

Planning and Strategic Housing

Reply to: Andrew Thomson

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By Email:

BotleyWestSolar@planninginspectorate.gov.uk

Your Ref: EN010147

Our Ref: 20055291

Date: 04 June 2025

Dear Sirs,

**RE: RESPONSE TO ACTION POINT 18 OF ISSUE SPECIFIC HEARING 1 (ISH1)
[EV5-010]**

1. West Oxfordshire District Council along with Oxfordshire County Council have been asked to submit a written response to action point 18 of ISH1.
2. *'West Oxfordshire District Council and Oxfordshire County Council to provide a written response in respect of their concerns regarding the 'downplaying' of effects' significance in respect of landscape, heritage and other relevant chapters.'*
3. West Oxfordshire District Council raised the issue of downplaying the significance of landscape impacts and associated impacts on heritage assets at Issue Specific Hearing 1, for agenda item 3g, Landscape and Visual Matters and referred to the 'downplaying' of impacts in relation to heritage assets in its Relevant Representation. [RR=1102]
4. The council appreciate that the ExA would benefit from greater clarity as to what is meant by such statements.
5. WODC have consistently referred to the downplaying of impacts, particularly in regard to landscape and heritage impacts throughout engagement with the Botley West DCO.
6. At pre-application stage, WODC highlighted that there were omissions from the applicant's assessment of landscape quality that it felt led to a misunderstanding of landscape quality for the project area, particularly in terms of cultural heritage. A number of studies were listed which it felt would help develop a better understanding of the landscape quality including Conservation Area Character Appraisals and the Blenheim Palace World Heritage Site Management Plan (Appendix 3, Setting Study), which it felt would be helpful in further refining the development proposals as they were presented for consultation at the time.
7. At PEIR stage, the applicant explained that the effects on designated heritage assets would be 'not significant' and that impacts on landscape and visual resources would be limited. The Council's Relevant Representation [RR=1102] stated that WODC do not agree with the with the conclusions of the applicant's Environmental Statement and consider that the applicant has played down the likely significance of impacts arising from the proposed development.
8. This was with regard to the applicant's assessment of effects in relation to the historic environment which concluded that no significant effects in respect of any aspect of the historic environment have been identified within the Environmental Statement.

9. The Council's understanding of the landscape quality and role that it plays in defining the significance of a heritage assets within the local area led the council to draw such conclusions with regard to downplaying of impacts.
10. In order to support the council's assertions and own view as to whether the applicant's assessments have been downplayed or underestimated, we commissioned specialist consultancy advice to review the applicant's submission documents with a particular focus on the Environmental Statement Chapters 7 (Historic Environment) [APP-044] and 8 (landscape and Visual Assessment) [PDB-006]
11. WODC wish to refer the ExA to the Local Impact Report submitted alongside this written response at Deadline 1 where the Host Authorities (HAs) expand on their concerns around the assessment of the significance of the impacts on the landscape and heritage assets.
12. In summary, the OHAs maintain that the approach and methodology used in the Landscape and Visual Impact Assessment (LVIA) [PDB-006] underplays the impact of the development on local landscape character and views; the LVIA assesses the development as not causing significant effects on the landscape character, and with regard to visual effects no significant effects are anticipated by year 15. The OHAs consider the proposed development would result in significant effects to both Landscape Character and Views.
13. With regard to the historic environment, the approach applied to assessment has resulted in likely systemic underestimation of both the importance of assets currently ascribed 'medium' value and sensitivity. This has potentially resulted in similarly systemic under-estimation of effects. The assessment of effects to historic landscapes, is largely divorced from consideration of the rest of the historic environment. This is particularly apparent with regard to the open agricultural landscapes that form the setting of the Blenheim Palace World Heritage Site and Registered Park and Garden. This agricultural landscape provides important context for the designed landscape, was part of the source of the wealth of successive Dukes that contributed to the development of the landscape park, and is indivisible from its significance – including through its contribution to the settings of these assets. On the face of it, 'minor adverse' impacts to the historic landscape would not appear to do justice to the extent or totality of change within areas of historic character.
14. Mitigation measures are provided without a clear explanation of assets' significance, magnitude of impact and effects deriving from the proposed development. Therefore, the effectiveness of the mitigation is not fully understandable.
15. Landscape mitigation, where proposed adjacent to historic environment receptors – particularly conservation areas – appear to have the potential to generate adverse effects in their own right. This is neither acknowledged nor assessed in the chapter. Year 15 visualisations illustrate this for a number of viewpoints. Additional mitigation with regard to setting change – such as screening planting – is rarely effective in reducing levels of effect.
16. WODC recognise that the Botley West Solar Farm should be considered on its own merits. We are mindful of the applicant's comments with regard the proportionality of their Landscape and Visual Impact Assessment as expressed at ISH1. We consider that the ExA should have regard to the LVIA of other similar NSIP solar farm proposals however, in making a judgement as to whether the assessment of significance (Major or above) for this proposed development is justified.

Yours sincerely,

Andrew Thomson
Planning Policy Manager – West Oxfordshire District Council