

# **BOTLEY WEST SOLAR FARM: DEVELOPMENT CONSENT ORDER EXAMINATION (ID20055258)**

## **WRITTEN REPRESENTATIONS**

Prepared in response to Deadline 1 (D1)  
June 2025

<b>Project Name:</b>	Botley West Solar Farm
<b>Client Name:</b>	Stop Botley West Group
<b>Prepared By:</b>	Various
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<b>Date:</b>	29 <sup>th</sup> May 2025
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<b>Date:</b>	29 <sup>th</sup> May 2025
<b>Revision:</b>	1

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## 1. Introduction

### 1.1 Background

- 1.1.1 These Written Representations are submitted by Marrons on behalf of Stop Botley West (“SBW”) Limited and are intended to address the information requirements set out in the Examining Authority’s Rule 8 letter, specifically in relation to Deadline 1. This includes, among other matters, the submission of Written Representations (WRs), summaries of oral submissions from hearings held during the week commencing 12 May 2025, and any post-hearing submissions or responses to Relevant Representations (RRs) as requested by the Examining Authority.
- 1.1.2 The representations provided here are prepared to supplement and clarify, where appropriate, the detailed Relevant Representations previously submitted by Marrons on behalf of the Group. These WRs are intended to be read alongside that material. In addition to elaborating on the matters already raised in those representations, we have also reviewed the Relevant Representations (**Appendix 1**) submitted by statutory bodies and technical consultees and, where relevant, make reference to those submissions to support or contextualise the Group’s concerns.
- 1.1.3 Stop Botley West Limited also participated in the Open Floor Hearing and submitted a written version of its contribution. That submission is appended to these representations at **Appendix 2**.
- 1.1.4 In summary, the Group maintains significant concerns regarding the proposed development, particularly in respect of its scale and the breadth of its impacts across a range of highly sensitive receptors. These include, but are not limited to, impacts on valued landscapes, the setting of heritage assets, the amenity of residential communities, and the character and setting of nearby settlements. The Group’s position remains that the development, as proposed, would result in substantial and unacceptable harm across multiple domains.

### 1.2 Previous Representations

- 1.2.1 As set out above, SBW has previously made detailed Relevant Representations in relation to the project. In summary, SBW’s RRs raised the following points:
- There would be less than substantial harm to heritage assets up to the highest level of importance;
  - There would be significant and extensive impacts upon the landscape character of the area and visual amenity given the Project’s design and scale;
  - The project design and scale has not considered the necessary mitigation;

- There would be significant harm arising from the loss of a substantial amount of Best and Most Versatile (“BMV”) agricultural land;
- There would be substantial harm to a variety of Public Rights of Way (“PRoW”) which are of importance to the local community;
- There would be significant impact on the local economy because of reduced tourism; and
- There would be substantial harm to the Green Belt because of inappropriateness, conflict with the Green Belt purposes and loss of openness.

1.2.2 SBW notes that consent for the Project is only sought for a temporary period. However, an operational life of 37.5 years (42 years in total including construction and decommissioning) is a substantial period and would be beyond the lifetimes of many of the people alive today and a substantial portion of the lifetimes of the next generation. Accordingly, the effects of the Project are effectively permanent and should be regarded as such.

1.2.3 The need for renewable energy development in general and utility-grade solar in particular is set out in National Policy Statements (“NPS”). However, The NPS also states that Applicants must apply the mitigation hierarchy and demonstrate that this has been applied and utilise good design, particularly in respect of landscape, visual amenity and heritage. SBW consider these requirements of not been adequately discharged.

### 1.3 Structure of Submission

1.3.1 These representations are structured as follows:

- **Section 2** – Core Issues
- **Section 3** – Conclusions and Matters for the Examination Authority’s considerations

## 2. Core Issues

### 2.1 Historic Environment

2.1.1 As set out in our RRs, the proposed development would result in considerable harm to the setting and significance of a number of designated heritage assets, including the Blenheim Palace World Heritage Site (WHS), several conservation areas, and a wide range of listed buildings. The importance of these assets is not derived solely from their architectural or physical form, but critically also from their wider setting—particularly in a rural landscape context where long views, open farmland, and historic land use patterns form an intrinsic part of their character and meaning.

