

Blenheim Palace World Heritage Site – Heritage Alert

Executive Summary

The recent application (PINS ref:010147) for a Development Consent Order by Photovolt Development Partners on behalf of SolarFive Ltd to impose a solar farm, known as Botley West Solar Farm (BWSF), of over 900ha (i.e. larger than Heathrow airport) upon the highly sensitive landscapes which comprise the “estate farmland” setting to the Blenheim Palace WHS represents a threat of international significance.

The proposed development is contrary to the obligations of the WHS Management Plan 2017, whereby those entrusted with the care of this historic landscape are obligated to protect the integrity of the historic landscape for future generations, not asset strip it for the financial benefit of its current owners.

The supporters of this Heritage Alert, therefore, urge ICOMOS to advise the applicants to withdraw this application or risk the loss of Blenheim Palace's World Heritage status.

FIGURES FOR PRESS RELEASE

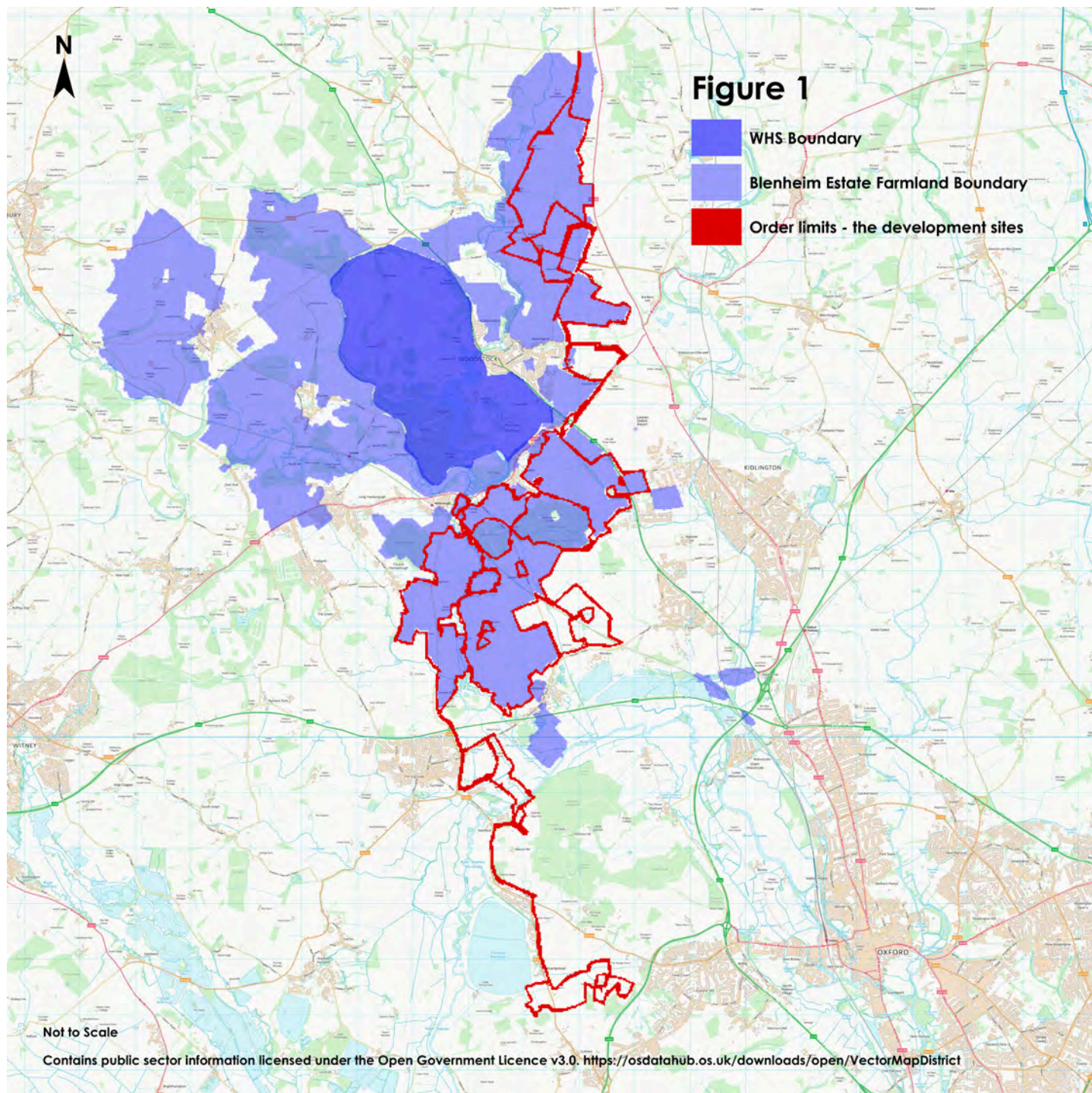


Figure 2

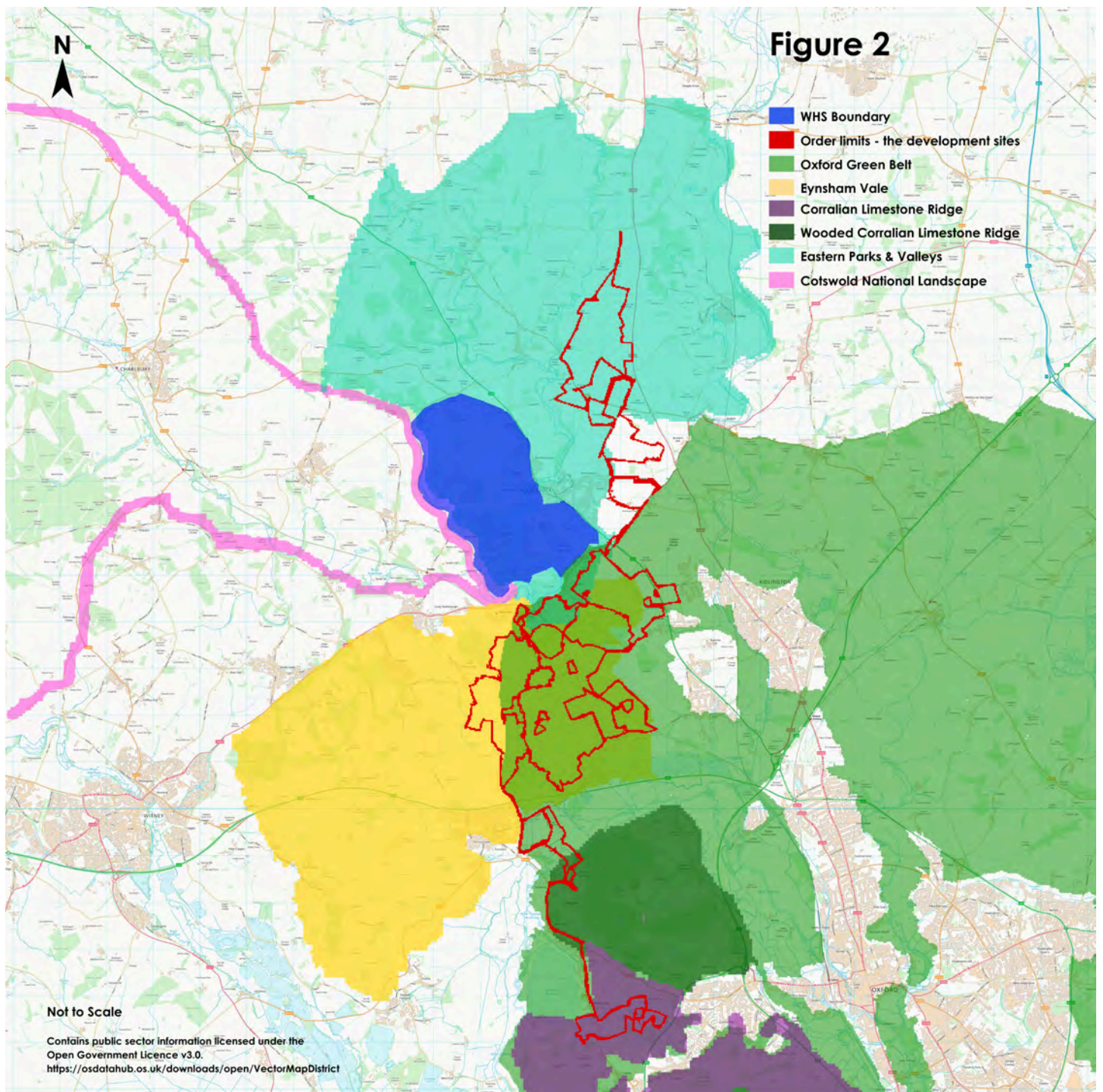


Figure 3.1 Existing aerial view from WHS to the south east



Figure 3.2 Indicative extent of solar panels. Aerial view to the south east from WHS

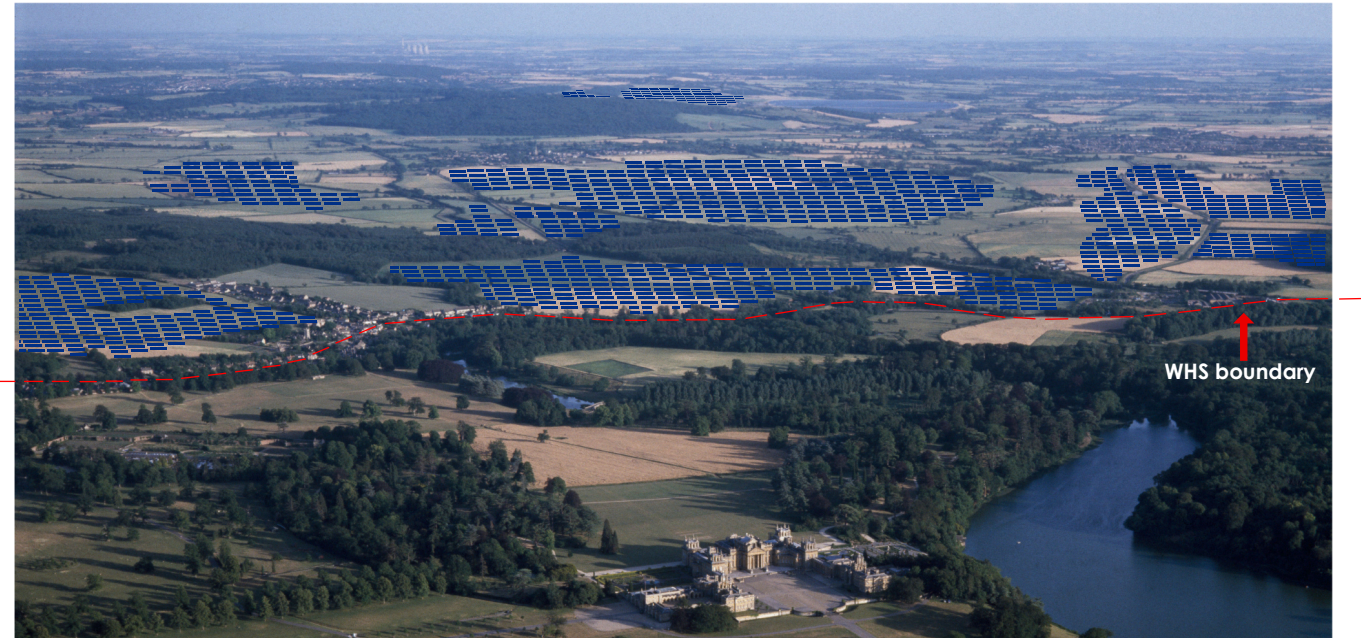


Figure 4.1 Existing View from public footpath adjoining Purwell Farm north west across Evenlode Valley.



Figure 4.2 Photomontage showing same view post development



1. Identity

- 1.1 Blenheim Palace WHS
- 1.2 Woodstock, Oxfordshire, OX20 1UL, UK
- 1.3 The Blenheim Estate comprises three interdependent elements: the Palace, the inner park and the outer estate farmlands. (Figure 1)
- 1.4 Blenheim was inscribed as a WHS in 1987 as a consequence of its exceptional cultural significance and Outstanding Universal Value. All land within the WHS boundary is included in the Historic England Register of Parks and Gardens at Grade I. The site is designated a "National Heritage Landscape" by HMRC for taxation exemption purposes.
- 1.5 To the west, the park shares a continuous boundary with the Cotswolds National Landscape, whilst the estate farmland to the southeast, proposed for development, lies within the Oxford Green Belt. This area comprises a sequence of river valley landscapes of exceptional visual amenity value and importance as the setting for both the WHS and the historic city of Oxford.
- 1.6 To the north the Blenheim estate farmlands form the central component of the exceptional "Eastern Parks and Valleys" landscape character area in the West Oxfordshire Landscape Assessment, which includes Ditchley Park, Glympton Park, Tackley Park, Rousham, Great Tew, Kiddington Hall, Cornbury Park, Kirtlington Park, Middleton Park and Sandford Park. (Figure 2)
- 1.7 Parts of Blenheim's inner parkland are designated as a Site of Special Scientific Interest, whilst the historic market town of Woodstock immediately adjoins the park gates and is a major Conservation Area.
- 1.8 The scale of the proposed solar farm, classified as a Nationally Significant Infrastructure Project (NSIP) under the 2008 Planning Act, has enabled the developer to bypass local planning controls by the County and District Councils. This situation is exacerbated by the fact that the Blenheim Palace WHS Revised Management Plan 2017 relied, in part, on local development control measures to justify **the omission of a protective "buffer zone"** within the estate farmland.

2. Statement of Significance and History

- 2.1 The Statement of Outstanding Universal Value, formally adopted by UNESCO in 2013 states that:

“Blenheim Palace in Oxfordshire was designed by John Vanbrugh. The English nation presented the site to John Churchill, first Duke of Marlborough, in recognition of his victory in 1704....”

- 2.2 The design and building of the Palace between 1705 and 1722 represented the beginning of a new style of Baroque architecture and its landscaped park, designed principally by Lancelot “Capability” Brown, is considered the epitome of the “English Landscape” movement.

- 2.3 Attribute 7 of the justification for WHS status states that:

“The park remains (sic) a complete 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim Palace and the traditional English countryside and villages surrounding it.”

- 2.4 The 18th century Baroque Palace, Brown’s English Landscape parkland and the well managed estate farmland setting have remained largely unchanged until the 20th century when the commercial opening to visitors necessitated modest changes to both the Palace and its park.
- 2.5 The Palace has been the home of the Duke and Duchess of Marlborough since its construction. The principal use of the palace and its park is now, however, as a commercial tourist attraction, with in excess of 1 million visitors per year.
- 2.6 With a few notable exceptions, there have been relatively few significant changes or additions to the Palace, its Parkland or the estate farmlands over the past 300 years, which has ensured the conservation of the site’s Outstanding Universal Value.

- 2.7 There are, however, ongoing major restoration programmes to buildings, structures and within the Park itself, including the restoration of lost design features. These works are funded by two charitable foundations.
- 2.8 There is also pressure from Blenheim Palace to continue the expansion of local villages through speculative house building, further eroding the setting to the WHS and placing more importance upon the conservation of the remaining rural estate.

3 Description

Introduction

- 3.1 Footloose solar farm developments of the scale of Botley West are required to be strategically located in areas of large scale, flat, sparsely populated landscape, where substantial peripheral woodland belts can provide effective screening, bio-diversity gain and recreational opportunities, i.e.: the antithesis of the high value, small scale, well managed, densely settled river valley landscapes which predominately characterise the rural estate farmland setting to Blenheim Palace WHS. `
- 3.2 The conclusions of the heritage, landscape and visual assessments submitted as part of this DCO application are not credible as a consequence of the failure to reflect:
- the significance of the WHS setting
 - the high quality of the landscape within that setting
 - the sensitivity of receptors to change in that landscape
 - inappropriate assessment methodologies for a development of this scale
- 3.3 ICOMOS states in their response to the PEIR that:
- “ICOMOS therefore does not agree that the ‘overall character of the historic landscape’ can be typified as generally low.’ Such a typification, made in the PEIR, cannot be supported when the landscape is seen as the setting of the Outstanding Universal Value of the Blenheim Place World Heritage property.*
- Consequently ICOMOS consider the assessment of the impact on the wider setting of the OUV of the Blenheim Palace World Heritage property as ‘Minor Adverse’ to be inaccurate.”*
- 3.4 Additionally ICOMOS state that:

“ICOMOS considers that both the historical legibility of, and the perception of, the property may be dramatically altered by as significant a conversion of the predominantly rural wider setting of the property to effectively a semi-industrialised landscape”

- 3.5 The proposed Botley West Solar Farm (Figure 1) comprises three interconnected sites to the north, southeast and south of the Blenheim WHS. All these sites are located within, or are adjacent to, an interconnected network of highly attractive farmed river valleys, through which the rivers Dorn, Glyme and Evenlode run, before flowing into the River Thames west of Oxford.

