

## West Oxfordshire District Council

### Botley West Solar Farm Written Representation

#### Executive Summary

- E.1 West Oxfordshire District Council (WODC) welcomes the opportunity to respond to the Botley West Solar Farm proposals.
- E.2 The council supports renewable energy but emphasise the importance of protecting and enhancing the environment and communities in determining proposals for renewable energy generation in the district.
- E.3 WODC supports renewable energy schemes that are proportionate and sympathetic to their location.
- E.4 The council objects to the proposal as currently proposed due to likely significant detrimental impacts on historic, built, and environmental assets.
- E.5 The proposal's scale and intervisibility would fundamentally alter the landscape character of the area. The council considers that the proposed development will result in detrimental impacts on the Oxford Green Belt, historic environment, landscape character ecology and agricultural land.
- E.6 WODC believe that the proposal, as currently framed, is too large and harmful.
- E.7 The council suggests reducing the scale of the project to mitigate harms while still achieving renewable energy benefits.

## Planning and Strategic Housing

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**Your Ref: EN010147**  
**Our Ref:**  
**Date: 04 June 2025**

Dear Sirs,

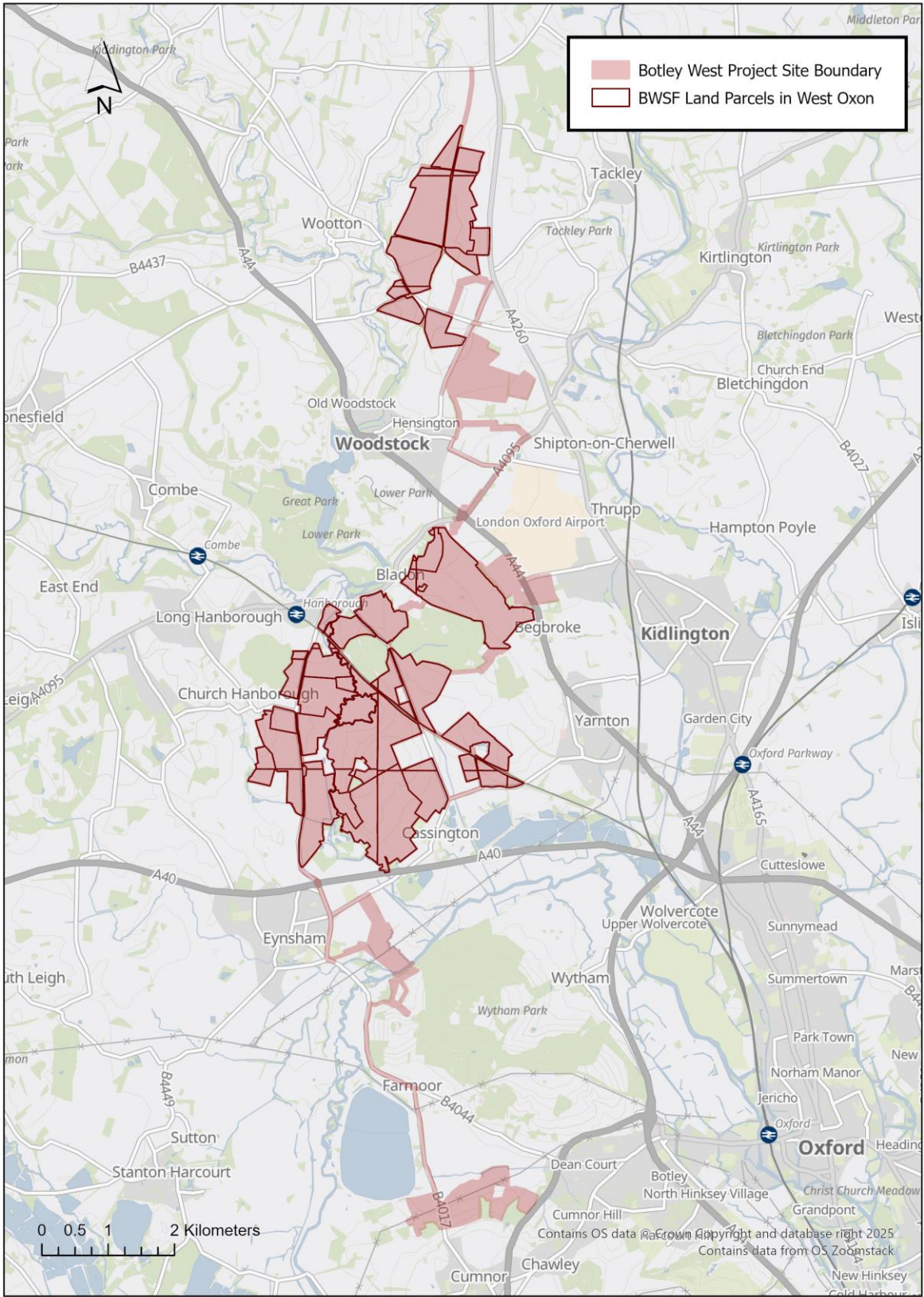
### **RE: WEST OXFORDSHIRE DISTRICT COUNCIL WRITTEN REPRESENTATION TO THE EXAMINING AUTHORITY ON BOTLEY WEST SOLAR FARM PROPOSALS**

1. West Oxfordshire District Council (WODC) welcome the opportunity to respond to the Botley West Solar Farm and to engage in the Examination of the proposed development.
2. We wish to cross refer to the Local Impact Report prepared jointly by the Oxfordshire Host Authorities in support of this representation, as it is through the report that WODC explore the impacts of the proposed scheme and draw our conclusions about the suitability and sustainability of the development.
3. WODC wishes to make clear that it supports the development of appropriate renewable energy schemes in the District in principle and has a good record of support for such infrastructure. In so doing, we have stressed the protection of the environment to ensure that such proposals have thus far retained the high quality landscape, heritage and soil resources of the District. We have supported schemes which are proportionate to the community and sympathetic to their location within the landscape, and we have worked constructively with developers to meet their objectives while minimising the local impact of their schemes. It is with regret that engagement with the applicant on these proposals has not resulted in a scheme design that addresses the many harms that we have sought to highlight throughout the process.
4. The position with Botley West Proposed Development is that the Council recognises and endorses the need for increased renewable energy generation nationally and in the District, but that cannot be to the significant detriment of historic, built and environmental assets and West Oxfordshire's communities, especially where the impacts which in some cases will last beyond the lifespan of the project and could be mitigated to reduce them to more acceptable levels.
5. We consider that the Botley West proposals could, with a more informed, collaborative and consultative approach be made acceptable in planning terms, but owing to the range and magnitude of detrimental impacts likely to arise from these proposals in their current form, WODC objects to the proposals as currently framed.
6. We are of the view that the extent and magnitude of the harms arising from the proposed development have been underplayed by the Applicant, in that they have been characterised as 'temporary' or 'not significant' for a range of impacts. The length of time that the development would be in place, coupled with the ongoing impacts post development (e.g. of the screen

planting and ability to fully decommission elements of the scheme) are such that the Council questions aspects of the project assessment methodology.