#### Blenheim World Heritage Site:

2.1.2 A key concern is the impact of the central section of the application site on the Blenheim Palace WHS (National Heritage List for England (NHLE) reference 1000091), which is recognised internationally for its Outstanding Universal Value (OUV). The proposals would also harm the significance of the associated Grade I Registered Park and Garden (NHLE 1000434) and the Grade I listed Blenheim Palace itself (NHLE 1052912). This part of the landscape is fundamental to the WHS's setting, and the development would introduce large-scale, visually intrusive infrastructure into a sensitive, historically legible, and culturally significant environment.

2.1.3 The Inspectors have rightly requested that the Applicant submit a number of important heritage-related documents, including the Blenheim Palace WHS Management Plan (2017) and all associated appendices, the UNESCO/ICOMOS Guidance and Toolkit for Impact Assessments in a World Heritage Context, Conservation Area Appraisals for Bladon, Cassington and Begbroke, the Heritage Mapbook, and the Archaeological Evaluation Report. That the scheme has been progressed without full reference to these critical documents is concerning and further underscores the inadequacy of the heritage assessment and project design process. The failure to integrate the WHS Management Plan and relevant guidance into the assessment framework demonstrates a lack of alignment with national policy objectives concerning the conservation of heritage significance and the delivery of high-quality, context-sensitive design.

2.1.4 In relation to the Applicant's reliance on the enclosed and self-contained nature of the Blenheim Palace World Heritage Site (WHS) as the basis for concluding that there would be no material heritage impact. Whilst it is accepted that views into and out of the WHS may be limited due to its self-contained nature, the assumption that this precludes harm to setting overlooks the broader spatial and cultural relationship between the WHS and its surrounding landscape.

2.1.5 The Blenheim Palace WHS Management Plan explicitly acknowledges this relationship. It states:

*“The park at Blenheim Palace is a well defined and contained landscape which, following the extensive parkland planting campaigns of the mid-18th and late 19th century which included enclosing boundary plantations, has a limited inter-visibility with its wider setting. However, the WHS stands at the core of an extensive private estate, which has over the centuries exerted huge influence over the character and appearance of the wider landscape, and neighbouring landowners.”*

2.1.6 This establishes that the significance of Blenheim Palace and its heritage assets extends beyond visual connections alone. The World Heritage Site’s influence and historic role in shaping the wider agricultural landscape forms part of its setting and significance. The Botley West Solar Farm proposals, by introducing a large-scale industrial land use into that wider setting, would result in a fundamental change in character, development pattern, and land use. These risks undermining the historic coherence between the WHS and its rural estate context — a relationship which is explored in greater detail from page 6 onwards of the Management Plan.

2.1.7 We consider that the Applicant’s assessment fails to address this issue with sufficient rigour. In our view, the effect of the proposals on the wider setting of the WHS should be re-examined, not only in terms of visibility but with proper regard to changes in land use character, coherence, and historic association.

The Comments of Interested Parties (IPs):

2.1.8 We also note the submission of Historic England and endorse their view that the Heritage Impact Assessment (HIA) underpinning the application lacks the necessary depth and rigour. Specifically, Historic England has raised concerns that the HIA has not been informed by a comprehensive or high-quality suite of visualisations and that it fails to evidence a clear design evolution process that responds meaningfully to identified heritage sensitivities. To our point above, the HIA relies heavily on visibility alone as a determinant of impact, with insufficient consideration given to the value of landscape character and historic setting in informing both significance and harm.

2.1.9 The harm is not limited to the WHS but extends to other highly sensitive assets, including three prominent churches—two Grade I listed and one Grade II\* listed—whose landmark value in the undulating rural landscape would be significantly compromised by the introduction of solar infrastructure. These are not incidental features but key elements in the historic fabric of the area, whose significance is intimately tied to their open, agricultural context.

