



Community Impact Report

compiled by

Stop Botley West Community Group

28 June 2025

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Note that the following three named pdf files (all dated June 2024) form part of this submission

SBW AOC main report.pdf
SBW consultation survey results.pdf
SBW consultation accessibility by village.pdf

1.0 Executive Summary

- 1.1 This Community Impact Report is presented by Stop Botley West, on behalf of the local community and in response to the joint Local Impact Report from Cherwell, Vale of the White Horse and West Oxfordshire District Councils and Oxfordshire County Council. We welcome their conclusion that the development should not go ahead in its current form.
- 1.2 Local residents were very dissatisfied with the public consultation process. Many felt the Applicant failed to listen to or take seriously their views on the impact the proposed project would have on their communities. In order to help ensure their views are heard, SBW have compiled a community impact report drawing on:
 - 1.2.1 Results of surveys conducted by SBW. The principal one is summarised in The Community Response (p10: 5.1-5.30)
 - 1.2.2 The views of local residents who have contacted SBW
 - 1.2.3 Relevant Representations submitted by local residents to PINS.
- 1.3 We are very pleased to find the views and concerns of local residents are shared by our Local Authorities as detailed in their joint LIR. In this document, we present our community impact findings organised according to relevant sections of the LIR.
- 1.4 The Community accepts the need for more renewable energy in Oxfordshire and across the country, but we have serious concerns about the scale of the proposed BWSF site and its impact upon highly sensitive receptors.
- 1.5 We believe that the proposal to impose the largest solar farm in the UK, with 900 hectares of solar panels upon the high value and sensitive land, contravenes many local planning documents and strategies:
 - 1.5.1 Landscapes of West Oxfordshire, Cherwell District and the Vale of White Horse is contrary to: Numerous local village Neighbourhood Plans
 - 1.5.2 The Cotswold National Landscape Management Plan 2023-2025
 - 1.5.3 The Blenheim Palace World Heritage Site Management Plan, 2017
- 1.6 We further believe that the assessment methodology adopted by the Applicant, and thus the conclusions of that assessment, are systemically flawed, partly as a consequence of the failure to address adequately four key issues raised by a solar farm of this scale and nature in this location:
 - 1.6.1 Inadequate consideration of alternative sites
 - 1.6.2 The unrealistic assessment of landscape sensitivity and the capacity to absorb development
 - 1.6.3 The SCALE of the development proposed
 - 1.6.4 The effects of “within-project” cumulative impacts arising from the repetitive nature of the development proposed. (*Ref: Russell Jonathan Canning RR*)
- 1.7 We share our joint Councils’ concerns in the LIR that there have been only limited attempts to mitigate impacts that were clearly identified at the pre-submission stage by councils, Statutory and non-Statutory Consultees and by local residents.
- 1.8 The purpose of the Community Impact Report is to supplement the Host Authority’s LIR and provide additional information from a residents’ perspective.

2.0 Introduction to Stop Botley West

- 2.1 The Stop Botley West (SBW) campaign (a private company limited by guarantee) is a community group of volunteers dedicated to protecting the heritage, environment and amenities of Oxfordshire from significant and long-term damage caused by the proposed Botley West Utility-Scale Solar Power Station. We will achieve this by stopping or significantly reducing the scale of the Botley West proposal while promoting alternative renewable energy solutions to achieving the decarbonisation of Oxfordshire's economy.
- 2.2 We believe our ambitious climate targets must be achieved sustainably by:
 - 2.2.1 Achieving the right balance between clean energy, nature preservation and food security.
 - 2.2.2 Using the full range of renewable energy solutions including community solar farms and solar on rooftops and brownfield sites as well as energy saving measures for homes, industry and transport.
 - 2.2.3 Promoting the health and wellbeing of all our citizens.
- 2.3 SBW came together at the end of 2022 soon after local residents were first informed about the proposal to construct a 1,400ha solar farm amongst the 15 villages and towns where we live.
- 2.4 The group has over 1,500 active supporters and we represent the views of many of the thousands of people who live close to the proposed site as well as others from further afield who know and love this very special place.
- 2.5 The area proposed for the solar farm is densely populated which means the daily lives of tens of thousands of individual citizens would change dramatically if Botley West Solar Farm were to go ahead as proposed.
- 2.6 The villages of Begbroke, Bladon, Cassington, Church Hanborough, Cumnor, Eynsham, Farmoor, Filchamstead, Long Hanborough, Kidlington, Shipton Slade, Wootton, Worton and Yarnton and the town of Woodstock are all adjacent to or within 500m of the proposed site. Freeland, North Leigh and Tackley all lie within 1.5km. Botley and the City of Oxford lie within 2.5km.
- 2.7 There are 10,800 properties and over 22,000 residents living within 1.5km of the boundaries of the proposed site. About 250 of these properties lie within 100m of the site. With the Applicant offering a standard buffer zone of just 25m, many would have solar panels right beside their homes and gardens.
- 2.8 Schools, businesses, churches, recreation grounds and other community amenities would also be dominated by solar panels. Properties would be at increased risk of flooding because of the vast area of solar panels.
- 2.9 The footpaths regularly used by local residents and visitors for exercise and recreation would also change dramatically. 26km of Public Rights of Way would become corridors between high metal fences and eventually between high hedging.
- 2.10 The area proposed for BWSF is an unusually varied habitat that is home to red-listed birds such as linnet and skylark and recognised as being of international importance for bats. It also contains many veteran and notable trees, well known to local walkers and some under threat due to the proximity of cable trenching.
- 2.11 A drop in tourism would affect not only Blenheim Palace but also many local hospitality businesses including around 450 AirBnB properties.

2.12 All these factors contribute to significant impact on Residential Amenity and the physical, mental and financial well-being of the local community.

2.13 In the absence of a Residential Amenity assessment by the Applicant, we hope that this report will help to inform the Inspectorate about the very real impact that local residents believe BWSF will have, not only on their individual lives, but on the whole wider Community of the area and its 22,000 residents.

3. Timeline of SBW and Community Activities and Engagement.

Timeline of SBW & Community Activities

Date	Event	Comments
Nov 2022	Community first learnt about Botley West Solar Farm (BWSF) mostly by leaflet through the door	
19 - 30 Nov 2022	1st Consultation	attendance numbers not collected.
17 Jan 2023	1st Community Meeting in Bladon	40 attended
23 Feb 2023	2nd Community Meeting. Stop Botley West formed. Mandate given by 50+ residents to set up a Steering Group (SG)	60 attended
Feb 2023	SBW website set up, leafleting started, petition launched, limited survey carried out on awareness of BWSF	5,000 leaflets 1899 signatures 300 survey responses
17 Feb 2023	1st Community Walk around site with Robert Courts, MP for Witney	120 attended
22 Mar 2023	West Oxfordshire District Council (WODC) met to discuss BWSF. SBW representative spoke	150 attended
31 Mar 2023	SBW SG members 1st meeting with West WODC leader Andy Graham (AG) and lead planning officer Andrew Thomson (AT)	
17 May 2023	SBW targeted members with representatives of each village to give advice and support on how to raise awareness in their community, distribute leaflets & posters	25 key supporters attended
April-June 2023	SBW reps spoke at Parish Council meetings around the area to raise awareness, leaflets delivered	9+ PC attended 10,000 leaflets
April- May 2023	Individual village communities set up their own sub-groups, SG members spoke at village meetings public events, leafleting continued	12,000 leaflets
May-July 2023	Placards erected, further flyers distributed, peaceful demonstrations at Blenheim, stalls at village events, articles in Parish magazines	12,000 leaflets 50 placards and banners erected

Date	Event	Comments
May-Sept 2023	SBW Community meetings providing update with Q&A at Bladon & Woodstock, Begbroke & Yarnton, Cassington & Worton, Cumnor, Farmoor & Filchamstead, Eynsham, Hanboroughs and Freeland, Wootton, West Kidlington,	Average 100 attended
Oct 2023	SBW SG rep attended local SBW village group meetings with update and support on upcoming consultations.	6+ meetings attended
26 Oct 2023	Merton College pulled out, removing 200 hectares of their land from the BWSF scheme	
25-27 Nov 2023	Forever Fields (FF), a project independent of SBW, established to showcase the community's creative response to the countryside. FF organised an exhibition where 100 local residents and artists displayed their work including paintings, sculptures, photographs, representing what is valued in the countryside within the BWSF that could be lost.	2000 attended the exhibition
30 Nov 2023 - 8 Feb 2024	2nd (Statutory) Consultation. 9 events held (4 pre-Christmas with low turnout). SBW Posters advertised events, and a mailer sent out to subscribers.	988 attended (251 in Dec, 737 in Jan)
1 Dec 2023	Briefing event for active supporters on conducting survey and manning consultation events	110 attended
30 Nov 2023 - 8 Feb 2024	SBW survey on adequacy of consultation (events, information, communication)	1440 responses
19 Jan 2024	SBW met Applicant PVDP (several SBW questions raised were never answered in full)	
26 Jan 2024	SBW met WODC (AG and AT)	
5 Feb 2024	WODC Development Control Committee met. SBW rep spoke.	130 SBW supporters attended
18 April 2024	SBW supporters joined rally against mega solar at Westminster	
May-July 2024	SBW SG members attended Parish Council meetings to update Council members on BWSF	10 PC meetings attended
14 Aug 2024	SBW 1st meeting with Calum Miller, new MP for Bicester & Woodstock	
10 Oct 2024	Joint event with CPRE highlighting Dornford Lane	
8 Nov 2024	SBW meeting with Calum Miller, MP	
9 Dec 2024	SBW SG members meet WODC (AG and AT)	
18 Jan 2025	Forever Fields Book launch. Book presented to MP Calum Miller & lodged with the District Councils.	500 attended

Date	Event	Comments
Feb 2025	Community Update meetings: Cassington, Cumnor, Hanborough	Average 100 attended
Feb 2025	Data collected on Community activities: adult and children's clubs and local businesses	Adult 195, Child 81, Businesses 273. Total 549
Feb 2025	Community surveys launched on Residential Amenity and use of PRoW	450 responses
24 Feb 2025	WODC Development Control Committee met to agree Relevant Representation. SBW rep spoke.	75 SBW supporters attended
28 Feb 2025	Deadline to register as Interested Party.	1115 registrations
25 April 2025	SBW SG members met Oxfordshire County Council.	
9 May 2025	SBW SG members met WODC planning officer (AT) responsible for LIR.	
13 May 2025	SGW SG member spoke at Open Hearing 1.	
13-15 May 2025	SGW SG members attended hearings. Supporters made statements.	
2 June 2025	WODC Development Control Committee met to agree LIR. SBW rep spoke.	
8 June 2025	SBW organised a walk on PRoW within BWSF site, part of a National walk against utility scale solar on farmland.	75 attended
June 2025	Community Update meetings: Bladon, Cassington, Cumnor.	Average 50 attended

Ongoing Events	Numbers
Website regularly update with news and updates on the stage reached in the process	
Mailers regularly sent out to those registered on website with updates and deadline alerts	Average 1500 mailers sent out approx every 7 days
Community encouraged to write letters to their MPs, District and Parish Councils, newspapers, the Applicant	Many hundreds of letters and emails sent
Articles in most local Parish Magazines and posted on Village Facebook pages	Monthly since early 2023
Press releases and Articles submitted to local and National newspapers.	
Fundraising requests and meetings	£120,000 raised to date.

Ongoing Events	Numbers
Pictures showing a sample of SBW Events and Publications can be found in Appendix E	

Key Concerns expressed by supporters at meetings and through correspondence
Understanding the size of the site
Impact on landscape, visibility of panels over such a wide area, across so many fields
Impact on enjoyment of the countryside, especially use of PRow
Residential Amenity, proximity to houses, buffer zones, glint and glare, storm damage
Amount of high fencing, lighting, CCTV,
Mitigation hedge planting may screen panels but also screen countryside views for ever
Traffic congestion and noise, especially during construction on the many minor, narrow roads through villages
Noise of construction (pile driving) and operation (inverters)
The need to replace the panels and inverters leading to ongoing maintenance, construction and noise and disruption throughout the Project's lifetime.
Effects on wildlife, habitats destroyed, wildlife corridors closed, red listed birds and bats in danger.
Damage to veteran trees and valuable meadows by cable laying and tunnelling.
Location of sub-stations (main and subsidiaries)
Flooding, increased run off - especially Cassington
Viability of proposal, what happens if Applicant cannot complete the construction and the site is abandoned?
Concerns about decommissioning, removal of infrastructure and reinstatement of land.
Limited investigation and safeguards of the archaeology.
Blenheim losing its World Heritage Status and the impact this will have on the local economy.

3.0 The Community Response to the Consultation Process and Engagement

- 3.1. Residents of this area, like most people throughout the country, understand and believe in the need for more renewable energy to be generated in this country.
- 3.2. When people first hear about the Botley West Solar Farm it takes them a while to appreciate its true size but it's the first thing they comment on when they speak about it subsequently.
- 3.3. The Statutory Community Consultation Leaflet opens with "The Botley West Solar Farm (Botley West) could deliver 840 Megawatts (MW) of clean, affordable power" but omits any mention of the size, relying on people to interpret the maps. It takes them a while to realise that the sea of grey patches marked "installation area" represents the 80 fields full of solar panels. Overall, residents found the application materials extremely difficult to engage with and comprehend, due to the basic quality of the proposed drawings, the substantial amendments required as a result of the Schemes "rushed" nature and the confusing presentation of information, which necessitated cross-referencing across numerous lengthy documents.
- 3.4. The Statutory Consultation ran from 30 November 2023 to 8 February 2024 despite calls from the local MP, CPRE and Stop Botley West to delay until after Christmas. The pre-Christmas events in that year were far less well attended (63 per event) than the post-Christmas ones (179 per event) but nevertheless nearly 1000 did attend in total.
- 3.5. The consultation process has been one of the most upsetting experiences of this whole affair for local residents. Residents believed that these events gave them, for the first time, the opportunity to engage with Applicant, to have their questions about the Proposal answered by knowledgeable experts, with a chance that their feedback could influence the design, but this experience was a shock and disappointment to many.
- 3.6. The SBW Community Liaison team attended every event, and it was salutary and upsetting to see so many of those who attended the consultation events leaving angry, frustrated and in despair - several in tears - at their total inability to influence what was a foregone conclusion.
- 3.7. This has had a profound effect on the mental health of many residents (over 350 mentioned this in their RRs), causing anxiety and depression.
- 3.8. The provision of wrong, contradictory, incomplete or no answers at all to questions at Consultation events have all been frequent criticisms of the Applicant and their Consultants by many of those who engaged in the consultation process.
- 3.9. Gardens Trust (GT), a Statutory Consultee, made this comment about their experience of Statutory Consultation. "Staff at public [consultation] event centres including Cassington were unable to provide adequate information on assessment of views and settings impacted, referring to the sample of viewpoints in the PEIR, which are woefully inadequate, from one view only, not to, from, in and around assets and not assessed according to the NPPF 2023 in terms of significance and substantial or less than substantial levels of harm".
- 3.10. Examples abound of lack of knowledge and contradictory answers (e.g. lorry journeys per day varying from 45 to 720) and one resident of the northern site reported: "It appears that the developers have made little to no effort to see what devastating impact this development will have upon us. Indeed, when I first spoke to a key

representative of the developers at one of the consultations, he had no idea that our hamlet even existed and was unable to point it out on a map.”

- 3.11. The fact that two further consultations were necessary, from 15th June to 28th July and 15th August to 25th September, reinforces our view that the Statutory Consultation was rushed and information provided woefully incomplete.
- 3.12. These additional consultations were not carried out according to the SoCC and information provided was, once again, incomplete and inadequate. The use of very small, thumbnail maps with no scale or grid references made a mockery of the process.
- 3.13. SBW also carried out a survey - designed by a professional market researcher - asking for people’s views on the way the statutory public consultation was conducted. It attracted 1440 responses with key findings including:
 - 3.13.1. While 40% agreed that they were given adequate opportunity to offer their views and thoughts about the proposal, less than 14% felt their questions were answered adequately by the developers or that the answers they received were based on adequate evidence and/or knowledge.
 - 3.13.2. A highly significant 83% of those offering an opinion did NOT believe they had an adequate opportunity to influence what is being proposed.
 - 3.13.3. This is illustrated by a particularly upsetting comment made by the Applicant who said at one of the Public Consultations, in front of several witnesses, “if 100% of people in the area are against it, it will make no difference. We have satisfied all of the government criteria for it to go ahead so it will.”
 - 3.13.4. The SBW consultation survey results are submitted as a separate pdf file as part of this submission.
- 3.14. The full report on the SBW Consultation Survey was submitted at the pre-examination stage and is not repeated here but can be re-submitted if required.
- 3.15. Subsequent behaviour by the Applicant has clearly demonstrated the same lack of engagement, not only with the local Community but with the Councils and other statutory consultees undermining their credibility. This was dramatically illustrated at Issue Specific Hearing 1 when London Oxford Airport expressed their very serious concerns about air safety and revealed that they were only meeting the following week to discuss the area where panels should be removed for safety reasons shown on a map that had been provided to the Applicant over a year earlier.
- 3.16. Further examples of lack of engagement are cited by:
 - 3.16.1. Oxford County Council (OCC). “Our previous comments on the Phase 2 consultation made in February 2024 remain to be addressed.”
 - 3.16.2. Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust. “We raised [a number of] comments in our previous response and are disappointed to see that in the intervening months they have not been addressed.”
 - 3.16.3. Calls by WODC to remove panels in some areas have been consistently ignored.
 - 3.16.4. Stop Botley West had one meeting with the Applicant on 19 January 2024 where we witnessed the same complacency. A few of our questions were answered at the meeting (at least one answer later proved as untrue), the remaining answers were promised “to follow”. Some were answered in part, but several key ones were not. These questions have never been fully answered.

- 3.17. These examples further undermine any trust the local Community had that even the Councils who represent them or other key Statutory Consultees could influence the outcome of this application.
- 3.18. The SBW Adequacy of Consultation (AOC) report on the Statutory Consultation concluded: "Observations and feedback from consultees show that the Applicant's approach to engagement with the affected communities did not have sufficient regard to the relevant guidance and did not meet the standards required for a public consultation. The consultation was therefore not adequate or legitimate."
- 3.19. The full SBW Adequacy of Consultation Report was submitted at the pre-examinations stage and is included as three separate pdf files as part of this submission.
- 3.20. We understand that, in planning terms, the Applicant may have "ticked the right boxes" and that the bar for adequacy of consultation is set very low but the ExA has noted the concerns raised by WODC, OCC, Cherwell and Vale of the White Horse Councils as well as from many members of the Public in the Acceptance of Applications Checklist and these concerns should be addressed now.
- 3.21. The Community trust that the Inspectorate will succeed, where others have failed, in eliciting from the Applicant responses to the many unanswered questions in the course of this Examination so that a fair decision can be made on the application.
- 3.22. The remainder of this report now follows the ES chapters in order, where they particularly impact the local community starting with summaries.

4.0 Summary of Concerns (with reference to chapters in the ES)

4.1 Alternatives Considered (APP-042 Chapter 5)

- 4.1.1 The Applicant has not adequately addressed the issue of population density in the vicinity of the site in considering alternatives. There are far more residential properties near the site than claimed by the Applicant.
- 4.1.2 The population density in BWSF site area is 4 to 6 times greater than solar farms elsewhere in the world, with approximately 12,274 residents within 1 km and 25,704 within 1.5 km of the site.
- 4.1.3 The Applicant failed to consider or mention the proximity to dwellings in their assessment of alternatives, despite it being a key consideration in planning policy.

4.2 Historic Environment (APP-044 Chapter 7)

- 4.2.1 The proposed BWSF development poses substantial risk to the historic environment, with potential harm to Blenheim Palace's setting, ancient villages, archaeological remains, listed buildings, and ancient woodlands.
- 4.2.2 There is significant public and institutional opposition to BWSF due to both cultural heritage and environmental impacts. In particular there is widespread opposition to its proximity to the Blenheim

Palace UNESCO World Heritage Site (WHS) not only locally. Over 500 public comments (90% against) from across the UK were received after a Mail Online article.