7. The proposals, as a result of their scale and intervisibility, would fundamentally alter the landscape character over a significant area. The landscape is currently recognised as being of particular quality and sensitivity to change, and the visual impact of extensive screening measures will last well beyond the lifetime of the project.
8. The Council have consistently identified areas of the proposed development that should be removed from the project, particularly areas proposed for panel coverage, in order to reduce harms to landscape, heritage and soil resources. The Council have prepared a series of maps to more clearly identify the parts of the proposed development where the harmful impacts are likely to be most significant and to communicate these to the Examining Authority. It should be noted however that with a more detailed and informed analysis, some parts of the plots identified as unsuitable may be capable of more limited development than currently proposed and conversely some parts of the plots identified as suitable may need to be reduced in scale.
9. Map I indicates the extent of the project area with land parcels proposed for development in West Oxfordshire outlined. The land parcels outlined on the map align with the applicant's Land Plans document [APP-007].
10. WODC have considered the significance of impacts likely to arise from the Proposed Development, in relation to a series of impact pathways and for each individual land parcel, to make recommendations for project changes and mitigations, to address the impacts of development.
11. The Council recognises that the scale and location of the proposed development has been dictated by the availability of land and a suitable grid connection. The Applicant has stated that they consider it rational to propose a scheme which delivers the greatest possible decarbonisation and energy security benefit from the available land and available grid connection [PDB-014] and that this is the approach which the Applicant has taken to the location and design of the Project.
12. WODC consider that a more nuanced informed and data-led approach is required and in that regard that the scale of the proposed development should be substantially reduced to address the harmful impacts of the scheme.
13. We consider each impact pathway below in line with the chapters of the Applicant's Environmental Statement and the Host Authorities Local Impact Report.
  - Green Belt
  - Historic Environment
  - Landscape and Visual Impact
  - Ecology and Nature Conservation
  - Hydrology and Flood Risk
  - Noise and Vibration
  - Agricultural Land

**Map I - Project Area and West Oxfordshire Land Parcels**

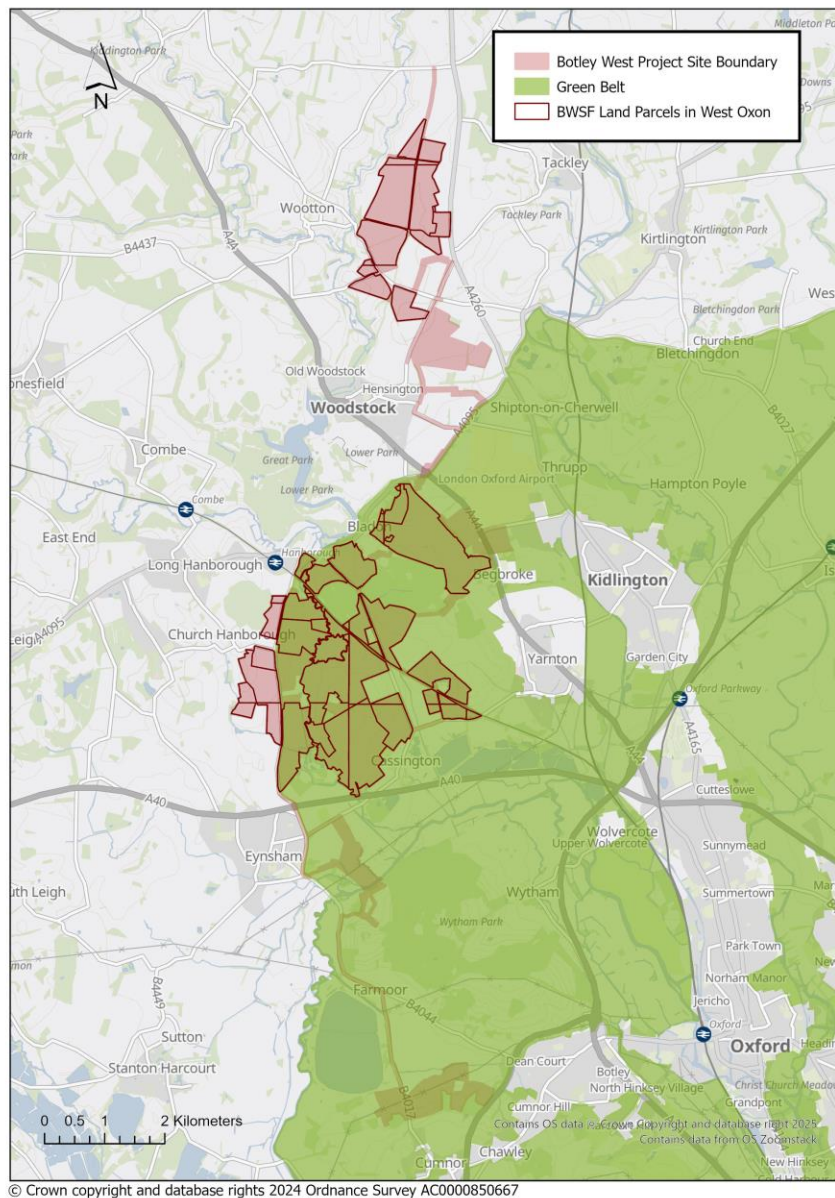




## Green Belt

14. The majority of the proposed development within West Oxfordshire is situated in the Oxford Green Belt. The Council considers that due to the scale of the proposed development and the homogenous nature of the scheme that the proposal represents inappropriate development in the Green Belt, affecting both the visual and spatial openness of the Green Belt.
15. Inappropriate development in the Oxford Green Belt is, by definition, harmful and carries very substantial weight. The duration of the impact of the project will extend well beyond its 40-year life owing to the extensive alterations to the landscape caused by the screening measures proposed.
16. Very Special Circumstances are not sufficient to outweigh the harm.