Northern Site

- 3.6 The Northern Site is located at the heart of the Eastern Parks and Valleys Landscape Character Area as defined in the West Oxfordshire Landscape Assessment (WOLA). Here a unique grouping of historic houses with their farming estates extend across the high quality farmland around the northern extent of the Blenheim estate. The imposition of a solar farm of this scale upon this distinctive, high quality historic landscape will effectively ‘hollow out’ the rural core of the area, replacing a mosaic of well managed working fields with an industrialised landscape alien to its setting. The **severe**, long-term **landscape** impacts will compromise the historic and cultural integrity of the Blenheim Estate WHS setting to the north of the palace.
- 3.7 The long-term **visual** impacts upon national and international tourists approaching the WHS of a solar farm of this scale within the heart of this unique historic landscape will be **severe**.
- 3.8 The WHS Management Plan in Para 4.17 supports this view, stating that:

*“The area has a good rural woodland/ farming character which contributes to the traditional nature of the setting of the WHS. **The forces for change that have the potential to most affect the setting of the WHS are alterations to land use which could have a significant impact particularly major infrastructure development**”*

Central Site

- 3.9 The central area of solar panels proposed is within the Eynsham Vale Landscape Character Area as defined by the WOLA study. Located entirely within the City of Oxford Green Belt, this diverse area of well managed, undulating wooded estate farmland is of exceptional visual amenity value. The area includes the rising ground of Bladon Heath which faces the WHS to the north, the scenic lower River Evenlode valley to the west and the adjoining rolling farmland north of Cassington village to the south.
- 3.10 The entirety of the central site provides a perfectly preserved example of a 300 year old working estate farmland, which functions as a key component of the visual, landscape, cultural and historic setting to the WHS.
- 3.11 This area is also the location of the principal designed view from the south façade of the Palace over Bladon village towards the rising ground of Bladon Heath. Should BWSF be implemented, a large area of solar panels in field numbers 2.5, 2.7, 2.8 and 2.11 would be clearly visible from the ground floor of the Palace and from the west side of the south lawn. It is also likely that panels in field numbers 2.2, 2.3, and 2.4 would be visible from the upper floors of the Palace. The visual impact of this intervisibility / intrusion into the designed view from the WHS into its rural setting is non-compliant with both the WHS Management Plan and Local Plan Policies EW9 and EH9, and as such is unacceptable, whilst the river valley landform precludes effective screening from both overviews and underviews.

Southern Site

- 3.12 Although not within the ownership of the Blenheim Estate, the southern site is equally unsuited to solar solar farm development, given its exposed location on the north facing flanks of the Cumnor Hill Corallian Limestone Ridge, as defined by the Vale of White Horse District Council's Landscape Assessment.
- 3.13 The large scale intrusion of solar panels between the existing woodland blocks will degrade the principal approach into the historic city of Oxford from the west and the wider rural setting and approach to the Blenheim WHS from the south and west.

PEIR Stage 2 Consultation

- 3.14** Notwithstanding the large number of predominantly negative comments submitted in response to the PEIR Stage 2 Consultation by both statutory consultees (including ICOMOS, Historic England, The Gardens Trust, Oxfordshire County Council, West Oxfordshire District Council, Parish Councils) and 1400 local residents, the scheme submitted for Development Consent Order approval is virtually unchanged. The project therefore remains **non-compliant with the obligations of the “Blenheim Palace World Heritage Site Revised Management Plan, 2017, in multiple respects.**

WHS Steering Group

- 3.15 It would also appear that since its inception in 2018, BWSF has not been subject to consideration, review and approval by the WHS Management Plan Steering Group, which includes representatives of ICOMOS UK, Historic England, Natural England, Oxfordshire County Council and West Oxfordshire District Council, as required by section 10 – Monitoring and Review of the WHS Management Plan.

Compulsory Purchase of Land

- 3.16 By including an option to sell the BWSF sites in the DCO application, there is no longer pretence of long term stewardship, i.e. there is no assurance that the estate farmlands will be managed by Blenheim Estate, returned to their historic use, or be protected as part of the setting of a WHS in the long term.
- 3.17 **References to option for compulsory purchase/permanent acquisition of land including Blenheim Estate land:**

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010147/EN010147-000625-4.3 Book of Reference - Clean Version \(Rev 1\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010147/EN010147-000625-4.3 Book of Reference - Clean Version (Rev 1).pdf)

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010147/EN010147-000642-2.4 Land Plans \(Rev 1\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010147/EN010147-000642-2.4 Land Plans (Rev 1).pdf)

The Blenheim Palace World Heritage Site Management Plan 2017

- 3.18 The importance of setting to highly valued heritage assets, such as Blenheim Palace, is recognised inter alia in the Historic England guidance "The Setting of Heritage Assets", the Historic England Publication "Conservation, Principles, Policies and Guidance for the Sustainable Management of the Historic Environment" and the UNESCO "Operational Guidelines" which states that:

"The broader setting may relate to the property's topography, national and built environment, and other elements such as infrastructure, land use patterns, spatial organisation and visual relationships."

- 3.19 The following extracts from the WHS Management Plan 2017 and the Settings Study (Appendix 3) identify the **fundamental incompatibility** of imposing a solar farm of this scale on the estate farmland setting of the WHS.

- 3.20 Para 2.02 Background Context

*"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 land owners.**"*

- 3.21 Para 2.07 The Setting of the World Heritage Site

*"The Operational Guidelines for the Implementation of the World Heritage Convention issued by UNESCO **recognise the importance of the character of the wider landscape around WHS's**"*

- 3.22 Para 2.10

*"As the UNESCO inscription for Blenheim Palace makes clear, the firm implementation of the existing policies in the WHS Management Plan **is important to provide effective protection for Blenheim Palace and its setting.**"*

3.23 Para 5.01 The WHS Justification – Integrity

*“The integrity of the property is well protected by its enclosing wall but important visual links do exist between the gates, the parkland buildings, **buildings in the surrounding villages and landscape, and care needs to be taken to ensure the key visual links are protected.**”*

3.24 Para 5.02 Attribute 7

*“The park retains a complete, 18th century enclosing stone wall which protects its integrity, **but views into and out of the site still provide key linkages between Blenheim Palace and the traditional English countryside and villages surrounding it.**”*

3.25 Additionally the following Management Plan Objectives summarise the importance of protecting the WHS site from inappropriate development:

9.07 Management Objectives

Objective 8 *“Ensure that Blenheim Palace is adequately **protected from development that is incompatible the unique status and character of the WHS and national heritage assets.**”*

Objective 9 *“Maintain a high quality environment for Blenheim Palace by promoting the highest possible standards of design, materials and execution during restoration and renovation, new development and alterations to existing buildings, that may impact upon the WHS and its OUV – **both within the WHS boundary and within the setting.**”*

Objective 10 *“Ensure that appropriate policies to protect the WHS are included in the **West Oxfordshire Local Plan 2031.**”*

The relationship between a WHS and its setting is internationally and nationally recognised as being important. In cultural heritage planning policy, especially in this country, the setting of a WHS is taken as a material consideration when any planning application within the setting of the WHS is being reviewed. The guidance contained in the Historic England publication ‘The setting of Heritage Assets’ Historic Government Good Practice Advice in Planning: 3) released in 2015, provides useful information on good practice too planning authorities, owners and applicants on how the setting may be defined, and offers approaches on how to assess impacts on it “

West Oxfordshire District Council – Local Plan 2031

- 3.26 Ironically it is Blenheim Estate's own proposals for the BWSF which pose the greatest threat to the WHS and are also contrary to the following policies in the Local Plan:

Policy EW 9 states that:

*“The exceptional cultural significance (Outstanding Universal Value) of the Blenheim WHS will be protected, promoted and conserved for current and future generations **Development proposals that would lead to substantial harm to or loss of those attributes and components of the Site will be unacceptable....”***

- 3.27 Additionally, Policy EW 9 states that:

*“in determining applications, great weight and importance will be given to conserving and/ or enhancing the significance of designated heritage assets, including **Blenheim Palace and Park WHS.***

Proposals which would harm the significance of a designated asset will not be approved.”

WHS Management Plan: Appendix 3

Settings Study

- 3.28 The Settings Study, which forms Appendix 3 of the WHS Management Plan, describes the estate farmland setting as follows, whilst also prescribing management policies designed to conserve that setting for future generations:

- 3.29 Para 5.07 Managing the Setting

*“One of the key characteristics of the surroundings of Blenheim Park is that **much of the setting lies within the wider extent of the Blenheim estate** - which is effectively managed by a single owner. It has been owned by the Dukes of Marlborough for 300 years (one of the attributes which contribute to OUV), and has in recent years been recognised as an outstanding property of national heritage value. **Thus for almost 300 years management of the wider estate has acted as a means of both supporting the historic core and protecting it.** As a traditional landed estate, much of the land is retained in open agricultural and enclosed forestry use – another attribute which contributes to OUV. **The grazed pastoral landscapes around the river valleys, along with the fields and woodlands are particularly significant as these reflect the land-use and character of the landscape that would have been appreciated during the 18th century. Contrasts between these features is muted and gentle, representing the historic character of the farmed landscape of middle England. The appropriate management and enhancement of these landscape features is therefore an important objective,** and the areas which make a particular contribution to the setting of the WHS are highlighted on the accompanying map (Figure 5 from the WHS Management Plan). In terms of management, therefore, it would be helpful to encourage on-going management of the open elements of the landscape and river meadows through effective agricultural practices and appropriate grazing. The opportunities for other land management practices such as community woodlands, agri-environment schemes and community supported agriculture can also positively contribute to the appropriate care of the setting”*

3.30 Para 3.01 *“The value of setting to Blenheim Palace and its wider communities can be summarised as:*

- ***The importance of the village clusters, farmed countryside and woodlands/ trees in enhancing local distinctiveness and fostering a sense of place***
- *The use of local stone*
- ***The contribution it makes to the distinctive quality of the landscape and environment around Blenheim***
- *The opportunities the setting provides for recreation and leisure...*
- *The opportunities for landscape to contribute to the green infrastructure of the area*”

Summary

3.31 Para 3.15 ***“The distinct mosaic of stone built villages, rolling farmland, river meadows and blocks of broadleaved woodlands is one of the foremost characteristics of the landscape surrounding Blenheim..... The physical connection to Woodstock at its gates, together with glimpsed views of the church spires and woodland looking south towards Oxford, which is still a valued characteristic of the area today as the rural setting of the park forming a positive backdrop to people’s lives.”***

3.32 Para 4.08 Views out of the WHS Today

3.33 *“South of the Palace lies perhaps the most obviously contrived view out of the park glimpsed views into the park can be obtained from some locations on the public rights of way north of Bladon Heath.”*

3.34 Para 4.11 *“The strong axial line all the way from the Ditchley Gate, through the Palace and out of the park into Bladon was designed at the time the `palace and its landscape were laid out and this has been retained ever since. Thus, it represents the most significant view out of the park.”*

3.35 Views into the WHS

“The park at Blenheim Palace is a well defined and contained landscape which has exerted huge influence over the character and appearance of the wider landscape.”

3.36 Para 5.02 Managing Setting and Assessing Impacts:

Summary of Valued Features

“The elements of Blenheim’s OUV (and the attributes which convey it) which the setting most directly relates to are:

- ***The key visual linkages between Blenheim and its setting....***
- ***The character of the setting as traditional English countryside, dotted with picturesque villages***

These significances are important individually and together in achieving a strong sense of community pride in the WHS and connecting it with the local area.”

3.37 Para 5.04 Managing the Setting

“The importance of these elements of the setting of Blenheim in reinforcing the OUV and in maintaining and enhancing the local distinctiveness and high quality environment, can perhaps best be understood by considering the implications of not protecting them:

The conversion of significant areas of agricultural land for other purposeswould detract from the distinctiveness of the setting;

Large-scale development(for example industrial development, wind turbines; SOLAR FARMS etc.) could detrimentally influence the character of the adjoining rural areas;

Development that results in the joining of one village settlement to another could result in the settlements losing their distinctive nature”

3.38 Para 5.05 “.... it is clear that management of any WHS requires protection and enhancement of not only the site and its setting as a whole, but also of the individual heritage assets which contribute to the OUV. **This will include assets and attributes both within the site and within the setting.**”

3.39 From this review, therefore, it is evident that the proposed BWSF development is non-compliant with multiple aspects of Blenheim Palace's own WHS Management Plan, and in particular measures for the protection of its historic estate farmland setting.

3.40 The ICOMOS response to the PEIR consultation concluded that:

“both the historical legibility of, and the perception of, the property may be dramatically altered by as significant a conversion of the property to effectively a semi-industrialised landscape.”

3.41 In addition to the **unacceptable industrialisation** of the estate farmland setting to the Blenheim Palace WHS site, the BWSF will **severely impact** upon many other cultural/ historic assets of value, including:

- The historic city of Oxford
- Numerous Conservation Areas including the historic market town of Woodstock
- The setting of the grave of Sir Winston Churchill
- The Cotswold National Landscape

4.0 Source of Alert

4.1 Proposer of Heritage Alert, contact details

Stop Botley West Campaign Ltd

Chair: Professor Alex D Rogers. email: [REDACTED]@stopbotleywest.com

Russ Canning

email: [REDACTED]

Admin:

email: contact@stopbotleywest.com

mobile: [REDACTED]

4.2 Groups supporting Heritage Alert and/or nomination with contact details

a. Council for the Preservation of Rural England, Oxford

Lisa Warne, Director CPRE Oxford email: director@cpreoxon.org.uk

High Street, Watlington OX49 5PYmobile: [REDACTED]

b. Oxfordshire Architectural and Historical Society

Secretary:

Dr Jill Hind, [REDACTED], email: secretary@oahs.org.uk

[REDACTED]

c. Oxfordshire Gardens Trust

Treasurer:

Will Holborrow

[REDACTED]

[REDACTED]

[REDACTED]

Contact: Secretary

Jane Carlton-Smith

email: secretary@ogt.org.uk

Mobile: [REDACTED]

4.3 Not applicable

4.4 Local, Regional, International significance citations about the place

a. Large Visitor Attraction of the Year 2024-2025 Beautiful South Tourism Awards.

b. Blenheim Estate Land Legacy Nov 2019.pdf – see Appendix I

4.5 Letters of support for Heritage Alert action, newspaper articles etc

Items listed below:

4.5.1 Letters of support - see Appendix II

- a. OAHS ask that their response to the PEIR consultation be accepted as supporting material.
- b. CPRE ask that their response to the PEIR consultation be accepted as supporting material.