(Ref: Author: Chris Matthews, 10 November 2024)

- 4.2.3 The Joint Local Impact Report (LIR), many times, highlighted concerns about significant harm to the Outstanding Universal Value (OUV) of Blenheim.
(Ref: 7.2)
- 4.2.4 Blenheim's setting is tied to a wider historical landscape with features like ancient rights of way (e.g., Dornford Lane) that illustrate the area's long-standing significance and cultural cohesion.
- 4.2.5 No Archaeological Evaluation Report has been submitted by the Applicant yet historical evidence indicates the potential for significant archaeological remains
- 4.2.6 Bladon Camp hillfort is a key Iron Age monument. Significant findings in Yarnton and Cassington show continuous settlement and ceremonial activity dating from 3800 BC. Extensive Saxon-era settlements and features have been discovered in Yarnton, Cassington, and Worton.
- 4.2.7 Photographs from the air during a drought in 1996 of Roman settlement at Sansom's Platt revealed a possible small town along Akeman Street, an important Roman road ignored by Applicant.
- 4.2.8 The development area includes interconnected historic villages with roots dating back over 1,000 years. These villages are part of the Wootton Hundred, listed in the Domesday Book.
- 4.2.9 BWSF would harm the setting of numerous heritage assets including:
5 conservation villages, 5 Grade I listed churches, 20 Grade II* listed buildings, 400+ Grade II listed buildings. Owners and residents of these buildings express concern over inadequate buffer zones and loss of historic character.
- 4.2.10 Several individuals and organizations raised specific heritage concerns: risk of flooding to historic buildings, including churches, due to run-off from the solar development, loss of rural and cultural character, threatening daily public enjoyment, heritage value, and tourism.
- 4.2.11 Several ancient woodlands would be affected: Burleigh Wood (recorded since 1420s), Pinsley Wood (mentioned in Domesday Book), Wytham Woods (with Saxon and medieval history).

4.3 Landscape and Visual Amenity - Glint & Glare Assessment (APP-045 Chapter 8 and APP-128 Appendix 4.4)

- 4.3.1 The absence of a Residential Visual Amenity Assessment (RVAA) is a major flaw in the Applicant's submission.
- 4.3.2 The Applicant's defined consultation zone includes over 22,000 properties, highlighting the extensive impact on the local population.

- 4.3.3 The Applicant's focus on a narrow Glint and Glare assessment fails to represent the broader visual impacts on over 5,000 properties within 1km of the site.
- 4.3.4 There are serious flaws in the Glint and Glare assessment wrongly assessing 600 of 690 properties as "no impact, no mitigation required"
- 4.3.5 Information required to fully check assessments for the Central and Southern sites is missing and has not been provided on request despite being promised.
- 4.3.6 Numerous properties, including the UNESCO World Heritage site Blenheim Palace, will face significant visual disruption from the solar panels.
- 4.3.7 The proposal threatens to industrialize previously agricultural and open landscapes, affecting local recreational public rights of way and overall quality of life.
- 4.3.8 Residents express fears about the loss of amenity, wildlife habitats, and the negative impact on health and wellbeing due to the proximity of the solar farm.
- 4.3.9 Proposed screening vegetation may not effectively mitigate the visual impact, leading to concerns about the long-term aesthetics of the area.
- 4.3.10 The development poses risks to heritage assets, including listed buildings and conservation areas, with insufficient assessments of these impacts.
- 4.3.11 There are serious concerns regarding the limited number of viewpoints and inadequate visual representations provided by the Applicant, which do not capture the full extent of the project's impact.

4.4 Ecology & Nature Conservation (APP-046 Chapter 9)

- 4.4.1 The Local Community are fully engaged and concerned regarding the potential ecological impact of the BWSF proposal, with many voicing concerns in the Relevant Representations (RR) submitted.

Trees and Ancient Woodlands

- 4.4.2 There are serious concerns about the potential impact of the solar farm on notable, veteran, and ancient trees in the area. Risks of damage to these trees have not been adequately assessed by the Applicant, particularly regarding trees within ancient woodlands like Pinsley Wood and Burleigh Wood
- 4.4.3 Local volunteer efforts and the Woodland Trust's Ancient Tree Inventory (ATI) indicate the presence of numerous veteran trees that the Applicant has overlooked in their assessments of risk due to proposed cable routes running close to them, potentially leading to damage or decline.
- 4.4.4 The proposal's scale significantly isolates local ancient woodlands, with insufficient mitigation measures for the fragmentation of these habitats.

Wildlife

- 4.4.5 The presence of solar arrays can severely impact bat populations, particularly given the area's high diversity of bat species. The conclusions drawn by the Applicant's ecological consultants regarding negligible impacts on bat populations are challenged in the light of recent scientific literature that indicates significant negative impacts of solar arrays on bat populations.

- 4.4.6 Local residents report regularly observing the presence of various bird species, including breeding and wintering birds, and they are concerned about the loss of habitat connectivity due to the solar farm's implementation. The replacement of arable land with solar arrays is seen as detrimental to farmland birds, particularly skylarks, which are already in decline. The proposed compensation measures, such as skylark plots, lack credibility and effectiveness.
- 4.4.7 Negative impacts of the solar farm on brown hares and hedgehogs due to their reliance on arable fields for foraging and breeding. The disturbance to badger sets due to construction activities.
- 4.4.8 The area has not been adequately surveyed for reptiles, which could lead to significant oversight in assessing the ecological impact. Concerns about the proposed development's proximity to known populations of Great Crested Newts and their habitats and connectivity of habitat required.
- 4.4.9 Relevant Representations from local residents express concerns about the ecological impacts of the proposal. Many highlight the potential disruption to local wildlife, including birds, bats, and other species, as well as the loss of significant habitats.

4.5 Hydrology and Flooding (APP-047 Chapter 10.)

- 4.5.1 The area between the Thames and Cherwell rivers faces serious challenges posed by numerous water courses and surface water flooding.
- 4.5.2 The region frequently experiences flooding, affecting homes, businesses, and transport due to both river and surface water runoff.
- 4.5.3 Farmers and locals have implemented various drainage methods, but these are becoming less effective with increasing severe rainfall.
- 4.5.4 Construction activities, including piling for solar panels, will damage existing drainage systems, exacerbating flooding issues across large areas.
- 4.5.5 Cumnor has areas at risk of fluvial flooding, particularly near the River Thames and Farmoor Reservoir, classified within Flood Zones 2 and 3. Several areas in Cumnor are also at risk of surface water flooding, particularly during heavy rainfall events.
- 4.5.6 Begbroke's Rowel Brook's flood risk assessment is recommended to ensure development does not increase flooding potential.
- 4.5.7 Bladon has experienced repeated flooding, particularly due to surcharging from local rivers and uncontrolled drainage runoff.
- 4.5.8 Cassington faces significant pluvial flooding risks due to runoff from surrounding fields, especially along Elm's Road.
- 4.5.9 In Wootton and Woodstock flooding primarily arises from the River Glyme.
- 4.5.10 Local residents express concerns that new developments, particularly solar farms, will worsen flooding due to increased runoff and disruption of natural drainage systems.

4.6 Traffic and Transport (APP-049 Chapter 12)

- 4.6.1 Traffic congestion due to the proposed development near residential areas is a serious concern to many residents.
- 4.6.2 The SBW survey of February 2025 on Residential Amenity showed a significant percentage of residents reported already experiencing traffic congestion due to roadworks, Blenheim Palace traffic and rush hour congestion. In this survey, the majority of respondents (84%) believe that traffic will be significantly affected during construction and (38%) believe that traffic will be significantly affected during operation.
- 4.6.3 There has been inadequate evaluation of road safety assessments and economic impacts due to increased delays from construction activities, particularly for local residents.
- 4.6.4 Several roads, including B4027, B4449, and B4017, are identified as problematic due to their narrowness and heavy usage, raising safety concerns for residents and businesses.
- 4.6.5 Access challenges for construction: Limited options for safe access points to the central site are noted, with concerns over the proposed re-routing of heavy vehicles through unsuitable roads.

4.7 Noise and Vibration (APP-050 Chapter 13)

- 4.7.1 No assessment has been conducted on how noise affects residential amenity.
- 4.7.2 The applicant has underestimated the noise impact during construction and operation phases, particularly from pile driving activities.
- 4.7.3 The applicant claims construction noise is temporary and limited, but this is disputed, with concerns that noise will have a more than transitory impact across a wide area affecting multiple communities.
- 4.7.4 Power Converter Stations will emit significant noise, yet their cumulative impact has not been appropriately assessed.
- 4.7.5 Many sensitive receptors, including schools and residential properties, were omitted from the assessment of noise impact during operation.
- 4.7.6 The construction phase lacks a comprehensive noise impact assessment for residential receptors, despite over 5,000 properties being within 1km of the site.
- 4.7.7 Residents have expressed concerns about noise disturbances impacting their daily lives and well-being, particularly during construction.
- 4.7.8 Local councils and residents have raised issues regarding the noise from Power Converter Stations and the need for a thorough cumulative noise impact assessment.

4.8 Socio Economics (APP-051 Chapter 15)

- 4.8.1 Potential socio-economic impacts of the Botley West Solar Farm (BWSF) on local businesses and the economy are highlighted with concerns from various

stakeholders regarding the negative effects on tourism, local businesses, and community well-being.

- 4.8.2 An SBW survey indicated that 64% of businesses felt their income would be significantly or moderately affected by BWSF, with 73% concerned about the appeal of their business.
- 4.8.3 Tourism contributes over £282 million annually to the local economy, and BWSF could negatively impact local hospitality and tourism-related businesses.
- 4.8.4 Several businesses, including Oxford Capital Partners and Wolfram Research, expressed concerns about the aesthetic degradation of the area and its impact on attracting talent and investment.
- 4.8.5 Specific businesses at risk, such as the London Oxford Airport Aviation School and businesses by Farmoor Reservoir, could face closure or loss of appeal due to BWSF.
- 4.8.6 Residents report difficulties in selling properties, with many citing the BWSF as a reason for reduced interest or lower offers.
- 4.8.7 Increased traffic and noise pollution from the development pose risks to local health and safety, particularly for businesses like North Oxford Crematorium and Hill End Forest School.
- 4.8.8 The applicant has not adequately assessed the broader economic impacts of BWSF on local businesses and tourism.

4.9 Public Rights of Way (APP-045, -052, -053 Chapters 8, 16 & 17)

- 4.9.1 Residents and stakeholders argue that the Botley West Solar Farm will lead to the permanent degradation of a uniquely dense and historically significant PRow network, with serious consequences for health, well-being, safety, recreation, and local character. The Applicant is criticized for failing to adequately assess, mitigate, or consult on these impacts.
- 4.9.2 Scale and Importance of PRow in the Area. 26 km of PRow lie within or next to the proposed site, many of which are historic or designated long-distance paths (e.g., Akeman Street, Oxfordshire Way, Thames Path). This is an unprecedented number of significant footpaths for any UK solar farm application. These routes are heavily used by both locals and visitors for recreation, health, and connection to the countryside.
- 4.9.3 Visual and Physical Impact. The applicant claims visual impact will be negligible, but residents argue that “Mitigation” (mainly dense hedgerows) fails to maintain the quality of existing routes through open countryside.
- 4.9.4 PRow would become “narrow canyons” enclosed by solar arrays, 2.1m high fencing and, eventually, hedging that will permanently block open countryside views, making them feel oppressive, unsafe, and industrial. This effect is especially worrying for equestrian users, where enclosed bridleways may pose serious safety risks.
- 4.9.5 Construction Phase Disruption. Significant concern over footpath closures during construction (pile driving, trenching, fencing, etc.). No clear timeline or cumulative assessment of access disruption has been provided. Residents fear loss of PRow access for the whole period of construction.

- 4.9.6 Health and Well-being Impacts. Walking in nature provides proven mental and physical health benefits; these will be lost if PRowWs are enclosed by panels and hedges.
- 4.9.7 Applicant's Health Chapter (Chp 16) lacks specific analysis of health impacts from PRowW degradation.
- 4.9.8 The SBW February 2025 survey on the use of PRowWs showed that 94% predict a significant or moderate impact from PRowW closures. Nearly 50% would drive elsewhere to walk, increasing traffic and emissions. Only 11% would continue using PRowWs enclosed by fences and high hedges.
- 4.9.9 Numerous residents provide deeply personal accounts of reliance on PRowWs for managing conditions like PTSD, myoclonus, and neurodivergence.
- 4.9.10 Mental health and safety concerns, especially for lone walkers and vulnerable users, are common. Residents criticize the lack of consideration for non-physical impacts, such as sensory overload and emotional well-being.
- 4.9.11 No quantified assessment of visual or health impact. Proposed new footpaths/cycleways are seen as poorly designed and unsupported locally.
- 4.9.12 Tourism and Economic Impact. Loss of scenic PRowWs may negatively affect tourism, which benefits from the area's walking appeal and proximity to attractions like Blenheim Palace.
- 4.9.13 Local economic and health consequences are underestimated by the Applicant.

5.0 Alternatives Considered (APP-042 Chapter 5)

- 5.1. APP-042 ES Chapter 7 Para 5.6.2 states that in terms of site selection and design, NPPF EN-3 paras 2.10.8 to 2.10.48 provides that the key considerations involved in the development of a solar farm include, among others, "Proximity of the site to dwellings". But dwellings are never mentioned again in this chapter.
- 5.2. Throughout the whole application process PVDP have maintained that very few residential properties are impacted by their proximity to the BWSF site. For example, the non-technical summary issued in the PEIR on 30 Nov 2023 para 6.3.13 states "there are very few people would experience significant visual adverse effects as a result of the project". This was later revised in the ES non-technical summary (ref APP-037, para 6.3.11) to "a number of isolated residential properties, associated with farms, in close proximity to the project site" There are around 12 individual farmsteads within or adjacent to the site but at least 70 other residential properties inside or on the boundary of the BWSF site and 150 within 100m and 10,800 within 1.5km.5.3 The Applicant has failed to take account of or to assess the loss of Residential Amenity to so many residents with the in the immediate vicinity or in the wider community.
- 5.3. PVDP sold their interest in the largest solar farm they have been involved with at Ukijima, Japan in 2012 and have not been involved with its development at all. It has still not been built. The site is on a small remote island (area 24.93km²) with 2,187 residents and a population density of 87.84 people/km² for the whole island - likely less in the area of the solar farm.

- 5.4. The population density of the Sunnica Solar farm, recently approved in the UK, is not given in their ES and is difficult to calculate due to its shape but is estimated to be around 300 people/km²
- 5.5. For instance, in Extremadura in south-western Spain it is 25 people/km²
(Ref: Spain's National Institute of Statistics (INE) Habitantes 2.024 [Torcillas de la Tiesa])
- 5.6. Population Density of the area around BWSF
- 5.6.1. Size of BWSF site = 14.18 sq km.
- 5.6.2. Desktop surveys by SBW show there are 5157 houses within 1km of the BWSF site and 10,800 houses within 1.5 km.
- 5.6.3. Residents/household in West Oxfordshire (2021 Census) = 2.38
Area of BWSF + 1km = 30.68 sq km
Population within 1 km = 5000 x 2.38 = 12,274
Population density with 1km of BWSF site is = **400 people/km²**.
- Area of BWSF + 1.5km = 41.28 sq km
Population within 1.5km = 10800 x 2.38 = 25,704
Population density with 1.5 km of BWSF site is = **623 people/km²**.
- 5.7. Conclusion: The BWSF proposal is not only the biggest so far examined in the U.K., but it is also likely that it would have the highest population density of any solar farm yet built anywhere in the world.

6.0 Historic Environment (APP-044 Chapter 7)

Introduction

- 6.1 We agree with LIR 7.2 Historic Environment. “The setting of designated and non-designated heritage assets as well as the Blenheim world heritage site is related to their landscape context as well as other factors like topography and use; the Oxford Host Authorities (OHA) consider the proposed development will result in harm to the settings.”
- 6.2 We endorse the Joint LIR concerns expressed in 6.3.30 about the impact of BWSF on the setting of Blenheim Palace World Heritage Site (WHS) where they state “the impact that this could have on the Outstanding Universal Value (OUV) of this asset is of the highest significance.”
- 6.3 Many serious concerns have already been expressed about the siting of BWSF so close to the UNESCO WHS Blenheim Palace and this will not be repeated here other than to say that from Statutory Consultees and Councils to many local residents and the general public from around the country (over 500 people from all over the U.K. posted comments to an article about BWSF, and its proximity to Blenheim, in the Mail OnLine on 12 Nov 2024, 90% of the comments were against the scheme), there is almost universal condemnation of the proposal, as it currently stands, and the impact on the setting of WHS Blenheim Palace.
- 6.4 This section will consider other related issues regarding the Historic Environment.

The Setting of Blenheim and its historical context

- 6.5 The villages affected by the Botley West Solar proposal have an historical interconnection that goes back at least a thousand years. They form an essential part of the wider setting of Blenheim and have a historic heritage of their own.
- 6.6 The villages of Bladon, Cassington, Eynsham, Hanborough, Combe, North Leigh, Yarnton, Kidlington, Shipton on Cherwell, Worton, Begbroke, Hensington, Tackley, Thrupp, Woodstock and Wootton are among 47 villages comprising the Wootton Hundred, one of three ‘hundreds’ belonging to the royal manor of Woodstock and listed in the Domesday Book.
- 6.7 The connections are still demonstrated by ancient rights of way, and the visibility of church spires.
- 6.8 For example, Professor W G Hoskins (The making of the English Landscape) suggested that the most likely reason for the existence of Dornford Lane is that it was used as a direct connection between royal demesne farms around Steeple Barton, also in the Wootton Hundred, to the royal hunting manor of Woodstock in Saxon times. He thinks it came into use in the tenth century. It is therefore 1100 years old. It would be a tragedy to wreck it now. Dornford Lane is referred to by developers only as a cycle path, when it is actually both an ancient track and a designated bridleway.
- 6.9 Blenheim Palace was built several hundred years later but on the site of Woodstock Manor and therefore inherited the setting within the villages. (Cumnor was in the Hornimere Hundred and is also in the Domesday book.)
- 6.10 The wider setting of these heritage assets includes the topography, natural and built environment, land use and visual relationships, social and cultural practices. Such elements define the landscape character and fundamental

changes to the landscape character will harm heritage assets of the highest significance.

Assessment of Archaeology

- 6.11 The applicant has not yet submitted an Archaeological Evaluation Report (ref Joint LIR 6.3). This means we cannot be certain whether any archaeological remains beneath the BWSF site are significant. The following references in literature suggest there is further work to be done.



Figures 6.1a Archaeological excavation site



Figure 6.1b Fragment of pottery

Ancient history - Iron Age

- 6.12 **Bladon Camp: Hillfort on Bladon Heath.** The monument includes a small multivallate hillfort known as Bladon camp, situated immediately south of Bladon Reservoir on Bladon Heath. The hillfort has defenses which include two concentric oval ramparts with outer ditches which combine to enclose an area up to 200m across from north to south and 180m from east to west. (Ref: *Historic England*)
- 6.13 **Cassington and Yarnton: Neolithic and Bronze Age.** “A rich prehistoric landscape was unexpectedly revealed on the Thames floodplain during investigations in advance of gravel extraction in the parishes of Yarnton and Cassington.”
- 6.14 “The earliest evidence for more than transient occupation was the construction of a substantial, rectangular post-built house at the beginning of the Neolithic (c 3800 cal BC); traces of midden activity, pit digging and cremation burial were also found, as well as a small, circular early Neolithic house dated to 3600 BCE. The volume then traces the changing character of settlement through a period of frequent but short-lived occupation events in the middle and late Neolithic and the early Bronze Age, a time when ceremonial monuments were constructed and burials were made, to more permanent settlement in the early to middle Bronze Age. Later Bronze Age settlement was focused on small circular and oval houses surrounded by evidence for domestic activity, perhaps representing single generation households.”

*Ref. Neolithic and Bronze Age Settlement and Landscape
by Gill Hey, Christopher Bell, Caroline Dennis and Mark Robinson*

Ancient history - Saxon and Medieval

- 6.15 “Between 1990 and 1996 the Oxford Archaeological Unit examined sites and landscape features dating from the fifth century AD to the post-medieval period in the ARC (now Hanson Aggregates) gravel extraction pit between Yarnton and Cassington, Oxfordshire. The work formed part of the larger Yarnton-Cassington Archaeological Project. Early Saxon settlement was identified on the edge of an Iron Age and Roman occupation site at Yarnton. Subsequent work revealed the presence of a Middle Saxon settlement immediately to the east. Investigations further afield uncovered evidence for Early and Middle Saxon settlement adjacent to the neighboring modern hamlet of Worton, and Middle Saxon buildings were uncovered among Iron Age pits and postholes at Cresswell Field.”

Ref. Hey, G. ed. (2004) Yarnton: Saxon and medieval settlement and landscape. Oxford: Oxford Archaeology.

Ancient history - Roman

- 6.16 “When a known Roman settlement at Sansom's Platt, in the parish of Tackley, Oxfordshire, was photographed from the air during the drought of 1996 a previously unsuspected layout of roads and buildings, interpreted as a small town, was revealed. The site is located on the eastern edge of the limestone hills which lie between the distinctive landscape zones of the Cotswolds and the Thames Valley. The cropmarks are situated to the south of the Roman road called 'Akeman Street' which extends along the southern edge of the limestone uplands between Cirencester and St Albans*. The site at Sansom's Platt is one of a series of Roman settlements, at Quenington, Asthall, and Wilcote, on the route of the Roman road. The settlement is visible on a west-facing slope, at 90m above OD, half a kilometre to the south-east of the confluence of the Rivers Glyme and Dorn and three kilometres west of the River Cherwell”.

Ref. A Possible Roman Small Town at Sansom's Platt, Tackley, Oxon, Helen Winton, Britannia Vol. 32 (2001), pp. 304-309 (7 pages) published By: Society for the Promotion of Roman Studies.