## Map 2 - Extent of Oxford Green Belt in relation to the Project Area

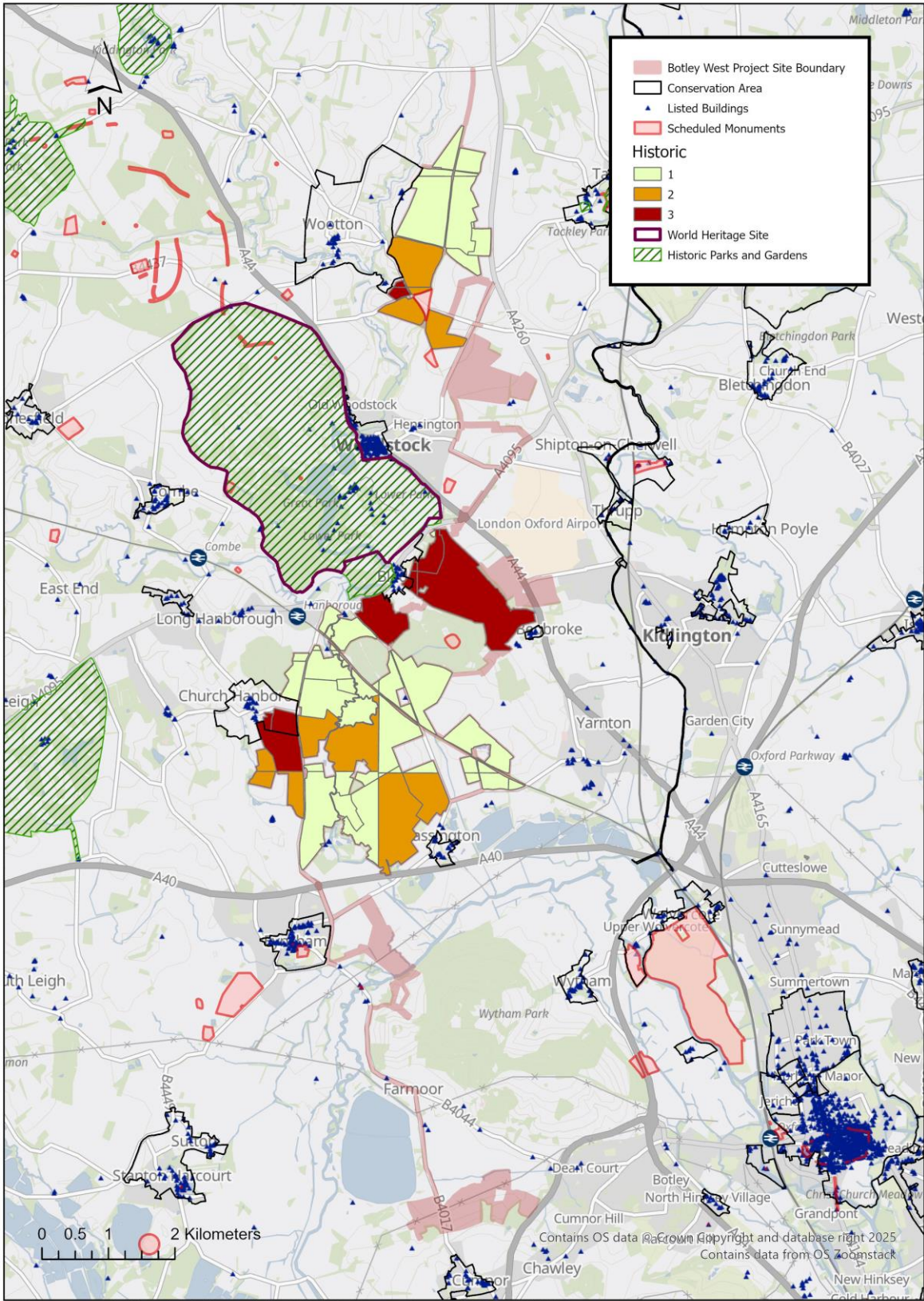


## Historic Environment

17. WODC's concerns relating to the impact on the historic environment primarily relate to changes within the setting of important heritage assets.
18. The Botley West scheme proposals are spread over a large expanse of the Oxfordshire countryside, which contains assets of the highest significance, including international designation of the World Heritage Site (WHS) at Blenheim Palace.
19. As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration needs to be given to the impact of large-scale solar farms which depending on their scale, design and prominence, have the potential to cause substantial harm to the setting of heritage assets. Paragraph 112 of the *Operational Guidelines for the Implementation of the World Heritage Convention 2015* points out that the broader setting of a WHS must be conserved to provide support to the Outstanding Universal Value of the Site: 'An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s) as well as the broader setting. The broader setting may relate to the property's topography, natural and built environment and other elements such as infrastructure, land use patterns, spatial organisation and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the broader setting is related to its role in supporting the Outstanding Universal Value'.
20. In that regard WODC have considered which land parcels contribute most to the setting and significance of heritage assets, with particular regard to Blenheim Palace World Heritage Site, the Grade I Listed Buildings at Cassington and Church Hanborough and Conservations Areas at Wootton, Bladon, Church Hanborough and Cassington. The wider setting of these heritage assets include the topography, natural and built environment, land use and visual relationships, social and cultural practices. Such elements define the landscape character of the District and the Council consider that fundamental changes to the landscape character will therefore harm heritage assets of the highest significance.
21. Map 3 below indicates the land parcels that we consider contribute most significantly to the setting of heritage assets. Red parcels (Score 3) are those within or directly adjacent to a heritage asset, where development would have a direct impact on the setting of an asset. Orange parcels (Score 2) are those where the setting of a significant asset can be viewed from the surrounding countryside and where development would impact the landscape setting of an asset. Green Parcels (Score 1) form part of the wider countryside setting of heritage assets, but the topography of the countryside in these locations reduces the contribution that these parcels make to the setting of the assets.