4.5.2 Newspaper articles – see Appendix III

- a. Sunday Times: 4th August 2024
Blenheim's vast solar Farm will make a fortune (online version)
The solar gold rush and the Battle over Blenheim
- b. Oxford Mail:
 - I. Protest at Churchill's Grave 20th September 2024
 - II. Dornford Lane Walk CPRE 22nd October 2024
- c. Mail Online: 10th November 2024
Fury over plans to build Britain's biggest ever solar farm
- d. Telegraph:
Miliband to rule on BWSF 13 December 2024
- e. Private Eye
 - I. 1507 Marlborough Light 18 October 2019
 - II. 1599 Botley Contested 2 June 2023
 - III. 1601 Light and Shady 30 June 2023
 - IV. News – Solar Opposites 14 July 2023
 - V. Lezhen learned 25 August 2023
 - VI. Pulling the plug 20 October 2023
 - VII. 1612 Shady Solar 1 December 2023
 - VIII. 1617 Sun Trap 16 February 2024
 - IX. 1635 Palace Intrigue. 25 October 2024

4.5.3 Parish Magazines

CAWN (Cassington), Cumnor Parish News (Cumnor and Farmoor) ,
Hanborough Herald, Kidlington News, Woodstock and Bladon
News, Yarnton News
"Who said this?" October 2024

4.2 Publications that describe the place

Blenheim Estate Land Legacy Brochure (4.4 b above and Appendix I)	November 2019
Park View Legacy Brochure https://www.blenheimestate.com/assets/files/downloads/estate/pv-design-community-code.pdf	March 2024
Park View Design and Community Code Reference Page 14. Energy Sustainability	circa 2019 In zip file
Link to full brochure: https://www.blenheimestate.com/flipbook/parkview/legacy-brochure/?_gl=1*14e6tes*_ga*MzcwNzMzMNTMzLjE3Mzc4MjEyNzg.*_ga_4KMB3L10RJ*MTczNzgyMTI3Ny4xLjEuMTczNzgyMTI5OC4wLjAuMA	

4.7 Time constraints for advocacy - immediate action.

An application for a Development Consent Order (DCO) has been submitted by the developers PVDP to the National Planning Infrastructure Consenting Inspectorate. Examination period scheduled for summer 2025

5.0 Recommended Action

As ICOMOS is a member of the Blenheim Palace WHS Steering Group Steering Group, the supporters of this Heritage alert, urge ICOMOS to advise the applicants to withdraw this application or risk the loss of Blenheim Palace's World heritage status.

6.0 Desired Outcome

Withdrawal of DCO application by Photovolt Development Partners

APPENDIX I

4.4.b Blenheim Estate Land Legacy Nov 2019



Always growing our legacy



BLENHEIM ESTATE

LAND



“We do not inherit the earth from our ancestors, we borrow it from our children”.

NATIVE AMERICAN PROVERB

THE AMBITION

The benefits of
our land can
reach far beyond
our boundaries.

Our land should be beneficial to our neighbours and communities for the physical and mental health we enjoy, the accessible connections we facilitate, the jobs and skills we encourage, and the quality of the food we consume.

At the pinnacle of our ambitions is the goal to become the first estate to demonstrate carbon-positive land management.

THE CHALLENGE

Caring for the land is caring about the earth.

Today, we live in a world faced with fresh challenges, more complex and sophisticated than those which faced our predecessors.

Challenges of a decline in our environment, climate change, an aging population and urbanisation. Our rural communities are facing increasing isolation.

The land is precious and finite, but cared for properly its benefits can be limitless, as a rich source of all our wellbeing. So now, our approach to taking care of the land must be as sophisticated, enduring and holistic as the challenges we face.



“No challenge poses a greater threat to future generations than climate change”.

PRESIDENT BARACK OBAMA

STRATEGIC PURPOSE

It's all part of the wider Blenheim strategy

The Blenheim Estate is a very special resource, covering a total area of about 12,000 acres. As well as the World Heritage Site, and the land for farming, it includes rivers and some of Europe's most important ancient oak woodlands, which first took root more than 900 years ago. It's a source of natural spring water, and home to hundreds of wildlife species.

At Blenheim, we have a social, environmental and economic responsibility to our local communities. We recognise the essential, and long-term, relationship with the world around us and, in particular, our closest neighbours.

As part of delivering Blenheim's purpose, our Land Strategy includes five key goals for the future. Work is already underway for a number of projects to meet these goals, which span the next five years, but the impact of this strategy will last for generations to come.

BLENHEIM

STRATEGIC PURPOSE

To be the
lifeblood of the
local economy

To enhance
the lives of
local people

To share
and protect
this place

ECONOMIC

ACORNS AND OAKS

SOCIAL

GRASS ROUTES

NATURAL HEALTH
SERVICE

ENVIRONMENTAL

NATURAL BALANCE

LANDED GENTLY



BLENHEIM ESTATE

LAND

“When the spirits are low, when the day appears dark, when work becomes monotonous... just mount a bicycle and go out for a spin down the road, without thought on anything but the ride you are taking”.

SIR ARTHUR CONAN DOYLE



SOCIAL PURPOSE

Grass Routes

Our neighbouring towns and villages are beautiful places, but are seen largely in isolation.

Connectivity is poor; links to railways are haphazard, cycle networks are inconsistent and footpaths do not join up. As a result, four out of five journeys in our area are by car.

We will work to provide green transport routes, linking existing and new communities to each other, and to the existing infrastructure, so increasing accessibility and reducing our reliance on the car.

SOCIAL PURPOSE


Natural Health Service

By joining the natural resources of our land with the health service, our woodlands, green spaces and fresh air can begin to be prescribed as the most natural of health solutions.

Society is living longer and developing long term health conditions, which include mental health issues and loneliness. GP surgeries are struggling to cope when, as a nation, 20% of consultations are for matters of housing, employment and relationship breakdowns.

Social prescribing - as it has become known - is increasingly a government priority.

As a landed estate, deep-rooted with the community, we are uniquely placed to respond.

A large, mature tree with a thick trunk and dense green foliage stands in a well-manicured garden. A person is sitting on the grass at the base of the tree, partially in shadow. The garden is filled with various plants, including a tall, dark evergreen and several flowering shrubs. The scene is bathed in soft, dappled sunlight, creating a peaceful atmosphere.

“Just living is not enough. One must have
sunshine, freedom, and a little flower”.

HANS CHRISTIAN ANDERSEN


ENVIRONMENTAL PURPOSE

Natural Balance

With our environment at the heart of our land, and agricultural practices responsible for up to 25% of all carbon emissions, we will join forces with Government and other landed estates to lead in the concept of 'natural capital'.

This is a new model of valuing our natural capital; an innovative way to attribute the benefits of good air, water, soil, woodland, green spaces and biodiversity to the total ecosystem, and so to generate new income streams and promote the best long-term decisions.

We want to be the first generation to truly leave this land in a better state than it was found.

A close-up photograph of a bee in flight, hovering over a white clover flower. The background is a soft-focus green field with other white flowers, creating a natural and serene atmosphere.

“One touch of
nature makes the
whole world kin”.

WILLIAM SHAKESPEARE



“When we see land as a community to which we belong, we may begin to use it with love and respect”.

ALDO LEOPOLD

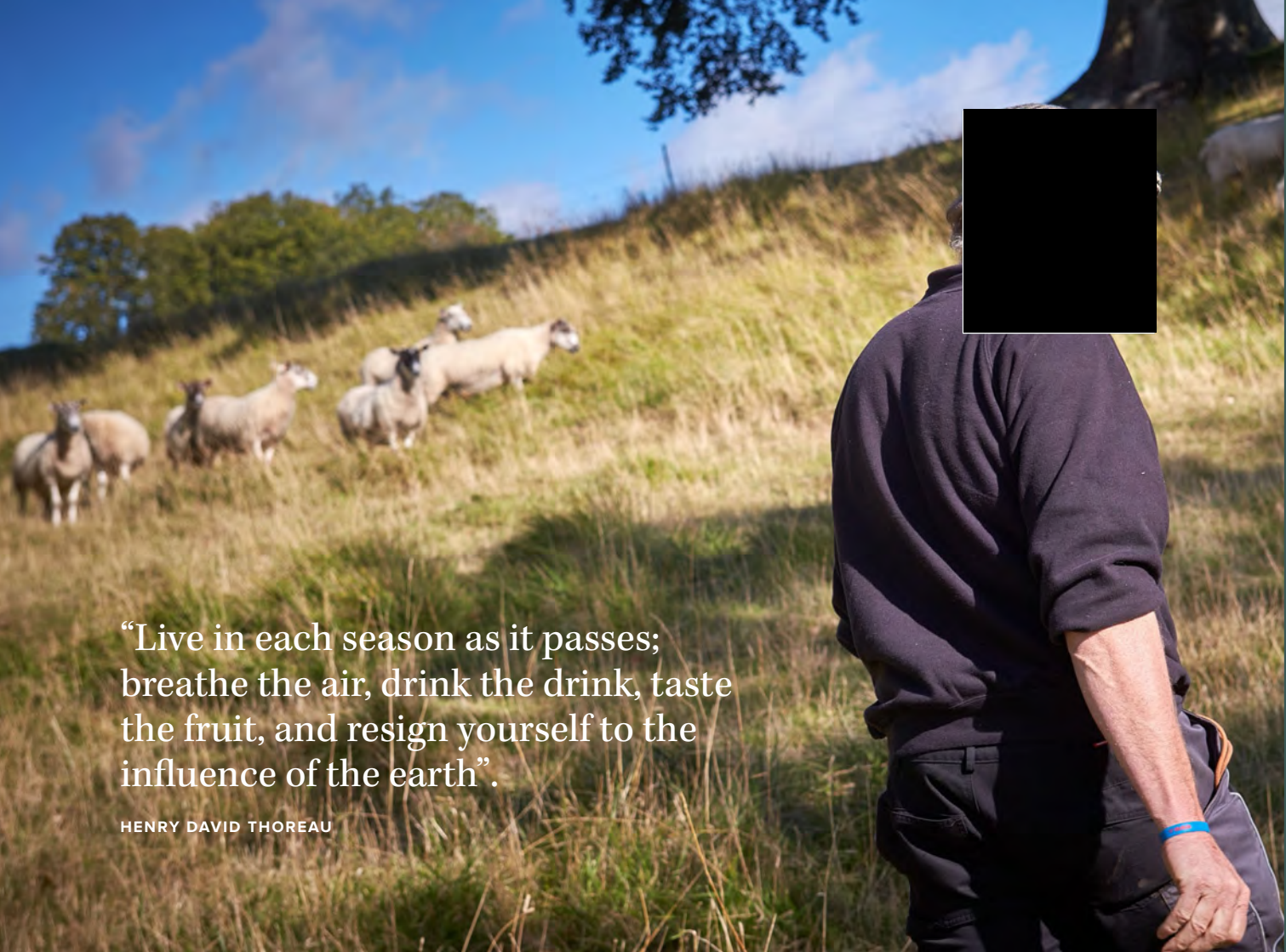
ENVIRONMENTAL PURPOSE

Landed Gently

This is the long-term change, looking out to the 10-year horizon. We will use the lessons of natural capital to first become carbon-neutral. Then we want to go further, to demonstrate carbon-positive land management.

There is no commonly agreed ‘one best’ sustainable practice amongst farming methods such as regenerative, agroforestry, and organic.

We will work with partners who can guide us on this journey, and together we will find the best mix, or model, that proves effective for our sustainable land use ambitions.



“Live in each season as it passes;
breathe the air, drink the drink, taste
the fruit, and resign yourself to the
influence of the earth”.

HENRY DAVID THOREAU

ECONOMIC PURPOSE

Acorns and Oaks

Blenheim stands for three centuries of caring for the land. As we have shown with our bottled spring water, we can do more to translate that legacy of care into great tasting local produce, that also spurs local business vitality.

By partnering with producers and artisans who share our values, we can bring our unique provenance from the land to the larder. Game, botanicals, grains, even grapes can become charcuterie, gin, bread, wine and beer.

When we successfully pull together connectivity, health, nature and the climate, we create a unique appeal to our partners, and together we will cultivate new opportunities, skills, jobs and drive economic benefits locally.

OUTCOME

Growing our Legacy

When we bring together all five parts of this strategy, with the support of our partners and the communities around us, this area will be a truly special place to live, work, grow and prosper.

This same legacy guides us in our new homes, making sure that we're considerate of both the natural world and the vital fabric which makes healthy communities.

Taken together the legacies of our land and homes, will be an environment that thrives - in every way - for the next 300 years. A place surrounding communities and ourselves, are proud to call home.





We live with our choices for a long time, we hope forever, and we choose to be proud of our legacy.

We see the bounty from our land as more than the annual harvest, it's the fundamental source of continued prosperity, renewal and wellbeing.

Always growing our legacy



APPENDIX II

4.5.1 Letters of Support

OXFORDSHIRE ARCHITECTURAL AND HISTORICAL SOCIETY

Registered Charity No. 259055_

From the Secretary:
Dr Jill Hind,



Email: secretary@oahs.org.uk

FREEPOST BWSF.
info@botleywest.co.uk

Dear Sirs,

I refer to Peter Gerstmann's email letter of 27 November 2023 and, on behalf of the Oxford Architectural and Historical Society, make the following initial response to your consultation.

1 This Society is the County Society for archaeological and Historic Environment work in Oxfordshire and it publishes an annual journal "Oxoniensia" which covers these matters. We are concerned with the protection and preservation of the historic environment, both visible and buried.

2 Our comments are thus limited to Historic Environment aspects of this proposal. Our key concerns are listed here and addressed in more detail below in three sections: Below-ground Archaeology; Historic Buildings; Historic Landscape.

A Below-ground Archaeology

- i) The scope of research into heritage assets;
- ii) The quality of the geophysical survey;
- iii) The need for trialled trenching as a results of that survey in time to inform the Environment Statement;
- iv) The assessment of importance of remains without a National designation.

B Historic Buildings

- i) The need to assess the settings of listed farm buildings;
- ii) The need to carry out recording of non-listed farm buildings;
- iii) The impacts of potential changes of use.

C Historic Landscape

- i) The narrow definition of setting, restricted to direct visual impact;
- ii) The acceptability of proposed mitigation measures.

3 We have serious concerns about the impacts of the proposed development and do not support it. The Consultation Leaflet states: *Effects on heritage assets are considered reversible, and impacts on buried archaeological remains are deemed insignificant, ensuring the responsible progress of our Project.* We would challenge this assessment.

A Below-ground Archaeology

i) Location of Heritage assets.

We note that you have consulted various sources including the Archaeology Data Services' Archsearch and County Historic Environment Record systems. There is a good possibility that these sources do not contain all the information concerning known remains. The

Archsearch system is due to be replaced in September 2024 and it not known when the HER will contain the range of information envisaged in section 230 of the Levelling-up and Regeneration Act 2023.

ii) Geophysical survey.

We note that a magnetometry survey has been carried out over much of the area. Other schemes, such as the West Oxford flood relief channel, have used other methods in addition to magnetometry. Magnetometry on this type of soil is likely to locate ditches, but less likely to locate limestone walls or burials and won't locate flint scatters.

We understand that some 1350 hectares of magnetometry is proposed and have been able to examine the draft report by Atlas Geophysics on 470 hectares. A smaller survey of the Red House farm area was received by Botley library on 24 January, but has not been considered here.

Our observations on the Atlas survey interim report are:-

- a) It has been carried out using equipment where several sensors are towed behind a vehicle. This is efficient but can leave a ripple in the data and small gaps between tracks which have not been surveyed. The reading density is not clearly stated, but is assumed to be 4 per square metre.
- b) The printed versions are on A4 paper with the survey plots saying they are 1:5000 at A3, (although linear scales are also shown). This is too small to be of much use and a long way from the 1:1000 suggested in the EAC Guidelines.
- c) Many anomalies are identified as being 'ferrous points'. Whilst many might be horseshoes and similar, some of the larger ones may be tree throw holes, corn driers or hearths. Trace plots, as suggested in the EAC Guidance could help distinguish these.
- d) There is a tendency to attribute some responses as being of natural origin when 'unknown' may be more appropriate and may indicate the need for further investigation.
- e) This survey has located, probably Bronze Age, round ditches, a possible Romano-British farmstead and other remains which would have otherwise have been unknown.

iii) Importance of remains

There appears to be a conflict between the applicants who allocate a 'low to negligible sensitivity to

Heritage assets with importance to local interest groups or that contribute to local research objectives'. This varies from the views of the County Archaeology section, although the applicants claim to have taken account of those views.

If only National Scheduled monuments and similar are to be considered relevant, (as this is apparently a nationally important infrastructure project), avoiding consideration of non-nationally important remains may account for the applicants swerving the usual Local Authority planning route.

B Historic Buildings

There are 16 farmsteads close to the proposed arrays of panels. The list of the affected farmsteads, given in Appendix 1, includes 8 sites containing a total of 18 listed buildings. (n/l = not listed)

For all the listed buildings, an assessment should be made of the effect of the proposed development on its setting – in 'normal' planning applications, consent would be refused if

the development had a major deleterious affect of its setting – unless of course the ‘public benefit’ outweighed the harm.