- 6.17 Akeman Street 117km, now part of the Oxfordshire Way, has been totally ignored by the developers.
- 6.18 The significance of the Roman Villa at North Leigh and its importance as a tourist destination has also been overlooked.

Heritage Assets and Listed Buildings.

- 6.19 Given the long history of villages and farms in the area, the Botley West Solar Farm development would affect the setting of many heritage assets, including the Blenheim Palace World Heritage Site, scheduled monuments, conservation areas, and listed buildings. The significance of these assets derives not only from their physical presence but also from their setting and the interrelated history. The proposed solar farm could cause substantial harm to the significance of these heritage assets and the overall setting.
- 6.20 Begbroke, Bladon, Cumnor, Church Hanborough and Wootton are conservation villages.
- 6.21 Apart from Blenheim Palace and Gardens, well described elsewhere, there are five Grade 1 listed churches: - Cassington, Church Hanborough, Cumnor, North Leigh and Yarnton

- 6.22 There are at least 20 Grade II* buildings (including 7 churches) in Begbroke, Eynsham, Freeland, Kidlington, Shipton on Cherwell, Tackley, Woodstock and Wootton.
- 6.23 There are approximately 400 Grade II listed houses in villages mentioned by PVDP and over 100 other listed artefacts: chest tombs, headstones, bridges, walls, barns, outbuildings, etc.
Ref: Listed Properties <2km from BWSF, WODC Exec Member for Heritage.
- 6.24 Historically important Churchill's Grave, St Martin's Church, Bladon.
- 6.25 It is unlikely that the listed buildings close to the sites have all been identified. Many of the owners of listed properties are extremely concerned about the loss of setting of their properties and the paucity of buffer zones, as evidenced in their relevant representations.

Heritage Assets - Ancient Woodland (and see CIR/APP-046 Chapter 9)

- 6.26 **Burleigh Wood** is an ancient semi-natural woodland with a history dating back over a thousand years. The earliest written records for the wood are from the 1420s and tell us that the wood was used for coppicing (a system of woodland management used to make fencing parts and firewood).
- 6.27 **Pinsley Wood** is an Ancient Woodland in Hanborough with a history dating back to the Domesday Book in 1086. It's part of the old Wychwood Forest and has been a significant feature of the parish since then.
- 6.28 **Wytham Woods**, (proximate to the possible Thames crossing). Wytham is a village full of history, with records of the village in the Saxon times. The name Wihtham dates back to AD 957, meaning homestead of village concealed in a river bend in Old English. During the Medieval times, Monks on pilgrimage from Cirencester to Canterbury would pass through Wytham Woods. The woods were bequeathed to Oxford University and are now the subject of continuous ecological research programmes, some dating back to the 1940s. (Ref. Wytham.org).

Extracts from selected Relevant Representations regarding Historic Environment.

- 6.29 **Giles Lewis.** A Grade 2 listed building, my home, situated between Begbroke and Yarnton, is a 400-year-old farmhouse built on one of the few hills in the area providing far-reaching views. It overlooks most of the Central Site, which represents a perfectly preserved example of farmland on the 300-year-old Blenheim working estate, together with ancient hedgerows, woodlands and historic footpaths. It is also significant in its proximity to two ancient woods, Begbroke Wood and Bladon Heath. The BWSF development would fundamentally change and semi-industrialise the character and appearance of [the] surrounding landscape. The property is set within undulating, wooded, estate farmland of exceptional amenity value to hundreds of walkers every week. During lockdown nearly 300 walkers passed the house on one Saturday; and the estimated daily average over the year is now around 50 people, including visitors from overseas.
- 6.30 **Stephan Michael Dale Brown.** In my own village of Church Hanborough there is a Grade I listed church, SS Peter & Paul, with a very impressive tall spire visible from a long way away and about 15 Grade II properties. The setting is on higher ground and views from Lower Road (travelling northwards) up the slopes to the village are highly regarded as recognised in the Host Authority, WODC's response to the Statutory Consultation. The

many significant gaps in the Lower Road hedging are a major asset to enjoying the setting and views. The quality of the setting would be ruined by uninterrupted dark panels, steel fences and rows of converter stations stretching for about a kilometre from the roadside up to the village across Land Plan Plots 10.02, 8.27 (fields 2.113, 2.114 and 2.115 in the PEIR Figure 9.1b) 42. The conservation village should retain its largely uninterrupted setting from the south and east.

- 6.31 **Miles Tuely.** In the northern sector, Hordley House (Grade 2*) and its setting will be badly impacted. Much of the northern site has archaeological significance and there are good records of Roman occupation around [as well as inside] the protected fields of Sansomes Platt.
- 6.32 **Keith Turner.** There are 25 listed buildings just in my village, with the Norman church being grade 1 and all will be in a vulnerable position if the expected flooding occurs. The planned buffer zone from the development to residential properties at only 25m is far too small for any industrial installation, let alone one in a rural area.
- 6.33 **St Peters Church Cassington Parochial Church Council.** Cassington is recorded in the Domesday Book in the 11th century as 'Cersetone'. St Peter's Church Cassington is Heritage Category: Listed Building Grade 1 - a building of national importance and exceptional interest. The church was constructed in the early 12th century. Additionally, there are 18 Grade II buildings in the village.
- 6.34 **The Friends of St Peter's Cassington.** We are a registered charity (no 1114780). Our Purpose is to raise funds for St Peter's church in the village to maintain, restore and preserve our Grade 1 listed 12th Century Norman building and grounds to the benefit of locals and visitors alike. The church is open daily for private prayer and reflection. Our main objection to the solar scheme as trustees of the charity is the increased risk of flooding forecast to occur both from the extremes of weather, now being seen everywhere, and from the expected run-off from the proposed site, which being partly situated on hills above the village will be difficult to control or mitigate.

7.0 Landscape and Visual Amenity (APP-045 Chapter 8)

- 7.1 We agree with the LIR statement in 7.3.136 “The OHA consider the proposal for BWSF is not acceptable in landscape and visual terms. The OHA lack confidence in the adequacy and accuracy of the LVIA and hence the masterplan and consider the impacts of the development on the local landscape and views to be underestimated.”

The lack of a Residential Visual Amenity Assessment

- 7.2 From the residents’ point of view this is probably the most important aspect of the BWSF proposal and yet, from the information provided by the Applicant, the true impact is not shown in this chapter of the Environmental Statement (ES)
- 7.3 Visual impact on residents. The lack of a Residential Visual Amenity Assessment (RVAA) by the Applicant is a serious shortcoming. As early as July 2023, in their APP-125 Scoping Opinion EN010147/APP /6.5 section 3.1 (referring to PVDP’s Scoping Report, Section 7.3, ID 3.2.3) the ExA questioned the Applicant’s intention to scope out a Residential Visual Amenity Assessment (RVAA) and stated that they did not agree to scope out an RVAA at that time.
- 7.4 PVDP’s response at that time: *“As part of the ongoing iterative design process through the LIVA and wider ES, residential properties (**predominantly individual farmsteads**) have been identified. As part of the project a minimum 25m offset to the Project has been included from the outer edge of the property boundary”.*
- 7.5 And in their DCO Application, APP-045. Chapter 8. Landscape and Visual Amenity they add in 8.6.79 *“Due to the low level of more than 2.3 m high of the project, in particular the solar arrays, it is anticipated that views of the project would neither overwhelm existing properties within the study area nor render these properties so unattractive a place to live that planning permission should be refused.*
- 7.6 AND, in 8.6.80 *“Due to the low level of the project, particularly the solar arrays, and proposed mitigation there is no potential for any private views to be adverse affected to extent that would result in a level of harm of Substantial, which trigger the threshold for an RVAA being required. As such, private views are not considered further in this chapter.”*

SBW Response to the lack of a Residential Visual Amenity Assessment (RVAA)

- 7.7 There are no more than 12 individual farmsteads throughout the BWSF area, but SBW have identified 255 other residential properties within 100m of the site and at least 70 directly on or within the red line boundary. Additionally, the intricate network of PRow across the BWSF site used by these residents would be visually impacted.
- 7.8 SBW disagree with the Applicant’s assessment as stated in APP-045. Chapter 8. Landscape and Visual Amenity that: *“No significant effects are predicted during construction, operation or decommissioning of the Botley West Project on Landscape character areas within the 5km area.*

- 7.9 AND *“It is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the project without significant effects beyond those identified at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape.”*
- 7.10 Thousands of residents likely to be affected by the BWSF proposal take issue with this conclusion as demonstrated in over 1000 RRs in which many respondents mentioned changes to the landscape and visual resources as being impossible to mitigate against and offering no benefit.
- Hundreds of artists took part in the Forever Fields project and in their art expressed their love of the landscape as it is currently enjoyed also expressed real grief at its potential loss.
- 7.11 It is acknowledged that loss of view for an individual resident is not a material consideration in planning applications. It is also noted that material considerations **do** include, among other things, scale and dominance, impact on the character or appearance of the area or the community. So, one may ask; “How many individual cases of loss of view constitute an impact on the character or appearance of the area?”
- 7.12 The impact now takes on a different perspective, causing not just inconvenience or unpleasantness for a few but having a major impact on the whole community, on the open aspect of the countryside and on the local economy and tourism. Results of visits, surveys and feedback received by the Stop Botley West Campaign (SBW) suggest that BWSF easily passes the threshold for these concerns to be seriously considered.
- 7.13 The number of properties impacted is very large: The Applicant has defined the Community Consultation Zone as properties within 2km of the red line boundary and delivered Consultation leaflets to 22,000 properties (population over 50,000) - an unprecedented population for any solar farm in the world.
- 7.14 A population of 12,270, in 5,160 properties, live within 1km of the site. Around 255 properties lie within 100m of red-line boundary panel area including UNESCO World Heritage site Blenheim Palace. Around 70 are adjacent to or within the boundary. An additional 120-150 properties are adjacent to cable trenching (exact route still not defined).
- 7.15 The only aspect of visual amenity investigated by the Applicant is the somewhat narrower Glint and Glare assessment for around 690 representative properties out of the 5,000+ within 1km of the redline boundary. It is our contention that this assessment is flawed both in its methodology and its conclusions. This is examined in the following section Glint and Glare Study (APP-128 Appendix 4.4)
- 7.16 Residential Visual Amenity as assessed by SBW is examined by site and by village in this section. A gallery of representative properties at 12 of the most impacted locations is attached in Appendix A and the SBW Impact map in Appendix B.

Residential Visual Amenity - Northern Site

7.17 Dornford Cottage, Wootton N34 (and representative of 3 further properties)

The panels come within 50m of Dornford Cottage covering these fields with no screening contradicting the Glint & Glare: assessment of “no impact” due to “existing/proposed vegetation” with no mitigation recommended. These before and after pictures contradict that argument. The industrialisation of a resident's environment to this extent, must have a serious impact on life, wellbeing, health and financial security.



Figure 7.1 Photomontage of a view of fields with and without panels.

The development will effectively industrialise an area which previously formed most of Lower Dornford Farm, comprising arable and grazing land, woodland, and open landscape. The adjacent fields are crossed by several public footpaths and bridleways used regularly by the residents, other walkers, horse riders and cyclists. The Applicant's proposal to enclose panels with fencing, will mean that paths and bridleways will be "alleyways" with fencing either side. It is difficult to imagine that this will enhance the experience of walking/riding in the countryside, which is a valuable resource to ever expanding urban areas.

of N34.



Figure 7.2 Map of location

The owner of Dornford Cottage (N34) writes: *“As a solicitor, I completely understand that an individual’s view is not a material consideration in planning terms but I am concerned about the dozens of walkers I meet where I walk every day on the Public Rights of Way passing close to my property and heading off across the middle of field destined to be covered in solar panels. The proposed vegetation planned to screen the panels will be as bad as the panels themselves forming oppressive footpath tunnels through the panels. My own property will be completely overwhelmed by the proposed vegetation to be planted to provide screening. For the many years, before this vegetation grows, I will be vulnerable to glint and glare from 80 acres of panels within 50m of my boundary and after the vegetation has grown, my view of the open countryside across to Dornford Lane will be permanently obscured by high hedging on my boundary.”*

7.18 Shipton Slade Hamlet (N95 & N96 also representing N92-N94)

App 4.4 G&G Report: “Existing or Proposed Vegetation is predicted to partially obstruct views”.



Figure 7.3 Photomontage of a view of fields with and without panels.

A resident at N95 writes: “Our house is part of a small hamlet (9 households) that will be totally enveloped on one side by this proposed development. The hamlet sits at the midpoint of two popular circular walks giving commanding views over the vale leading to the nearby historic town of Woodstock. The PRowS are used extensively by those living in Woodstock and were very much a lifeline during the pandemic. These plans will totally transform our hamlet idyll and the footpaths around it. Our hamlet/vale contains a plethora of wildlife including Barn Owls, Bats, Kestrels, Badgers, Red Kites, Yellow Hammers, Swallows, Herons, Fieldfares and Great Crested Newts in a series of connected ponds. To add insult to injury, the developers are proposing to carve a track between fields 1.17 and 1.18 to lay a cable connection between them and obliterate this ancient existing footpath.”

Residential Visual Amenity - Central Site

Adjacent to the villages of Begbroke (2km E, pop 757), Bladon (1km NE, pop 655), Cassington & Worton (1km SW, pop 735), Church Hanborough (1km W, pop 180), Long Hanborough (1km NW, pop 2666), Eynsham (1km, pop 5042), Yarnton (1km SW, pop 3227), WHS Blenheim Palace (200m N). Near the town of Woodstock and 4 further villages 2-3km away. Many severely impacted isolated properties between the villages.

7.19 Begbroke Residences

The oldest part of Begbroke lies on the west of the A44 very close to the redline boundary and on the flight path for London Oxford Airport. The village has several listed properties and grade II* listed St Michael's Church.

Village End, Spring Hill Road, property M377. This house faces north within 25m of the panel area and would be completely overwhelmed by panels stretching round in a 270° arc.

From a desk-based glint and glare assessment, the applicant classifies the impact as “moderate” with no significant screening. The mitigation they propose is totally inadequate.

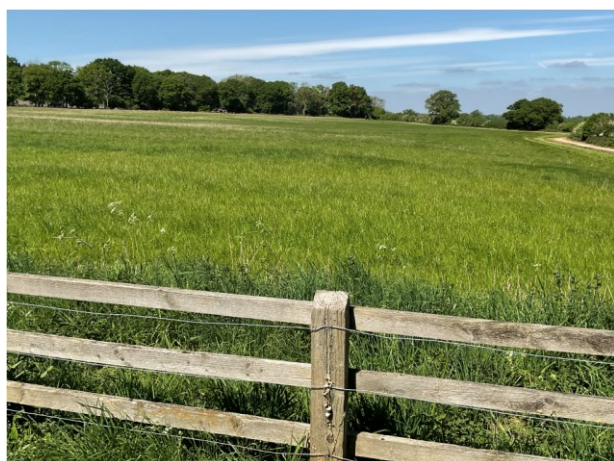


Figure 7.4 Photomontage of a view of fields with and without panels.

A resident writes: *"My house is next to many of the fields and will suffer from glint and glare. The suggestion that only ground level view should be considered is far too limited. We have upstairs living rooms which look out on these fields. Our surroundings would be ruined!"*

"We live next to the bridleway that runs from Begbroke to Bladon and witness its constant use. Users include walkers, daily, with and without dogs; family groups; school groups; walking groups, walking for health; people following the Shakespeare Way, of which this path is a part; cyclists; riders; and people using this route on their way to and from work. Some users are local, some come from Oxford city and beyond. All benefit from and enjoy the open countryside. It would be pitiful if these walks were fenced in by high security barriers and the views beyond spoiled.

The threatened land around us includes productive farmland, ancient woodlands, water meadows, hedgerows and trees. It is home to deer, hares, badgers, foxes, rabbits and many smaller creatures. They cross it by well-established corridors and can roam freely. They are frequently to be seen and are much enjoyed. Their habitat would be destroyed by the solar farm scheme and the security fences. This area is also rich in birdlife. Buzzards, red kites and kestrels, as well as sky larks, soar over the fields, and the woods and hedges are home to countless smaller birds. Barn owls nest in the tree above our house and regularly breed there. There were three successful owlets this year. The habitats of all these birds are under threat, and it breaks my heart."

There are 4 more properties on the same side of this road around 50m from panels in a 180° arc. The grade II* listed church of St Michael is within 100m of panels and also liable to glint and glare - but not assessed.



Figure 7.5. Map showing position of St Michaels Church and photograph of view from edge of Begbroke.

Spring Hill Farm is a grade II listed 400-year-old property on the top of Spring Hill and enjoys views across the Evenlode Valley up to the spire of Church Hanborough to the west (3.5km), the spire of Cassington to the southwest (2.5km), and the ancient woodland of Bladon Heath to the northwest (1.5km).

As Merton College has now pulled out of the scheme, they are now spared panels up to their property boundary. The nearest panels are around 500m away but, due to its elevated position, many fields of panels would be visible particularly the facing hillsides to the west across the Evenlode river. This house has been on the market since 2022 but has failed to sell, several potential buyers citing the Solar Farm as the main reason for not proceeding.

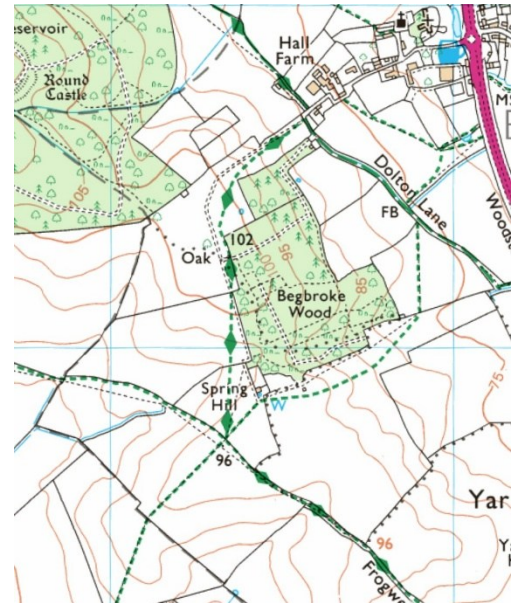


Figure 7.6 Map of Begbroke

Wood

Very close to this property, five PRoW meet at an elevation of 96m (just 6m short of the highest point for the whole central site). Footpath users will have sweeping views to the west as far as Church Hanborough and its Grade 1 listed St Peter and Paul Church 2.75km away. The view of panels to the west would be present for a distance of 3km to walkers as they follow Frogwelldown Lane (part of the long-distance path, Shakespeare's Way) from the north edge of Yarnton to Burleigh Lodge, near Bladon.

7.20 Bladon Residences and Community Areas

One of the most impacted villages with 60+ properties on the red line boundary. In particular Grove Road (No. 13), Heath Lane (No. 28), Manor Rd (No. 5), Church St (No. 5) and 10 individual properties.

Bladon is an historic village with many listed buildings including the Grade II church of St Martin's and the grave of Sir Winston Churchill. It is bounded along its northern side by WHS Blenheim Palace with the narrow, winding and already heavily congested A4095 passing through it.

There are very few public meeting-places, but one important outdoor area is the recreation ground. This includes an orchard and a wildflower meadow and is used daily by the Primary school (approx. 100 pupils) for PE classes, after school classes, Forest School, Sports Day and other events. The recreation ground is the only publicly available open space available to residents to enjoy community events like the Bladon Feast, the Coronation Celebration and the Queen's Jubilee Celebrations. The recreation ground borders the land proposed for the solar farm. There is serious concern in the Community about the loss of amenity that such a large solar farm will have on Bladon Parish and on this space in particular. Erecting a solar farm of this

size so close to the only recreational area in the village will undoubtedly have a negative impact on human health.

(Ref: EN010147-000642-2.4 Land Plans (Rev1)

Churchill's grave attracts thousands of visitors from around the world and is a place of tranquility and contemplation. The noise impact during the construction stage and the constant humming during operation would be intolerable.

The current buffer zones are insufficient, and the enclosing of 5.8km of adjacent Public Rights of Way (PRoW) with 2.1m high fencing and hedging will affect the amenity of the PRoWs by creating unattractive corridors that will deter not only local users but also those who would have visited the area to enjoy the countryside.

There are more properties in Bladon within 100m (and often closer) than any other village affected by the BWSF. Thirteen properties on the south side of Grove Road are particularly impacted and the outlook from three of these are shown here.



Figure 7.7 The outlook from two of the properties on the west side of Manor Rd are shown here.:



Figure 7.8 There are 28 properties on the east side of Heath Lane with panels 50m away to the east and some also have a view of Blenheim Palace to the north from their garden.

There are several other individual properties around Bladon. One particularly impacted is Burleigh House with panels 50m beyond an open low fence clearly visible from inside the property. The visual impact of the panels is totally overwhelming. A retired couple wishing to downsize, and trying to sell, have had several offers withdrawn as a direct result of the proximity of the panels.