2.1.10 Historic England also identifies harm to a number of other important assets, including the Scheduled Monument of the Roman Villa, the Church of St Peter and St Paul in Church Hanborough, the Church of St Peter in Cassington, and the Church of St Michael in Begbroke. The erosion of traditional open landscapes that characterise the setting of these assets would materially harm their significance.



2.1.11 The evident understatement of these impacts stems, in our view, from an assessment methodology that prioritises intervisibility while failing to account for the wider experiential and contextual qualities of these heritage assets. The landscapes in which they sit are not just visual backdrops but integral to their meaning, significance, and communal value. This methodological failure is particularly problematic in the context of a WHS, where setting, character, and function are critical to maintaining OUV.

2.1.12 We further draw attention to the representation made by World Heritage UK, which states that

*“The large scale and wide extent of the Project solar panels and infrastructure are proposed to be imposed on this landscape and would create a severe and adverse impact on the character and functions of the WHS setting.”*

2.1.13 We strongly agree with this assessment. The degree of intrusion represented by the proposal is incompatible with the protection and enhancement of heritage assets.

2.1.14 There is broad alignment among representors on several key issues regarding the treatment of heritage within the Applicant’s submission. First, there is a shared concern that the setting of the Blenheim Palace World Heritage Site (WHS) has been consistently undervalued. Second, there is a general view that the Applicant’s approach to assessment—particularly its reliance on visual impact alone—is flawed and does not fully address the complexities of heritage setting. Third, the lack of information, particularly in relation to setting and cumulative impacts, has been highlighted by several parties, including Historic England.

2.1.15 The ICOMOS response raises several pointed concerns. Notably, it identifies substantial areas that it believes should be excluded from development, which underscores the scale of the potential heritage impact. West Oxfordshire District has also made an important observation regarding the Green Belt designation and the absence of a buffer zone around the WHS—highlighting a further missed opportunity to protect the setting of this internationally significant site.

## **2.2 Green Belt & Landscape**

2.2.1 The proposed development would result in substantial and enduring harm to the character and openness of the landscape, particularly where it falls within the Oxford Green Belt. One of the five purposes of the Green Belt, as set out in national policy and reaffirmed through adopted local plans, is to prevent the coalescence of settlements. The proposals before the Examining Authority clearly conflict with this fundamental objective. Of particular concern is the narrow remaining gap of undeveloped land between Begbroke and Kidlington, notably around the corner of the A44 and Langford Lane. This is the last open green field in this location, and the introduction of solar arrays here would effectively erode the physical and visual separation between these settlements, undermining the spatial integrity of the Green Belt.

2.2.2 In our RRs, we also raised concern about the urbanisation of significant tracts of Green Belt between settlements resulting in the erosion of long established gaps between settlements – including between Long Hanborough/Bladon and Bladon/Begbroke).

2.2.3 Cherwell District Council has rightly highlighted this conflict with Policy ESD 14 of the Cherwell Local Plan and saved Policy C15 of the 1996 Plan. Although the Applicant has acknowledged proximity between certain settlements such as Begbroke and Bladon in its Planning Supporting Statement, it has failed to recognise or assess the much more immediate and sensitive relationship between Begbroke and Kidlington.

2.2.4 We previously submitted extracts from the Green Belt study with our Relevant Representations which demonstrate that the affected areas perform a high-functioning Green Belt role. The proposed solar development would infill narrow, highly sensitive gaps between settlements and, by doing so, undermine the core spatial purposes for which the Green Belt is designated – to retain the separate identities of settlements. Whilst it is acknowledged that development plans do not determine the outcome of a DCO examination, all three host authorities have declared climate emergencies and established policy frameworks to support renewable energy infrastructure. In West Oxfordshire’s case, however, the local approach clearly advocates for a landscape-led assessment of siting, scale, and community support—criteria that have not been adequately addressed in the current proposal (Policy EH6 of the West Oxfordshire Local Plan adopted in 2018).