Experience of recording farm buildings has shown that even if a structure is not listed, it has potential for shedding light on datable constructional features (materials, roof structures, fittings etc) and hence past (and current) agricultural practices. It should, therefore, not be assumed that an unlisted building is of no significance in terms of the definitions used by Historic England. Regardless of their listed status, therefore, all the affected buildings should be fully recorded before the plans for the development are decided upon.

The effects on the historic environment have been assessed by the RPS Group (a Tetra Tech company) and are set out in Chapter 7 of the project PEIR (Preliminary Environmental Information Report) https://botleywest.co.uk/document_library.html

It is clear from that document that:

1. It seems that none of the relevant conservation officers has been consulted
2. the report does not consider Grade II listed or unlisted buildings to be of significance
3. those that compiled the report have not studied local neighbourhood plans or conservation area appraisals to identify non-designated heritage assets (and indeed have considered these of such minor importance that the effects of the scheme on them can be ignored).

The report states that no designated heritage assets will be directly impacted by the development. This is somewhat disingenuous. All the sites listed in Appendix 1 have farmhouses, which are probably in domestic use. The report is silent as to who owns these buildings – but while we understand two are freehold, the Blenheim Estate owns the remainder, and we believe that they are currently tenanted, perhaps by those who also lease agricultural land and farm it as an occupation. These people will presumably lose their livelihoods as a result of the development and may be compelled to leave the properties. But who is going to live in the farmhouses surrounded by solar panels? It seems likely that neither farming families (who will not have anything to farm) nor people wishing to exchange town life for the countryside will be interested in living in these places. To the extent that there are historic buildings, these could be at serious risk of neglect and deterioration.

Overall, the general view taken by the PEIR is that there are few adverse consequences for the historic built environment. This is based on a very narrow legalistic definition of what constitutes significance and ignores context and unintended consequences. They also state that there are ‘uncertainties’ about the impacts and think that these can be dealt with by further efforts of mitigation if they arise. This is disingenuous and it is necessary for as full as possible an assessment be made BEFORE decisions are taken. We should ask for an assessment showing which buildings will be needed to support the limited agricultural use on the site (lambling barns etc.) and which will be redundant.

C Historic Landscape

i) Setting

The ‘setting’ of the WHS, listed buildings and conservation areas is usually defined in terms of visual impact measured at ground level, or, as with the Oxford view cones, from specific points in the landscape. There is scope here for arguing that the impact has been minimised only through ground-level mitigation measures such as hedge-planting, while the viewpoints and aerial aspects of setting have been ignored.

This is a lot narrower than the factors potentially contributing that the historic England guidance which covers:

- *physical* surroundings (eg topography, vegetation/landuse, other historic features, historic character of the vicinity) that may be changed
- *perceptual* characteristics (eg visual interrelationships and noise context) and
- *associative* factors (eg historical, artistic, traditional).

It might also be taken to suggest that settings cannot be affected unless there is a direct visible link – whereas it is about how historic attributes and relationships to physical surroundings are ‘experienced’ which can involve the experience of moving through the landscape.

There are four Conservation Areas immediately adjacent to the proposed locations of solar panel arrays, two of which are impinged by the development. These and other CAs are rural villages, historically reliant on farming containing several listed buildings, including in some cases churches with towers or spires intended to be seen from the surrounding landscape.

ii) Mitigation

The focus of the mitigation measures such as new cycleways is simply on the provision of a sterile amenity in the form of a straight-line pathway through the panels. No account is taken of the possibility that people do not want to walk through acres of technology when they go for a walk or bike ride in the countryside – they want trees, agricultural land, wildlife and so on – it is a matter of connecting with the landscape, or a spiritual experience – not simply exercise. If that’s all people wanted they could do it in a gym. The open countryside is an intangible natural asset that is generally valued for its own sake, yet this has been ignored.

Yours sincerely

Jill Hind
Hon. Secretary

Appendix 1

Shipton Slade (Farmhouse <https://historicengland.org.uk/listing/the-list/list-entry/1210435>;
Barn <https://historicengland.org.uk/listing/the-list/list-entry/1290426>)

Hordley n/l

Weavaley n/l

Lower Dornford (Walls <https://historicengland.org.uk/listing/the-list/list-entry/1199714>;
stable <https://historicengland.org.uk/listing/the-list/list-entry/1052907>; farmhouse and
attached barn <https://historicengland.org.uk/listing/the-list/list-entry/1052906>; barn
<https://historicengland.org.uk/listing/the-list/list-entry/1199705>)

Upper Dornford n/l

Hall Farm, Begbroke (Barn <https://historicengland.org.uk/listing/the-list/list-entry/1291301>;
farmhouse <https://historicengland.org.uk/listing/the-list/list-entry/1291300>; cartshed
<https://historicengland.org.uk/listing/the-list/list-entry/1219796> [also other buildings on
Spring Hill Road]

Burleigh Farm (House, attached barn and stable <https://historicengland.org.uk/listing/the-list/list-entry/1198551>)

Mill Farm, Church Hanborough (Farmhouse <https://historicengland.org.uk/listing/the-list/list-entry/1283600>)

College Farm n/l

New Barn Farm n/l

City Farm (Farmhouse <https://historicengland.org.uk/listing/the-list/list-entry/1052428>;
outbuilding and wall <https://historicengland.org.uk/listing/the-list/list-entry/1198172>;
outbuilding (stable cottage <https://historicengland.org.uk/listing/the-list/list-entry/1052429>;
barn and outbuildings <https://historicengland.org.uk/listing/the-list/list-entry/1198161>)

Purwell Farm n/l

Jericho Farm Barns n/l

Worton (Rectory farmhouse <https://historicengland.org.uk/listing/the-list/list-entry/1367912>;

Old Rectory <https://historicengland.org.uk/listing/the-list/list-entry/1283794>)

Upper Witley Farm (Farmhouse <https://historicengland.org.uk/listing/the-list/list-entry/1368588>)

Denman's Farm n/l



The countryside charity
Oxfordshire

Campaigning to protect our rural county

6 February 2024

By email:

info@botleywest.co.uk

CPRE Oxfordshire
20 High Street
Watlington
Oxfordshire OX49 5PY

Tel: 01491 612079
campaign@cpreoxon.org.uk
cpreoxon.org.uk

Dear Sir/Madam,

RE: CPRE Oxfordshire response to Botley West Phase 2 Consultation, February 2024

Overview

CPRE Oxfordshire remains opposed in principle to the Botley West Solar Farm proposal as this is an entirely inappropriate location for solar energy generation in terms of its impact on the Green Belt, productive farmland, the countryside and ecology, and local communities.

The Pathways to Zero Carbon Oxfordshire report, produced by Oxford University, says we need the equivalent of 1% of Oxfordshire's land surface for solar. Since Oxfordshire's domestic and commercial roofs provide three times as much space as that, CPRE Oxfordshire believes this is where the County's future solar power should be accommodated, and the priority should be investing in the appropriate infrastructure to deliver this.

We once again urge both PVDP and Blenheim Estate to reconsider their approach and instead work with both local authorities and local communities to develop a more appropriate and sustainable renewable energy strategy for the area.

Inadequacy of the consultation

We note that despite specific requests from CPRE Oxfordshire and the Stop Botley West campaign group to avoid the Christmas period, this consultation was launched on 30 November and ran over exactly that timeframe.

We also note that despite providing many thousands of pages of material, much of it inconsequential, there are a significant number of key areas where information is yet to be provided.

Just as examples:

- Failure to set out the Applicant's grounds for establishing the 'very special circumstances' required to justify building on the Green Belt
- Failure to provide a Biodiversity Net Gain Assessment



- Failure to provide an Environmental Management Plan
- Failure to provide a Construction Traffic Management Plan
- Failure to provide an impact assessment on the Blenheim World Heritage Site
- A very limited and inadequate selection of photomontages, including omission of many of the most significant view-points.

Although much of this information is promised at a later stage, CPRE Oxfordshire does not believe that the public currently has enough detail to engage properly in this Phase 2 consultation. We therefore request that the consultation is re-run when the appropriate information is available and that submission of the proposal to the Planning Inspectorate is delayed until after this has taken place.

Green Belt

Over 76% of the proposed land take for Botley West would be in the Oxford Green Belt. This would represent 3.1% of the Oxford Green Belt, marking almost certainly the biggest ever single loss of Green Belt land within the County. It would also cover over a 1/4 of the Green Belt within West Oxfordshire (451Ha out of total 1,610Ha).

Whilst the need to demonstrate very special circumstances to justify the development in the Green Belt is acknowledged, the case for this is not yet provided (PEIR 5.4.1.22). At this point, we find it hard to conceive what justification could exist for such a significant loss.

The Green Belt is valued for its permanence and openness. This is not just about the visual impact but also the landscape resource, in line with this recent Appeal judgement:

*"...Green Belt is a spatial planning designation and not a landscape policy. That said, it is clear that the openness of the Green Belt has a spatial as well as a visual aspect, so assessment of openness is not just a matter of comparing the current nature of the land – in this case undeveloped pasture – with the proposal."*¹

According to the same judgement, arguments about the 'temporary' nature of the development should also carry little weight:

"Although the proposal is for a limited period, the length of that period is very substantial. But even more importantly, the fundamental aim of national Green Belt policy is to prevent urban sprawl by keeping land permanently open. With that well established policy background it cannot be right that the fact that approval is sought for a 40-year period is accorded more than very limited weight in favour of the scheme in relation to the loss of openness. To do so would go against the concept of permanence."

¹ Appeal Decision 3317818 - <https://www.shropshire.gov.uk/media/26968/cd103-appeal-ref-app-a1910-w-23-3317818-little-heath-lane-little-heath-berkhamstead.pdf>



Inefficient use of land/over-sizing

We understand that PVDP is looking at 1,307MW at peak output, compared to National Grid maximum capacity of 840MW.

We appreciate that this is to ensure generation of as much power as possible across less efficient months, even if 'wasting' power in the summer, and that such oversizing is standard in the industry perhaps to a factor of 30-35%.

However, here the over-sizing is 60%. We ask that PVDP provide justification for this exceptionally high level of oversizing along with clarification of how much land this impacts. If the over-provision was brought down to the more normal 30%, how many hectares of countryside could remain untouched by this development?

Need, National Planning Policy & Alternatives (Preliminary Environmental Information Report - PEIR Chap 5)

We reject entirely the justification set out by PVDP in 5.2.1.4. Many of the constraints subscribed to rooftop renewables apply just as much to the Botley West scheme eg impact on conservation areas, competing land uses. In addition, large-scale solar farms create energy away from the point of use, with subsequent loss of energy through distribution.

The Pathways to Zero Carbon Oxfordshire report, produced by Oxford University, says we need the equivalent of 1% of Oxfordshire's land surface for solar. Since Oxfordshire's domestic and commercial roofs provide three times as much space as that, CPRE Oxfordshire believes this is where the County's future solar power needs should be accommodated. The priority should be investing in the appropriate infrastructure to deliver this, including creation of a distributed network that supports community-based solar.

In terms of consideration of alternatives, the options presented appear to rest between 'do nothing' or 'build the biggest solar farm you can imagine'. There is no reasonable consideration given to other alternatives, such as a network of rooftop/brownfield based smaller sites established by engaging with local communities or, for example, to exploration of the former power station site at Didcot that presumably has good transmission capacity. We have been told verbally by PVDP representatives that this latter site was explored and ruled out, but no explanation or justification is provided here.

Can it really be true that there are no feasible alternatives to building a 1,400 hectare solar farm on productive agricultural land, in the Green Belt, between a world renowned historic city and a World Heritage site, in an area that would directly impact the amenity of many thousands of residents? We are inclined to think that, in any reasonable judgement, this is perhaps one of the last places in the world that one would select!



Historic Environment (PEIR Chap 7)

This preliminary report fails to provide a good initial outline, even at a generic level, of the nature and scale of impacts and how they would be avoided, prevented or reduced and, if possible, offset, both in themselves and with regard to heritage and interactions with other factors, including the settings of heritage assets.

For example, the sections dealing with the 'Magnitude of Impact' make no reference at all to the total ground disturbance or its distribution within different components. The statement that *'It is anticipated that the footprint of activities associated with decommissioning will not exceed the footprint required for construction'* is not credible unless all footings were to be left in the ground or could be extracted with no additional disturbance: neither is remotely likely.

The full significance of archaeological sites that would be affected has yet to be established. Three scheduled monuments are adjacent to or surrounded by the development including cable runs which would be deep enough to disturb archaeology. The immediate surroundings (ie 'setting') would be physically disturbed, potentially destroying buried remains highly relevant to their significance, and prior archaeological investigation would clearly be warranted.

Information on the effects on the Blenheim World Heritage Site (which includes a landmark monument visible from well outside the WHS and therefore has a wide setting) is not yet provided.

There are four Conservation Areas (CAs) that are immediately adjacent to the proposed locations of solar panel arrays, and in two cases the development impinges on the CA. Conservation Areas seek to maintain the historic character of rural villages that have been set amongst fields throughout their existence. Where they have been extended by more recent suburban development the areas where CAs are still abutted by fields is where their setting is best preserved. This applies in several cases and the loss of the remaining open farmland to industrial development would be a major change to their setting and how their historic role relates to their surroundings.

In order to establish the full 'likely significant effects' in terms of setting issues and identify suitable mitigation measures to avoid, prevent or offset any harm it will be necessary to establish the future use of listed farmhouses and associated historic farm buildings and their future viability.

The coverage of Historic Landscape Character issues in the report only looks at the importance of the main Historic Landscape types affected in terms of age and rarity within the county, not the nature and scale of the impact. Thus, there is nothing about the nature of the impact being a fundamental change of historic landscape character from agriculture (since at least the Middle Ages and in some cases demonstrably Roman and earlier) to industrial energy generation (in the Oxon HLC terminology, 'Civic Amenity Utilities').



Contrary to the methodology proposed there is no discussion of historical importance of different Historic Landscape character types, only their relative rarity which is not the same.

Cumulative Impacts (PEIR Chap 7 – Historic landscape)

The approach here is flawed in that the only reference to the scale of impact is the bizarre suggestion that the numerous other solar and housing developments considered as cumulative effects would not noticeably add to the impact of the proposal because it is so large!

This claim is not supported by any figures for the total areas concerned, nor their locality both of which are key to the overall cumulative effect. The map of cumulative projects (which is very limited in spatial scope to the immediate surroundings of the proposed development) shows that a key effect of the cumulation of solar and other (mainly housing) developments would be to create an urbanised swathe of countryside from Wootton in the north east almost to Cumnor in the south west. But this fails to consider further cumulative effects – for example the major developments proposed around Didcot, Harwell and Abingdon, including the proposed Abingdon Reservoir; or further east around Bicester, whose proximity all fall well within the overall length of this development.

Cumulative Impacts (PEIR Chap 8 - Landscape & Visual Resources)

As well as over 2 million solar panels, the project proposes 156 power converter stations each up to 12m long and 3m high, six high voltage transformers each 18m long and 6 m high, and over 100km of 2m high security fencing.

CPRE Oxfordshire does not consider it possible to mitigate to any substantial degree the dramatic landscape and visual impacts that would occur as a result of a project of this scale. It would effectively transform a vast swathe of rural Oxfordshire into an industrial landscape, on a scale never previously seen.

The cumulative effects assessment here either fails to mention or does not appear to take due account of:

- a) The 19,000 houses currently coming forward in the Oxford Green Belt through Local Plan allocations – see graphic/map: <https://www.cpreoxon.org.uk/care/oxford-green-belt/> (plus other relevant allocations such as the Salt Cross Garden Village)
- b) The number of ground-mounted solar farms already allocated on Oxfordshire land, totalling over 1,000 hectares – see: https://www.google.com/maps/d/viewer?mid=1KnG6KFyRE-i_oI8bZytYY43EKZ0TvGmW&ll=51.816848538843196%2C-1.2894128699999996&z=9



Ecology (PEIR Chap 9)

We note that there is still a considerable amount of information not yet provided that is relevant to this issue, including a Biodiversity Net Gain statement, an environmental management plan, and specific surveys eg on owls. We would not expect the project to be submitted to the Planning Inspectorate prior to a pre-application consultation where this information is publicly available.