Figure 7.9. View from Burleigh House.

7.21 Cassington Residences

The second most affected village in terms of proximity with the added hazard of increased flooding risk. Yarnton Rd (11 properties), Eynsham Rd (No. 29), Williams & Barrow Court (No. 10), all within 50-100m of the site boundary.

Community Assets including allotments, village green spaces, sports and recreation grounds, provide for amenity and exercise for residents of the parish as well as corridors for green transport. All of these will be impacted by the proximity of panels, oppressive hedge screening, and increased danger of flooding (see Chp 10 Flooding). Concern over increased damage to allotment crops from deer forced out of the fields by deer-proof fences. The recreation ground would have panels on two sides within 25m.

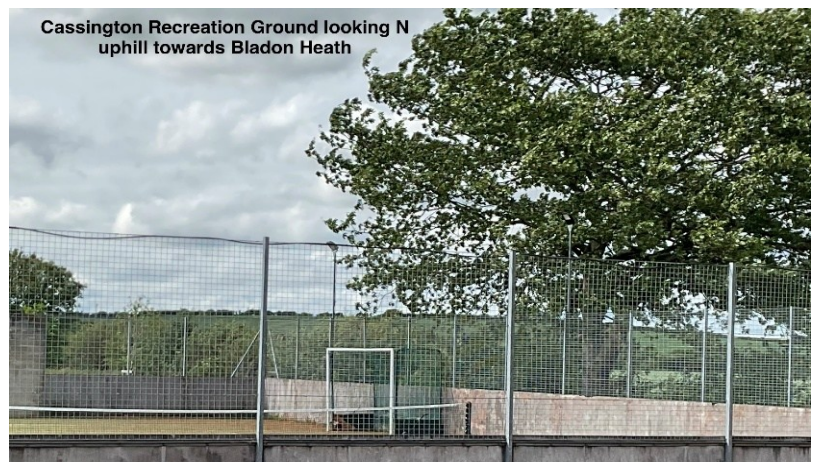


Figure 7.10. Recreation ground at Cassington.

Cassington Village Hall committee write: *“There is concern that an infrastructure of such a great scale so near to the village centre will have a huge detrimental impact on the community as a whole and on the activities which take place in the hall. The noise disturbance and additional traffic and congestion throughout the constructional phase may well deter potential bookers which will make the hall difficult to be financially sustainable for*

the benefit of the community. The traffic and noise will also impact village members attending events in the hall."

Properties on Yarnton Road. Highly impacted with panels just 25m from their low, open wooden fences without any existing vegetation and stretching nearly 2km uphill towards Bladon Heath.



Figure 7.11. Views from properties on Yarnton Road, Cassington.

[7.22 Church Hanborough Residences](#)

Church Hanborough is a conservation village with several listed properties and the notable Grade I listed SS Peter and Paul Church, whose spire is a landmark across the whole of the Central site. Properties on Lower Road are particularly impacted being on the site boundary.

[7.23 Goose Eye Farm \(M140\)](#)

Towards the middle of central site and completely overwhelmed with panels on 4 sides. Likely to be impacted by both glint & glare and noise. House has been the target of violent burglary and safety; security and privacy is a real concern. Water supply is in danger of damage from underground disturbance and piles.



Figure 7.12. Photomontage of fields surrounding Goose Eye Farm.

Other Lower Rd properties include College Farm (M134) and Pelican House (M133), Mill Farm (M104-7) and New Barn Farm (141). Panels within 25m with limited existing vegetation screening but all assessed in glint and glare study as “no impact, no mitigation”

College Farm and Pelican House have the additional issue of a new PRow proposed to pass within 5m on three sides of their properties. The panels will start within 25m of the PRow and stretch 1.3km SE uphill to Purwell Farm and over 2km NE to Bladon Heath in an 180deg arc.

The joint impacts of hedging, PRow and panels (visible even when oppressive hedging screens the lower ground) have not been assessed.

College Farm, Lower Road, Church Hanborough looking east.
Panels within 25m stretching to horizon and beyond



Photomontage of the panel area visible from College Farm, Lower Road, Church Hanborough



Figure 7.13 Photomontage of view from College Farm, Church Hanborough.

Residential Visual Amenity - Southern Site

Cumnor Village, Farmoor and Filchamstead all lie in the Southern site. The north facing panel area lies in a valley with steeply contoured sides up to Tumbledown Hill offering commanding views of the whole site. The main substation is proposed to be sited close to Farmoor Reservoir.

Farmoor Reservoir. The panels would be visible from the path round the Farmoor Reservoir - recognised as a vital area for resident and migratory birds e.g. the rare snow geese which now base themselves here and use the adjacent fields (proposed for the substation) for grazing and resting. (Ref: Jan 2025 BBC Countryfile). The reservoir is popular with local residents and visitors alike: families, runners, fishermen, the sailing club, bird watchers, Nordic walkers, nature groups, disabled car users.

Lake View House, on the top of Tumbledown Hill, enjoys panoramic views of Farmoor reservoir. It looks down across at least half the entire southern BWSF site as well as the main substation currently proposed between the reservoir and Smith Hill Copse. Because of its elevated position, and for 4 others nearby, no amount of vegetation would be able to screen the view of panels area.



Figure 7.14. Views from Lake View House.

The son of Lake View House's owner says:

"It's important that we sell this property because, due to ill health, "my mother can no longer cope with managing a 7,000 sq ft house and it's grounds". The situation is worsening my mother's mental health problems and causing real anxiety among the whole family. First marketed in early 2023 at £3.5m, the price been reduced to £2.5m but still remains unsold with the majority of viewers expressing concerns about the potential solar plans. The view from the house looks directly to where the solar farm would be."

Cumulative Impacts

Though not part of this Application, it is vital to consider the cumulative impact of other infrastructure adjacent to the BWSF site, the proposed electrical substation adjacent to the reservoir and the battery farm proposed alongside, 25m from homes. This will have a major permanent negative visual and noise impact on all residents and amenity users.

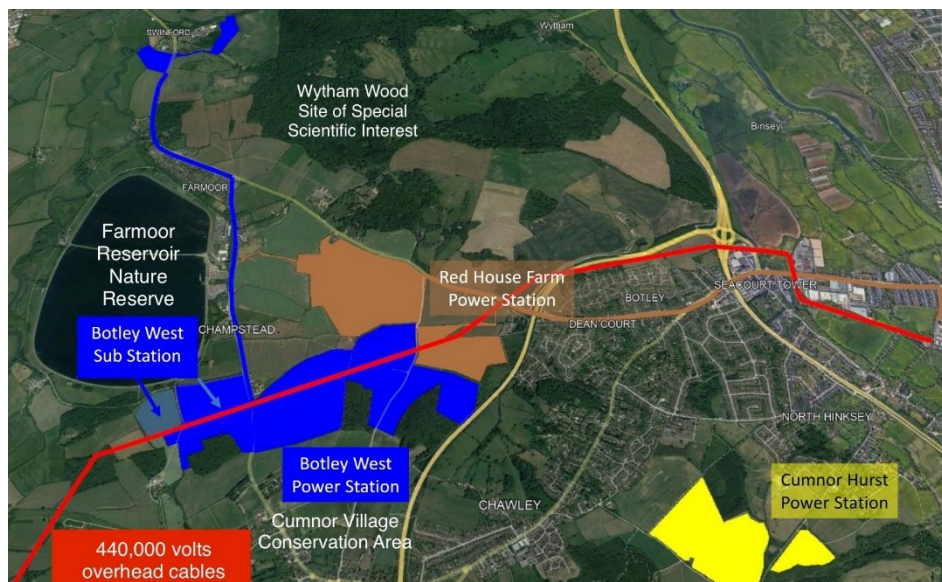


Figure 7.15. BWSF infrastructure at Southern Site.

Viewpoints, photographs and photomontages to assess Visual Amenity

- 7.24 The number, locations, directions and photographic quality of viewpoints provided by the Applicant are inadequate.
- 7.25 There is a failure to comply with the guidance from Landscape Institute TGN06/19.
- 7.26 There is significant under assessment of impact in ES.
- 7.27 The public are not informed or aware – Non-Technical Summaries omit any mention of viewpoint photographs, photomontages or visualisations.
- 7.28 Assessment of impact at one point does not represent the accumulation of impacts along a length of road or footpath.
- 7.29 It is difficult for the public to appreciate the full impact due to insufficient information.
- 7.30 The Applicant has provided 55 viewpoints with 58 views, (viewpoint 5 has 3 directions and viewpoint 37 has 2) and 31 photomontages for winter yr.1 and summer yr.15 but no winter photomontages beyond yr.1. This is insufficient for appreciation of the impact.
- 7.31 Examples of inadequate assessments, and factors leading to significant under assessments in the LVIA in the ES Chapter 8 (APP-045 for the Central site – paragraphs 8.9.178 – 8.9.231), include:
- 7.32 The limitation of the number of viewpoints to 55 has inevitably provided only sparse coverage for such a huge triple site project proposed over undulating countryside.
- 7.33 No assessment of the ‘within project’ accumulation of adverse impacts along the whole length of: (a) each footpath or (b) the repetition of impacts on users

along all the footpaths criss-crossing the site. The same applies to those travelling along Lower Road and Burleigh Road.

- 7.34 Lack of recognition of the extent of negative impact on heritage assets including conservation villages and listed buildings. For example: no viewpoints along 3.5km of Lower Road between viewpoints 22 and 30 despite many lengthy gaps in the hedging and at access points providing views up to Church Hanborough and its church steeple even in summer.
- 7.35 Poorly sited viewpoints. For example: viewpoint 27 (APP-076 at Fig. 8.314) would show greater impact if moved 200m northwards, and viewpoint 40 (APP-078 at Fig. 8.340) would also show greater adverse impact if moved 500m up the lane.
- 7.36 No genuine recognition of the continuous negative impact on walking by or between high metal fences and vast areas of panels. These are under assessed, for example at viewpoints 23, 32, and 38.
- 7.37 No recognition of the strongly negative impact of corridors creating a 'tunnel' effect on walkers. For example: Yr. 15 viewpoints 32 and 38 (APP-077 and APP-078). Walking northeast from viewpoint 32 would be largely enclosed and towards a wall of panels ahead in the next field (APP-077, Figs. 8.824 - 7), and the panorama view from viewpoint 38 (APP-078, Fig. 8.338) towards Church Hanborough and its church spire would be ruined as shown by the photograph and corresponding photomontage both at Fig. 8.338.
- 7.38 Several The 2-2.5km footpaths have only a single viewpoint, the Applicant frequently ignores footpaths entirely or assesses the impact as 'not significant'.
- 7.39 The 3.5km of Lower Road has no viewpoints between 22 and 30, and 4.5 km of Burleigh Road has only one viewpoint 41 at the southern end.
- 7.40 The failure to provide a photomontage for key viewpoint 24 is a serious omission. This location provides a major view across the Evenlode Valley. (APP-065, Fig. 8.178 summer and APP-066, Fig. 8.62 winter). It will be seriously impacted by fencing and panels. It is not, as claimed, "a glimpse of a view" (APP-045 at paragraph 8.9.195) but well known and admired as a stopping point for the panoramic view across the valley.
- 7.41 The elongation of photographs has reduced the apparent visibility of the extent and impact of panels, fencing and other associated equipment.
- 7.42 Many images suffer from low contrast and low-resolution photographs, many of which appear to have been taken in overcast conditions. This reduces the apparent visibility of panels against green fields. For example: viewpoints 34 at Fig.8.330, 38 at Fig.8.336 and 40 at Fig. 8.340.

Conclusion on Viewpoints

- 7.43 Overall, the lack of true representation of the negative impact of such a very large three sites project on an undulating high quality rural landscape.
- 7.44 This is professionally summarised in paragraph 2.38 of Landscape Architect, Russell Canning's Relevant Representation (APP-0919) in these terms:
- 7.45 *"The use of discrete, static imagery to illustrate landscape and visual impacts which extends over an area, 22km, is largely ineffective in conveying the cumulative impact upon the landscape and highly visual receptor's views of that landscape, including local residents/ visitors moving through the area."*

- 7.46 This map of the Central Site is based on figure 17.5 'Public Rights of Way and Other Promoted Routes' (APP-112) onto which have been marked in pink, viewpoints with photomontages, and in green viewpoints without photomontages taken from figure 8.10 'Representative Viewpoints and Photomontage Locations' (APP-085).

Key to Map

Pink and green marks include the direction arrows and numbering used in APP-085 are shown.

Grey areas correspond to the solar panel areas shown on the Illustrative Masterplan 2.2 (AS-020)

Yellow highlighting along PRow and pink highlighting along Lower Road and Burleigh Road are to assist identification.

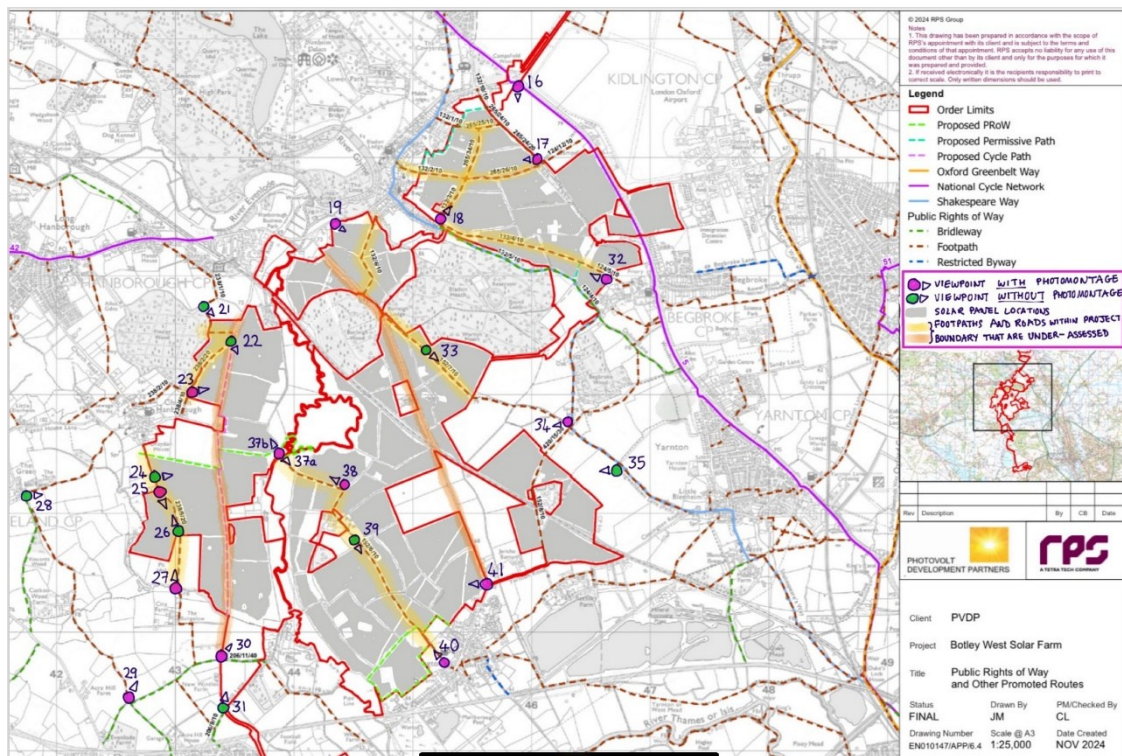


Figure 7.16. Map showing Viewpoints and PRow on the Central Site

8.0 Glint and Glare Study (APP-128 Appendix 4.4)

Methodology and Assessment

- 8.1 The Glint and Glare study carried out by Page Power under the instructions of the Applicant analysed 687 properties (though 699 was given as the total). These were chosen to be representative of properties within 1km of the site (of which there are around 5,000 in total) that could potentially have a view of the panels.
- 8.2 A glaring error is the total omission of around 30 properties on A4095 in Bladon from being assessed at all despite being within 100m of the panel area which would afford a very clear view of the panels
- 8.3 Nos.39-59 Bladon Rd, Nos. 92-126 Grove Road and 2 properties on Orchard Field Lane have been completely omitted from the assessment despite lying less than 100m from the panel area. M1, the first property identified in the central section, is No.90 Grove Rd.
- 8.4 No reflections were possible for 67 and just 7 were deemed “moderate impact” and requiring mitigation. The methodology leading to this conclusion must be questioned.
- 8.5 For 606 of the assessed properties, the identified screening (desk-based review) was that “*existing and/or proposed vegetation is predicted to **significantly** obstruct views of reflecting panels.*”. It is therefore wrong to describe there being “no impact” for these 606 properties and wrong not to recommend any mitigation.
- 8.6 “Existing vegetation” and “proposed vegetation” should be dealt with separately because they offer very different levels of protection. “existing vegetation” gives immediate protection from glint and glare on day one whereas “**proposed** vegetation” would give no protection for at least 10 years (as shown in the Applicant’s own photomontages).

- 8.7 An example of vegetation planted for screening after 3 years is shown in **Fig.8.1** Photograph taken Nov 2024 at 12-acre solar farm, Eynsham - construction completed in 2022. It will be a considerable number of years before the screening is effective at hiding the fencing and solar panels. In this example the screening has not been maintained and some of the plantings have died.



Figure 8.1. Example of vegetation after 3 years at a 12 Acre Solar Farm, Eynsham

Failure to distinguish between the screening provided by existing and proposed vegetation.

- 8.8 In its modelling table (APP-128 Appendix 4.4 Glint and Glare Study, table 7.2.2) the report has lumped together “**existing** vegetation” and “**proposed** vegetation” in the identified screening (desk-based review) column of their modelling table. The report’s authors “Page Power” did not do this in their

assessment of properties impacted by the Sunnica Solar project so why have they done it here?

- 8.9 An example from this table is shown in Fig.2. SBW have visited several of these properties and can confirm that, for example, M34 has NO existing vegetation screening it but is shown as no impact with no mitigation recommended. M36 is judged as having no significant screening and therefore moderate impact with recommended mitigation. **There are clear errors in this assessment as demonstrated in the following section.**

A comparison of the assessments of two properties in the Northern Site

- 8.11 **N34** is described below in table as 7.4.2 as having no impact and no mitigation recommended due to “existing or proposed vegetation is predicted to significantly obstruct views of reflecting panels” In fact there is no existing vegetation at all, and the “proposed vegetation” would offer no protection for 10 years - even with careful management.



Photograph taken at N34, March 2025.



Photomontage at N34 showing view of panels

7.4.2 Results Discussion

The modelling has shown that solar reflections are geometrically possible towards 632 of the 699 assessed dwellings. Tables 8 to 10, below and on the following pages, summarises the predicted impact at these receptors.

Dwelling Receptor	Geometric Modelling Results (screening not considered)	Identified Screening (desk-based review)	Relevant Factors	Impact Classification	Mitigation Recommended?
N1 – N2	No solar reflections geometrically possible	N/A	N/A	No impact	No
N3 – N35, N38 – N70	Solar reflections geometrically possible for more than 3 months per year but less than 60 minutes on any given day	Existing and/or proposed vegetation is predicted to significantly obstruct views of reflecting panels	N/A	No impact	No
N36 – N37	Solar reflections geometrically possible for more than 3 months per year but less than 60 minutes on any given day	No significant relevant screening identified	N/A	Moderate impact	Yes

Extract from APP-128 Appendix 4.4 Glint and Glare Study, Table 7.4.2



Figure 8.2 Google Earth image from Appendix 4.4: Glint and Glare Study Fig 216, p213 showing proposed vegetation (pink line). No impact, no mitigation recommended

8.12

No.36 is described as having “**no screening identified**” so moderate impact and mitigation recommended. In fact, here there is considerable existing vegetation that would provide immediate screening. The mitigation appears to cover one gap in the hedge (circled in red). In fact, the only gap is a field entrance to be used for vehicular access by the Applicant to the BWSF site.



Figure 8.3. View from property No.36.

- 8.13 This annotated Google Earth image below (Figure 8.4) is from Appendix 4.4: Glint and Glare Study, (Fig 89, p94) and shows the proposed mitigation which goes across the field entrance.

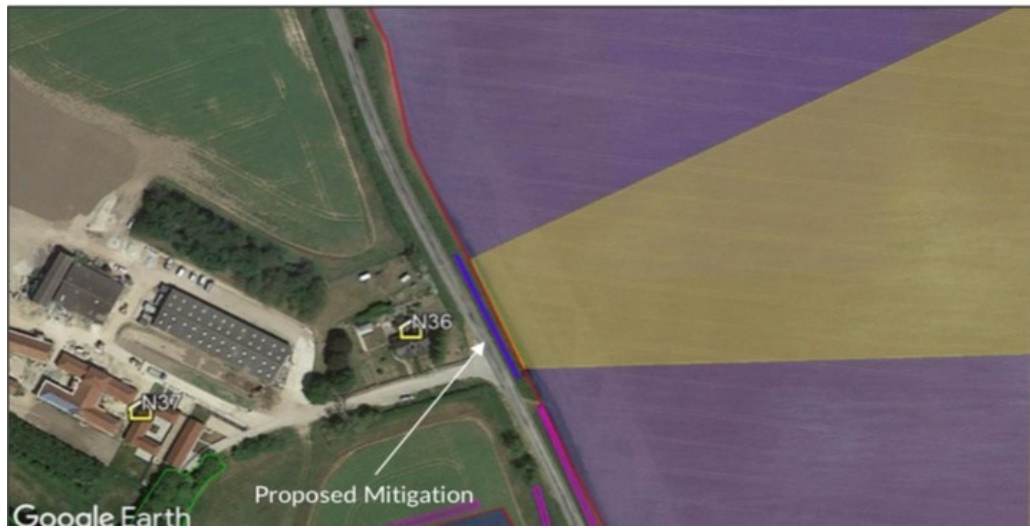


Figure 8.4. Map of proposed mitigation for No.36 from Appendix 4.4 of the ES.