2.2.5 The 2016 LDA Landscape and Visual Review (submitted here as Appendix 3) forms part of that local evidence base. It identifies broad areas across West Oxfordshire District that may be more or less suitable for solar energy development, based on landscape character, sensitivity, and capacity. The application site falls within the Eastern Parks and Valleys landscape character area, which the study identifies as having “very limited” capacity to accommodate solar or wind development due to the high sensitivity and scenic value of the landscape. The report goes on to recommend that where such development is proposed, smaller schemes within the Limestone Wolds character area, and away from the most susceptible Valleys and Parkland landscapes, are likely to result in the least harm. No such locational sensitivity or refinement appears to have informed the current proposals.

## Renewable Energy And Low Carbon Energy Assessment And Strategy For West Oxfordshire

Figure 12 Suitability of West Oxfordshire for Solar Farms (landscape based approach)

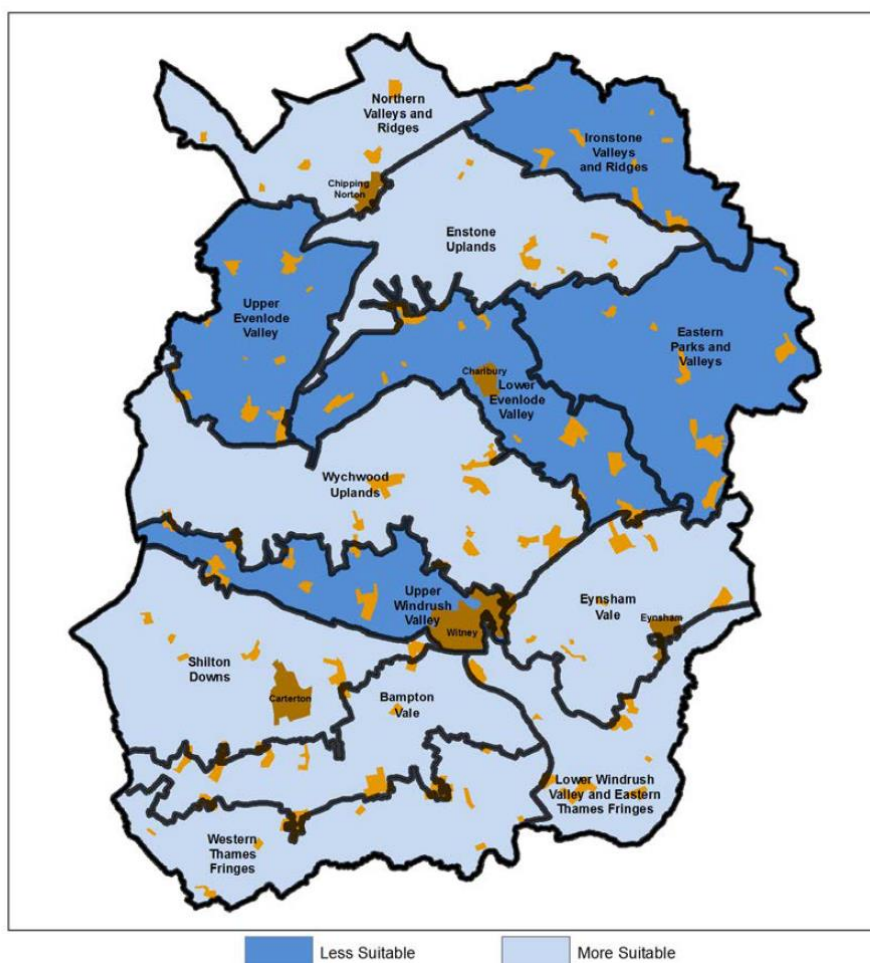


Figure 1 Extract from LDA Study

2.2.6 The proposed development would result in significant adverse effects on the landscape due in large part to an inadequate understanding of the site's local character and the absence of a sensitive, location-specific design approach. Oxfordshire County Council has identified a critical shortcoming in the Landscape and Visual Impact Assessment (LVIA) submitted by the Applicant [APP-045], namely that it fails to explain how the findings of local landscape character assessments have informed either site selection or the detailed design and mitigation strategy.