What is clear is that the land in question provides a rich mosaic of habitat, including farmland, hedges and woodland (incl. Ancient woodland) and rivers. As one would expect, it is therefore rich in biodiversity. The wildlife surveys of reptiles, wintering birds and badgers indicate that actually the land affected is of considerable importance in the wildlife it supports. Badger activity is particularly concentrated in the central section. The bird survey indicates the land is of importance to many red-listed and amber listed species, such as yellow hammers and linnets. The bat survey shows very high numbers of bats especially over the land north of Cassington.

Our concerns include (but are not limited to):

- How comparisons of benefits will be made – will Biodiversity Net Gain benefits be assessed on the basis of how the agricultural land has been previously managed, or against how it *could* be managed (eg regenerative farming, introduction of Environmental Land Management Schemes, ELMS)
- The ecological isolation that would be caused by over 100km of fencing. We note that Thames Valley Police are now calling for high security fencing at all large-scale solar installations to help combat rural crime.
- Buffers and connectivity – in particular, the buffer zones for Ancient woodlands still look to be inadequate, and more thought should be given to connectivity between these areas.
- Impact of cabling route on the extremely rare ancient wildflower floodplain meadows around Swinford
- The ability to deliver an extensive wildflower area under the panels. What commitments will be made in terms of avoid of use of herbicides?
- The claims re sheep and grazing – our information from industry insiders is that despite all the promises, the use of sheep rarely lasts more than one season, as they are curious and disruptive (eating cables, escaping etc).

Our view is that the scientific evidence on the biodiversity benefits of large-scale solar farms is still patchy and contradictory. Notwithstanding CPRE Oxfordshire's overall opposition to Botley West, if it were to receive consent, we would consider it vital that a full-scale, robust and independent scientific survey were put in place so that lessons could be fully learnt and appreciated.



Hydrology & Flood Risk (PEIR Chap 10)

It is clear that there is the potential for increased flood peaks, erosion and degradation of water courses following the installation works and during the operational phase of this project. Given the sensitivity of the downstream villages (and indeed Oxford City) to flooding this would clearly be unacceptable. From the limited evidence presented (based on a single study) it seems possible that these impacts could be mitigated (it is even possible, but not proven, the flood response could be improved). We do note that within site filter strip SUDS and Swales are proposed. But to ensure there are no adverse effects we recommend:

1. Strict protocols are developed, and monitored, during, and after, the installation phase, particularly with regard to the piling, the use of heavy machinery on site and during the installation of the connecting cabling.
2. A more comprehensive and critical literature search is undertaken on the impact of solar farms on the local hydrology.
3. The proposed filter strips and swales are installed in a timely manner.
4. A comprehensive land and water management and monitoring plan for the operational phase is agreed and implemented.

Climate Change (PEIR – Chap 14)

Based on the best-case scenario presented, recouping the carbon costs of this project will take at least 10 years, but more realistically over 13 years.

In fact, using the 'long run marginal' - assuming the CO₂ intensity of electricity generation decreases over time, following Government policy – construction 'cost' is *never* recouped (although we accept that this is a Catch 22 with investment needed in renewables to ensure CO₂ intensity decreases).

The question which clearly is not addressed here is a comparison with the construction cost of other low carbon electricity sources, like wind or nuclear. *Is this really the most emission efficient technology for achieving low carbon electricity?*

The World Bank states that in fact the UK is the 239th worst location out of 240 countries for the potential output of solar power.²

Notwithstanding the above comments, if the project were to go ahead we would expect to see a robust lifetime maintenance plan to ensure maximum long-term efficiency of the panels, without being subject to investor pressure if the predicted returns do not materialise.

² <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/466331592817725242/global-photovoltaic-power-potential-by-country>



Best & Most Versatile Land (PEIR Chap 17 Agricultural Land)

Nearly 40% of the land in question is identified by the PEIR as 'Best & Most Versatile' (PEIR 17.5.2.2) ie Grades 1 – 3a, which Government policy seeks to protect from "significant, inappropriate or unsustainable development proposals"³. We note that the UK is already the world's third largest importer of food, behind only China and Japan⁴, relying on imports to provide almost half of our food⁵. The Climate Change Committee has not surprisingly found that climate change will 'make it harder for the government to ensure the resilience of the UK's food supply'⁶.

Although precise information on how this figure breaks down across the three site sections has not been provided, the maps (p5-7 Chap 17 Agricultural Land & PRoW figures) make it clear that the northern section and the western area of the central section have a particularly high concentration of BMV.

Whilst CPRE Oxfordshire would maintain that none of the land in question should be ceded for this development, the BMV land (especially where it is also part of the Green Belt) should be prioritised for protection and the landtake reduced accordingly.

Public Rights of Way (PEIR Chap 17)

CPRE Oxfordshire supports the stated intention to retain all the public rights of way affected and to improve their connectivity notably by extending the cul-de-sac Cassington FP6 to reprovide a lost footpath link between Cassington and Church Hanborough and by providing new cycle paths between Bladon and Begbroke, along Lower Road, Church Hanborough and between Sansom's and Hordley and a number of other permissive paths.

However, this cannot disguise the fact that most of the public rights of way concerned would be aesthetically ruined by being encased between high fences and solar arrays totally alien to the Oxfordshire countryside. However much care has therefore been taken to assuage the practical concerns of rights of way users, this overlooks *why* people use public rights of way – namely to enjoy the natural countryside and not simply to perform some physical ritual.

³ <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

⁴ <https://www.fao.org/3/cb9928en/cb9928en.pdf>

⁵ <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-security-report-2021-introduction>

⁶ <https://lordslibrary.parliament.uk/impact-of-climate-change-and-biodiversity-loss-on-food-security/#heading-4>



Cable routing across the Thames

CPRE Oxfordshire strongly opposes any cabling route that would compromise the Long Mead Wildlife Site and other nearby SSSIs. This ancient floodplain wildflower meadow comprises some of the rarest habitat in the UK, 98% of which has been lost in the past 100 years. The remaining fragments now together comprise only 4sq miles in the UK.

Overall land use & spatial strategy

The damaging nature of this proposal highlights the urgent need for our Oxfordshire local authorities to work together to produce an overall land use framework for the county, including a spatial strategy for renewables that prioritises a brownfield first approach.

CONCLUSION

The landscape and visual impact of the Botley West solar farm would be enormous, completely transforming almost 1,400 hectares of countryside into an industrial area.

Development on this scale would have a radical impact on local ecology. Providing a few plots for growing local food would do little to replace the agricultural land which would be lost, much of which has been identified as 'Best and Most Versatile' land which should not be built on. Over three quarters of the land in question is also in the Oxford Green Belt, which is valued precisely because of its openness and permanence.

The Pathways to Zero Carbon Oxfordshire report, produced by Oxford University, says we need the equivalent of 1% of Oxfordshire's land surface for solar. Since Oxfordshire's domestic and commercial roofs provide three times as much space as that, CPRE Oxfordshire believes this is where the County's solar power should be accommodated - leaving the green fields unblighted, to grow food to feed our bodies and to provide landscape to feed our souls.

APPENDIX III

4.5.2 Newspaper Articles

Blenheim's vast solar farm will make a fortune — but for whom?

An aristocrat in a tax haven helps to run the estate where Botley West will power 330,000 homes. Are Oxfordshire and the country getting a fair deal?

[Glen Keogh Matilda Davies](#)

Sunday August 04 2024, 12.01am, The Sunday Times



Blenheim Palace is Winston Churchill's birthplace and the family home of the Duke of Marlborough

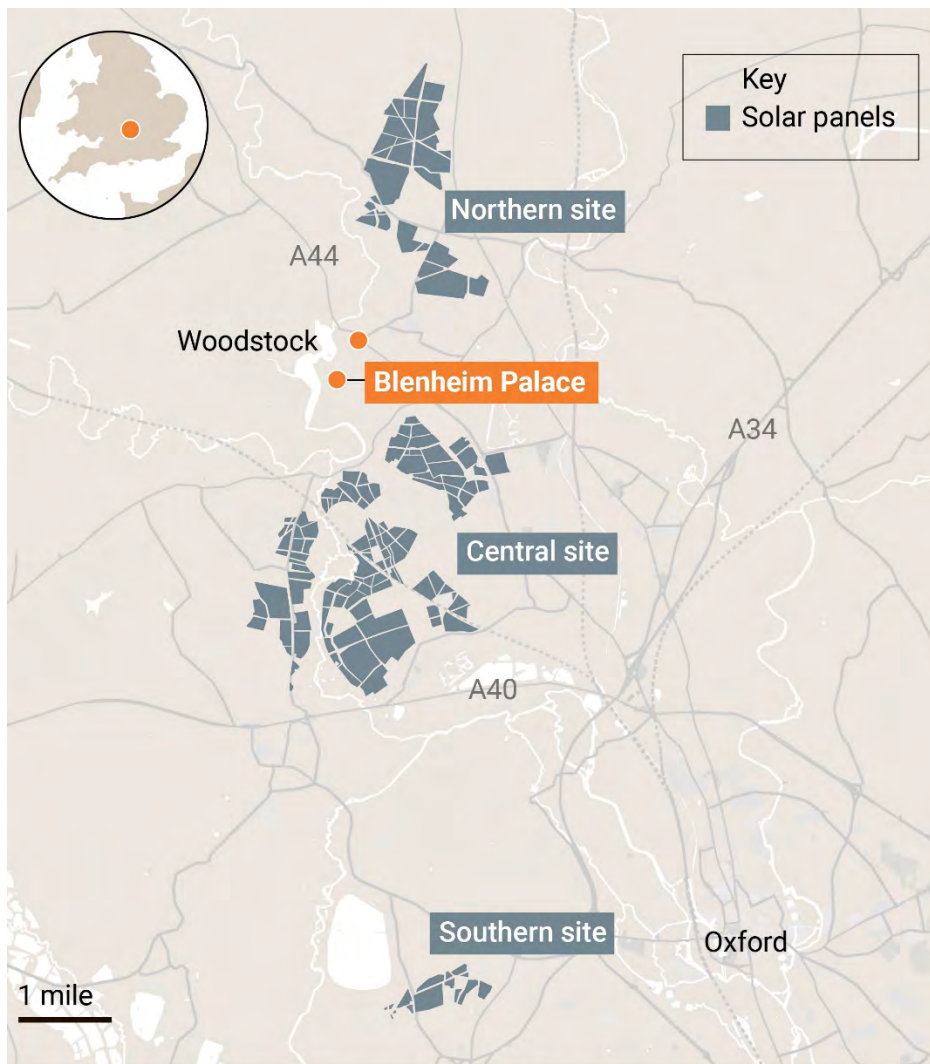
The view near the Oxfordshire cottage of Rosemary Lewis is marvellous in the summer sunshine. Rolling wheat fields, woodland to one side. In the distance tall oak trees stand alongside willows bending their leaves into a stream.

In three years' time, however, this may not exist. A total of 3,450 acres of countryside, 11 miles end to end, could host Europe's largest solar farm.

More than two million solar panels will be installed at Botley West, each up to 2.5m tall and surrounded by 2m-high security fencing. Arable farmland will be lost. Local campaigners believe substantial tax revenue will be lost too.



Rosemary Lewis, a retired maths teacher, and her husband Tom oppose the plan



Graphic by The Times and Sunday Times. Source: Botley West Solar Farm

Last year more than 1,000 planning applications for solar panels were approved in the UK. Five years ago there were six. Most of those were roof-mounted, data from the Department for Energy Security and Net Zero shows, but about 300 are solar farms.

Development has been slow. Only one of six solar sites approved in 2018 is operational and one is under construction. The other four are waiting for developers to have the time, money and resources to build them.

But there are 85 operational in Cornwall, 42 in Wiltshire, 23 in Somerset and 21 in both Shropshire and Pembrokeshire.

A further 2,153 sites with planning permission (many of them residential) are awaiting construction. Longfield solar farm, backed by EDF Renewables, was approved in June last year, boasting a capacity once installed of 500 MWe, equivalent to 1.25 million of the standard solar panels used on British homes. Located just northeast of Chelmsford, in Essex,

on a plot of land stretching four miles, it is predicted to be capable of providing enough clean energy to power more than 96,000 homes a year.

The decision to award planning permission in Oxfordshire lies with Ed Miliband, the energy secretary, who has promised to triple the amount of solar power within six years and double onshore wind and quadruple offshore wind capability.

This site could produce 840 MW of green energy to the national grid — enough to power 330,000 homes — and make millions for the nearby Blenheim Estate and the business people linked to it and tens of millions for the German firm developing the solar farm.

More than 70 per cent of the site will cover Oxfordshire green-belt land, mostly owned by the trust behind Blenheim Palace, known as the birthplace of Winston Churchill and present family seat of the Duke of Marlborough.

To mitigate the impact on the landscape, the solar farm, with a 40-year lifespan, is described as temporary in planning documents.

“I would be over 100 if I lived to see the end of it,” says Anthony Thompson, [REDACTED], a former Marks & Spencer retail director who lives in the neighbouring village of Church Hanborough. “The history books say farmland lost is farmland lost for ever.”



Anthony Thompson: “You need to swap the word ‘nimby’ for ‘whistleblower’”

Last month Miliband announced that three smaller solar projects would be approved, fuelling concern among opponents of Botley West. John Orme, a member of the Stop Botley West campaign group, said leaving the decision in the hands of the secretary of state rather than a local planning level (given its size, Botley West is classed as a “nationally significant infrastructure project”) was “a deficit of democracy”.

As part of its plans to decarbonise the electricity network, Labour [has launched GB Energy](#), which will “own, manage and operate clean power projects” across the UK and should be “owned by the British people, built by the British people and benefit the British people”.

The web of firms linked to Blenheim

Botley West, should it be approved, will be operated not by GB Energy but by Photovolt Development Partners (PVDP), a German company. Also involved are a string of firms and trusts linked to the Blenheim Estate, a private business that is part of Blenheim Palace, the family home of the Duke of Marlborough.

A trust was established in 1994 to run the estate when the duke at the time feared his son, James Blandford, who at the time had well-publicised drug problems, would not be able to look after the palace once it was inherited.

However, in 2014 Blandford inherited the title and rights to the palace on his father’s death after cleaning up his act. The trust remains. One of its trustees is the duke’s half-brother, Lord Edward Spencer-Churchill, [REDACTED], an investment banker who lives in the tax haven of Monaco. Estimates suggest that the Blenheim Estate could receive more than £2.2 million a year for leasing its land to PVDP for solar farm use. Developers are willing to pay about £1,000 per acre — considerably more than the £150 per acre from tenant farmers who use the land for agriculture. Over the 40-year term of the project, which is expected to create 2,400 acres of panelling, this equates to more than £90 million.



Lord Edward Spencer-Churchill and his wife Kimberly Hammerstroem at a Dior show at Blenheim in 2017

PVDP can earn at least £51.2 million per year for the energy it produces, meaning it would take more than 15 years to recoup the £800 million construction costs.

Under share options agreed in 2018, Blenheim Palace's chief executive, Dominic Hare, stands to earn £2.5 million if targets relating to the running of the estate are hit by 2026.

Hare has directorships of many private companies acting for the benefit of the family trust. He is a trustee of the Blenheim Palace Heritage Foundation charity, which is designed to protect the palace's reputation as a Unesco world heritage site and is exempt from income tax.

Meanwhile, Spencer-Churchill is a trustee and director of trusts and companies also tied to Blenheim.

The complex nature of the financial agreements means campaigners are asking for clarity about who will benefit from the scheme.

'I'd support a community solar farm in my backyard'



The central site viewed from Purwell Farm, looking northwest towards Church Hanborough.

Thompson, who has also been chief executive of Blackwell's bookshops and the clothing chain Fat Face, said: "If you think Blenheim and PVDP are there for a selfless civic duty you are being naive. This is about tonnes of cash going directly to their purses.

"GB Energy needs to benefit the Great British people. I would support a community-led solar farm right in my backyard — you mustn't mistake this for a group that doesn't support solar.

You need to swap the word ‘nimby’ for ‘whistleblower’. We are saying, ‘Hang on. This isn’t the right scheme. It’s the wrong scheme in the wrong place.’”