- 8.14 Masterplan 2.1B (Figure 8.5) shows a vehicular access point for construction traffic (orange dot) in the middle of the strip of vegetation to be planted as proposed mitigation. This exemplifies the errors and understatements made throughout the Glint & Glare report.



Figure 8.5. Copy of map from Masterplan 2.1B

Missing Information from the Applicant

- 8.15 It has only been possible to examine examples from the Northern site because maps of vegetation type for the Central and Southern have not been provided by the Applicant.
- 8.16 On p190 of EN010147/APP/6.5 Appendix 4.4 Glint & Glare, the desk-based Analysis Overview states: "*Representative desk-based analysis for receptors is shown on the following pages including the identification of relevant screening and reflecting panel areas. Further images can be provided upon request.*"
- 8.17 Images for the whole of the highly contoured and more densely populated Central site are missing, as are all those for the Southern site. This seems far from representative. Why are only some images provided? The images provided are ALL for the flatter, less populated Northern site.
- 8.18 SBW contacted the Applicant on 28 March 2025 requesting copies of the missing images but, at the time of writing, have not received the promised images. (5 June 2025)

9.0 Ecology & Nature Conservation (APP-046 Chapter 9)

Introduction

- 9.1 We concur with all the summary statements made in the LIR in section 7.4 regarding failures and insufficiencies in the assessment and mitigation of ecological impacts and damage to trees.
- 9.2 People are engaged in Ecology & Nature Conservation. Comments made in Relevant Representations reveal people are deeply concerned about the potential impact of the BWSF proposal on Ecology & Nature Conservation.
- 9.3 We echo the Joint LIR's concerns about the likely significant impact of cabling routes on the root protection areas of multiple trees and the justification for the wide-ranging powers described in the DCO articles 38 and 39.
- 9.4 Analysis of Relevant Representations on the PINs website shows that within the 1,115 Relevant Representations (RR), the terms 'Ecology', 'Nature', 'Conservation' or 'Wildlife' are mentioned 629 times. They are mentioned more times in total than 'Panel' (592 mentions) clearly illustrating the focus on these issues. The term 'Wildlife' alone is mentioned 336 times – a sample of comments containing the term 'Wildlife' is shown in section
- 9.5 Other terms such as 'Birds' (134 mentions), 'Trees' (94), 'Woodland' (70), 'Bats' (58), 'Hares' (29) and 'Swan' (23) also appear numerous times.

Trees and Ancient Woodlands

- 9.6 We have raised concerns about the impact of this development on notable, veteran, and ancient trees within and around the application area. We believe the risk of damage, decline or loss of important trees has not been fully assessed by the Applicant and that there are omissions, and poor presentation and assessment within the application.
- 9.7 Our specific concerns are for trees that form part of the ancient woodlands in the Central Area at Pinsley Wood, Burleigh Wood, Bladon Heath and Worton Heath. Across the whole Botley West site there are other areas of ancient woodland and an ancient green lane at Dornford impacted. The high value trees contained within hedgerows and boundary lines mark out and form a major element of the setting of this part of Oxfordshire.
- 9.8 Local volunteer field work, observation and knowledge confirms veteran and notable trees exist in large numbers within and adjacent to these ancient woodlands. The Woodland Trust's Ancient Tree Inventory (ATI) lists 25 Oak, Ash and Horse Chestnut trees which have been verified by the Trust's specialist assessors. Of these, 10 specimens are verified veteran trees (registration numbers and a location map shown at section 2.8). A number of the trees listed on the ATI do not appear in the Applicant's submission. Many more trees have been recorded, measured and assessed by volunteers.
- 9.9 Local observations show a significant proportion of the high value trees present exist around the perimeter of the woodlands and as a result are particularly at risk from being directly exposed to the installation of solar equipment and infrastructure, and cable routing. Cable route options are proposed that pass very close, adjacent to and, in some instances, underneath high value trees. The routes increase the risk of damage to trees and areas of ancient woodland across the site. Examples of high-risk pinch points are located at Bladon Heath, Cassington Lane near Burleigh Lodge,

and Worton Heath boundary with Merton College land (where a cable route option runs adjacent to ancient woodland for almost 500m).

- 9.10

The scale of the proposal creates a situation where local ancient woodlands are significantly or completely surrounded. The size of this development is much larger than and isolates the woodlands themselves. Buffer zones and new hedgerows are proposed but there is no mitigation proposed for the effect of woodland isolation or fragmentation and no robust evidence-based assessment of the local impact on ancient woodlands or woodland species that rely on adjacent habitat for dispersal and feeding.
- 9.11

There is a clear failure to identify threats in the Applicant’s Veterans Tree Survey Report, including examples of veteran and notable trees located within, adjacent and close to the site that are not included in the report. The report takes a simple 54 standardized approach to buffer zones risking encroachment into canopy areas and root protection zones. There is little attention paid to indirect impact such as hydrological changes, soil degradation, and increased exposure to wind and light – all of which are relevant to sensitive, aged trees. We are concerned that the report underrepresents the scale and seriousness of risk to irreplaceable trees across the site.
- 9.12

By way of an example of under-representation, we are sharing photographs taken by local residents of 4 veteran Oak and Ash trees standing close to or on impacted field margins and cable route options. The trees are listed on The Woodland Trust’s Ancient Tree Inventory (ATI). The Applicant has completely omitted the 4th tree – a veteran Oak tree – from their Veterans Tree Survey Report submission. How many more important trees have been missed?


<div> <div>Image taken by local resident</div> <div>Woodland Trust Verified Veteran Tree 268313</div> <div>Oak</div>  </div>	<div> <div>Developer Image</div> <div>Tree 41 Veterans Tree Survey Report</div>  </div>	<div> <div>Image taken by local resident</div> <div>Woodland Trust Verified Veteran Tree 268314</div> <div>Pedunculata Oak</div>  </div>	<div> <div>Developer image</div> <div>Tree 70 Veterans Tree Survey Report</div>  </div>
<div> <div>Image taken by local resident</div> <div>Woodland Trust Verified Veteran Tree 268344</div> <div>Oak</div>  </div>	<div> <div>Developer image</div> <div>Not recorded Veterans Tree Survey Report</div> <div>No Developer Report or Image</div> </div>		

Figure 9.1 Veteran trees

GRID REFERENCE (SP)	SPECIES	ATI TREE NUMBER: https://ati.woodlandtrust.org.uk/
46089 13349	Oak	268355
44662 13770	Oak	268298
44654 13777	Horse Chestnut	268301
45721 13328	Oak	268314
45747 13334	Pedunculate Oak	268316
45786 13339	Oak	268317
45996 13357	Oak	268340
46046 13360	Oak	268344
44814 14224	Common Ash	268352
44941 14229	Oak	268353

Table 9.1 Woodland Trust Ancient Tree Inventory (ATI).
Verified veteran trees registration numbers:

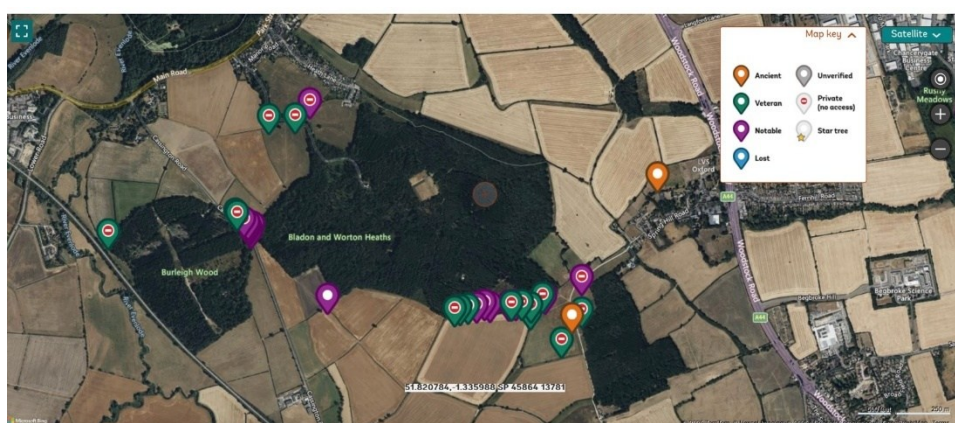


Figure 9.2. Woodland Trust Ancient Tree Inventory (ATI). Map showing examples of Ancient, Veteran and Notable Trees in the vicinity of Burleigh Wood & Bladon and Worton Heath Ancient Woodlands in the proposed BWSF Central Site. Recorded by local volunteers and verified by Woodland Trust specialist assessors).

Bats

- 9.13 We are very concerned about the effects of the proposal on local bat populations. It is clear from the scientific literature that bats do forage over arable land to a varying extent depending on species (e.g. Heim et al., 2017; Finch et al., 2020; Tinsley et al., 2022; Foxley et al., 2023; Szabadi et al., 2023) and furthermore there is evidence in the UK and elsewhere that the presence of solar arrays have a significant impact on bat numbers over open countryside (e.g. Montag et al., 2016; Tinsley et al., 2022; Szabadi et al., 2023) which for some species is severe.
- 9.14 The proposal causes serious concern given the high number of bat species detected in the area (12). The diversity of bat species, especially within the Central Section of the proposed project, is likely a result of the mosaic of different habitats in the area including woodland, hedgerow, water bodies and open fields. So important is the bat assemblage in the area that the Applicant's own ecological consultants have classified the area as of International Importance for bats.
- 9.15 The consultants conclude that the presence of the solar farm will have no significant impact on bat populations. This is an erroneous conclusion given the very strong evidence, including from the U.K. that the presence of solar arrays has a significant impact on bat numbers over open countryside (e.g. Montag et al., 2016; Tinsley et al., 2022; Szabadi et al., 2023) which for some species is severe and for bat populations overall is serious.
- 9.16 We therefore conclude that the conclusion of "negligible impact" on bats reflects a lack of appreciation of recent peer-reviewed scientific literature on bats habitat use and the negative and, in some cases, severe impact of solar arrays on bats. This has led to the use of a flawed baseline survey methodology which has neglected to survey the habitats on which the solar arrays will be placed.
- 9.17 The local area for this project represents a very special mosaic of habitats creating a high diversity of bat species of international importance and that the construction of a large-scale solar farm would have a high risk, given recent findings on the impact of solar arrays on bats, of doing significant harm to multiple species severely compromising the abundance and biodiversity of bats in the area, especially the Central Section of Botley West Solar Power Station.

Birds

- 9.18 We are very concerned about the effects of the proposal on local bird populations. The presence of birds including Breeding Birds and Wintering Birds is well observed locally. Local people regularly report sightings of an over wintering population of Swans (numbering 20-30 birds) and Geese in the fields at Cassington and Lower Road.
- 9.19 We are concerned that the proposal fails to consider habitat connectivity and the importance of farming.

- 9.20 In total 107 species of birds were observed during breeding bird surveys of which 61 were assessed to be breeding (9.6.55; EN010147/APP/6.3). Of these 33 species were considered to be of conservation interest including a number of farmland bird species (e.g. linnet, skylark and yellow hammer) which are all red listed (9.6.56 and Table 9.6.3; EN010147/APP/6.3). For skylarks 228 breeding pairs were identified in the second year of survey. For wintering birds 96 were observed, of which 50 are of conservation interest (9.6.58). Of these 6 species were Annex I species (golden plover, kingfisher, little egret, merlin, peregrine, and red kite; 9.6.59 EN010147/APP/6.3) and 15 species were Red Listed (corn bunting, fieldfare, greenfinch, grey partridge, herring gull, house sparrow, lapwing, linnet, marsh tit, merlin, mistle thrush, skylark, starling, woodcock, and yellowhammer; 9.6.60 EN010147/APP/6.3).
- 9.21 It is very important to stress that many of the species listed in decline which are observed locally in high numbers across the area are farmland birds that rely on arable farming to provide habitat and food.
- 9.22 Farmland birds are in decline nationally and will likely be significantly impacted by this development. We feel it is simply not credible that hundreds of hectares of arable cropped land is replaced with solar arrays and grazed grassland and there is no impact on farmland birds. Compensation with 36 ha of wild grassland over archaeological sites (Table 9.8.1 EN010147/APP/6.3) is not a credible replacement for the farmed land.
- 9.23 We are highly skeptical about the potential for skylark plots to compensate for the enormous loss of breeding territories on the Botley West Solar Power Station. No evidence is presented of their effectiveness in the ES and no comparison of this as a skylark conservation measure is given with respect to other conservation strategies.
- 9.24 Consequently, local people are very worried that the local population of skylarks will be negatively impacted by the proposal.
- 9.25 Aquatic birds are a feature of the local area due to the presence of reservoirs and rivers in the landscape. As previously mentioned, Wintering Birds feed in the fields and meadows at Cassington and Lower Road. Both of these areas will be lost to solar panel arrays and supporting equipment under the proposal. We are very concerned about the potential loss of this bird habitat.
- 9.26 In addition, we are concerned that bird mortality will increase due to panel strikes in particular.

Other Species

Brown Hare

- 9.27 Hares have been in decline in the U.K. since the 1960s. Scientific evidence suggests that arable fields are important to hares as the prime habitat for foraging and breeding (Hutchings and Harris, 1996; Reynolds et al., 2010; Sliwinski et al., 2019). It is therefore likely that the Botley West Solar Power Station will have a significant and negative impact on this species. This is not just because of taking farmland out of production but also because grassland can be an unfavourable habitat (Hutchings and Harris, 1996).

Hedgehogs

- 9.28 Hedgehogs have also undergone a major decline in the U.K. and are also a species of conservation concern (Yarnell and Pettett, 2020¹). Reasons for their decline are various and include agricultural intensification, leading to a loss of hedgerows and expanding field sizes, fragmentation of rural landscapes, reductions in food availability as a result of use of pesticides and farming practices and the increase in their natural predator, the badger (Williams et al., 2018²; Yarnell and Pettett, 2020¹). Hedgehogs favour lowland habitats such as arable land as well as mixed-use plains, valley bottoms and undulating landscapes (e.g. Williams et al., 2018²).
- 9.29 We note that both these species occur frequently in the Central Section of the Botley West proposal and in Cassington hedgehogs are frequently observed in gardens.

¹ Yarnell, R.W., Pettett, C.E. (2020) Beneficial Land Management for Hedgehogs (*Erinaceus europaeus*) in the United Kingdom. *Animals* 10: 1566.

² Williams, B.M., Baker, P.J., Thomas, E., Wilson, G., Judge, J., Yarnell, R.W. (2018) Reduced occupancy of hedgehogs (*Erinaceus europaeus*) in rural England and Wales: The influence of habitat and an asymmetric intraguild predator. *Scientific Reports* 8: 12156.

Badgers

- 9.30 We are concerned that badgers and badger sets are at high risk of disturbance due to the proposal. The presence of badgers was identified using walkover surveys to identify signs of badgers such as sets, latrines, hair caught on fences etc. These surveys were undertaken throughout the proposed project area. Signs of badgers were located across all three sections of the survey site with the density of signs being much in the central section of the proposed solar power station between Cassington and Bladon than the northern and southern sections of the proposal. [REDACTED], separate badger territories and multiple signs of badger foraging and territory marking. It is notable that almost all of these sets are in fields / field margins that will be covered by or next to solar arrays meaning there is a high risk of disturbance of the animals during construction and operation.

Reptiles

- 9.31 Local people have reported and recorded numerous sightings of viviparous lizards, slow worms and grass snakes in locations adjacent to areas omitted from the survey for the reptile report. Several sites were investigated for reptiles and reported in Environmental Statement Volume 3 Appendix 9.7: Reptile Survey Report (EN010147/APP/6.5). It is notable that the area occupied by the allotment to the north of Cassington has abundant populations (see iNaturalist records). This is adjacent to the area of the proposal to the immediate north of Cassington. It is therefore an omission that the entire block of the proposed site north of Cassington was not surveyed for the reptile report. Natural England (2014³) recommends that surveys for reptiles take place in these habitats. By these recommendations the northern margins of Cassington and associated hedgerows, and margins of footpaths together with other similar areas across the proposal should have been surveyed.

Great Crested Newts

- 9.32 The connectivity of the landscape is important for great crested newts. They utilize a variety of terrestrial habitats, including woodland, scrub, grassland, hedgerows, and field margins. These habitats provide foraging opportunities and suitable hibernation sites. A resident of Shipton Slade hamlet describes a series of connected ponds that contain Great Crested Newts and is concerned that the proposed development stretches right down to these ponds.

³ Natural England (2014). Guidance Protected species and development: advice for local planning authorities: How to assess a planning application when there are protected species on or near a proposed development site. Updated 2023. <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications> (viewed 25th February, 2024).

Relevant Representations comments expressing concern about impact on wildlife

- 9.33 Bruce Windwood: Our hamlet/vale sits at the midpoint of two popular circular walks that give commanding views over the vale [which] contains a plethora of **wildlife** including: Barn Owls, Bats, Kestrels, Badgers, Red Kites (at least 6 roosting pairs), Yellow Hammers, Swallows (annual visitors to their nests in various barns), Herons, Fieldfares etc.....There is also the impact of panels right next to the ancient and wonderful allotment "Weaveley Furze" which has now become a woodland and wildlife haven.
- 9.34 Charlotte Freeborn: There will be a lot of disruption and will unsettle the **wildlife**, including deer, foxes, owls, hedgehogs, red kites, bats (studies have found solar panels reduce the population of bats) to name just a few.
- 9.35 Charlotte Holmes: All of the inhabitants of this area will be negatively impacted by the proposal, due to the visual impact on the landscape/countryside, the negative ecological impact, **wildlife**, important trees and hedgerows, the loss of Green Belt and important open spaces, and crucially, amenity access to the countryside lost.
- 9.36 Cherie Chopping: The section in Cumnor, in particular, would fill much of the scenic agricultural valley between the Cumnor Village Conservation Area, the world renowned Wytham Woods and the Farmoor Reservoir recreational area and local **wildlife** sites, and virtually all that valley when combined with the proposed Red House Farm power station and the substation National Grid is proposing to build to serve Botley West.
- 9.37 Daniel Rossati: The abundance of **wildlife** found here is something I'm personally passionate about. There's an excitement to spotting all your favourite plants and animals as you wander the land. My wife shares my passion so it's one of our favourite things to do, just exploring the landscape to see what we can find.
- 9.38 Dawn Leedham: Being a local resident who uses the local environment to exercise for physical, mental and emotional health, I am very familiar with the large amount of **wildlife** that inhabits the local area around Bladon in all seasons.
- 9.39 Denise Knox: This proposal will have a disastrous impact on **wildlife** in the valley which links these two sites and therefore is of notable strategic importance. Evidence would suggest, as Gillian Burke in BBC Wildlife Magazine points out, that "Scrutiny by Gwent Wildlife Trust of the results of post-construction monitoring at an existing solar site on the Levels – Llanwern Solar Farm – has shown high levels of pollution at a number of locations in the watercourses inside and outside the site, while a 99 per cent reduction in bat activity and local extinctions of the breeding population of lapwings have also been recorded." This cannot and should not be allowed to occur here.
- 9.40 Diana Taylor: In my garden and in the surrounding landscape the lack of **wildlife** becomes more apparent each year. The proposal suggests a biodiversity net gain as a result of change in use and their mitigation measures. There are many studies which refute this on many levels which others will put forward. Common sense tells me that the disruption to the landscape and finely balanced interdependencies, already frail, which exist in any ecosystem, will be adversely affected in innumerable ways, often unpredictably and irreversibly so.
- 9.41 Dr D Day: The large areas of solar panels will impact flora and fauna including an impact to birds and other **wildlife** that is not adequately

considered. Some is adjacent to SSSIs, LWS, AW, and other vital ecosystems.