Map 3 - Significance of Heritage Impacts in West Oxfordshire

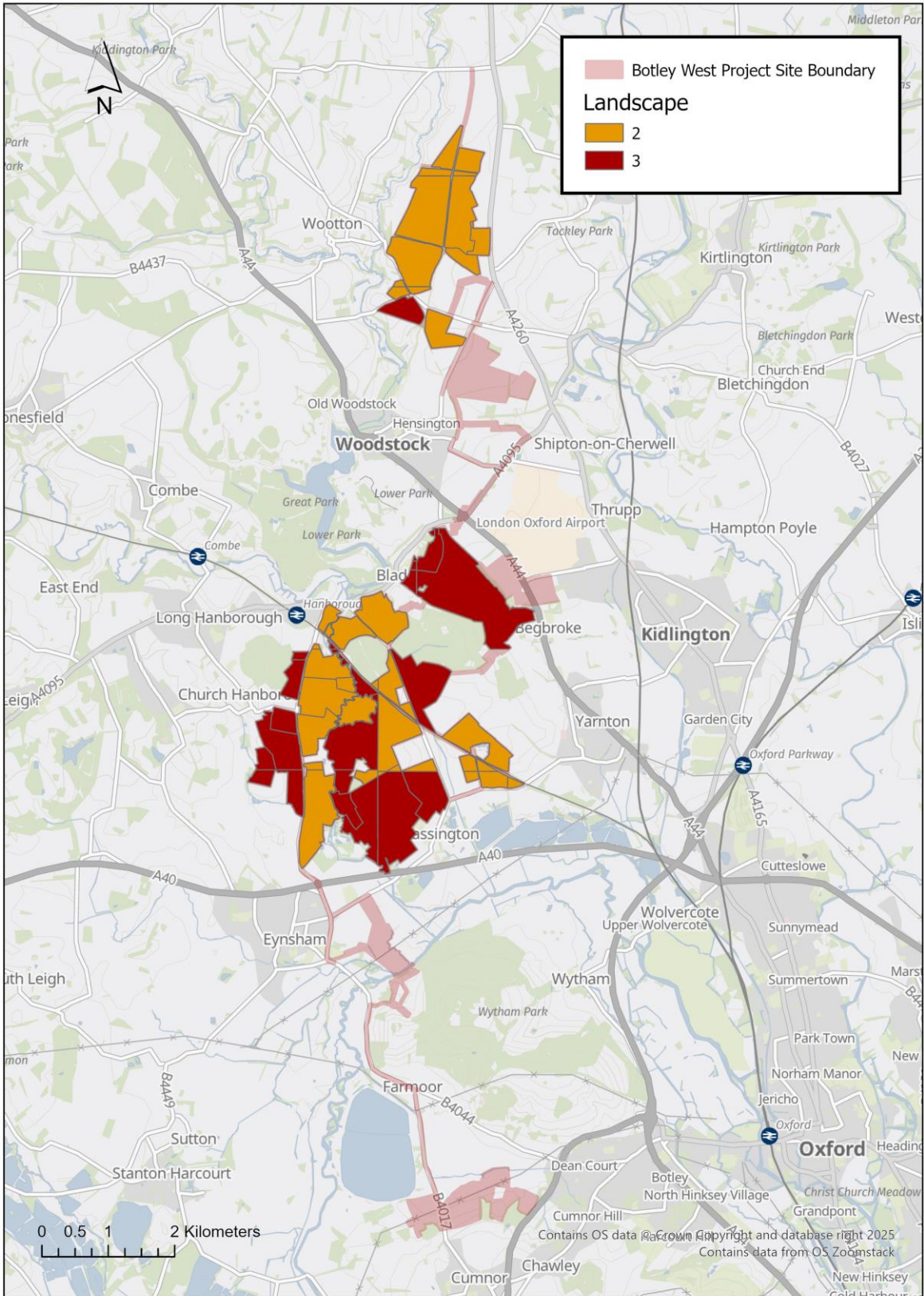


## **Landscape and Visual Impact**

22. WODC consider that a proposed development at this scale will fundamentally change the landscape character of the area from rural, arable fields to a semi-industrial landscape for the lifetime of the project. The screen planting proposed to screen the solar farm will impact on the character of the area well beyond the lifetime of the project. A landscape plan aimed at hiding the panels does not equate to mitigation and the legacy beyond the lifetime of the project is a major missed opportunity to secure landscape scale improvements. The Council consider that the Applicant's assessment of landscape impacts significantly underestimates the impact on local landscape character and views.
23. WODC seek to conserve and enhance the quality, character and distinctiveness of West Oxfordshire's natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity. Enhancements to such features require mechanisms to ensure regular and ongoing maintenance, including beyond the lifespan of the project.
24. We provide a detailed description of how and where we consider the impacts on the landscape to be understated in the Local Impact Report and the concerns we have with the Applicant's methodology for assessing impacts.
25. Our Written Representation seeks to draw the Examining Authority's attention to those areas of the proposed development where the landscape impact is most significant, and where removal of development from land parcels would reduce the landscape impacts of the proposed scheme.
26. Areas indicated in red on Map 4 (Score 3) indicate areas of exposed, elevated and sloping land where the proposed development will be more prominent in the landscape. The council requests that these areas land parcels should be excluded from development to minimise harm to the landscape character of the area. Other areas, indicated in orange on Map 4 (Score 2) show where the landscape impact will be less than severe, but the cumulative impact will nonetheless reduce the attractiveness of the area for outdoor recreation and tourism.
27. In addition to the impacts of the proposal on the landscape character of the area, the proposed development will result in significant visual impacts on sensitive receptors, primarily users of the public rights of way network (PRoW) across the project area. The development will, by its scale and nature, adversely affect the experience of PRoW users travelling through the area. In many locations, PRoW users will either travel between large areas of solar infrastructure or walk through corridors of hedgerows or tree belts with no, or very limited, views of the surrounding landscape.
28. The Applicant has proposed a range of mitigation measures including planting of hedgerows to screen views of the solar farm from the wider countryside. The Council consider that the removal of panels from land parcels adjacent to public rights of way will be much more beneficial in reducing the visual impacts of the proposed development and protecting views of the wider countryside.
29. The Council consider that in its current form, the proposed development would significantly detrimentally impact the public rights of way network across the project area both in terms of landscape and visual harm and the degradation of routes for the benefit of the local community.



