. Interference with Tree Physiology and Seasonal Cycles

Artificial lighting can interfere with the photoperiodic responses of trees, leading to maladaptive phenological changes. Veteran trees exposed to prolonged or irregular artificial illumination may exhibit: Premature or delayed leaf-out and senescence - increasing risk from late frosts or drought; Extended growing periods - which may exhaust stored energy reserves; & Disruption to hormonal cycles - weakening internal physiological resilience. Given the reduced regenerative capacity of ancient trees, such changes may result in long-term decline or premature death, particularly when combined with root disturbance, soil compaction or associated hydrological changes.

### 3. Policy Conflict and Regulatory Oversight

The introduction of light pollution in proximity to ancient and veteran trees is in direct conflict with: National Policy Statement EN-1 - which requires that biodiversity and landscape impacts be minimised and mitigated; The Environment Act 2021 - which embeds a duty to enhance biodiversity; & The Forestry Commission and Natural England's Joint Standing Advice - which states that ancient and veteran trees should be retained with appropriate buffer zones and protected from indirect harm, including from lighting.

End./