- 9.42 Elaine Nicholls: The southern site is located near SSSIs, ancient woodland, local **wildlife** sites and priority habitats. It is such an important area for wildlife that Countryfile recently filmed an episode in the area. The devastating effects this proposal will have on the ecology here have been trivialized and ignored – for example, the proposal to include designated ‘skylark plots’ (surrounded by solar panels) to mitigate the impact on this red-listed species is ridiculous.
- 9.43 Elizabeth Begley: It is unclear how the stated biodiversity net gain of 70% would be achieved with only bird and bat boxes, bee hives and log piles, especially with the removal of long-established hedgerow and the fencing of solar arrays removing the ability of larger **wildlife** to freely roam, affecting their natural behaviour, with possible migration to other areas. I was told at the Woodstock consultation that no existing hedgerows would be removed as a result of BWSF. I understand that this is not in fact the case. Much of the existing hedgerow is very old and makes a huge contribution to local biodiversity. This would not quickly be restored by planting new hedgerow.
- 9.44 Heather Armitage: There would be a significant adverse impact on the existing **wildlife** such as red-listed farmland birds, including ground nesting birds such as skylarks, which have already been significantly impacted by local development, extremely rare birds such as turtle doves which are almost extinct in the UK, a pair of which visited my garden in Long Hanborough in the late Spring of 2024 and the swans who I regularly see overwintering on a field in Cassington. It will almost certainly have a severe adverse impact on the currently diverse bat population for which there is peer-reviewed scientific evidence. The destruction of existing hedgerows and trees will have a significant effect on wildlife. The effectiveness of planting new hedgerows will take years to realise during which time the insect population will decline and as a result the bird population will be significantly reduced. Wildlife would also be affected by runoff, during and after construction, on water courses.
- 9.45 John Daniel Stringer: The proposal describes “creating **wildlife** corridors”; a misnomer, since they already exist and solar farms require huge amounts of fencing which will cut off access to open countryside for people and animals alike. Hedgerows offered by the applicant in mitigation will simply turn paths into tunnels.
- 9.46 Katherine Ann Francoise Howells: Our understanding of the environmental impacts of large-scale solar power stations remains very poor. But certainly, they will add to the fragmentation of our natural landscapes by virtue of their fencing alone, and early indicators suggest they have direct negative consequences for **wildlife**.
- 9.47 Kathryn Margaret Finlay: It would have a significant ecological impact on **wildlife**, fauna, and human communities and increase flood risk in the area.
- 9.48 Keith Durham: All of the inhabitants of this area will be negatively impacted by the proposal, due to the visual impact on the landscape/countryside, the negative ecological impact, **wildlife**, important trees and hedgerows, the loss of Green Belt and important open spaces, and crucially, amenity access to the countryside lost.
- 9.49 Keith Gull: Biodiversity negative impact. There will be major negative impacts on **wildlife** with the destruction of feeding habitats for protected birds of prey around Farmoor as well as geese roosting and feeding grounds.

- 9.50 Lucy Allen: **Wildlife** forage, graze and hunt freely in the areas that are potentially to be developed. During the process of construction of a solar farm, their territories and/or habitats will be destroyed. When construction is complete, because of the fencing-off of huge areas, few animals will return. Many people will move away also, as they will no longer be able to enjoy any of the benefits that drew them to such a lovely location in the first place. All in all a depressing prospect.
- 9.51 Marisa Keeley: **Wildlife** is impacted, the ground below is wasted, only hares etc are happy as they are protected from hawks etc. I have never seen any sheep grazing in a field of solar panels. There will be a loss of habitat, ancient hedgerows and I presume trees will be removed. The ground will take many years to regenerate.
- 9.52 Mary Ann Canning: Ecology and Nature Conservation – I am also concerned about the detrimental effect on **wildlife** in the area, by restricting movement of mammals between our diverse habitats of woodlands, streams and meadows, as well as the reduction in hedgerows and open farmland, which at present support a wide variety of birds as well as a diverse bat population. Potential damage to Veteran trees and ancient hedgerows along the cable route is also a concern, as is the threat to river meadows where the cable crosses the River Thames.
- 9.53 Michael Turner: Surrounding wild land is vital for local **wildlife** and cultivators, offering a haven of natural beauty and ecological balance. Factors like fencing, lighting, site-wide construction, and noise will drive local wildlife away and create blockages for roaming animals such as hares, foxes, deer, and owls. Additionally, the area is home to endangered species of farmland birds, including yellowhammers and lapwings, who will lose a substantial portion of their favoured habitat due to the development. For the community, the impact will be equally devastating.
- 9.54 Mr Hurly: **Wildlife** will be lost. Deer: the tall summer grass of these fields is sanctuary for large does to birth and raise their young during which they have jumped into my garden to eat the roses. Red kites: the sycamore tree behind the summer house has a low branch on the right which we trim to make the “raptor perch”; each January red kites stop here for hours to scan the iron hard field for prey. Will they try among the solar panels? Barn owls: these nest in fir trees at the front of my house, close to the A4195 road; in the evenings you hear their call and watch them glide between the houses into the field. Bats: we have a large bat population which rely on insects from the fields. How do birds and bats survive when the field is barren of crops and their insects? Badgers: their snout marks and diggings are found all around this field and they have several times squeezed through my fence into the garden to dig for worms – how do badgers navigate solar panels and “security fencing”?
- 9.55 Richard Taylor: **Wildlife** of all kinds is bound to be detrimentally affected. This could be of additional concern because of the site’s proximity to the Wytham Wood SSSI. This large area is effectively a huge long-term ecology experiment and is world famous. The findings from their research are vital for the husbandry of deciduous woodland across Northern Europe. It is largely closed to the general public because of its sensitive and unspoilt nature. Of course, animals and insects travel to and from the woodland. We cannot be sure that covering the nearby fields with huge numbers of solar panels will not affect the behaviour of the **wildlife**.

- 9.56 Robert Enright: The introduction of fencing could sever important **wildlife** corridors, limiting the movement of species such as badgers, deer, and small mammals.
- 9.57 Robert Wakefield: The large areas of solar panels will impact flora and fauna including an impact to birds and other **wildlife** not adequately considered. Some are adjacent to SSSIs, LWS, AW, and other vital ecosystems.
- 9.58 Sarah Eaton: This area supports rich and diverse **wildlife** which is valuable in its own right but which also enriches the lives of residents and visitors. This proposed development, especially given its enormous scale, would be to the further detriment of wildlife which should be under close protection from loss or degradation.
- 9.59 Susan Margaret Cleave: Its impact on **wildlife** and biodiversity not least from the removal of extensive areas of established hedgerows. Any replanting will take decades to replace even a proportion of what will be lost.

10.0 Hydrology and Flooding (APP-047 Chapter 10.)

- 10.1 On Hydrology and Flood Risk the LIR notes insufficient information on surface water management during construction or under panels during operation, insufficient evidence of the impact of the development of areas with established risk of flooding. We agree with this assessment but disagree with the conclusion of a neutral impact. We believe that the limited mitigation measures will be insufficient to prevent an increase in flood risk.
- 10.2 The sites which lie between the rivers Thames and Cherwell, comprise ten water courses, and numerous small rivulets and underground springs. Much of the area is subject to flooding which affects homes and commercial undertakings, roads and transport. Although the rivers brooks and streams cause flooding, there is a significant problem with surface water flooding caused by run-off from the fields. The undulating landscape encourages natural run-off channels that flow onto the underlying impermeable Oxford clay at the bottom of the slopes.
- 10.3 Over many years, farmers and local inhabitants have used methods such as ditches and culverts, balance ponds and bunds, protective ploughing schemes and widespread perforated pipe systems of land drains. But these are not coping well with the increases in severe precipitation. Anything that makes it worse is to be avoided.
- 10.4 Damage to these systems by sinking steel piles through the land drains, compaction during construction and from the increased run-off from panels that will be created when rain cannot soak evenly into the ground is likely to increase the problems when magnified over thousands of acres.
- 10.5 We endorse the Joint LIR where it notes insufficient information on management of surface water and on the ground beneath the panels during operation and insufficient evidence of the impact of the development of areas with established risk of flooding.

Southern Site - Cumnor and Farmoor

- 10.6 According to the Environment Agency's (EA) map of fluvial (river) flood zones, there are areas within Cumnor Parish that are at risk of fluvial flooding (see Drawing No. CUMFRA1812-6).
- 10.7 These are located along the western Parish boundary, which runs parallel to the River Thames; and towards the east and north of Farmoor Reservoir. These areas partially sit within Flood Zone 2 - i.e. areas that sit within the 1:1000 year (plus climate change allowance) flood extent – and Flood Zone 3 – i.e. areas that sit within the 1:100 year (plus climate change allowance) flood extent.
- 10.8 In particular, the EA-mapped flood extents partially intersect with (or are immediately adjacent to):
 - Areas of Interest 2 (Farmoor) and 3 (Filchampstead).
 - Areas of Interest 1 (Cumnor Hill & Dean Court), 2 (Farmoor) and 3 (Filchampstead) are partially at risk of surface water flooding.

Ref: Assessment of Groundwater and Surface Water Flood Risk in Cumnor Parish for Cumnor PC February 2019

Table 1 – Risk of flooding from different sources at the Areas of Interest (AOI).

Area of Interest	Source of flood risk		
	Fluvial	Surface water	Groundwater
Cumnor Hill & Dean Court (AOI 1)	NONE	HIGH	HIGH
Farmoor (AOI 2)	LOW	HIGH	VERY LOW
Filchampstead (AOI 3)	HIGH	HIGH	VERY LOW
Wootton Catchment Area (AOI 4)	NONE	MEDIUM	LOW

Table 10.1 Risk of flooding from different sources at the Areas of Interest.



Figure 10.1 Aerial View of Swinford Toll Bridge. The picture shows the area flooded in January 2024. The cable route (see below) from the Central site to the Southern site must cross the River Thames near this point.

The actual crossing point has still not been defined.

Central Site – Begbroke

10.9 **RR Environmental Agency extract:** Recommended: Consider the flood risk to the development associated with the Rowel Brook. The upper reaches of this watercourse do not have any Flood Zone mapping due to the small size of the catchment. Undertake an assessment of flood risk for the upper reaches of Rowel Brook. Confirm if infrastructure is outside of the design flood extent. If infrastructure is placed in areas of flood risk associated with this watercourse, then hydraulic modelling will be required to quantify the risk to and from any development.



Figure 10.2. Rowel Brook November 2024. Royal Sun and the bottom of Spring Hill Road at the road traffic island on the A44

Central site - Bladon

Parish Flood report November 2008

- 10.10 **Park Street** 3 properties flooded. Primary causes: Surcharging of the River Glyme from its throttled junction with the River Evenlode adjacent to Hanborough bridge. Uncontrolled highway drainage run-off from Lamb Lane.
- 10.11 **Heath Lane** 1 property flooded. Primary Causes: Extensive agricultural run-off to the rear of the property. Surcharging of the combined sewer under Heath Lane to the front.
- 10.12 **Lower Park Blenheim and Caravan Park Blenheim:** Extensive Flooding. Primary causes: Blockage in the culvert to the rear of properties abutting Grove Road. Overtopping of the balancing pond.



Figure 10.3 Stranded vehicle on A 4095 between Long Hanborough and Bladon. Oxford Mail 25th November 2024.

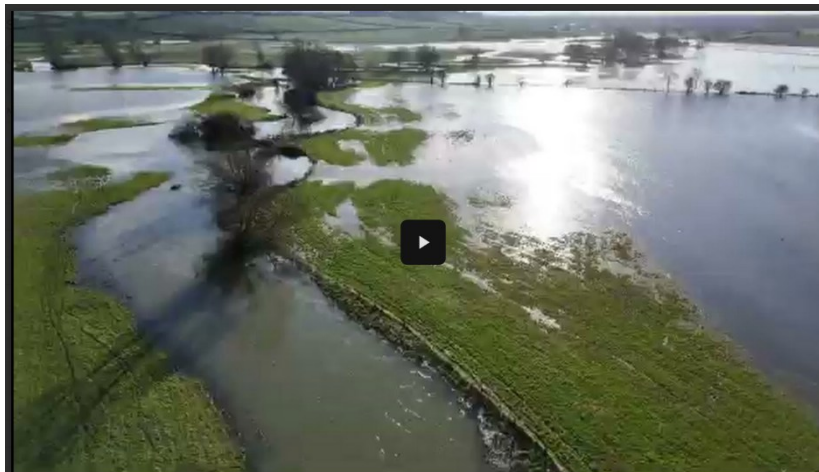


Figure 10.4. Frame from Drone footage between A4095 (Hanborough – Bladon Road) and Cassington. 6 January 2024.



Figure 10.5 Fields, proposed to have solar panels to south of Bladon, October 2024

Central site - Cassington, Jericho Barns and Worton

- 10.13 Extract Cassington Flooding Event 23rd – 24th September 2024: As can be seen in on the Environment Agency map below, Cassington is at low risk of flooding from the River Thames to the South and the River Evenlode to the west. However, the village is at risk from pluvial flooding events even at a 1 in 30-year event. Elm's Road has consistently been the most vulnerable area of housing from these events which result from surface water draining off the fields to the north of Cassington.
- 10.14 This is consistent with flooding of properties on Elm's Road in 2007 (WODC, 2008). Foxwell Court, St Peter's Close, Horsemere Lane, Foxwell End and Reynold's Farm are also at risk of flooding from extreme surface water events (WODC, 2008).
- 10.15 Outside the village Jericho Farm and Worton are also vulnerable to flooding and the road junction to Worton Farm was flooded over the winter of 2020/2021. Following the 2007 flood events action was taken to mitigate future surface-water flooding including the clearing of previously blocked drains and the building of a drainage pond behind the southwest corner of the playing fields. Since this time there have been further near-miss events, but no further property flooding had occurred up to September 2024.



Figure 10.6 Flood Risk Map from the Environment Agency for Cassington

Examples of flooding in 2024



Figure 10.7. Worton Culvert, Yarnton/Cassington Road. September 2024.



Figure 10.8. Elms Road, Cassington. September 2024.



Figure 10.9. Cassington Flooded playing Fields, Elms Road houses, culverts. September 2024.

Northern Site - Wootton, Woodstock

10.16 Flood risk is largely from the River Glyme

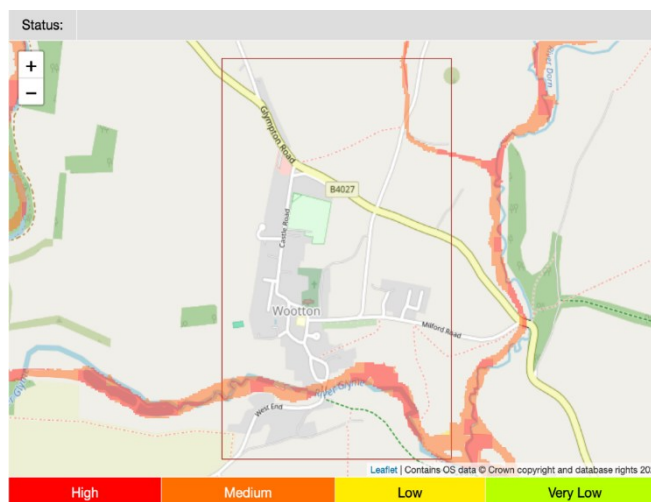


Figure 10.10. Flood Risk Map for Wootton.

10.17 Key Concerns arising from the fact that the area is already prone to flooding
Flooded Houses, Panel run-off, Destruction of Field/land Drains, Soil compaction, Release of contained springs, Flooded/closed Roads, Flood plain, Flooded fields, Sewage contamination, CNP Flood risk assessment.

Extracts from Relevant Representations

- 10.18 **The Environment Agency.** The assessment of flood risk is inadequate at this time due to evidence gaps within the submissions. Further modelling is needed in areas of unmapped flood zones relating to those watercourses which typically have a catchment less than three square kilometres. Environment Agency assets that lie within the order limits should be evaluated via pre-work and post-work assessments to ensure there has been no impact upon them. The proposed high directional drilling (HDD) cable depths may restrict the adaptability of assets whilst the entry/exit pits do not create an adequate buffer for watercourses.
- 10.19 **Oxford Capital Partners Limited.** Exacerbation of risk of flooding in Oxford city and surrounding areas. The proposed farm is between two rivers (Cherwell and Thames) and adjacent to an increasingly built-up area which has already diminished natural water flows and drainage soakaways. This is an unknown consequential cost which the community would have to bear, not the solar developer or the Blenheim Estate.

Central Site RRs

- 10.20 **Roderick John Craig.** Farm Manager Blenheim 1987 – 2001. It is not until you get to the flat land close to the flood plain that you find the gravels. All the slopes are impermeable Denchworth and Kelmscot clays. The majority of Burwell Farm is of the impermeable Denchworth and Kelmscot clays also. During construction the comprehensive field drainage system on Purwell Farm and some on Manor farm Cassington will be destroyed creating springs and surface run off where the drains are broken into by the panel supports. Where gravel soils meet clay or vice a versa springs will break out and when the Kelmscot and Denchworth soil types become waterlogged severe soil erosion and water run-off will occur. This winter so far, the A4095 at Bladon

has been flooded making the road impassable between what is known as the Lower Road and the village of Bladon. The lower road itself from Bladon to Eynsham roundabout has been very nearly impassable and four houses in Cassington have been flooded

- 10.21 **Prof Alex D Rogers.** There has been an erroneous assumption in the hydrological considerations of the ES that Solar Arrays do not affect the runoff of rain. This is materially incorrect and there is mounting evidence in the academic literature that the so-called dripline effect accelerates runoff of rain from Solar Arrays, especially during heavy rainfall. Cassington village is highly vulnerable to pluvial flooding and has suffered incidents of flooding of properties in 2007 and 2024. Between these dates there have been near-miss flooding events. Any development on the hills and fields to the north of Cassington risk elevating the incidence of flooding. Furthermore, the soils in the fields to the north of Cassington are clay, which has a poor capacity to absorb water. These field are therefore under-drained to make them more suitable for agriculture. I believe that the piling required for the construction of Botley West, will destroy much of this under-surface drainage and also likely lead to compression of the ground. This will risk further exposing the village, including vulnerable residents, to flooding. I do not have confidence that mitigation proposed for Cassington is sufficient and note that other areas vulnerable to flooding in proximity to this scheme (Jericho Barns, Worton, Bladon, road network) have not had mitigations planned for them against flooding.
- 10.22 **Friends of St Peter's Church Cassington.** Our main objection to the solar scheme as trustees of the charity is the increased risk of flooding forecast to occur both from the extremes of weather, now being seen everywhere, and from the expected run-off from the proposed site, which being partly situated on hills above the village will be difficult to control or mitigate. There are 26 listed buildings in the village of Cassington. Flooding has recently come close to the church building and if this scheme is approved in its current form the risk of flood damage is increased, especially with the volume of concrete being used across the site and compaction of natural draining soil by vehicles and machinery being employed. This risk will also affect many households in the village, and in some cases may make property uninsurable. Flooding from water coming off the hills has recently caused disruption due to the closure of the main A40 road to Oxford, in spite of the natural flood plains and existing drainage which mitigate this.
- 10.23 **Cassington Allotment Association.** At the moment there are pipes fitted underground in some of the fields on the hill to direct water into the drains, but these will be broken when they drive the piles for the panels into the ground.
- 10.24 **Anne Elizabeth Luttmann-Johnson.** Obviously if you cover a field in solar panels then it will have an impact on where the rainfall goes, instead of falling on every bit of the ground and soaking in to it, the rain will fall on the panels, run down it, and pour off the lowest point forming a channel which will then take it to the nearest ditch or drainage point. The ditches already can't cope with the runoff as it is and when this increases we will get more flooding in the village. I am a wheelchair user, and I live in a bungalow, which has almost flooded on one occasion when the drains were blocked, and if I hadn't called the fire brigade to come and help my house would have flooded. I have no upstairs so I would have been trapped, and the contents of my house ruined. On that occasion the fire brigade was able to clear the ditch and the drains and get the water running, but I fear I shall not be so lucky if there is a higher volume of water coming off the fields.