Map 4 - Significance of Landscape Impacts in West Oxfordshire



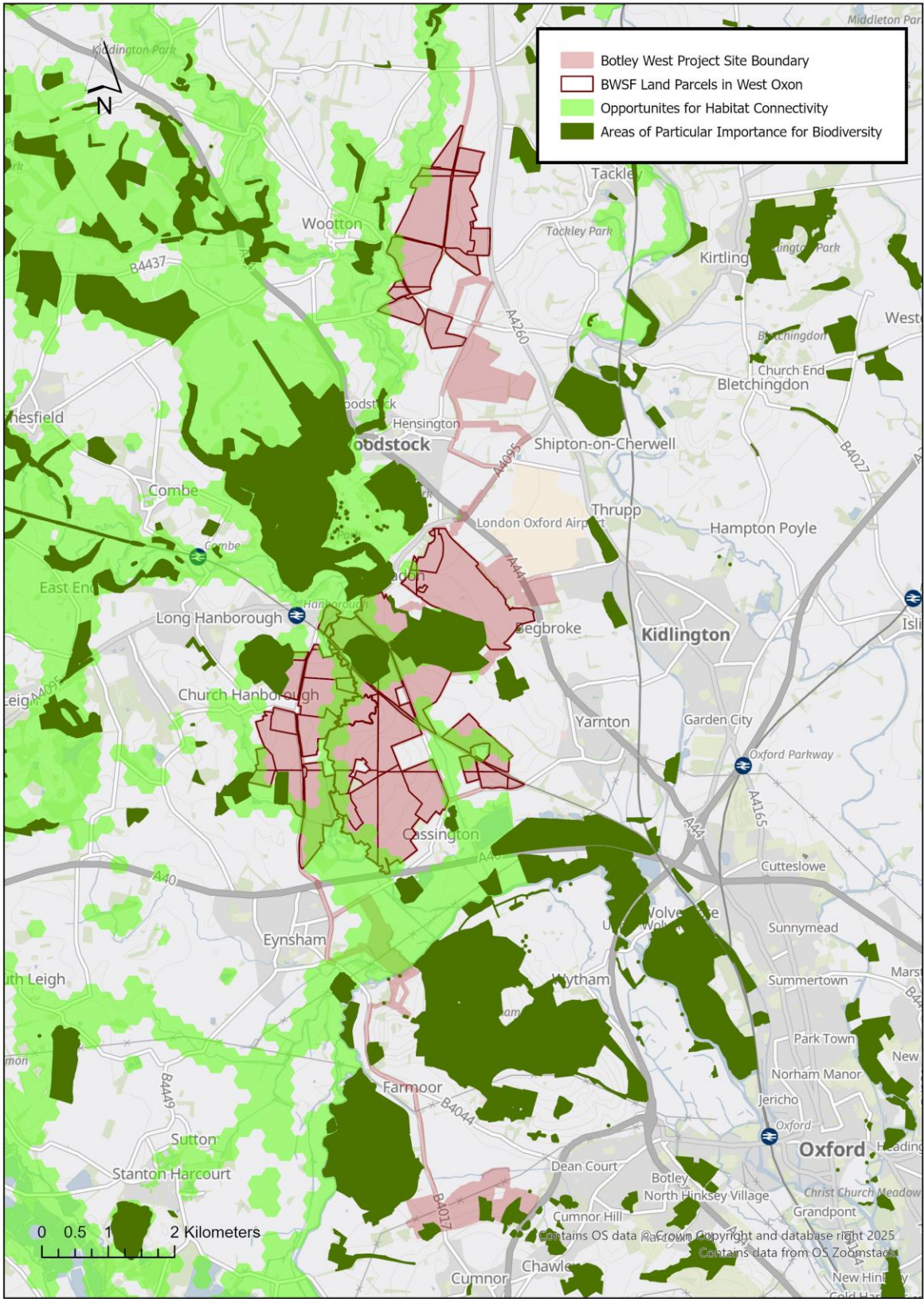
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## Ecology and nature conservation

30. WODC's assessment of ecological impacts arising from the proposed development is detailed in the Local Impact Report.
31. The LIR identifies a range of predominantly negative impacts to protected habitats and species across the project area which will likely require further mitigation, enhancement or changes to the project, in order to avoid or minimise harms.
32. These include impacts on bat populations, aquatic mammals and great crested newts, for which inadequate survey work has been undertaken by the Applicant and impacts on farmland birds and Ancient Woodlands, for which inadequate mitigation of impacts is currently provided. We also have a more general concern about the fenced enclosures limiting the ability of all land-based wildlife to roam and migrate.
33. WODC consider that the project should be modified to deliver further enhancement to trees and woodlands which would deliver additional benefits for protected species to offset harms generated elsewhere. There are several Ancient Woodlands within and adjacent to the site. Ancient Woodlands are irreplaceable habitats and any deterioration of these habitats must be for wholly exceptional reasons and unavoidable.
34. WODC consider that a minimum 50m buffer adjacent to Ancient Woodlands would reduce the impact of edge effects of the proposed development and contribute to the protection of Annex II bat species associated with woodland (maternity roosts for both Bechstein's and Barbastelle bats). Ideally however, opportunities should be sought to connect areas of woodland and contribute to the aims of the emerging Local Nature Recovery Strategy (see Map 5).
35. More appropriate mitigation for the impact on farmland birds needs to be provided within the project, as the proposed provision of skylark plots is inadequate and will likely result in the displacement of farmland birds to the periphery of the development or more open areas within the project. There may be opportunities to manage areas of archaeological interest for the benefit of farmland birds if such areas are to be excluded from development.
36. Red areas on Map 6 (Score 3) indicate areas of the proposed development that must be removed to mitigate the impacts on important ecological features and to improve ecological connectivity through the landscape. Orange areas (Score 2) indicate where enhanced mitigation is likely to be required to mitigate impacts on protected species, particularly farmland birds.



