

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

## **WRITTEN REPRESENTATIONS (SUMMARY)**

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. Summary

### 1.1 Heritage

- 1.1.1 The proposed development would cause substantial harm to the setting and significance of numerous designated heritage assets, including the Blenheim Palace World Heritage Site (WHS), associated Grade I listed buildings and Registered Park and Garden, as well as various conservation areas and listed churches. These assets derive significance not only from their architecture but also from their rural landscape setting, characterised by long views, open farmland, and historic land use patterns.
- 1.1.2 A principal concern is the impact of the central part of the site on the WHS. While the Applicant relies on the enclosed nature of Blenheim to argue there is no material harm, this overlooks the wider historical and cultural relationship between the Palace and its surrounding estate. The Blenheim Palace WHS Management Plan recognises this broader influence, stating that although the WHS is visually contained, it has long exerted a shaping influence on the surrounding landscape. The proposed industrial-scale development would disrupt this relationship through fundamental changes to land use, character, and development pattern.
- 1.1.3 The Applicant's failure to fully integrate the WHS Management Plan, UNESCO/ICOMOS guidance, and Conservation Area Appraisals into the heritage assessment process is a serious omission. The assessment places undue emphasis on visibility, ignoring experiential and contextual factors that contribute to setting and significance. As a result, the Heritage Impact Assessment lacks rigour and depth.
- 1.1.4 This concern is echoed by Historic England, which criticises the limited visualisations, the absence of evidence of design evolution responsive to heritage sensitivities, and the overly narrow focus on visual intervisibility. In their view, the proposed development risks harming not only the WHS, but also key listed buildings and Scheduled Monuments across the site, including three landmark churches and the Roman Villa.
- 1.1.5 The erosion of the open, agricultural landscape that defines the setting of these assets would significantly compromise their significance. These are not isolated viewpoints but part of a wider, legible historic landscape. The approach taken by the Applicant, which treats heritage in fragmented, overly visual terms, fails to capture this.
- 1.1.6 World Heritage UK has also raised strong objections, stating that the project would have a severe and adverse impact on the WHS's setting and function. Similarly, ICOMOS identifies large areas that should be excluded from development due to their sensitivity. West Oxfordshire District Council's point about the lack of a buffer zone around the WHS—despite its location within the

Green Belt—reinforces the conclusion that the heritage sensitivities of this area have not been properly addressed.

## 1.2 Landscape & Green Belt

- 1.2.1 The proposed Botley West Solar Farm development is strongly opposed on landscape and Green Belt grounds due to its scale, location, and inadequate design sensitivity. The scheme would cause substantial and lasting harm to the rural landscape, especially where it intersects with the Oxford Green Belt. This directly conflicts with national and local Green Belt policy, particularly the aim of preventing settlement coalescence. The narrow, undeveloped green space between Begbroke and Kidlington—one of the last of its kind—would be effectively eroded by the proposed solar infrastructure, undermining both physical and visual separation between settlements.
- 1.2.2 The proposal is also at odds with local planning policies, including Cherwell’s Policy ESD 14 and saved Policy C15, as well as West Oxfordshire’s landscape-led approach to renewable energy development (Policy EH6). Supporting studies, such as the 2016 LDA Landscape and Visual Review, identify the application site as highly sensitive with “very limited” capacity for solar development. Yet, the application fails to consider this, proposing standardised mitigation measures that do not reflect local landscape character or sensitivity.
- 1.2.3 The Landscape and Visual Impact Assessment (LVIA) is critically flawed, lacking clear evidence that local character assessments informed either site selection or design. Oxfordshire County Council and other consultees, including the Ramblers Association, have highlighted that the development would significantly degrade the rural and recreational value of public rights of way (PRoWs), replacing tranquil farmland with a semi-industrial landscape of fencing, infrastructure, and solar arrays. These changes would be especially jarring for users of footpaths running through or alongside the site, negatively impacting health, wellbeing, and countryside access.
- 1.2.4 Moreover, while the Applicant claims the development is temporary, permanent mitigation planting (e.g., hedgerows) suggests otherwise, further weakening the credibility of the proposal. The development’s dispersed and fragmented layout, in close proximity to around 15 settlements, would exacerbate its visual and spatial impact, contrary to principles of good design and EN-1 national policy expectations.
- 1.2.5 Overall, the Botley West proposal represents an inappropriate and poorly conceived transformation of the landscape. It fails to minimise harm through site selection, design, or meaningful mitigation and would irreversibly alter the area’s rural character. These shortcomings should weigh heavily against the scheme in the planning balance.

### 1.3 Other Matters

- 1.3.1 In conclusion, the landscape and visual harm arising from the Botley West Solar Farm proposals is considered so severe—due to the scheme’s scale, fragmented layout, and proximity to multiple settlements—that only a substantial reduction in its overall size could meaningfully mitigate the impact. National Policy Statement EN-1 acknowledges that reducing scale can be an appropriate response to minimise harm, even if it reduces energy output. Given the spatial dominance the scheme would exert over a large rural area, the current scale weighs heavily against its acceptability. The Examining Authority is therefore urged to explore whether a significantly reduced scheme would better align with national policy objectives of delivering well-designed, low-impact renewable infrastructure.
- 1.3.2 In terms of process, the submission calls for further Issue Specific Hearings (ISH) on both landscape and heritage matters. This is considered necessary given widespread concerns raised by local authorities and other interested parties about the robustness of the Applicant’s assessments. The Applicant’s commitment to submitting new heritage evidence following the first ISH demonstrates the need for further scrutiny. A similar level of focus is warranted for landscape impacts, particularly in light of inconsistencies within the Landscape and Visual Impact Assessment (LVIA) and the clear differences between the Applicant’s findings and those of statutory and technical consultees.
- 1.3.3 Stop Botley West Limited has appointed expert consultants in both heritage and landscape matters and is willing to support the examination process through further written or oral submissions.
- 1.3.4 Additionally, targeted site inspections are recommended. The ExA is encouraged to visit specific locations where residents and users of public rights of way (PRoWs) would experience the most significant and illustrative impacts, particularly where local topography and visual exposure would amplify the harm. Stop Botley West is willing to provide suggested viewpoints to aid this process.
- 1.3.5 Overall, the scale and nature of the development require greater scrutiny, and opportunities to reduce harm through a smaller, more sensitively designed scheme must be considered.