- 10.25 **Worton Farms Ltd., Worton.** Flooding: We have experienced a number of flooding events on the estate. The origin of the floods being water run-off from the land bordering us to the North, namely Spring Hill. This land, forms part of the solar proposal. However, BWSF don't seem to have recognised our site as a flood risk. As a result, we commissioned a professional Flood Risk Appraisal. It concludes: "Any localised increased in runoff, or alteration to land drainage patterns could potentially serve to exacerbate the existing flood risk situation, potentially impacting the Worton Park access road and adjacent residential properties." "Whilst some preliminary environmental documentation is available on the BWSF website, there is currently no specific mention of this land parcel, or indication that this specific area has been fully investigated with respect to the known flood risk history to the land itself, the Yarnton Road, or Worton Park site access road. It is noted, however, that under the National Planning Policy Framework, the proposals should not be given consent if there is any potential increase in flood risk offsite.
- 10.26 **Sherard Veasey.** It will permanently destroy the land drains that have been laid by our ancestors over hundreds, if not thousands, of years, which in most cases are un-mapped but which were laid by those with intimate knowledge of the land. These can never be replaced and their destruction will lead to local flooding.
- 10.27 **Judith Frances Wardle.** I am aware of the dangers of flooding during and after heavy rain, local roads are too often closed, and Ramblers' walks are cancelled. Solar panels will increase the risks. The developers appear not to have discovered the extent to which the area proposed for the solar farm has many, many small ditches, drains or springs. They can only be seen on the Definitive Map by increasing the magnification or visiting on foot.
- 10.28 **Geoffrey Peter Goddard Begbroke PC.** Fields north of Begbroke had until recently been contour ploughed to alleviate flooding in the village, but this was abandoned in preparation for this solar farm hence severe flooding to properties in the village occurred at the end of 2024.
- 10.29 **Dawn Needham.-** In the Bladon area there is significant and regular flooding of areas of proposed solar panels (photo documentation is available) and in the last 2 years the A4095 that runs through Bladon (and is the only road in and out of the village) has completely flooded and been impassable. There is evidence that solar panels affect rainwater run off and increase the flood risk which we are already subject to.
- 10.30 **Lucia Norton Bladon.** Ten water courses flow within the proposed area. The intense rainstorms in recent years have resulted in some houses in Bladon flooding. Much of the village is on clay. During construction some existing land drains will be damaged, and soil compacted further, and along with the run-off from panels the risk of flooding will be increased.
- 10.31 **Adrian Cox Bladon.** In recent months the road from Bladon and Witney has flooded to the extent that vehicular access has been impossible. Solar panels in the immediate area would cause run off from fields surrounding this road making the situation even worse causing personal inconvenience to the surrounding population and economic detriment to businesses in the local area
- 10.32 **Hanborough Parish Council.** The roads also frequently flood and run off from the building site will potentially increase this chance of flooding. In the winter of 2024/25, the villages of Church Hanborough and Long Hanborough

became inaccessible because of road flooding. Mud from the site will cause a skid hazard.

- 10.33 **Christine Cooke.** Lower Road, Church Hanborough. The field by the west side gate and footpath to Pinsley wood on Lower Red (a favourite with dog walkers) is flooded much of the time but solar panels are still planned.
- 10.34 **Emma Clare Merry.** As a resident of Long Hanborough, I am also fully aware of how quickly traffic blocks ensue when there is flooding across the A4095 and at Lower Road. Earlier this year even the A40 was flooded, and I had to approach the village from the north. So I am concerned about the farm's impact on flood risk, particularly increased run-off, reduced groundwater absorption and increased soil erosion.

Southern Site RRs

- 10.35 **Layla Moran MP.** Flood Risk. The area of Farmoor Valley is prone to flooding. During storms, the road from Farmoor to Cumnor is often closed. As this is the designated access road to the site this will be problematic.
- 10.36 **Cumnor Parish Council.** Flood Risk. It is self-evident that the applicant has neither read or understood the [CNP Flood Risk Assessment](#), and so CNP policy RNE2. Even before considerations of altered run off due to expanses of impervious panels, hard standings etc., there are already substantial flooding issues within the proposed southern site. At the time of writing (mid-February 2025) fields within the proposed site are flooded – hardly surprising given the extent of EA Flood Zone 3 in the Farmoor valley. The requirements of Policy RNE2 have not been met and so the application is contrary to it.
- 10.37 **Dianne Hillary Leonora Gull.** The area where the solar farm is to be built occupies farming land near Farmoor reservoir at the bottom of a shallow large flat area, surrounded by low hills, providing lovely views and opportunities for walkers. From an aesthetic point of view its loss would be large. This land is already subject to flooding on a very regular basis. I have multiple photographs, taken over several years, to back up this statement. When this proposal was initially made it stated clearly that this land was not subject to flooding!!! The large concrete area needed for the batteries which will store the electricity generated will increase this problem and an independent expert has said it will worsen flooding problems already present in areas of Oxford around Botley, they are bad enough already!
- 10.38 **Sarah Bannerman.** We have lived and walked in the Southern Site for 25 years now and know that much of the proposed site has issues with flooding: as evidenced by the current state of the fields in February 25. Putting solar panels on these already flood-prone fields will destroy soil drains, create runoff channels and adversely affect the flood risk throughout the valley. This could have a direct impact downstream in Oxford, which is already grappling with flood alleviation schemes.
- 10.39 **Cherie Chopping, Cumnor.** Flood Risk It is self-evident that the applicant has neither read or understood the CNP Flood Risk Assessment, and so CNP policy RNE2. Even before considerations of altered run off due to expanses of impervious panels, hard standings etc., there are already substantial flooding issues within the proposed southern site. At the time of writing (mid-February 2025) fields within the proposed site are flooded – hardly surprising given the extent of EA Flood Zone 3 in the Farmoor Valley.

Concerns about Sewage and Flooding

10.40 **Kathryn Jane Hallowes Robson.** Thames Water cannot manage the existing water issues in the area, resulting in the discharge of untreated sewage into the local water courses ending up in the River Evenlode and eventually the Thames. This has a knock-on effect on whether the water in the River Thames is clean enough to go into the reservoir at Farmoor and when built, the new reservoir that is planned west of Abingdon that will serve the whole of the south of England. Of note is the observation that part of the field above the Thames Water Sewage works at Cassington is very often under several centimetres of water. This is not the only field in the proposed area that is prone to long term low-level flooding. Many of the fields that have been proposed as suitable for the solar farm contain land drains that were installed to help manage these flooding risks and allow the efficient growing of cereal crops. Heavy plant and machinery used during the installation of the solar farm will damage the land drains and in so doing increase the flooding risk.

11.0 Traffic and Transport (APP-049 Chapter 12)

- 11.1 The LIR considers the permanent impacts of the proposed development on the highway's network are likely to be neutral. However, the construction phase is likely to have localised impacts due to cables laying under the carriageway and could see an increase in traffic on key routes.
- 11.2 The LIR does not comment on routes to be used for access and indeed, in the absence of a complete Traffic Management Plan it is difficult to assess the impact on the network of local narrow and minor roads. Looking at the limited options for accessing the site other than via narrow, restricted roads, we consider the impact to be negative through all 3 phases not just construction due to the amount of infrastructure needing to be replaced during the operational phase. (Applicant admitted at Issue Specific Hearing 1 that 100% of panels would need to be replaced within 25 years.)
- 11.3 We believe that the Applicant's assessments and conclusions on the impact of increased number and size of vehicles accessing the site are inadequate, ignoring or downplaying the impact on already heavily congested roads, proximity to dwellings and businesses and the unsuitability of most of the access routes and of the site compounds/access points proposed.
- 11.4 In terms of road safety, the Applicant relies only on Crashmap data. While generally considered a reliable source for road crash data in the UK, the data, sourced from the Dept. for Transport and police forces, has limitations. Specifically, it only includes personal injury collisions reported to the police and recorded using the STATS19 accident reporting form. This means that not all collisions are included. Observations from residents living adjacent to locally recognised "black spots" contradict some of the quoted data.
- 11.5 The Applicant acknowledges some disruption during the construction and decommissioning phases but appears to have ignored the operational phase. Indeed, the Joint LIR has assessed the impact during operation as "neutral". But, as revealed during the Issue Specific Hearing, 100% of the panels are likely to be replaced over the lifetime of the project which means there will be a good deal of transportation of new panels in and old panels out during the operational phase. The traffic impact of this has not been assessed.
- 11.6 The economic impact of increased delays due to cable trenching, HGV and AIL deliveries and maintenance access to the site has not been adequately assessed. SBW carried out a Residential Amenity Survey which included 2 questions on traffic (see Table 11.1).

Table 11.1 Residential Amenity Summary - Traffic Questions

Have you experienced traffic congestion near your property in the past in the event of					
	Significantly	Moderately	Negligible	Not at all	Blank/?
Roadworks, temporary traffic lights	53%	29%	8%	4%	6%
Blenheim Palace traffic	40%	22%	13%	12%	13%
Rush hour congestion	58%	25%	9%	3%	5%
How do you think BWSF will affect traffic near your property					
	Significantly	Moderately	Negligible	Not at all	Blank/?
during construction?	84%	7%	2%	4%	3%
during operation?	38%	32%	11%	5%	14%
during decommissioning?	77%	9%	3%	3%	8%

Survey results showed that roads identified by residents as causing particular problems which have been overlooked include:

Northern Site

- 11.7 The **B4027** is a narrow but well-used road and the main access road to Wootton. It has several junctions with minor roads and residents' driveways. It is the main access road to North Oxford Crematorium and the Oxford Drama School. Meeting HGVs on this road will be a hazard.

Cable Route and Southern Site

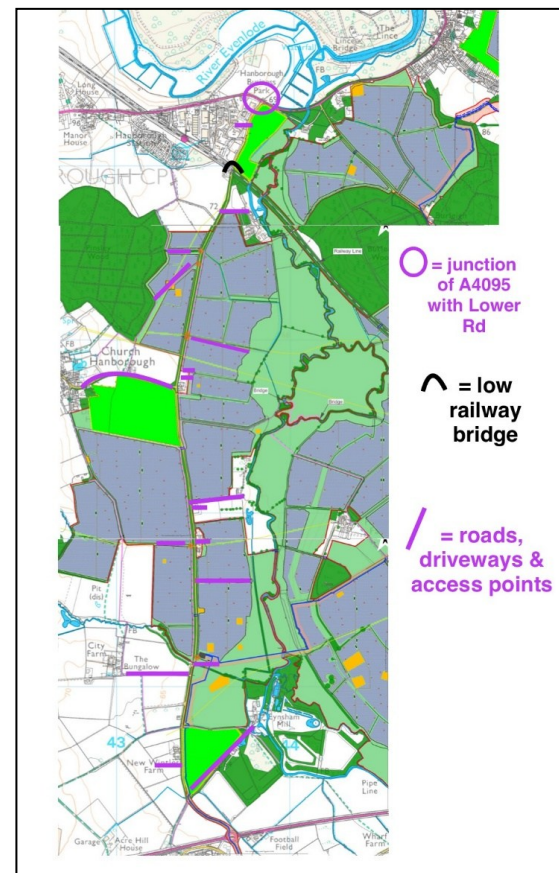
- 11.8 The **B4449** between Eynsham roundabout and Swinford Toll bridge is one of the most heavily congested roads in the area with regular queuing traffic.
- 11.9 The cable route from Eynsham to the proposed new electrical grid station behind Farmoor Reservoir will be trenched <15m from boundaries of 90+ properties in Farmoor and Filchamstead.
- 11.10 The **B4044** from the Eynsham Toll Bridge towards the Botley interchange and the Botley Road (currently closed), is renowned for its traffic queues during peak times, especially when HGVs and builders' lorries predominate. The noise, disruption and delays to regular road users, including the only bus route towards Oxford, will cause much distress to residents (many elderly); intensify the carbon effects/ air pollution, and affect quality of life. It is the only alternative route between the busy A40 and A420 in the event of an accident/closure of the equally busy A34.
- 11.11 The turn from **B4449 onto B4017** proposed to be used for cable route and access to the southern site is a mini-roundabout in Farmoor, close to Farmoor Village Hall and two bus stops and several dwellings and businesses. There would likely be a reduction in road safety, as articulated HGVs seek to navigate the very tight turning circle and partially unsighted Farmoor roundabout.

- 11.12 The **B4017** from Farmoor to Cumnor is a narrow road with no verge which is scheduled to accommodate the cable route and to be used by HGV and ALL's. It is a major commuter route and, in the event of an accident or blockage on the A34, the only route between the primary routes A40 and A420. The **B4017** provides the **only** access to parts of Farmoor, Filchamstead and Cumnor Village including 35 dwellings, 5 businesses and a Nursery School and Farmoor reservoir - regularly well used by families, runners, fishermen, the water sports clubs, bird watchers, and many other members of the public will be especially impacted. The panels on the north facing sloping fields of Tumbledown Dick beside the **B4017** are not in a prime position for solar energy but could create glint & glare in the eyes of the many drivers using this narrow winding steep road
- 11.13 Farmoor Nursery School's website says "These spacious premises are purpose built in 3 acres of grounds between the villages of Farmoor and Cumnor. It was carefully selected to provide children with a safe, healthy and natural environment in which to develop and grow. Situated in open countryside, close to Oxford with very easy access from the Ring Road, the A420 and the A40". The property lies within 500m of BWSF infrastructure and will be severely impacted by disruption, congestion and delays during cable trenching directly outside the property on the narrow **B4017**.

Central Site

- 11.14 **A4095** is very heavily used - especially when there is disruption on the equally busy A40. It passes close to many residences in Long Hanborough and, in Bladon, the A4095 becomes very narrow, unsuitable for HGVs and regularly blocked - especially when there is an event at the adjacent Blenheim Palace.
- 11.15 **Lower Rd** (see Fig.11.1 map of Lower Rd) is a heavily used commuter route and cut through between the busy A4095 and the A40 at Eynsham roundabout. This road contains 10 tracks and driveways leading to dwellings, business properties, a Nursery School and a turning to Church Hanborough and a low and narrow Railway Bridge. To this have been added 7 vehicular access points for construction and maintenance traffic. Lower Road has no speed limit and contains long straight stretches but also has bends and contour changes restricting sight lines in places.

Fig. 11.1 Lower Road + junctions with A4095, Church Rd and A40 at Eynsham roundabout



- 11.16 At the junction between **A4095 and Lower Rd** traffic frequently queues for 500m as far as the low narrow railway bridge which is too narrow for a lorry to pass a car and unsuitable for large HGVs or AILs. The queue restricts access into the prestigious Wolfram Institute and other businesses near the junction. More traffic turning onto Lower Rd to access the fields of solar panels will further delay the traffic trying to turn out. To avoid the queues, cars would cut through Church Hanborough, an unsuitable alternative as the road is narrow and winds through the village where there is no pavement, no lighting and many properties adjacent to the road.
- 11.17 **Burleigh Road** between Cassington and Bladon is a narrow road marked “Single Track Road 7.5t limit”. There is barely room for two cars to pass, especially as the verge is uneven with broken road surface. There is also a humpback bridge with poor sight lines and danger of grounding for long loads. The road is totally unsuitable for HGVs and the ExA has already questioned the 200% increase in traffic predicted on that road.

The problem of access to the Central Site

- 11.18 In EN010147/APP-049/para 12.7.19, the Applicant writes: “Due to a low bridge on the northern section of Lower Road, construction HGVs delivering PCS units must arrive [and depart] at accesses along Cassington Road/Burleigh Road/Yarnton Road via the A44 and the A4095 as they are unable to route under the low Bridge.”
- 11.19 It has already been acknowledged (in EN010147/APP-049/para 12.7.18) that there is a 7.5t limit on Cassington/Burleigh Road although, the Applicant adds “except for loading” without explanation.

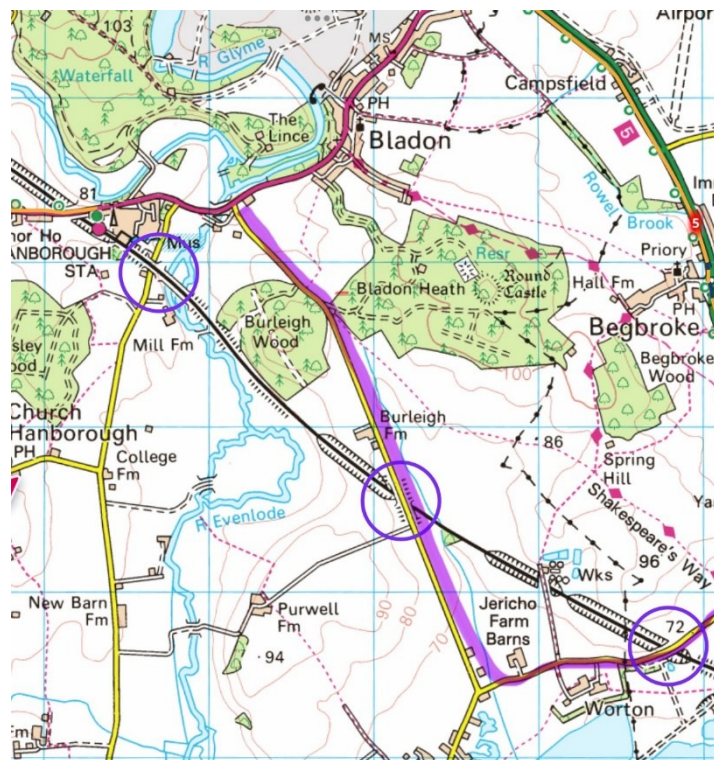


Fig 11.2. Central Site.
'Approach roads and railway bridges

- 11.20 This suggested re-routing of HGVs (which are, by definition, over 7.5t) along a single-track road with a 7.5t limit railway bridge is surely not permitted? Over 100 PCS units need to be delivered to the central site as well as 1,000,000 solar panels and associated infrastructure.
- 11.21 It must therefore be concluded that there are very limited options for safe access points to the central site due to low or limited weight bridges and a narrow winding road through Bladon.
- 11.22 The only suitable approach roads are the A44 on the Eastern side and at the southern end of Lower Rd from the A40 at Eynsham roundabout.

12.0 Noise and Vibration. (APP-050 Chapter 13)

- 12.1 Para 7.9 of the LIR states “Noise impacts of the proposed development on the open countryside and users of the PRoW network have not been fully assessed.” SBW endorse this.
- 12.2 We would add that impacts on sensitive receptors have not been assessed or mitigated against during the construction phase.
- 12.3 We note the following areas where the Applicant has failed to carry out any assessment:
- Residential Amenity assessment of noise impacts on residents
 - Impacts on the open countryside and the users of the PRoW network (as identified in Joint LIR) This issue will be considered further in our review of impacts on users of PRoW in section 12.
- 12.4 We believe that impact of Noise both during construction and operation has been underestimated in the Applicant’s assessment.
- 12.5 Impacts of Construction noise are dismissed by the Applicant as temporary and short-lived. In paragraph 13.9.11 they state *“pile driving has the potential to cause some noise and vibration audible outside of the project site boundary however the pile driving will occur for a short period of time next to any one receptor”*
- 12.6 There is no justification for this conclusion in the Environmental Statement. Pile driving in an unbroken area of 500 hectares will cause severe noise pollution for each receptor for longer and at a much greater distance than predicted by the Applicant.
- 12.7 Given the scale and topology of the central area, hammering will reverberate throughout the Evenlode Valley impacting properties in Church Hanborough, Bladon, Begbroke and Cassington. A notable concern is the loss of peace and tranquillity in Bladon Churchyard containing the much-visited Churchill’s grave. It is well known in these villages that noises from Blenheim events up to 4km away can frequently be heard quite clearly.
- 12.8 All these concerns extend into the **Operational phase** too. The ES states that Power Converter Stations (PCS) will emit 92dB. There are 156 PCS throughout the site, some are placed in pairs, many are within 100m of properties and as close as 5m to PROW and yet the impact is universally assessed as negligible and cumulative impacts have not been considered.
- 12.9 During the construction phase, there has been no assessment of noise impacts on residential receptors. During the operational stage some dwellings have been assessed for noise but how the Applicant arrived at the very limited number of these has not explained [in EN010147/APP/6.3 Table 13.26], nor why they omitted so many sensitive receptors including several schools and a Crematorium. Noise from pile driving or trench drilling reaching the North Oxford Crematorium during services would be totally unacceptable but has not been considered.

Assessment of Noise impact - Construction and Operation

- 12.10 During the Issue Specific Hearings the Applicant was asked to explain:
- How the rather limited number of residential receptors listed in Chapter 13 Noise and Vibration [APP-050] was selected?

- Why there was no similar noise assessment for these receptors during the construction phase of the project?

12.11 The answers given were:

- *“We selected the receptors just based on those which are located closest to the red line boundary and those which are most likely to be affected by noise.”*
- *“Noise impact assessment (APP-050) does include an assessment of construction phase noise on residential receptors that is all set out there. It’s also expanded in the construction appendix 13.2 which is APP- 212 as well. It is fully considered at all residential receptors”.*

12.12 Having re-checked we can confirm that **tables 13.26, 13.27 and 13.28 (APP-**

050) deal with **operational** phase noise only.