Concerns about [a solar gold rush](#) are not limited to Botley West.

In Wiltshire, Island Green Power, the developer of another large proposed solar farm, Lime Down, is 50 per cent owned by the Australian investment firm Macquarie. Nicknamed the “vampire kangaroo”, it is known in Britain for its ownership of Thames Water for 11 years until 2017. It loaded the privatised water service with £10 billion debt while rewarding shareholders and paying handsome dividends.

Hare, Blenheim Palace’s chief executive and a former investment banker, has denied claims that the solar farm project is simply a “money-making exercise”.

He said last year: “What kind of crazy world would we live in if the oil giants were allowed to generate power for a profit, but those who want to generate clean energy are condemned if they make money in the process?”



The central site from the western boundary looking east.

Alex David Rogers, co-chair of Stop Botley West, who has solar panels installed on the roof of his own home, said: “UK plc is unlikely to see much in the way of tax benefits coming out of this as well, because I would think it’s going to be set up in a way where a lot of the proceeds are simply going to disappear overseas.”

Hare, chief executive of the estate, said: “We are proud to advocate for this grid-scale clean energy solution.” He said that to protect future generations Britain needed to decarbonise

energy production by using sites of relatively poor land near major grid infrastructure, criteria met by Botley West.

He added: “On this basis, Botley West is an utterly compelling green energy site. We will add to that a package of community benefit and land rejuvenation which will set new benchmarks for all future sites.” He said commercial arrangements were confidential but that it was a profitable business model. “If this were not the case, that burden would sadly fall on governments — and the required progress would be made too slowly to make a difference.”

Mark Owen-Lloyd, an energy trader and director of the Botley West project for PVDP, said the firm had always been transparent about its finances.

He said that all taxes would be paid in the UK as PVDP has set up the company SolarFive Ltd as a special purpose vehicle for the project, on which they will pay corporation tax. He said: “In terms of opposition, I would say those who oppose us are very vocal, and those who support us, of course, by their very nature, they tend to just get on with their lives.”

A government spokesman said that solar power was a crucial source of cleaner, cheaper energy. “It is also important that local views are taken into account, and where communities live near clean energy infrastructure, they should benefit directly from it,” they said.

NEWS

The solar gold rush & the battle over Blenheim

Europe's biggest solar farm will be built on land owned by the palace, despite the concerns of Oxfordshire residents. It is set to make a fortune – but for whom?

Glen Keogh and Matilda Davies

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Millions of solar panels will be installed on land owned by the Blenheim Estate. Winston Churchill was born at the palace in 1874



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To mitigate the impact on the landscape, the solar farm, with a 40-year life, is described as temporary in planning documents. "I would be over 100 if I lived to see the end of it," says Anthony Thompson, a former Marks & Spencer retail director who lives in Church Hanborough. "The history books say farmland lost is farmland lost for ever."

Last month Miliband said that three smaller solar projects would be approved, fuelling concern among opponents of Botley West. John Orme, a member of the Stop Botley West campaign group, said leaving the decision in the hands of the secretary of state rather than a local planning level (given its size, Botley West is classed as a "nationally significant infrastructure project") was "a deficit of democracy".

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Estimates suggest that the Blenheim Estate could receive more than £2.2 million a year for leasing its land to PVDP for solar farm use. Developers are willing to pay about £1,000 per acre, considerably more than the £150 per acre from tenant farmers who use the land for agriculture. Over the 40-year term of the project, which is expected to create 2,400 acres of panning, this equates to more than £90

million. PVDP can earn at least £51.2 million per year for the energy it produces, meaning it would take more than 15 years to recoup the £800 million construction costs. Under share options agreed in 2018, Blenheim Palace's chief executive, Dominic Hare, stands to earn £2.5 million if targets relating to the running of the estate are hit by 2026.

The complex nature of the financial agreements means campaigners are asking for clarity about who will benefit from the scheme. Thompson, who has also been chief executive of Blackwell's bookshops and the clothing chain Fat Face, said: "If you think Blenheim and PVDP are there for a selfless civic duty you are being naive. This is about tonnes of cash going directly to their purses. GB Energy needs to benefit the Great British people. I would support a community-led solar farm right in my backyard – you mustn't mistake this for a group that doesn't support solar. You need to swap the word 'nimby' for 'whistle-blower'. We are saying, 'Hang on. This isn't the right scheme. It's the wrong scheme in the wrong place.'"

Hare, a former investment banker, has denied claims that the project is simply a "money-making exercise". He said last year: "What kind of crazy world would we live in if the oil giants were allowed to generate power for a profit, but those who want to generate clean energy are condemned if they make money in the process?"

Alex David Rogers, co-chair of Stop Botley West, who has installed solar panels on the roof of his home, said: "UK plc is unlikely to see much in the way of tax benefits coming out of this as well, because I would think it's going to be set up in a way where a lot of the proceeds are simply going to disappear overseas."

Hare said that in order to protect future generations, Britain needed to decarbonise energy production by using sites of relatively poor land near grid infrastructure, criteria which is met by Botley West. He added: "On this basis, Botley West is an utterly compelling green energy site. We will add to that a package of community benefit and land rejuvenation which will set new benchmarks for all future sites."

He said commercial arrangements were confidential but that it was a profitable business model. "If this were not the case, that burden would sadly fall on governments and the required progress would be made too slowly to make a difference."

Mark Owen-Lloyd, an energy trader and director of the Botley West project for PVDP, said the firm had been open about its finances and all taxes would be paid in the UK. A government spokesman said solar power was a crucial source of clean, cheap energy, but added: "It is also important that local views are taken into account, and where communities live near clean energy infrastructure, they should benefit directly from it."

“UK plc is unlikely to see much in the way of tax benefits



Protest at Churchill's grave against giant solar farm

1 hr ago

By [Miranda Norris@mirandajnorris](mailto:Miranda.Norris@mirandajnorris) Senior reporter

Protesters gathered at Churchill's grave to demonstrate how close the proposed Botley West Solar Farm will come to the wartime leader's memorial.



Supporters of Stop Botley West group demonstrated their opposition to plans to install solar panels less than 200 yards from the memorial in St Martin's churchyard in Bladon.

A number of protesters then walked local footpaths that would border fields full of solar panels.



(Image: Stop Botley West)

Photovolt Development Partners (PVDP) are set to submit an application for a development consent order for Botley West Solar Farm in early November.

It would cover a total of 3,200 acres of mainly greenbelt land owned by Blenheim, stretching 11 miles from end to end and around 15 villages from north of Woodstock to Botley in the south.

PVDP has said it will generate enough electricity to power up to 330,000 homes.

Professor Alex Rogers, chair of the Stop Botley West group, said: "Churchill had a great affection for the Blenheim estate and the countryside around it, and many Bladon residents we have spoken to believe he would be turning in his grave if he knew that his heritage could be abandoned for unsustainable profit."

He added: "Local people are rightly concerned that if the Botley West proposal goes ahead, fields of panels would come close to the edge of a children's play area and to the back of houses as well as engulfing local footpaths to the north of Bladon."

According to an assessment by the group "around 25 kilometres" of footpaths in the northern, central and southern sections of the proposed site would be "adversely affected with walkers having to walk beside or between acres of solar panels".

Oxfordshire [County](#) Council responded to the plans last month, listing a number of areas that would need "considerable improvements" before PVDP submits its DCO application.

West Oxfordshire District Council said there were "multiple areas of concern", including the impact it would have on the landscape.



(Image: Stop Botley West)

PVDP said they were "confident that no panels would be visible" from Churchill's grave as it is surrounded by a walled churchyard, and then a house and woods.

During the consultation no concerns were submitted about proximity of panels to Churchill's grave, they said.

They added they were "continuing to work closely with all relevant experts and authorities and we are confident that the project will in no way be detrimental to the access to or legacy of the estate".

PVDP said the project will deliver 2km of new cycleways and 40km of current footpath surface will be upgraded.

A spokesperson said: "No footpath will be disrupted or obstructed.

"We would reiterate that PVDP has worked hard to ensure that any visual impact will be extremely rare.

"The dimensions and visibility of the proposed site have been considered and scrutinised in full by local planning authorities in such a way to ensure that the impact on the visual landscape of the area is minimised."

Botley West Solar Farm objectors stage protest walk

By [Miranda Norris@mirandajnorris](mailto:Miranda.Norris@mirandajnorris) Senior reporter



Campaigners against plans to build one of Europe's largest solar farms have taken part in a protest walk. If approved the 1,400 hectare (3,500-acre) Botley West Solar Farm would cover sites near Botley, Kidlington and Woodstock mostly owned by the trust behind Blenheim Palace.

A formal application is expected to be submitted to the government 'in the next couple of weeks'.

Supporters of the Campaign for the Protection of Rural England (CPRE) Oxfordshire and the Stop Botley West (SBW) community group walked sections of Dornford Lane between Woodstock and the Bartons, which would be surrounded with panels.

Developers PhotoVolt Development Partners (PVDP) propose to use the lane which is crossed by Akeman Street, the Oxfordshire Way and a number of other public rights of way, for access by maintenance vehicles.



CPRE Oxfordshire and Stop Botley West campaigners staged a protest walk (*Image: Ed Nix*)

PVDP's most recent proposals state: "The project site boundary has been changed to include Dornford Lane to provide access for maintenance purposes during the operation of the solar farm (due to be up to 42 years). This access is not intended to be used during construction."

Lisa Warne, director of CPRE Oxfordshire, said: "There's no denying that the transition to renewable energy is urgent and vital, and we at CPRE fully support decarbonising our energy.

"Given that in Oxfordshire we are already halfway to our solar target for 2050, we can afford to be selective, meaning that local authorities can and must be more discerning about where solar is installed.

"We must protect valued landscapes such as those in the proposed Botley West Solar Farm area as well as agricultural land for growing much-needed food.



If approved Dornford Lane will be surrounded by solar panels (*Image: Ed Nix*)

"Instead, we need to push for the installation of solar panels on roofs where it would not only save our countryside, but also be nearer to the point of use."

Biodiversity and ecology expert Dr Julian Parfitt joined the walk and explained Dornford Lane's history as a drovers' road when Anglo-Saxon kings stayed on the Barton estate and used Woodstock as a hunting ground.

He encouraged local people to identify ancient trees and record them with the Woodland Trust as part of efforts to protect the lane.

Alex Rogers, chair of the Stop Botley West community group, said: "It would be a betrayal of Dornford Lane's unique local heritage, loved and used by walkers and cyclists, to turn this historic green lane into a commercial access route to this unnecessary, misplaced industrial-scale power station for the next 40-plus years."

Project director Mark Owen-Lloyd said: "No trees will be removed or damaged as a result of the proposal, and the boundary of the site deliberately excludes all areas of ancient woodland.

"Not only will the project preserve trees and hedgerows, it will also introduce new ones in order to restore wildlife habitats and encourage pollinators. This is part of the minimum biodiversity net gain of 70 per cent the development will deliver.

"The project will also protect food production in the local area, as we are partnering with community agriculture projects and farmers to use parts of the site to grow produce.

"By resting other parts of the land which have been intensively farmed, we will restore the soil quality and make it viable for growing again.

"We absolutely support solar panels on rooftops, but this deployment alone will simply not be enough to meet our net zero targets, or the UK's national energy demand. Relying on rooftop solar alone is not a viable solution to the climate crisis in the UK."

Palace intrigue

AS developers draft a development application to business secretary Jonathan Reynolds for what would be the largest solar farm in the UK, covering 3,500 acres owned by Spencer-Churchill family trusts around Blenheim Palace in Oxfordshire (*pictured*), campaigners have unearthed papers contradicting claims from the cash-strapped family that the scheme will not unduly impair the heritage value of the 300-year-old seat of James Spencer-Churchill, Duke of Marlborough.

In 1987 Unesco names Blenheim Palace a World Heritage site, a status that has to be carefully guarded. Thirty years later, Blenheim published a revised management plan on how it was doing so. It waxed lyrical about the surrounding bucolic landscape. Among the "elements of Blenheim's outstanding natural value" was "the character of the setting as traditional English countryside, dotted with picturesque villages" (which will now be surrounded by solar panels).

"The grazed pastoral landscapes around the river valleys, along with the fields and woodlands are particularly significant as these reflect the land-use and character of the landscape that

would have been appreciated during the 18th century." The last thing that was needed, thought the Blenheim trustees seven years



ago, was "large-scale development... for example industrial development; wind turbines; solar farms, etc".

But now the biggest, er, solar farm out there is suitable for the estate, say the trustees. "At Blenheim we are uniquely positioned to take action to protect future generations and support global efforts to reduce carbon emissions, but also focus on the impact to our local area." There will be "new greenways, cycle routes and footpaths along with initiatives to boost biodiversity".

Why the change of heart? There is serious money up for grabs. The so-called Botley West solar farm (though a glance at a map suggests it would more aptly be called Blenheim East) is being developed by a company called SolarFive Ltd. This is part of the Photovolt Development Partners group and is co-owned by the Cypriot-resident widow of a Russian businessman who was accused of scamming a Russian bank over a non-existent goldmine (*Eyes passim*). It will make hefty lease payments to the Spencer-Churchill trusts that could run to a couple of million pounds a year over the 35- or 40-year lease.

This could be handy for trustees such as Monaco-resident Edward Spencer-Churchill (half-brother of the duke), whose own Vanderbilt property business seems to be struggling – latest accounts show it owing more than £100m to a mysterious British Virgin Islands company. Small wonder the chief executive of the trust company, Dominic Hare, has been incentivised with £2.5m in share options to hit financial returns (*Eye 1609*). That's worth surrendering a bit of England's green and pleasant for.

Mail online article (abridged). 10th November 2024 written by Chris Matthews

Fury over plans to build Britain's biggest ever solar farm on 2,000 acres of greenbelt land around Winston Churchill's ancestral home as locals say it will 'destroy the landscape' and WW2 leader would be 'turning in his grave'

The countryside view that Sir Winston Churchill cherished could be destroyed if Labour gives the green light to the UK's largest solar panel farm surrounding Blenheim Palace, as it is expected to.

The Duke of Marlborough's half-brother Lord Edward Spencer-Churchill, who runs Blenheim Estate, has agreed to lease 2,000 acres of his land to a German company that will cover the land with two million solar panels - with 75 per cent being on the green belt.


Locals have branded the plans an outrage and suggested the name Botley West Solar Farm was chosen to distance [Unesco](#) world heritage site and national treasure Blenheim Palace from the vast project.

Large swathes of Oxfordshire would be covered in eyesore navy-coloured solar panels if the plans, which were submitted to the Planning Inspectorate on Friday, are approved.

More than 11,000 homes across 15 villages within a mile of the panels will be affected, with the panels visible from most of the land in the 60 square miles surrounding the massive solar farm.

Homeowners in one of the most affected villages, Church Hanborough, revealed how they were overcome with 'grief', 'horror' and 'absolute disbelief' when they were first told about plans for the ginormous solar park just before [Christmas](#) in 2022 and said Churchill would be 'turning in his grave'.

Now, two years later, they are ebbing closer to a time that the nationally beloved land surrounding Blenheim Palace, Churchill's ancestral home, will be covered in a sea of ugly dark solar panels, banishing huge chunks of green from the pleasant English countryside.

Former Church Hanborough parish councillor Penelope Marcus, , told MailOnline: 'It's going to absolutely destroy this ancient agricultural landscape.'

It's just outside the Unesco world heritage site. Who's going to come? It's going to be surrounded by panels for the next 40 years.

'Blenheim is going to really suffer in terms of visitors. The two world heritage sites nearest to London for a day's trip are this one and Canterbury.

'What would you see? Blenheim bathed in a lake of solar panels. This is crazy.

'I think it would affect tourism enormously. There will be so many trucks working but then coming along the road what do you see?

'This is the setting for this village. This is where we live. We are a very close community.

'The countryside is part of what makes England and that's so important. England consists of landscape but this is shared by all of us.

'The countryside is ours. We're losing national land and national views.'

MailOnline approached Ed Miliband, the Secretary of State for Energy Security and Net Zero, to comment on the plans but he would not do so.