2.2.7 Rather than reflecting the nuanced differences in landscape quality and receptor sensitivity across the extensive site, the mitigation proposals—largely limited to standardised hedge and tree planting—have the potential to fragment the landscape and detract from the open, scenic qualities of the landscape. This is particularly problematic where PRow's pass through or

alongside the development area. In such cases, mitigation needs to do more than screen views; it must respect the open, rural context and preserve the experiential quality of routes that are valued by local communities for recreation and access to the countryside. There is no clear evidence that this has been achieved. We suggest the ExA consider the apparent inconsistency between the Applicant's claim that the development is "temporary" and the proposed mitigation strategy. During the May hearings, the Applicant confirmed in response to a question from the ExA that the hedge and tree planting intended for visual mitigation would not be removed following decommissioning. This implies that the resulting screening and associated fragmentation of the landscape would, in fact, be permanent. This undermines the temporary nature of the scheme as presented, and we believe it warrants further scrutiny.

Public Rights of Way & Mitigation Measures:

- 2.2.8 We note that significant objection has been raised by the Ramblers Association in relation to the impact of the scheme on the enjoyment and use of the public footpath network. They note that the sheer scale of the proposed development is likely to diminish the recreational value of walking along these routes. The open and rural setting of many of the footpaths contributes significantly to the wellbeing benefits associated with countryside access. The transformation of this landscape into a semi-industrial environment enclosed by fencing and bordered by newly planted hedgerows would fundamentally alter the character of the setting through which walkers move. This, in turn, is likely to reduce the use of the PRoWs and undermine their social and health-related value. We agree with this assessment and endorse it to the ExA.
- 2.2.9 The Applicant's assumption that the visual impact of the scheme will be acceptably mitigated over time by hedgerow planting ignores the reality that the change in land use and landscape character will be immediate, pronounced and ensuring across a significant timescale. The replacement of arable fields with extensive tracts of solar infrastructure and security fencing introduces a semi-industrialised landscape into an otherwise agricultural and tranquil setting. This transition will be particularly stark for PRoWs that traverse or border the site, where users would be exposed to uninterrupted views of solar panels, fencing, and infrastructure, often at close quarters.
- 2.2.10 Moreover, there is little evidence that the design process has given serious attention to the experience of local communities and recreational users. The approach to mitigation lacks the refinement required for a scheme of this scale and sensitivity. By focusing narrowly on visual screening, the Applicant has failed to engage with the wider experiential qualities of the landscape or with the importance of maintaining rural tranquillity and openness—qualities that are highly valued by local residents and visitors.
- 2.2.11 We conclude that development would fundamentally alter the landscape character of the area—from one of open, rural, arable farmland to a semi-industrialised energy-generating landscape for the lifetime of the project. The cumulative extent and intensity of solar arrays,

fencing, infrastructure, and access roads across the site would result in a highly engineered and incongruous landscape typology, inconsistent with local character.

Landscape Impact Conclusion:

- 2.2.12 The approach to landscape and visual impact within the Botley West Solar Farm application raises significant concerns when considered against national policy requirements. These make clear that careful consideration of siting and project design is fundamental to minimising adverse landscape and visual effects. It is expected that these matters are addressed proactively through an iterative design process and that applicants take steps to integrate effective mitigation measures from the outset.
- 2.2.13 In the case of Botley West, it is apparent that while the Applicant did undertake some preliminary work in identifying the site, there is no evidence that landscape and visual constraints were a key driver in that process. This lack of upfront rigour in both site selection and design evolution has led to a reactive approach to mitigation. As a result, the measures proposed appear belated and fail to demonstrate that the mitigation hierarchy has been followed.
- 2.2.14 The sheer scale and fragmented configuration of the Botley West proposals, coupled with their proximity to multiple settlements, will result in widespread and significant adverse effects on people's perception of their environment. These effects are compounded by the erosion of rural character across a large tract of countryside. Such outcomes are in clear conflict with the principles of good design embedded within EN-1, which requires sensitivity to place and the avoidance of harm where possible.
- 2.2.15 The dispersed layout of the Botley West Solar Farm across multiple land parcels and its expansive footprint in close proximity to a number of settlements would materially harm landscape character and visual amenity. Rather than being a coherent and integrated scheme, the application is characterised by fragmentation and spatial intrusion. This pattern of development is not conducive to good design and should weigh heavily against the proposal when considered in the planning balance.
- 2.2.16 The proposed shift from an open, agricultural landscape to a semi-industrialised energy landscape will be acutely felt by both residents and users of the countryside, including walkers and recreational users. The increased sense of enclosure and loss of open views will diminish the ability to enjoy and appreciate the rural setting. Whilst the Applicant has proposed some screening through additional hedgerow and tree planting, this would deliver only limited mitigation at a very localised scale and would itself alter the wider character of the landscape in ways that are not necessarily beneficial or contextually appropriate.
- 2.2.17 The Applicant has not demonstrated that the proposed mitigation is proportionate or adequate in the context of national policy requirements. Indeed, the reliance on standardised buffers