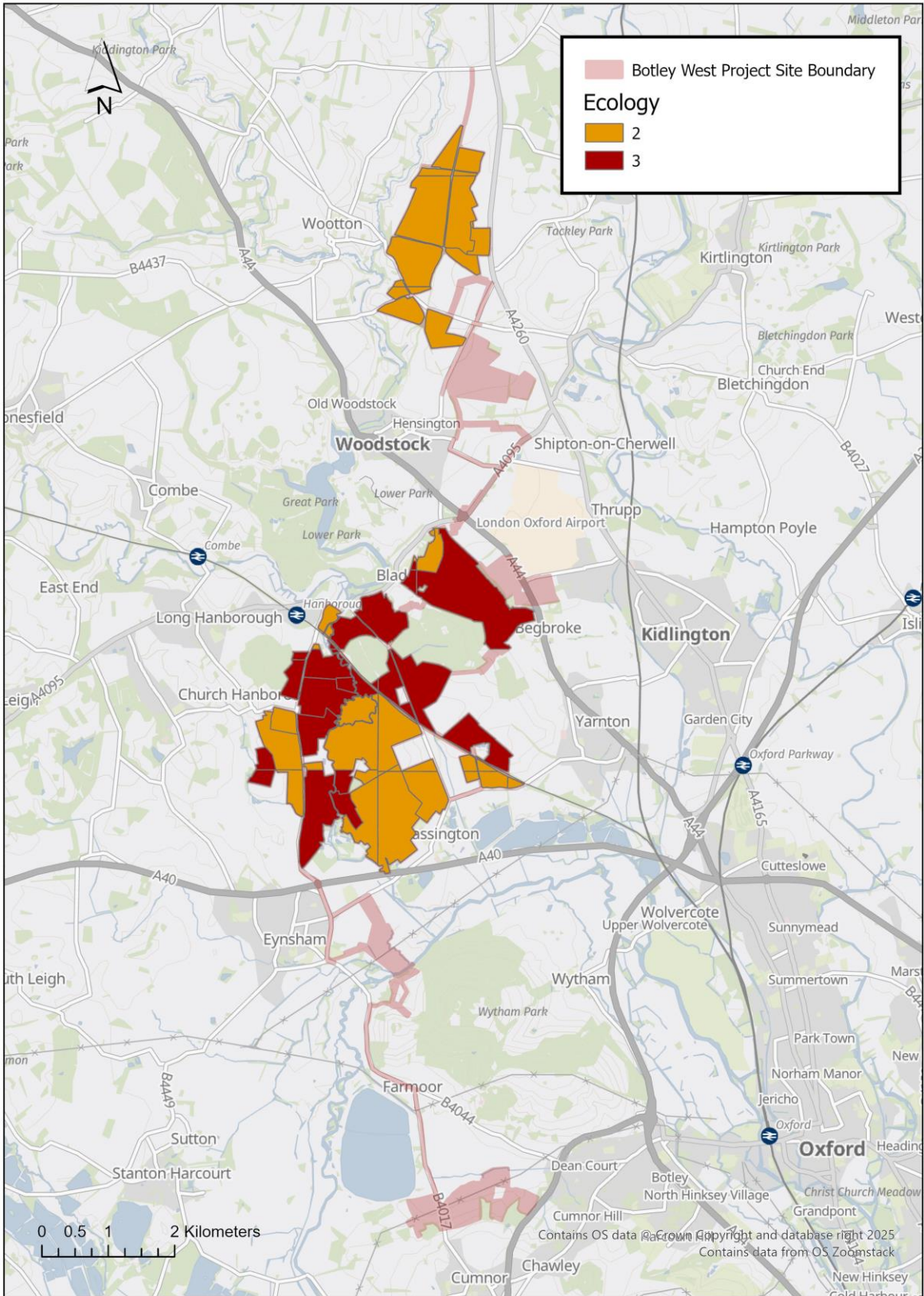
**Map 5 – Areas of significance for Local Nature Recovery Strategy**



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Map 6 – Significance of Ecological Impacts in West Oxfordshire



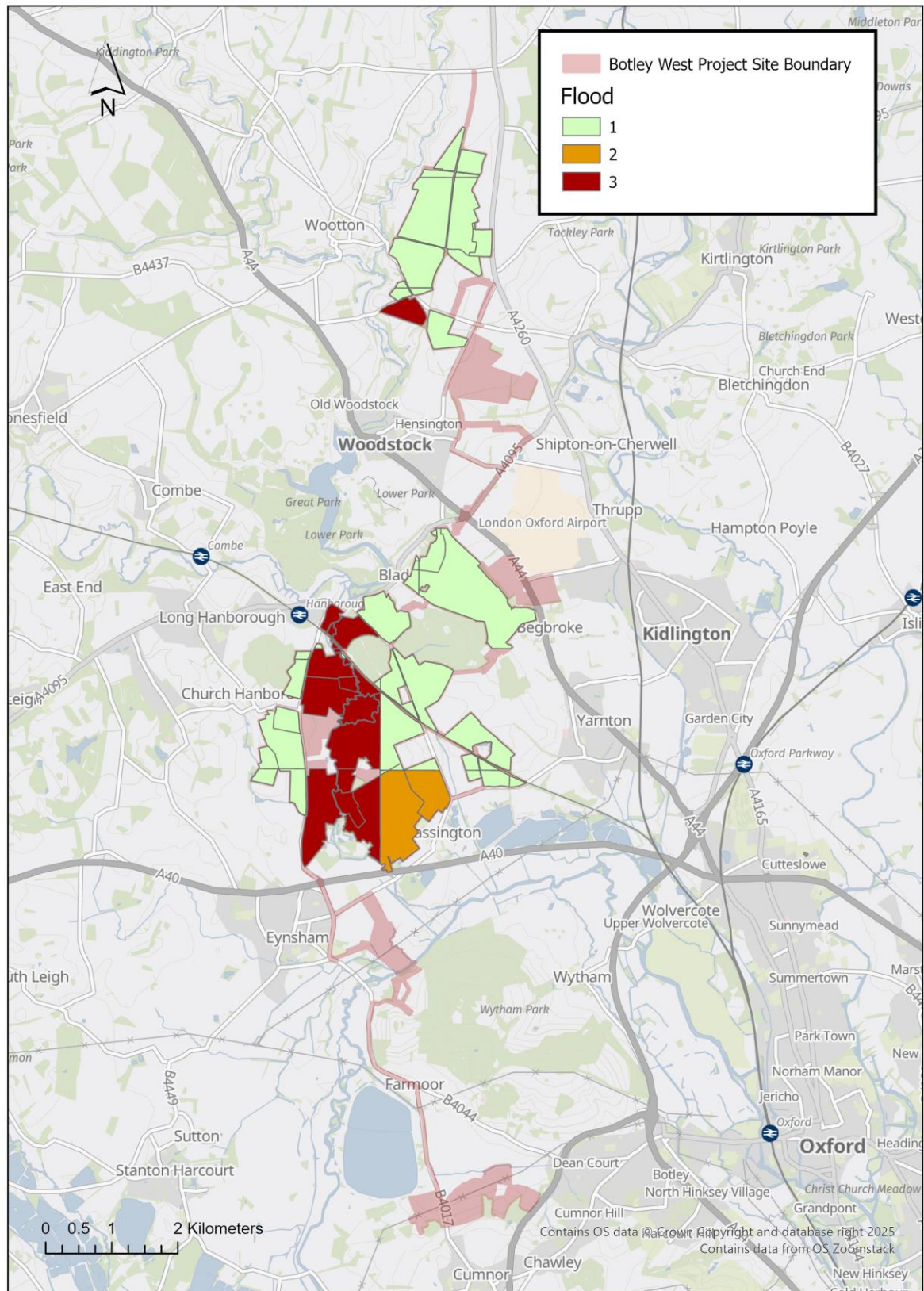
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## Hydrology and Flood Risk

