

Botley West Solar Farm Ref: EN010147 -

Deadline 2: June 27th 2025 – Subsequent to Questions (ExQ1)

For the attention of the Planning Inspectorate. Our reference number: RR 0413

Revision of Submission Reference Number: 36569

This document revises the written submission reference number 36569 so that it is now consistent with the requested resubmission of drawings showing recommended omissions, using the Illustrative Masterplan dated 31.01.2025 (10 pages). This up-to-date Illustrative Masterplan has been kindly supplied by the Applicant to enable a response to Q.1.6.10.

SUMMARY:

Should the Secretary of State be minded to grant planning consent to Botley West Solar Farm, ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee recommends omission of those areas which would be especially oppressive to local villages or particularly harmful to this attractive landscape. Solar arrays should be kept apart from all villages by a significant landscape breathing space and never be closer than a 3 minute leisurely walk (200m) from houses on the edges of villages - Shipton Slade, Bladon, Begbroke, Cassington, Church Hanborough. A planning condition is needed to enforce a desirable landscape treatment and its long-term management round the edge of each solar farm area, beside affected public footpaths and to protect the roots of mature trees. The spatial framework of the new Salt Cross Village should be respected by excluding from consideration for solar farm development all the fields north-east of the village across which "panoramic views" are proposed. The Applicant's proposals appear to have ignored topography. The conspicuous steep slopes near Hordley and Sansoms Farms (Northern Area), beside the B4027 and numerous public footpaths including the Oxfordshire Way (*Akeman Street*), should not be covered with solar panels. There should be no solar panels on any of the escarpment on the east side of the Evenlode Valley. No solar arrays should be placed on the sloping sides of the ridge to the south of Church Hanborough village, crowned by a *soaring limestone steeple ... seen across fields*. The Southern Site, largely a highly visible north facing slope, is a totally unsuitable place for a solar farm and should be omitted from the proposal, except for the necessary substation, carefully sited. To clarify the location of these proposed omissions from the solar farm they are marked up on the 10 sheets of the Illustrative Masterplan dated 31. 01. 2025 (Figures 2.1 A-C, 2.2 A-F, 2.3).

Botley West Solar Farm: Written Representations, absorbing information from earlier submissions, accompanying ICOMOS-UK's Registration as an Interested Party, and representations of June 4th 2025

These comments and depictions of Areas Unsuitable for Solar Panels on the Illustrative Masterplan dated 31.01.2025 are from the Cultural Landscapes and Historic Gardens Committee of ICOMOS-UK.

ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on Cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage

Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites.

The maintenance of the Outstanding Universal Value (OUV) of the UK World Heritage Sites and their settings is a key objective. UNESCO has produced updated guidance for Heritage Impact Assessments (HIAs) for World Heritage Sites (Guidance and Toolkit for Impact Assessments in a World Heritage Context, 2022) and expects this to be followed for all development proposals which may affect World Heritage Sites or their settings.

The Cultural Landscapes and Historic Gardens Committee of ICOMOS-UK comments below on the impact of the proposed solar farm on the OUV of Blenheim Palace and Park WHS and its setting, and, in case the Secretary of State is minded to grant planning consent, has identified areas it recommends be excluded from the solar farm in order to conserve the most valuable qualities of this landscape, noting that the Applicants had not identified an independent landscape consultant advising them about the quality of the landscape before they submitted their application. Following the Preliminary Meeting on May 13th 2025 a meeting to discuss these proposed omissions was suggested to the Applicants, but not taken up.

ICOMOS-UK wishes to register with the Planning Inspectorate as an Interested Party to support these representations during the Examination Phases.

A. Blenheim Palace and Park WHS:

ICOMOS-UK considers that the proposed Botley West Solar Farm would not have a direct impact upon the OUV of Blenheim Palace and Park WHS.

The 1000 ha Park is enclosed by a high wall and continuous tree belt so that there are only two outward views from the Park. A southerly view from the Palace to Bladon Church is terminated by woodland on high ground only a kilometer beyond the southern boundary of the Park. An easterly view from the Column of Victory ends at the nearby houses of Woodstock, a view which also incorporates the view of Woodstock church over the lake beyond the Grand Bridge. The three proposed solar farms to the N-E and south of Blenheim Park are beyond these terminations. Page 45 of Appendix III of the Management Plan also identifies an 'Area of High Scenic Value' outside the south-west of the Park, which would be unaffected by the Solar Farm, though the N-W corner of the central block of the Solar Farm is not far away from the WHS.

B. Preliminary Assessment of Impact on Blenheim's Rural Landscape, surrounding the WHS and part of the historic Blenheim Estate:

ICOMOS-UK also has an interest in sustaining the quality of the rural landscape in the UK, which in this instance contributes to the setting of the WHS. The attractive countryside which would be affected by the three blocks of the proposed Botley West Solar Farm is sensitive to downgrading. The Northern and Central blocks are not far from Blenheim WHS, while the Central and Southern blocks are in the NW of Oxford's Green Belt. While it is understood that it is national policy to provide solar farms as a contribution to counteracting global warming, it is surprising that there appears to be little national policy as to how suitable sites should be selected, so that in the perceptive words of The Gardens Trust: *the choice of energy sites is currently unplanned and opportunistic*.

ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee has asked one of its members, Hal Moggridge OBE VMH PPLI FIHort RIBA AADip, to assess the current proposals, an assessment endorsed by the committee, on the basis of a possible assumption that, in part at least, Botley West Solar Farm might be constructed. The assessment suggests that parts of the current proposals are altogether unacceptable because they impinge too closely upon adjacent villages, including the new Salt Cross village proposal. The proposals also appear to have ignored topography in a landscape with some significant escarpment and steep slopes, though river valleys have been respected. For these reasons

the Committee strongly recommends that the following elements of the submitted proposals are omitted from the project, as cross hatched silver on dull green on the attached plans which are overlays on the Illustrative Masterplan of 31.01.2025.

1. Northern Solar Farm, east of Wootton, north-east of Woodstock: (3 plans)
(4km N-S; greatest width 1.4 km; Tackley Park, a kilometer to the east, is not affected)

The majority of the proposal for the Northern Solar Farm is on arable farmland with gentle slopes in locations which are not very visible from outside locations. Tall boundary hedges and wide vegetation beside the footpaths should substantially obscure most of the solar farm.

An exception to this is near Oxfordshire Way (Akeman Street) around Hordley and Sansoms farms, near the B4027 road and several public footpaths as well as 'Oxfordshire Way'. Here the land is dome shaped and visibly sloping. Therefore, **the south-eastern bays on Illustrative Masterplan Figure 2.1B and northwestern bays on Illustrative Masterplan Figure 2.1C should be omitted [note: it is assumed that the extensive Areas of Archaeological Interest around Sansoms Farm, where solar panels would be equally harmful to the rural landscape, are no longer part of the proposed Solar Farm].**

Shipton Slade hamlet abuts the southeast corner of the North Solar Farm. To reduce the sense of oppression by solar panels upon this hamlet **the whole of the easternmost field and a minimum 200m arc, only 3 minutes gentle walk, to the NW of the hamlet should be omitted and edged by a dense hedge. (Illustrative Masterplan Figure 2.1C – Northern Site Area).**

2. Central Solar Farm, S & SE of Blenheim Park down to Cassington: (6 plans)
(5km N-S; 4km E-W; not all is proposed for development for instance not including meadows along the river Evenlode and historic northern woodlands. A few fields NW of the Sewage Works are also now omitted though shown on the Preliminary Masterplan.)

The Central Solar Farm is in three separate areas, not far apart, which would come to dominate the landscape south of Blenheim Park, and so, if given consent, would need to be arranged to avoid being too obvious by being set away from adjacent villages and important landscape features. This whole area is in Oxford Green Belt.

Illustrative Masterplan – Figure 2.2A (with 2.2B & 2.2C top right) - Bladon & Begbroke:

The proposed northern block of the Central Solar Farm fills most of the 2 km of farmland between Bladon and Begbroke villages, with ancient Bladon Heath Wood to its south and Oxford airport to the N-E beyond the A44. The proposal comes too close to the linear Bladon village, an adjunct of Blenheim Park associated with Winston Churchill. To provide the village with breathing space **arrays on the fields between Bladon village and the village recreation footpath to its east should be omitted, together with an arc east of the southern village extension [Figure 2.2A western side with 2.2B] .**

Arrays are shown imposing upon Begbroke village which opens out westwards beyond the small ancient Begbroke church towards countryside and woodland, and the well-used dual footpaths along the north side of Bladon Heath Wood. To conserve this valuable characteristic of the setting of Begbroke there should be no solar panels within 200m of the north side of Begbroke village, a mere 3 minutes leisurely walk, nor in the two fields to the west of the village, the western of which is ground rising from 'Shakespeare's Way' long distance recreational footpath. There should not be solar panels on the narrow strip of land between the dual footpaths linking Begbroke with Bladon.

Illustrative Masterplan – Figure 2.2E - Cassington:

Much of the 3km long central block alongside the railway, including the slightly detached surroundings of a sewage works (2.2C), and on either side of a minor road, is on a kind of plateau of gently rising ground where solar arrays could be made comparatively inconspicuous from without if surrounded by tall wide dense hedges. This applies also to its detached northern end (Figure 2.2B) which, though a place where a solar farm would have a detrimental

local impact, does not appear to impinge upon the nearby 'high scenic value' land S-W of Blenheim Park and the wooded south of Blenheim Park itself. However, solar arrays are proposed far too close to Cassington village. There should be wide open fields between the NW edge of Cassington village with dense new hedges planted along the solar array boundary. **The fields NW of Cassington village should be excluded from development to provide the village with breathing space.**

Illustrative Masterplan – Figures 2.2 C,D,F – Evenlode Valley Eastern Escarpment:

The eastern edge of the lovely Evenlode valley is a very unsatisfactory part of the Applicants' proposals. It is unacceptable to place solar panels on the steep west facing escarpment along the east side of the Evenlode valley, itself wisely excluded from proposed development. It is as if the topography of the landscape has not been analysed, as if no independent landscape mind has been involved. **There should be no solar panels on any of the escarpment on the east side of the Evenlode Valley.**

Illustrative Masterplan – Figures 2.2 F,D –Church Hanborough & future Salt Cross:

No attention has been paid to the conservation of the important north-easterly views identified on the Salt Cross Garden Village spatial framework as *panoramic views*. Salt Cross is a new village to be built beside the Oxford green belt west of Oxford. To conserve these panoramic views across the Evenlode valley to the escarpment on its north-eastern flank, **all the fields near the north-east of Salt Cross should be excluded from consideration for solar farm development.**

Church Hanborough's soaring limestone steeple can be seen across fields from every point of the compass (England's 1000 Best Churches by Simon Jenkins). To conserve most of these views and the setting of the village, in particular the rural scenery of the valley passing the western side of the village, **no solar arrays should be placed on the sloping sides of the ridge to the south of Church Hanborough village.**

3. Southern Solar Farm, SE of Farmoor Reservoir – Illustrative Masterplan Figure 2.3:
(1.7km E-W; 0.7 km maximum width; substation with access to overhead power line which crosses this site.)

At least half of this proposal is on exposed north facing arable slopes, which would be highly visible, almost certainly also being obvious from Farmoor Reservoir recreation area. All the area is in an important part of Oxford's Green Belt related to Oxford City and University, visible from footpaths above or below, useful to the population of the nearby city, being accessible by bus. **This Southern site is a totally unsuitable place for a solar farm and should be omitted from the proposal.** Care will need to be taken over the siting of and screen planting around the substation connecting to the overhead line.

C. Some Landscape Issues of Concern:

a. The developer is PVDP – Photovolt Development Partners – *"Our team comprises highly qualified engineers and technicians with experience of designing and constructing solar parks worldwide ..."* However, there seems to be an absence of a named independent landscape consultant, to ensure that the interests of local people and this attractive landscape receive proper consideration, though the most recent Illustrative Masterplan does show more landscape sensibility than its predecessors.

b. Adequate space needs to be provided around public footpaths. The land beside the existing wooded east/west footpath across the northern solar farm proposal (Figure 2.1B) is sufficient to substantially seclude the path from adjacent land and to include mature trees; it is 25m wide. Beside the Withy Clump footpath south-east of Bladon (Figure 2.2A), it is 7-10 m from the outside of the adjacent thick hedge to the edge of the wood beside the path. These dimensions suggest that footpaths with solar panels on both sides should, as a standard requirement, run in an unobstructed width of 20-25m between the access tracks outside the fences around solar arrays. Where a path has solar arrays beside one side at least 12m should be left as a buffer beyond the access track alongside solar array fencing. The recent

Illustrative Masterplan suggests that such standards would be accepted; they need to be enforced by planning conditions.

c. The value of nearby houses would undoubtedly be reduced if this solar farm proceeds; compensation for this should be paid.

d. No analysis appears to have been carried out to identify conflicts with obvious locations for future new housing associated with villages, necessary to achieve government policy related to desirable volume of new house building.

e. In solar farms already built in this region heavy vehicles used during installation have tended to result in footpaths and adjacent ground (and presumably also land beneath the solar panels) being compressed and chewed up; this should be avoided by proper landscape specification and supervision.

f. Page 17 of the November 2023 Leaflet states “*a minimum 5m buffer zone for hedgerows, trees, ponds and woodland ...*”; this is far too little to protect the roots of existing trees. British Standard 5837:2012 has recommendations about this which should be followed, which the recent Illustrative Masterplan appears to recognise.

g. Quality of farmland might be an issue. “*In assessing land use and agriculture, we have been conducting a number of Agricultural Land Classification surveys - 62% 3b; 38% 3a +.*” (November 2023 Leaflet p19) but apparently not externally verified.

h. Maintenance of the land beneath the panels and long-term retention of soil quality would be an important issue. This issue should be addressed at an early stage.

i. Dense tall wide hedgerow planting should be a standard treatment along all the edges of the solar panel arrays.

j. Some new footpaths are shown on the Illustrative Masterplan – a useful feature. A new north-south footpath at the bottom of the Evenlode valley east escarpment would be a desirable additional feature.

k. “*At the end of Botley West’s operational life the land will return to its original use, and not become brownfield land ...*” (November 2023 Leaflet p19). This is good policy which needs legally binding documentation. However, to make a significant contribution to countering global warming, any benefits of this electricity generation may not come to an end in the foreseeable future.

In conclusion, ICOMOS-UK asks the Planning Inspectorate to take into account this representation in making recommendations to the Secretary of State regarding a decision on the Botley West Solar Farm proposal.

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