It is understood this was because his department believes it would not be appropriate for him to comment on specific matters related to the proposal in case it could be seen as prejudicing the decision-making process for the application, which he has a quasi-judicial role in.

Labour has said it plans to ensure the UK is powered by non-fossil fuel power by 2030, which would mean a need for large scale renewable projects.

If the Blenheim Palace plan goes ahead, protesters said children being born now will be middle-aged before they see the green fields surrounding their homes.

Meanwhile, Blenheim Estate is set to make £128million from leasing their land to German company Photovolt Development Partners (PVDP), which has created UK company SolarFive Ltd specially for the project.

At the moment Blenheim are said to make £150 per acre per year from its land. PVDP said the going rate for leasing land for solar panels is £1,000 per acre, a 567 per cent increase.

Calum Miller is the Liberal Democrat MP for Bicester and Woodstock.

He said: 'Like many residents, I support the transition to renewable energy but I cannot support the current Botley West proposal.

'The developers of Botley West have not engaged meaningfully with local communities. Had they done so, they would have heard many concerns including the sheer scale of the proposal, the impact on the World Heritage site at Blenheim Palace, and the derisory level of community benefit that has been proposed.

'Rather than riding roughshod over these concerns, I am pressing the developers to engage more meaningfully with residents to ensure that local voices are heard.'

The solar farm's project director Mark Owen Lloyd, from German company PVDP, admitted there will be panels as close as 200m away from Churchill's grave, although he maintained you wouldn't be able to see them from his resting place itself.

He told MailOnline: 'There's a visual impact issue. With most of the fields, you will look from the road and you will see panels.

'You are going to see them. There's nothing we can do about that.

'You look at those fields and say, "That's England, how it's always been and that's perfect," and it won't look like that with solar panels.

'You can't get away from the visual impact.

'Try and think long term. It's not as bad as you think. It's quite possible that you will not realise we are there, until you walk across a footpath.

'Think of the next generation. It requires a leap of imagination.'

He acknowledged there was a 'dedicated opposition' to the plans and said that after a recent statutory consultation that 1,000 people attended, 800 sent letters opposing the plans and the remaining 200 did not show support either way.

However, he said planting hedges and strips of wildflowers between the panels and people's homes and surrounding roads would limit exposure.

He added: 'It's possible to break up these views. What we don't want people to see is a sea of panels.'

'Each field will have sheep in it. The panels will be surrounded by sheep.'

'There are footpaths that will be impacted. There are places we are opening up which have no panels on them.'

Despite his reassurances, many villagers remain sceptical of the project.

Steve Jenkins, a retired project manager, said he was most worried about what would happen to the area's ancient woodland, some of which is 500 years old.

He said work to install cables to take energy from the panels to the national grid will destroy water meadows and cut through the roots of trees that are 'half a millenia old'.

'The areas of woodland are the last remnants of Wychwood Forest and they need to be protected.'

'There are thousands of ancient trees. To go within metres of them will cause damage. It will destroy the roots.'

'Even the terms of "pipe ramming" and "hydraulic dynamic drilling" — you don't need to be a genius to work out what it means.'

Fellow Church Hanborough homeowner and retired picture researcher Tessa Hammond said: 'It's a few people who stand to gain. It's not the Palace, it's not the Duke. It's the managers of Blenheim Estate.'

John Orme lives in nearby Woodstock. He told MailOnline: 'We've been trying to get Blenheim to look at alternative sites for solar panels. Small community solar farms is what we really want.'

'There's one in Charlbury, which is just north of here, and they actually get a return for that.'

'This vast thing is going to destroy legacy and heritage.'

Yet despite locals' concerns, the plans have now been submitted to the national Planning Inspectorate.

If approved, it could be a flagship solar farm for Labour in their quest to build on the green belt and secure clean power by 2030.

Unesco said: 'The World Heritage Centre is aware of the planned solar farm near the Blenheim Palace World Heritage Site and is in contact with the State Party to avoid any negative impact on the property's Outstanding Universal Value (OUV), which refers to the elements that justified its inscription on the UNESCO World Heritage List.'

'Before a World Heritage property can be deleted from the UNESCO World Heritage List, the UNESCO World Heritage Centre and the World Heritage Committee – the governing body of the Convention made up of 21 Member States – follow established procedures.'

A Planning Inspectorate spokesman said: 'The Botley West Solar Farm application is expected to be submitted by November 8 2024.'

'When we receive the application, we have 28 days to decide whether to accept it for examination.

'If we accept the application, interested parties will be able to register to have their say and view all the application documents.

'At the end of an NSIP examination, a recommendation report is prepared for the relevant Secretary of State who will then make the decision on whether or not to grant a Development Consent Order.'

Oxfordshire County Council said: 'We are not the decision maker on this scheme. 'Solar production of renewable energy at scale will be a critical to achieving zero-carbon electricity and associated UK energy security. However, we are disappointed at this stage by the level of impact mitigation and woefully inadequate community benefit being proposed by the developer.'

Blenheim Palace, Blenheim Estate, the Duke of Marlborough, Lord Edward Spencer-Churchill and West Oxfordshire District Council did not respond to requests for comment.

Miliband to rule on building Britain's biggest solar farm at Churchill's ancestral home

Blenheim Estate faces renewables blitz after project passes crucial hurdle

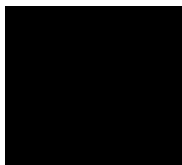
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If approved, the site will cover at least 2,471 acres of the 12,000-acre estate Credit: Loop Images/Universal Images Group Editorial

[Luke Barr](#) Assistant business editor

13 December 2024 7:01pm GMT



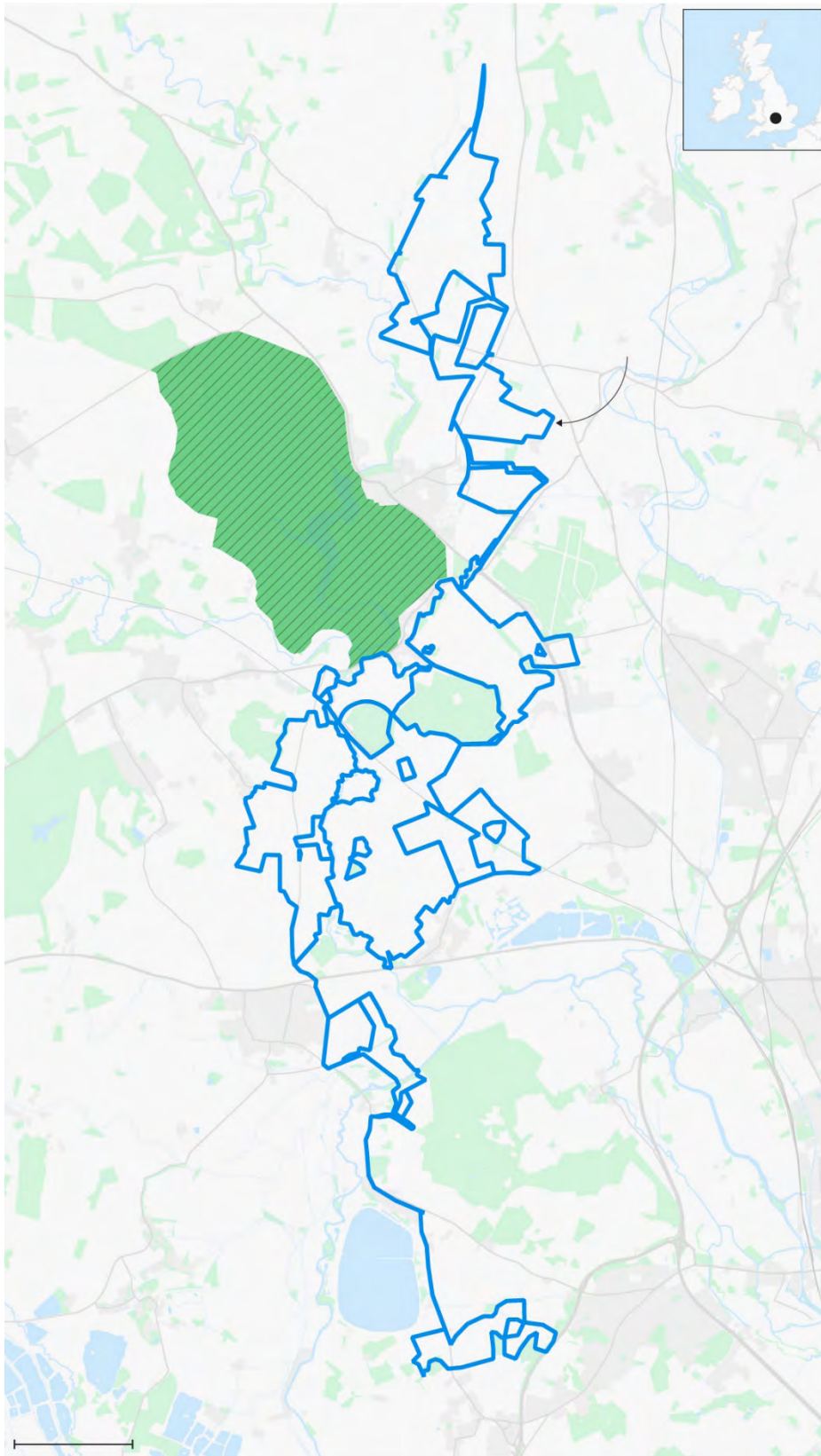
Ed Miliband will decide whether Britain's biggest solar farm can be built on Winston Churchill's ancestral estate after the renewables project cleared a key hurdle.

The Planning Inspectorate confirmed on Friday that the Botley West Solar Farm on Blenheim Estate had been accepted for examination.

Months of scrutiny will now follow to determine the project's feasibility before the Energy Secretary will decide next year whether it can proceed.

If approved, the site will cover at least 2,471 acres of the 12,000-acre estate and provide renewable energy to more than 300,000 homes in Oxfordshire.

However, concerns have been raised over [the project's impact on the local countryside](#), particularly given the prospect of thousands of panels being installed across farmland.



Botley West Solar Farm/Photovolt Development Partners

The estate's links to the former prime minister also make the project particularly high profile.

Churchill was born in Blenheim Palace, at the heart of the estate, in 1874 and his ties remained strong throughout his life. He proposed to his wife, Clementine Hozier, there in 1908, and he was also buried within sight of the estate in 1965.

The row over Botley West Solar Farm comes as the Government prepares to rip up planning rules to unleash green energy projects across Britain, including wind turbines and electricity pylons.

[The Energy Secretary's renewables blitz](#) has already sparked opposition from swathes of activists, including those opposed to the proposed Botley West Solar Farm in Oxfordshire.

However, the solar farm has already been classed as "Nationally Significant Infrastructure", meaning local residents and community groups do not have any powers to intervene.

Calum Miller, the Liberal Democrat MP for Bicester and Woodstock, said: "While I support the transition to renewable energy, I cannot back the current Botley West proposal.

"The developers have failed to engage meaningfully with local communities, ignoring concerns about its scale, impact on Blenheim Palace, and minimal community benefits. I am urging them to listen to residents and address these issues."



Winston Churchill's links to the Blenheim Palace estate make the project particularly high profile Credit: David Savill/Hulton archive

Concerns have also been raised about the project's backers, Photovolt Development Partners (PVDP), with local campaigners alleging that the project is "Russian-owned".

This relates to claims that Photovolt's main shareholder, Yulia Lezhen, was married to a Russian citizen.

Speculation led to Liberal Democrat MP Layla Moran using parliamentary privilege last year to question Photovolt's alleged Russian links.

Photovolt, which is registered in Germany, has consistently denied any inappropriate links to Russia.

However, Professor Alex Rogers, chairman of the Stop Botley West local campaign group, is urging regulators to scrutinise the project and its backers as part of the forthcoming examination process.

He said: "If it goes ahead, the Botley West solar power station proposal will transform a large area of rural Oxfordshire, including extensive areas of the city of Oxford's green belt, into a semi-industrial landscape with damaging consequences for the physical and mental health of residents and visitors.

"The proposed 3,200-acre development is in the wrong location as it will have damaging impacts on valuable heritage, including the Unesco World Heritage site of Blenheim itself, on productive agricultural land and on the local ecology."

Photovolt has claimed that visitors will not be able to see any solar panels from Blenheim Palace. It has also vowed to build new hedgerows to help hide large parts of the solar farm.

Mark Owen-Lloyd, a director of PhotoVolt, said: "We are pleased that the Planning Inspectorate has accepted Botley West Solar Farm for examination, which will now progress to the pre-examination phase.

"This project, once built, will make a huge contribution towards achieving net zero in the UK whilst providing the reliable, clean power Oxfordshire needs.

"These plans, which are now available for anyone to view on the Planning Inspectorate's Botley West website, are the result of years of extensive and rigorous work to build a detailed proposal for how the Botley West Solar Farm project will be constructed and delivered."

Botley West - Private Eye coverage 2023

GREEN EYE

Marlborough light

IF THE Duke of Marlborough has his way, the largest solar farm in Europe, to be built on 3,500 acres of land near his family's Blenheim Palace in Oxfordshire, will be run by a company backed by some seriously dubious Russian money.

The land, neighbouring the towns of Wootton and Woodstock and more than three times the size of the largest solar farm under construction in the UK, is managed by trustees of a series of family trusts for the benefit of the Spencer-Churchill family, of which the duke, once known as jailbird Jamie Blandford, is the head.

The trusts have negotiated a deal with Photovolt Development Partners to lease what will be known as the Botley West Solar Farm, also incorporating land owned by Oxford University's Merton College. The aim is to deliver 840 megawatts of clean power to the National Grid. Residents of Wootton, Woodstock and a dozen villages who think the area will be blighted by a development the size of 1,800 football pitches are less enthusiastic.

Photovolt claims an "18-year track record of delivering large-scale solar projects in Europe and Japan". But it has less to say about who is behind the company.

Photovolt Development Partners GmbH is registered in Germany and owned by Cyprus company Cransseta Investments Ltd. The latter's sole shareholder is one Yulia Lezhen, who also gives a Cyprus address and is behind a series of other companies, some in the UK under the similar name of Julia Lejeune, alongside German businessman Peter Gerstmann.

More about Lezhen emerges, the *Eye* can reveal, from a New York court case last year involving a supposed gold field developer going bust and a creditor chasing its money. Russian company GK Amazarkan had been granted a licence to develop a gold field in the Zabaykalsky

region of Russia and had borrowed \$58m from Uralsib bank. In 2016 Amazarkan went bust, owing the bank more than 99 percent of the loan.

The court filings, obtained by the *Offshore Alert* investigatory website, reveal that the 75 percent beneficial owner of Amazarkan was Dmitry Glukhov, husband to Yulia Lezhen. She is described by Ingorgstroy, the company to which the debt was assigned, as his "spouse and trustee" and "the nominee owner of Glukhov's business structures in Cyprus, Netherlands and other countries".

Ingorgstroy alleged that Lezhen and others were used by Glukhov and his co-owners "to conceal their assets, and/or have improperly received funds by them in priority over [Ingorgstroy]". The company also alleged the money was "not actually used to develop the gold field" and that "inspections of the gold fields in recent years have revealed that there is no sign of production infrastructure".

Among dozens of companies also said to have been used to conceal money as Glukhov and co "syphoned off" assets was none other than Photovolt Development Partners GmbH and Cransseta Investments, plus several UK companies – which appear to have no active business – owned and run by Lezhen (sometimes as Lejeune) and Gerstmann. Photovolt did not respond to the *Eye*'s questions on the matter.

While the company professes a long record of solar delivery, it cites only one project, at Ukijima in Japan. This has yet to be finished and Photovolt sold its stake back in 2018. But then the Spencer-Churchills may be in need of quick cash: last year the duke had his top-of-the-range Porsche repossessed after failing to keep up payments.

The Botley West development is still at the consultation stage, ahead of a planned development consent order application to Whitehall later this year. The chairman of the Spencer-Churchill family trusts, Richard Jessel, and the acting warden of Merton, professor of, ahem, corporate finance law Jennifer Payne, might want to shine a light of their own on where the money is coming from. Others might wonder whether, with renewable energy supposedly a route out of dependence on energy from overseas, funneling cash to Glukhov's set-up is part of the solution or the problem.