suggests a failure to fully understand and respond to the local landscape context. The scheme as a whole marks a fundamental and irreversible change in land use over a vast area, in close proximity to approximately 15 separate settlements. This extent and intensity of development sets Botley West apart from other solar proposals and serves only to emphasise the failure of the siting and design process to meaningfully minimise harm.

## 2.3 Residential Amenity

2.3.1 Section 3.7 of our Relevant Representations outlines our concerns regarding the impact of the proposed development on residential amenity. While we do not repeat those points in full here, **Appendix 5** provides further detail on several properties where amenity and outlook would be notably affected. In our RRs, we raised the point about inadequate buffer zones to residential properties and that the information in **Appendix 5** sets out the implications of that.

2.3.2 Appendix 5 sets out the number of residential properties likely to be impacted and includes a selection of representative case studies demonstrating how the proposed development would alter the immediate outlook from both gardens and internal living spaces.

2.3.3 These examples help to highlight the overall scale and reach of the scheme, illustrating how it would materially alter the visual and environmental experience of residents living near the site.

2.3.4 SBW are collating a community impact report which will be included in future submissions and will contain further information about residential amenity impacts.

### 3. Conclusions & Matters for the Examining Authority's Consideration

#### 3.1 Conclusions

##### Consideration of Scale and Mitigation:

3.1.1 We note that National Policy Statement EN-1 recognises that reducing the scale of a project may be a legitimate means of mitigating landscape and visual impacts, albeit with a potential trade-off in energy output. In the case of Botley West, we consider the landscape and visual harm to be so substantial, by virtue of the scale, fragmented configuration, and proximity to multiple settlements, that only a significant reduction in the scale of the development could deliver meaningful mitigation.

3.1.2 We respectfully suggest that the current extent of the proposals, and the spatial dominance they would exert over a large rural area, weighs heavily against the scheme in its current form. We urge the ExA to explore, as part of the examination, whether an extensive reduction in scale would allow for better alignment with national policy objectives to minimise harm and deliver sensitive, well-designed renewable infrastructure.

#### 3.2 Next Steps

##### Further Issue Specific Hearings:

3.2.1 Given the widespread concerns expressed by host authorities and other Interested Parties regarding the robustness of the Applicant's assessments, we believe it is appropriate for dedicated Issue Specific Hearings (ISH) to be held on both landscape and heritage matters.

3.2.2 We note that following the first ISH, the Applicant has committed to submitting significant revisions and additions to its heritage evidence base. This suggests that heritage considerations require closer scrutiny, and we believe the same level of focus is warranted in relation to landscape impact. This is all the more relevant in light of the scale of the proposed development, the inconsistencies in the Landscape and Visual Impact Assessment (LVIA), and the evident divergence between the Applicant's conclusions and those of statutory and technical = consultees.

3.2.3 We also wish to highlight that Stop Botley West Limited has appointed qualified heritage and landscape consultants to advise on these matters. Should it assist the Examination Authority, we would be pleased to provide further input on these topics through written and/or oral submissions.

##### Future Site Inspections:

3.2.4 We also invite the ExA to undertake targeted site inspections to locations where residential and recreational receptors would experience concentrated and representative impacts. These include areas where public rights of way traverse the proposed development zones, and where the combination of topography and visual enclosure would significantly affect the amenity of local residents. We are happy to provide suggested viewpoints which illustrate the nature and extent of the changes that would be experienced.





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