37. WODC recognise that the proposed development has been restricted in areas at risk of fluvial flooding, but have previously highlighted concerns about surface water drainage to the north of Cassington [RR-1102].
38. The village of Cassington is at particular risk of impacts of surface water flooding having experienced property flooding (at Bell Close and Elms Road) on a number of occasions in recent years. The existing issue of surface water drainage is recognised in evidence prepared by the Applicant and this will require careful consideration through project design, to reduce and not increase the flooding risks to people and property in proximity to the scheme.
39. The development proposals indicate the introduction of buffer strips, bunds, ponds and ditch widening to the north of Cassington, designed and positioned to mitigate the surface water impacts of the proposal and provide betterment compared to the existing baseline position. However further work on the modelling of proposals needs to be undertaken, to confirm the effectiveness of these measures to mitigate flood risk.
40. The proposed development relies on the construction and operational management of the land to effectively drain the site for surface water flows. Where this is not secured, flood risk could be increased due to increased rates of runoff. The surface water drainage proposals that included in the application require significant information and calculation to confirm their acceptability. The Council requires information on how the land management, particularly during the operation will address any issues around sheeting off the solar panels to reduce bare ground and channelling of water in any specific way. The inspection and maintenance regime is key to mitigating any potential effects and must be included in any operational plans.
41. Red areas on Map 6 (Score 3) indicate land parcels that include areas of flood zone 2 which in most cases are already excluded from development. Orange areas (Score 2) are areas recognised as being at risk of surface water flooding, where development may create additional risk to existing properties. Green Areas (Score 1) are areas at less risk of flooding.

### Map 7 – Significance of Flood risk and Hydrology impacts in West Oxfordshire



## Noise and Vibration

42. WODC have previously highlighted concerns regarding the noise impacts of the proposal during the operational phase of the development, particularly noise impacts of the Power Converter Stations and Sub Stations.
43. The Applicant has assessed the impacts on noise sensitive receptors in proximity to the proposed development (primarily residential properties neighbouring the site) but it is not clear that the assessment extends to users of the public rights of way network and associated impacts on the tranquillity of the countryside.
44. The modelled noise emissions levels for Power Converter Station (PCS) units are up to 92 dB(A) (**APP-213**). There are 156 such units proposed across the project area. The applicant's baseline assessment of background noise, from both short term and long term monitoring positions indicates sound levels well below this with maximum daytime noise level of 69 dB at LT6, adjacent to Lower Road within the Central Site. The background noise at this monitoring position is dominated by road traffic.
45. The Applicant's solar design parameters have previously indicated a noise impact of 67 dB at 10m distance from each PCS. A rough calculation, based on the development of 156 PCS units across the site equates to an area of 5ha, where the noise impacts would exceed the monitored baseline position adjacent to a main highway.
46. The Council consider that noise impacts of the project will have a significant detrimental impact on the environmental quality and amenity of the countryside, particularly in proximity to public rights of way, contrary to Local Policy.