GREEN EYE

Botley contested

REVELATIONS in *Eye* 1597 that the proposed largest solar farm in Europe, on the Duke of Marlborough's estate in Oxfordshire, is backed by dubious Russian money have not deterred the promoters of the Botley West scheme, even when added to fierce local opposition.

The *Eye* reported how German-based Photovolt Development Partners is owned by Cyprus resident Yulia Lezhen, wife of one Dmitry Glukhov and accused in papers filed in a US court of being a front for him. The New York case concerned a dispute in Moscow about Glukhov borrowing money for a goldfield that allegedly wasn't developed, with money "syphoned off" via companies including Photovolt and the UK company being used for the Oxfordshire development, SolarFive Ltd.

Photovolt declined to answer the *Eye*'s questions but has since informed readers on its website that it "does not accept recent allegations made against certain individuals and the financial arrangements of the company". They are, it now tells the *Eye*, "smears by association" (*With what? The evidence? Ed*), while the "shareholders for SolarFive Ltd are available for all to view on the Companies House website".

Indeed they are. And they show that in April 2021 SolarFive's ownership was transferred from Cyprus company Cransseta Investments Ltd (itself controlled by Lezhen) to Photovolt boss Peter Gerstmann and a certain "Julia Lejeune". This, none too reassuringly, is an alter-ego of Yulia Lezhen. Photovolt refused to explain the name switch.

Photovolt also insists that "Ofgem [the energy regulator] conducted due diligence on [Photovolt] and SolarFive". Ofgem's checks,

however, hardly amount to "due diligence". They cover straightforward matters such as checking for director disqualifications, but the do not examine where funds come from.

As for the source of funds for the proposed 3,500-acre farm near the duke's Blenheim Palace, this is said to be "the sale of Photovolt projects in Japan". More information on these emerges from Photovolt's Irish holding company Mulledmont, which records that in 2018 it sold a company called TeraSol GK to Japanese company Ukujima Miraj Energy Holdings GK for €48.8m, returning a handsome gain of €43.3m. The solar farm there remains under construction.

Then the Irish company also claimed to have sold companies called BlueSol GK and PetaSol GK for proceeds totalling €158m, and an impressive overall €152m gain. But the larger of these sales, for €111m, was to Cransseta Investments in Cyprus, so from one group pocket to another. What BlueSol and PetaSol, now dissolved Japanese companies, did for their money remains unknown; there is no public sign of activity and Photovolt declined to identify any to the *Eye*.

None of this murk deters one august institution giving up a large chunk of its land, constituting around 5 percent of the proposed solar farm, alongside the trusts controlling the Marlborough estate. Merton College, Oxford, continuing its involvement and has added to its website, a touch desperately, that "the college neither the applicant nor the developer behind the Botley West project".

The Merton warden who initially approved the deal, Professor Irene Tracey, is now Oxford University vice-chancellor, and may want to take a closer look.

GREEN EYE



Light and shady

MORE on plans for a 3,500-acre solar farm on land largely belonging to the Blenheim estate in Oxfordshire, which locals fear will blight countryside surrounding several villages and which, *Eye* 1597 revealed, is backed by dubious Russian money.

This month the UK company undertaking the development, SolarFive Ltd, filed a 140-page “scoping report” with the government’s national infrastructure planning inspectorate. Or rather German company Photovolt Development Partners did on its behalf. Focusing on supposed environmental benefits, the report conspicuously fails to mention who is actually behind SolarFive. According to company documents, it is one Julia Lejeune, although this is in fact the alter ego of Yulia Lezhen, a Cypriot-resident Russian and, according to US court papers, a proxy for her husband Dmitry Glukhov. He is alleged to have used numerous companies, including SolarFive, to syphon off the ill-gotten gains of a goldfield scam in his home country.

Opponents of the solar scheme have naturally pointed out this background, plus Photovolt’s uncertain record in the solar game, to regulator Ofgem. It has granted SolarFive a licence, but with the minimum of checks, and appears to be having another look. As one *Eye* reader pointed out, licences can be revoked if there was a “material misstatement” on the application.

A false name, especially one used in previous scams, might just meet that test. Meanwhile, local MP Robert Courts has reassured campaigners he has “raised these concerns with the government” since “we need to understand what financial interests would be involved in critical national infrastructure or its promotion”.

That isn’t something about which the landowners – largely the trusts set up for the benefit of the Spencer-Churchill family, which own the 12,000-acre Blenheim estate, and to a much smaller extent Merton College, Oxford – seem too bothered. This might be connected to the estate’s parlous financial state. Since its formation in 2014, Blenheim Finance Ltd, which funds myriad Blenheim companies, had increased its borrowings from around £60m to around £140m by December 2021. Of this, £12m came from the entirely separate charitable foundation that runs Blenheim Palace – historic seat of the Spencer-Churchill family and currently home to the, er, troubled 12th Duke of Marlborough, James Spencer-Churchill – and exists to “safeguard the future of our world heritage site for centuries to come”. Over the following three months, the charity’s accounts show, this had risen to £17m – arguably not the most charitable use to which to put cash.

One prominent family member who could use some good financial news is the duke’s half-brother, and at least until recently a trustee, Edward Spencer-Churchill. While he gives his usual residence as Monaco, his corporate interests in the UK are also heavily indebted. Vanderbilt Topco Ltd, a company through which he holds some unprofitable property companies, was due to have repaid a bond in 2019 but this has since been deferred, with the amount outstanding £82m by the end of 2021 and possibly higher now. Which makes the solar project, regardless of where the money’s coming from, look pretty crucial for the aristocrats’ coffers.

NEWS

SOLAR OPPOSITES

THE family trusts running the Blenheim estate, seat of the Duke of Marlborough, may be keen to get much-needed (if dubious) cash by handing over land for a Russian-backed company to build Europe’s largest solar farm (*Eyes passim*), but their enthusiasm for the low-carbon technology has its limits.

Blenheim Estate Homes, the trusts’ house-building arm, is behind the Park View development in Woodstock, which neighbours Blenheim Palace. But buyers and renters there had better not get any ideas about solar efficiency for themselves. “We believe that solar panels are more problematic [than decent insulation], in terms of achieving a good appearance from the public realm”, says the operation that wants to carpet them over 3,500 acres of Oxfordshire.

● Local Lib Dem MP Layla Moran brought up the *Eye*’s coverage of the affair during a Common debate on Russian assets two weeks ago. “I ask the minister, how can we know that Russian money is not still being greenwashed through our economy here in the UK?” she asked. “I would welcome a meeting with him or Treasury ministers to get to the bottom of where the money is coming from.” Junior foreign minister Leo Docherty did not respond to the point.

GREEN EYE

Lezhen learned

ALL change – or maybe not – at the murky business behind the largest proposed solar farm in Europe, on land largely owned by the Duke of Marlborough's family trusts near Blenheim Palace.

The developer of the 3,500-acre solar farm is a UK company called SolarFive Ltd, backed by German outfit Photovolt Development Partners. It's owned by one Julia Lejeune – or was, until the *Eye* recently revealed that this is a pseudonym for a Russian, Yulia Lezhen. In June and July, company filings show, Lezhen



amended records for SolarFive Ltd and other companies to revert to her real, Russian name.

The *Eye* had discovered Lezhen's identity from US court records detailing allegations that her husband, Dmitry Glukhov, had ripped off a Russian bank through a supposed gold field that didn't materialise and had "syphoned off" the proceeds using Lezhen – who was said to be "nominee owner" for Glukhov – and companies including her UK ones.

As its name suggests, SolarFive is one in a series of companies. Around the time of the name reversion, further iterations – SolarEight and SolarNine – were set up with Photovolt's Henley-based director Peter Gerstmann as the sole owner, in what looks like an attempt to distance the business from Lezhen and Glukhov. Gerstmann has also set up a new British arm of his business, Photovolt (UK) Ltd.

The questionable source of the money and

corporate shenanigans haven't worried the landowners, trusts set up for the benefit of the duke's Spencer-Churchill family and, to a much smaller extent, Oxford University's Merton College, that are signing up with Lezhen. But as the knot tightens on Russian money in the UK, it may yet do so.

Since Russia's invasion of Ukraine, sanctions have outlawed entering into joint ventures, loosely defined, with "a person connected with Russia", which Lezhen and Glukhov appear to be. Sanctions have also been placed on providing

professional services such as accounting, legal advice and consultancy, either directly or indirectly, to a person connected with Russia. This could prove a headache for the landowners and Gerstmann, as well as

to the firm providing consultancy services, engineering and planning advisers RPS Group.

The authorities, meanwhile, seem unperturbed where the money is coming from for such a large chunk of Britain's renewable energy infrastructure. Ofgem granted SolarFive Ltd a licence last year, although it has said it is looking at information given to it about SolarFive and can revoke licences if there has been a "material misstatement" of facts. The planning inspectorate, an agency of Michael Gove's levelling-up department, has indicated it will be some way into the process before it can possibly consider the matter.

Robert Courts, the Tory MP for Witney on whose patch (as currently configured) the solar farm would be, has started a petition against it on the grounds that the "scale and design" are incompatible with the area, but tactfully not mentioning the Russian connections.

SOLAR POWER

Pulling the plug

AFTER a few months of the *Eye*'s pointing out the links between the largest proposed solar farm in Europe and its dubious Russian financial backer, one organisation that was due to provide a large chunk of land for the project, but might have been expected to be slightly concerned, has finally pulled out.

Oxford University's Merton College had set aside around 170 acres it owns near the Blenheim Palace estate in Oxfordshire to form part of the 3,500 acre, 840MW solar farm to be developed by a UK company, SolarFive, on land largely owned by the trust running the Blenheim Estate.

SolarFive Ltd is controlled by German director Peter Gerstmann of Photovolt Development Partners and Russian Yulia Lezhen, who previously used the pseudonym Julia Lejeune but changed to her real one once the *Eye* had pointed this out. As *Eye* 1597 set out, she was alleged in US court papers to be the nominee owner for her (now deceased) husband Dmitry Glukhov and to have "syphoned off" fortunes using Photovolt and SolarFive Ltd among other companies.

The *Eye* wondered how this would look to Merton's warden and professor of corporate finance law Jennifer Payne, or indeed to the university's vice-chancellor, Professor Irene Tracey, who had been warden of Merton when the deal was approved, presumably without too much scrutiny. Questions now having been asked, earlier this month Merton made a statement. "Following

further early-stage discussions," it said, "we have decided to continue with our existing approach to sustainability and biodiversity for [the land], rather than including some of our land for consideration in the Botley West Solar Farm Project."

The trust that runs the Blenheim Estate for the benefit of the Spencer-Churchill family (at the top of which sits the Duke of Marlborough), and which is separate to the charitable trust that runs the palace, is nevertheless ploughing ahead. But then there is serious money at stake and the Vanbrugh Unit Trust could use some of it.

Latest accounts for the company that finances the various property construction and other companies owned by the trust show that bank loans have risen by £38m to £164m, costing £13.7m in interest, while £12m is owed to the palace charitable trust. Small wonder the trust, chaired by Richard Jessel, is incentivising the directors of its management company Vanbrugh Management Ltd to transform the finances.

Under options agreed in 2018, chief executive Dominic Hare and chief operating officer Roger File each stand to pocket up to £2.5m if targets for financial returns and asset growth are hit by 2026 – which is the kind of dosh that could make it worth not looking too closely at where the money's coming from.

Meanwhile energy regulator Ofgem, which gave SolarFive a licence before the financial revelations, has taken no action despite receiving a complaint. Its dire record on approving electricity supply companies over the years could yet be beaten for complacency by its approach to a new generation of producers.

Shady solar

RUSSIAN court documents seen by the *Eye* show the ongoing links with Russia of the woman behind what is planned to be the largest solar farm in Europe, and pose serious questions over the scheme's compatibility with post-Ukraine invasion sanctions.

The Botley West solar farm, covering 3,500 acres of land near the Blenheim estate in Oxfordshire owned almost entirely by trusts of the Spencer-Churchill family (headed by the Duke of Marlborough), is to be constructed by a company called SolarFive Ltd. This was set up in 2020 by the Cyprus investment vehicle of one Yulia Lezhen and is now co-owned by her and Peter Gerstmann, the Henley-residing boss of German solar company Photovolt Development Partners.

As revealed in *Eye* 1597, Ms Lezhen was the wife of Russian businessman Dmitry Glukhov and was said in a US court filing to be “the nominee owner of Glukhov’s business structures in Cyprus, Netherlands and other countries”. These structures – including SolarFive Ltd itself – were alleged by a company seeking to recover \$58m in debts to have “siphoned off” money borrowed by Glukhov’s company Amazarkan from Russian bank Uralsib to supposedly develop a gold field that never materialised.

Attempts to get the money back continue in Russia, with court papers revealing the extensive wealth of Glukhov until his death in September 2022, upon which his assets were inherited by

Lezhen and his daughter. The property (now frozen) includes four apartments (one said to be an expansive 382 square metres) in Moscow and shares in half a dozen companies, including petrol company TopGaz.

The precise source of the funds being deployed by SolarFive Ltd is unclear. Investments in other solar farms, notably in Japan, have been shunted through a complex financial web, and it is the sale of some of these that Photovolt insists is the source of the money for Botley West. The Cyprus investment company owned by Lezhen has itself, however, introduced €111m by buying one of the project companies from another group company (*Eye* 1599).

Wherever the cash originates, Lezhen’s background looks even more problematic following the latest revelations. Since the Ukraine invasion, sanctions have outlawed joint ventures with “a person connected with Russia” and providing professional services to such a person. This might prove awkward not just for Gerstmann but also for the Oxfordshire-based RPS consulting group that is fronting for SolarFive on planning matters, and perhaps even the Spencer-Churchill trustees themselves.

Oxford University’s Merton College, which had been providing around 5 percent of the land for Botley West, has recently pulled out (*Eye* 1609). On the other hand, Ofgem, the regulator that has already granted a licence for the project, seems uninterested in the provenance of the millions backing the biggest solar scheme on its books.

Sun trap

AS THE consultation ahead of “development consent” for building what would be Europe’s largest solar farm – covering 3,500 acres of mostly green belt Oxfordshire on the Blenheim estate – draws to a close, conclusive evidence emerges to link a deceased Russian businessman who was accused of a bank fraud centred on a fake gold mining project to the money behind the scheme.

Last year, *Eye* 1597 first reported on the backers of the planned 840-megawatt Botley West solar farm, said to be a Russian-Cypriot, Yulia Lezhen, and German Peter Gerstmann of Photovolt Development Partners. Lezhen, who occasionally also went by the name Lejeune, was the wife of Russian Dmitry Glukhov (who died in September 2022) and was said in a US court document to have acted as a nominee owner for him.

The Botley Farm team swiftly responded to the *Eye*’s revelation with a press notice insisting: “Mr Gerstmann and Ms Lejeune are both EU citizens and have been successfully working together on the development of solar projects since 2011.” No mention of Glukhov. The *Eye*’s report was a “smear by association”.

In its attempts to persuade residents of

their bona fides, the Botley backers have listed a number of projects in Europe and Japan they claim to have developed. The second largest is the 183MW farm at Osaki in Japan, which a few years ago Photovolt tried to sell to Thai Solar Energy. Alas, a report from the latter’s advisers made its way online, with some revealing information. It shows that the Japanese plant was owned by a Belize-registered company called Kamisol, which in turn was owned by another offshore company. The report confirms that the beneficial owners behind what looks intended to have been an opaque structure were: “Mr Peter Gerstmann, German nation [*sic*] and Mr Dmitry Glukhov, Russian nation [*sic*].”

It was, a Photovolt spokesman told the *Eye* last year, returns from selling projects including the one at Osaki that were being invested in UK solar projects – so certainly at least one company that had been controlled by Glukhov (although the largest sale was to a Cypriot company controlled by Lezhen herself).

After the *Eye* raised concerns, another participant in the Botley scheme, Oxford’s Merton College, withdrew its land (*Eye* 1609). Local MP Robert Courts (now solicitor-general) has spoken out against the scheme on environmental grounds but hasn’t yet mentioned the Russians. Perhaps it’s time he did.