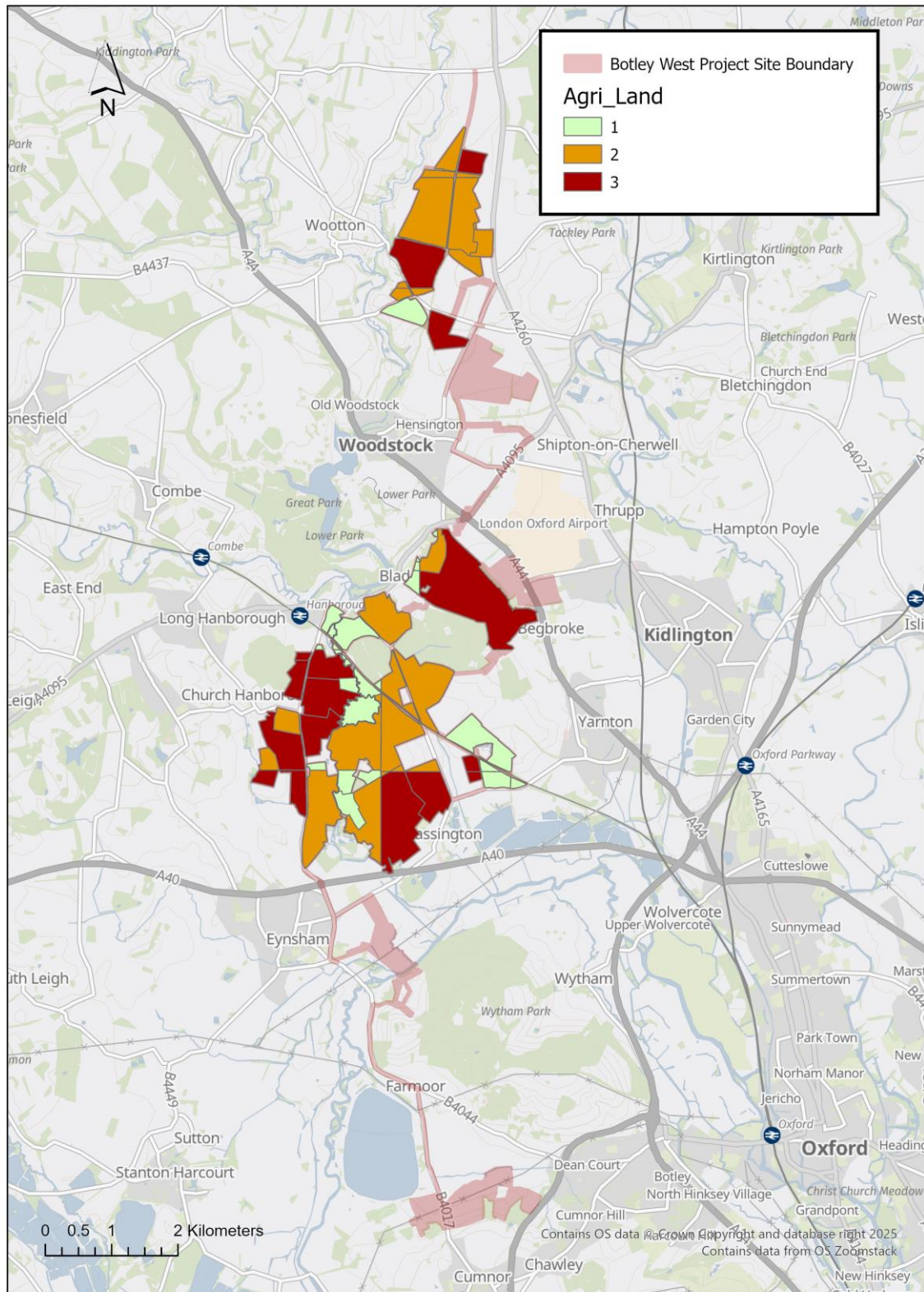
## Agricultural Land

47. Significant areas of best and most versatile (BMV) agricultural land would be taken up by panel development and permanently lost in the case of the grid connection substation.
48. National Policy Statements state that solar development should avoid "the use of Best and Most Versatile agricultural land where possible". It goes on to define BMV land as those in Grades 1, 2 and 3a of the Agricultural Land Classification.
49. For developments in West Oxfordshire, the Council require that all development proposals are required to show consideration of efficient and prudent use of natural resources, including minimising their use on the soil resource. Any proposals for a solar farm involving BMV agricultural land would need to be justified by the most compelling evidence which demonstrates why poorer quality land has not been used in preference to best and most versatile agricultural land.
50. The applicant's mapping of BMV Agricultural Land included in their Agricultural Land Classification and Soil Survey Report [APP-223] indicates significant coverage of BMV across the project area. Approximately 40% of the land proposed for solar PV would be sited BMV agricultural land. With more careful selection of sites such extensive loss could have been avoided.
51. WODC request that areas of BMV agricultural land should be removed from the project in order to protect the soil resource and to avoid any long term issues that may impact the quality of the soil resource such as inadequate decommissioning and remediation at the end of the project.



52. Map 7 shows land parcels with high concentrations and coverage of best and most versatile agricultural land shaded red (Score 3). Parcels with low coverage or no indication of best and most versatile agricultural and are shaded green (Score 1).

**Map 8 – Significance of Agricultural Land impacts in West Oxfordshire**





## Other matters

53. The mapping and commentary above primarily relate to the spatial impacts of the proposed development, identifying where West Oxfordshire District Council consider the proposed development should be reduced to minimise harmful impacts on the environment, resources and communities.
54. It is these spatial impacts in particular that are critical to the Council's view about the suitability and sustainability of the proposed development. However, other non-spatial impacts have also been assessed through the Local Impact Report, including impacts on waste, traffic and transport, socio-economics and climate change. Whilst not capable of being mapped, the more widespread general impacts on the local community including those from lost tourism and harms to mental well-being, add weight to our view that, as presently framed, the scheme is too big for its location. Nonetheless, we believe that if reduced in scale the harms could be lessened to a level where they could be accepted while still achieving the benefits of significant solar power generation.

## Conclusion

55. There has been no meaningful engagement by the Applicant to seek to address issues as they have arisen and the Council regrets this as it entered this process as a willing participant seeking to secure an acceptable scheme. Rather it is the case that the proposed mitigation of impacts on sensitive receptors is inadequate with minimal buffers to Ancient Woodland, inadequate habitat compensation for ground nesting birds and incomplete survey work for bats of national importance alongside inadequate stand offs against heritage assets thus depriving them of their setting and importance. Other key national policy directives, such as retaining the Green Belt free of inappropriate urbanising development and ensuring that the best and most versatile agricultural land is not sterilised have been set aside.
56. The Council would have liked to be supportive, but the scheme as proposed will result in major harm lasting for a generation and beyond. Furthermore, it is a lost opportunity to demonstrate how necessary infrastructure, such as strategic renewable energy generation, could be sensitively and appropriately inserted into a historic and attractive landscape and leave a legacy beyond the lifetime of the plan, to the benefit of the landscape, heritage assets, nature and the receiving population.
57. In totality the cumulative impact of such a major development in its current form, would be detrimental to many of the special and protected characteristics that make West Oxfordshire such a special place to live in. In the light of this assessment, WODC has undertaken mapping of the proposed scheme to identify where cumulative impacts, against a range of receptors and topics overlap and where it is considered that the scheme should be decreased in scale through the removal of panels.
58. In order to arrive at a development proposal that would address the harmful impacts of the project, WODC have identified a number of parcels that could potentially accommodate some development. (See Map 9) The scale of the project would undoubtedly be dramatically reduced but would likely still pass the threshold for a Nationally Significant Infrastructure Project with capacity to generate significant amounts of energy.
59. There may be other parcels that could accommodate some development beyond those identified by the Council, but development proposals must be guided by the characteristics of the West Oxfordshire environment and seek to conserve and enhance the quality, character and distinctiveness of West Oxfordshire's natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity.

60. West Oxfordshire District Council would hope that the Secretary of State, when determining the application for development consent, would consider this representation as “both important and relevant” for the purposes of section 104(2)(d) of the Planning Act 2008.

**Map 9 - West Oxfordshire revised Development Parcels**