Table 13.26: Operational noise results (Southern Site Area)

Southern Site Area												
Receptor	Background Sound Level, $L_{A90,T}$ (dB)			Rating Level, $L_{A,r,T,r}$ (dB)			Difference Δ Between Rating Sound Level and Background Sound Level (dB)			Magnitude of Impact		
	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM
Denmans Farm (N)	43	37	38	36	14	33	-7	-23	-5	Negligible	Negligible	Negligible
Denmans Farm (W)	43	37	38	26	18	32	-11	-19	-6	Negligible	Negligible	Negligible
Heidersbach	37	32	38	28	22	25	-11	-10	-13	Negligible	Negligible	Negligible
Jumpers Farm (W)	39	31	37	33	17	25	-6	-14	-12	Negligible	Negligible	Negligible
Jumpers Farm (E)	39	31	37	35	27	30	-4	-4	-7	Negligible	Negligible	Negligible
Jumpers Farm (S)	39	31	37	24	33	34	-19	2	-3	Negligible	Low	Negligible
Tudor Court Park	43	31	38	24	13	21	-13	-18	-17	Negligible	Negligible	Negligible
Upper Whitley Farm	37	32	38	36	23	24	-7	-9	-14	Negligible	Negligible	Negligible

Table 13.27: Operational noise assessment results (Central Site Area)

Central Site Area												
Receptor	Background Sound Level, $L_{A90,T}$ (dB)			Rating Level, $L_{A,r,T,r}$ (dB)			Difference Δ Between Rating Sound Level and Background Sound Level (dB)			Magnitude of Impact		
	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM
Battimer	43	32	33	35	17	30	-8	-15	-3	Negligible	Negligible	Negligible

Central Site Area												
Receptor	Background Sound Level, $L_{A90,T}$ (dB)			Rating Level, $L_{A,r,T,r}$ (dB)			Difference Δ Between Rating Sound Level and Background Sound Level (dB)			Magnitude of Impact		
	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM
Bladon House	43	32	33	30	11	28	-13	-21	-5	Negligible	Negligible	Negligible
Bladon Pits	41	31	36	28	13	25	-13	-18	-11	Negligible	Negligible	Negligible
Brackenwood	41	31	36	30	13	27	-11	-18	-9	Negligible	Negligible	Negligible
Burleigh Farm	35	31	35	30	10	27	-5	-21	-8	Negligible	Negligible	Negligible
Burleigh House	41	31	36	34	13	32	-7	-18	-4	Negligible	Negligible	Negligible
City Farm Cottages	46	32	39	26	13	23	-20	-19	-16	Negligible	Negligible	Negligible
Elms Road	37	34	36	34	14	31	-3	-20	-5	Negligible	Negligible	Negligible
Elms Road (South)	37	34	36	29	11	26	-8	-23	-10	Negligible	Negligible	Negligible
Evenlode Crescent	46	32	44	29	19	26	-17	-13	-18	Negligible	Negligible	Negligible
Eynsham Hill	46	32	39	29	24	27	-17	-8	-12	Negligible	Negligible	Negligible
Eynsham Road	37	34	36	29	12	26	-8	-22	-10	Negligible	Negligible	Negligible
Eynsham Road (South)	37	34	36	30	13	27	-7	-21	-9	Negligible	Negligible	Negligible
Goose Eye Farm	38	30	36	32	15	28	-6	-15	-8	Negligible	Negligible	Negligible
Goose Eye Farm	38	30	36	30	12	29	-8	-18	-7	Negligible	Negligible	Negligible
Hall Farm Paddocks	46	32	36	32	18	29	-14	-14	-7	Negligible	Negligible	Negligible
Heath Lane	39	29	38	25	12	24	-14	-17	-14	Negligible	Negligible	Negligible
Heath Lane (South)	39	29	38	26	14	25	-13	-15	-13	Negligible	Negligible	Negligible

Central Site Area												
Receptor	Background Sound Level, $L_{A90,T}$ (dB)			Rating Level, $L_{A,r,T,r}$ (dB)			Difference Δ Between Rating Sound Level and Background Sound Level (dB)			Magnitude of Impact		
	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM
Jericho Farm	37	34	36	29	17	26	-8	-17	-10	Negligible	Negligible	Negligible
Manor Road	39	29	38	27	9	25	-12	-20	-13	Negligible	Negligible	Negligible
Mill Farm	43	32	33	23	9	21	-20	-23	-12	Negligible	Negligible	Negligible
New Barns Farm	38	30	36	31	6	11	-7	-26	-28	Negligible	Negligible	Negligible
New Wintles Farm	46	32	39	12	15	27	-34	-15	-9	Negligible	Negligible	Negligible
Purwell Farm	38	30	36	30	11	23	-8	-20	-13	Negligible	Negligible	Negligible
The Beeches	41	31	36	20	11	22	-21	-21	-11	Negligible	Negligible	Negligible
The Paddock	43	32	33	25	21	28	-18	-11	-16	Negligible	Negligible	Negligible
Toll Cottage	46	32	44	30	14	26	-16	-23	-13	Negligible	Negligible	Negligible
Worton Rectory Farmhouse	38	37	39	29	8	14	-9	-29	-25	Negligible	Negligible	Negligible
Yarnton Nursing Home	38	37	39	16	17	30	-22	-15	-3	Negligible	Negligible	Negligible

Table 13.28: Operational noise assessment results (Northern Site Area)

Northern Site Area												
Receptor	Background Sound Level, $L_{A90,T}$ (dB)			Rating Level, $L_{A,r,T,r}$ (dB)			Difference Δ Between Rating Sound Level and Background Sound Level (dB)			Magnitude of Impact		
	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM	Day	Night	Early AM
Field View Lane	45	31	39	22	8	19	-23	-23	-20	Negligible	Negligible	Negligible
Hordley Cottages	37	33	34	33	13	29	-4	-20	-5	Negligible	Negligible	Negligible
Lower Dornford Farm	40	31	38	28	9	24	-12	-22	-14	Negligible	Negligible	Negligible
Milford Bridge Cottage	37	33	34	20	6	18	-17	-27	-16	Negligible	Negligible	Negligible
Mulberry Cottage	40	31	38	24	10	20	-16	-21	-18	Negligible	Negligible	Negligible
Old Weaveley Farm	45	31	39	29	18	26	-16	-13	-13	Negligible	Negligible	Negligible
Reeves Cottage	45	31	39	34	13	29	-11	-18	-10	Negligible	Negligible	Negligible
Sansoms Barn	37	33	34	28	10	24	-9	-23	-10	Negligible	Negligible	Negligible
Studys Castle	37	33	34	26	21	24	-11	-12	-10	Negligible	Negligible	Negligible
Threshers Barn	45	31	39	24	16	21	-21	-15	-18	Negligible	Negligible	Negligible
Upper Dornford Barn	40	31	38	23	6	20	-17	-25	-18	Negligible	Negligible	Negligible
Upper Dornford Cottages	40	31	38	27	7	23	-13	-24	-15	Negligible	Negligible	Negligible
Weaveley Farm	45	31	39	32	13	28	-13	-18	-11	Negligible	Negligible	Negligible
Wooton Downs Cottages	40	31	38	21	4	18	-19	-27	-20	Negligible	Negligible	Negligible

12.13 Moreover many sensitive receptors are omitted from tables 13.26 - 13.28.. Some of the most significant omitted receptors are listed here but many more exist:

- Dornford Cottage, one of the closest and most impacted properties in the North Site (different from all the other “Dornford” properties listed)
- Oxford Crematorium, very close to the cable route
- The Oxford School of Drama at Sansom’s Farm
- Amhurst Cottage
- Bladon Road & Grove Road, Bladon, 18 properties adjacent to the site boundary
- Bladon Primary School
- Bladon Churchyard (containing the much-visited Churchill’s Grave)
- Village End, Begbroke
- College Farm
- Pelican House
- Lake View House, Cumnor

12.14 There are no equivalent tables (13.26, 13.27 or 13.28) for Construction Noise in either APP-050, or APP-212. The only assessment of potential magnitude of impact during construction is table 13.25 which assesses any receptors <1344m from solar pile driving to be of **high** impact. There are over 5,000

properties within 1km but **none** of these have been assessed despite this finding.

Magnitude of impact

13.9.14

The magnitude of the impact at various distances from the boundary of the solar PV array areas for each of the Northern, Central, and Southern Site Area is presented in **Table 13.25**: below.

Table 13.25: Construction noise impact assessment – solar pile driving


Potential Magnitude of impact	Solar pile driving Distance d to receptor (m) for magnitude of impact
High	$d < 1,344$
Medium	$1344 \leq d < 2,113$
Low	$2113 \leq d < 3,500$
Negligible	$d > 3,500$


13.9.15

The assessment above has been undertaken based upon predicted noise emission levels from the boundary of the solar PV installation areas. The number of receptors per impact magnitude band equates to the total number of receptors affected across the whole site.

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13.9.16

Due to the nature of the operations, all receptors would not be affected simultaneously across all sections. Moreover, the solar pile driving works would be very transient in nature and move across each of the PV installation areas thus receptors could be exposed to high noise levels built this would occur only for a short period of time.

13.9.17

The prediction of noise impacts has not accounted for screening provided by intervening buildings and thus the levels at receptors within built-up areas are likely to be at least 5 - 10 dB lower than those predicted.

- 12.15 The view expressed in para 13.9.16 is repeated in APP-212 Appendix 13.2 in paragraph 1.5.11 *“the solar pile driving works would be very transient in nature and would move across each of the installation areas. Thus, receptors may be exposed to high noise levels but this would occur only for a short period of time”* **No evidence is provided for this statement or consideration of cumulative impact**
- 12.16 ... and in 1.15.3 *“if required, noise screens could be installed around the solar pile driver where the installation occurs very close to residential receptors* **“but these residential receptors have not been identified or assessed.**

Evidence from Residential Receptors

- 12.17 In contrast, we have evidence and statements from residents relating to noise and vibration including:
- 12.18 Blenheim's private 20-acre Weaveley solar park has just finished construction north of Woodstock. Pile-driving during the construction was audible all day for several weeks from the hamlet of Shipton Slade Farm over 1km away. An audio recording of this pile driving made by a resident is in audio attachment 1.
- 12.19 **Bladon Parish Council (BPC)** is concerned with the location of the PCS and the noise that will be generated from their operation. There are several PCS located in Bladon Parish including near the residential areas of Heath Lane and Church Street, in the field adjacent to Bladon Recreation Ground and in close vicinity to many footpaths that run through the development. BPC is concerned that the topography of the Parish has not been taken into account when assessing this noise impact. There are many locations around Bladon Village where the topography means that sound bounces around and is magnified. It is likely that due to this effect the sound from the PCS will be heard at St Martin's Churchyard and the burial site of Winston Churchill and by the users of the PRoWs. Many Bladon residents comment similarly, and one says “The developers have not seriously addressed these issues and failed to respond to my concerns during the various consultations I attended”
- 12.20 The **Oxford School of Drama**. Noise and Vibration during construction, operation and decommissioning of the Project. Cables are to be laid via a dynamic pipe ramming process, the noise pollution caused by this will affect the working of the school which operates from 8am - 6pm five days a week.
- 12.21 **North Leigh Parish Council**. The size of the secondary substations indicates a substantial level of noise will occur. The transformers will operate 24/7. The additional noise resulting from all transformers becomes more apparent at night-time and in the early morning where baseline sound levels in the area are lower. It is incorrect to assume that the solar PV inverters will not operate during the night-time. It is understood from experience with other solar energy schemes that the inverters ‘ramp up’ in the early hours of the morning.
- 12.22 **Woodstock Town Council (WTC)** is concerned with the location of the PCS and the noise that will be generated from their operation. There are several PCS located in the northern area and some of these may be in close vicinity to the many footpaths that run through the development. WTC is concerned that the location of these PCS's could affect the residential and recreational areas [of Woodstock] and also the users of the PRoW's.
- 12.23 A resident of **Cassington** lives with a medical condition called myoclonus for which loud noise or sensory overload is catastrophic and a walk through the quiet countryside is essential to her well-being. “With sensory overload of

noise from the work needed to install the solar factory – concrete piling, cabling trenching, transport, the cost to my health will be substantial”.

13.0 Socio Economics (APP-051 Chapter 15)

Concerns regarding Tourism

- 13.1 Para 7.11 of the LIR states “Negative impacts arising from the scheme could substantially impact local tourism and its value to the local economy.” We endorse this statement.
- 13.2 In APP-051 Chapter 15. Socioeconomics the Applicant’s assessment on the impact on the local economy focuses mainly on the impact on construction jobs - both positive and negative and uses a very narrow definition of the impact on tourism. Eg, they conclude that *“loss in Airbnb tourists would be offset by increased rentals from construction workers” without any justification while elsewhere they say they would bring in construction workers by minibus from outside the area. The Applicant totally ignored many other hospitality businesses that would lose out. In the Joint LIR (para 6.129) it is noted that “the host authorities wish to highlight the importance of the tourism sector and wish to ensure that any impacts arising from the BWSF development are minimized.”*
- 13.3 Tourism is a significant driver for the local economy of West Oxfordshire. A less than comprehensive assessment of the impact on tourism was carried out by the Applicant playing down or ignoring the impact on many local businesses.
- 13.4 Key Figures and Impacts provided on WODC’s website and according to according to the Joint Tourism Service Review include:
- **Economic Contribution** : Tourism generates over £282 millions annually to the local economy.
 - **Visitor Numbers**: West Oxfordshire attracts over four million visitors per year.
 - **Job Creation**: The **tourism** sector supports approximately 4,400 jobs, representing 8% of the district's total employment.
 - **Spending Patterns**: Visitors spend an estimated £247 million in the local area annually, with significant **portions** allocated to food and drink, retail, accommodation, and attractions.
- 13.5 The Applicant has done no analysis of the impact of BWSF during the construction or operation stages on Local Businesses in terms of operation, loss of trade, loss of clients, future viability or willingness to invest in new or expanding businesses in the area.
- 13.6 Data collected by SBW has identified 278 businesses (87 hospitality, 33 retail, 60 service industries, 49 Industrial/tech, 24 Health/care, 25 Animal Care) in the affected villages many likely to be impacted by a fall in tourism, a loss of

Impact of proximity of BWSF to:	Significant	Moderate	Negligible	Not at All	Blank/Dont know
Appeal of the business	55%	18%	14%	5%	9%
Number of customers (footfall)	45%	14%	18%	9%	14%
Income	55%	9%	18%	9%	9%
Safe access to your premises	36%	14%	23%	9%	18%
Noise	59%	5%	23%	5%	9%
Physical and mental health of staff	41%	14%	9%	9%	27%
Health and safety of customers	32%	18%	18%	9%	23%

Table 13.1. Survey results for Business Impact

clients, a rise in traffic congestion affecting accessibility, etc. In responses to SBW's survey of Business Impact, though the number of responses was small, 64% felt their income would be either significantly or moderately affected. 73% believed there would be a significant or moderate impact on the appeal of their business. A full breakdown of survey results on Business Impact is shown in Table 13.1.

- 13.7 SBW surveys identified at least 87 hospitality businesses in the impacted villages including hotels, pubs and cafes, shops and garden centres. In addition, there are 450 Airbnb properties within 1,5km of BWSF.
- 13.8 **Woodstock Town Council Statement:** *"WTC is concerned with the effects of the development on tourism. Tourism plays a major role in the district's economy, attracting over four million visits and around £282.5 million to West Oxfordshire per year. Woodstock and the surrounding areas attract many of these visitors. These visitors do not only come to the area to visit the towns and villages they also come to the area to enjoy the rolling countryside and to walk the many PROWs in the area."*

Concerns from Businesses and Investors in the area

- 13.9 Oxford Capital Partners Holdings Limited (OCPH)
Based in Oxford, OCPH invest across the UK to support early-stage founders and companies to reach their full potential. Over 25 years, they've invested over £500m into over 100 companies and are proud to have enabled entrepreneurial successes from the earliest stages to later growth. Their key concerns about BWSF. Excessive degradation of the immediate vicinity of Oxford city, diminishing the attraction for businesses and the attraction for employees to relocate to the Oxford area. Overly imposing aspect of the proposed solar panel installations on hillsides where they are most visible. Impact on image and reputation of this great city and its environs, further reducing its attraction for tourists. A Mega Solar Farm so near to a great UNESCO Heritage Site is devaluing.
- 13.10 Wolfram Research, Long Hanborough
Conrad Wolfram, entrepreneur and business owner of writes: *"We appear to represent exactly the kind of organisation the government is building the UK's future economic prosperity on, and we are located in the Oxford-Cambridge Arc that is its focus for driving this forward. If Botley West proceeds Wolfram Research is likely to leave West Oxfordshire and relocate much of this business outside the UK. Why? This very expensive area is justifiable in large part because it is attractive to top talent employees, many of whom are internationally mobile. The combination of countryside, nice buildings, and the locality of Oxford make this edge of the Cotswolds a unique proposition e.g. Silicon Valley. Vandalism of a unique environment by installing extremely visible, guarded, fenced, ugly panels will destroy the appeal for us to locate here. To hold meetings, get investment and locate business at our offices, the ambiance of the local environment is key"*.

Businesses under threat

- 13.11 None of these threats have even been recognised let alone assessed by the Applicant who only mentions generalised "benefits" due to e.g. new jobs in the construction sector.
- 13.12 London Oxford Airport (LOA) Aviation School. MD Will Curtis
If the proposal is approved in its present form, the Aviation School would have to close due to *"threat to life"*. See their full statement at Issue Specific Hearing 1.

- 13.13 Burleigh Farm (M135-136)
This thriving and well managed arable farm producing good crops with responsible management will cease to exist. It had diversified into a Farm Bed & Breakfast attracting guests worldwide who particularly admire this countryside. All this business will be lost to the local economy.
- 13.14 Several Airbnb owners have expressed similar concerns about lost business. There are 450 Airbnb owners within 1.5km of BWSF including 135 in Woodstock and 50 in Bladon.
- 13.15 Valley Farm Campsite, Farmoor_- under threat due to loss of appeal. A commercial campsite near Farmoor. Currently uniquely positioned in rural countryside between SSSI Wytham Woods, Farmoor Reservoir and Tumbkedown Hill in Cumnor yet within km of the City of Oxford. They have genuine fears for their financial future - as their location will lose its attractiveness, endangering the number of visitors and subsequent revenue as well as the impact on their personal circumstances. The owner writes: *"The proposed site is an ugly backdrop to what was a beautiful valley view from Cumnor Hill, it was the deciding factor of why we moved here with idea of a pretty rural campsite so close to Oxford."*
- 13.16 Hill End Forest School, Wytham Woods
On the edge of Wytham Woods, an SSSI administered by the University of Oxford, Hill End is a popular and well used facility providing a diverse range of outdoor activities and facilities to schools and organised groups. In their RR, Hill End express serious concerns about *"the adverse effect on local visual and recreational amenity, and in turn a detrimental impact on our business"*.
With around 24,000 visitors each year, BWSF would impact a very large number of adults and children from Oxfordshire and beyond including around 1,700 participants in Duke of Edinburgh expeditions. These groups typically walk in via the footpaths from the direction of Cumnor or Eynsham. The attraction to use Hill End as their base is very largely our rural setting and proximity to pleasant countryside public rights of way.
The increased volume of traffic along the Eynsham Road, already a busy road, that would result from this development is a significant safety concern, given the number of visitors driving to Hill End and walkers needing to cross this road.
- 13.17 Dog Agility Charity. Loss of use of Blenheim owned field at Burleigh Farm, Cassington. This charitable business is impelled to move due to the fields it rents being taken over by BWSF. It may have to close permanently if the owner feels unable to continue investing after an enforced move or if they are unable to find anywhere appropriate that they can afford or if they lose too many members. The manager writes "This has had a significant impact on our financial and mental wellbeing. Our 30+ members use the club for exercise, social and mental health benefits and by moving some distance away (all nearby fields also being covered in panels), not everyone will be able to attend. We might also have to close after 27 years if it becomes unviable.
- 13.18 Farmoor Reservoir. Managed by Thames Water, several businesses operate at Farmoor Reservoir including Oxford Sailing Club, Oxford Sail Training Trust, Farmoor Fishery, Waterside Café. Its website states "Farmoor is a unique habitat for wildlife and a dream destination for anglers and sailors." The difficulty of access during construction, the disruption to wildlife and the unattractiveness of the area during operation is likely have a significant

impact on the number of visitors and therefore the impact on the income and viability of the businesses operating there.

13.19 Several RRs mention impacts on businesses in and around Farmoor Reservoir.

e.g. Cherie Chopping: Local businesses (Farmoor [Waterside] Café, the Vine pub, The Bear and Ragged Staff pub/hotel, Cumnor Village shop) will see a reduction in sales – an economic and employment loss to the Parish.”

Observations and Comments from other impacted businesses

- 13.20 Siemens, MRI Scanner manufacturer. Depending on the cable route chosen (still not decided at time of writing), Siemens are likely to be severely impacted during the construction phase as the trenching will go along at least part of the only access to their premises via a single, narrow, access road used to receive and dispatch very large loads of components and finish products of magnetic resonance imaging hardware.
- 13.21 Oxford School of Drama at Sampson's Farm (N39-N40). Principal Ed Hicks writes:
"The Oxford School of Drama is recognized internationally for training actors for the profession. Our alumni include acclaimed Bafta and Oscar nominated actors including Clare Foy from 'The Crown'. It was deliberately established in a rural area following a tradition of leading practitioners in this field - Constantin Stanislavski and Jacques Copeau. Contact with the natural landscape is crucial to the teaching at the school. The proposed development would have a devastating impact on the appeal to applicants, to the serene environment central to our successful training and to our ability to maintain our world leading status. Noise pollution and vibration during construction, operation and decommissioning will affect the working of the school which operates from 8am - 6pm five days a week. The applicant's assessment of 'low impact on Education and Training' is incorrect."
- 13.22 North Oxford Crematorium. Concerns about the serious impact of noise, disruption and limited access during construction stage. The cable trench passes on the minor road directly outside which is used for access by funeral cortèges. The crematorium has not been mentioned by the Applicant, and it is NOT included in the assessment of noise impact either during construction or operation.
- 13.23 Sturdy's Castle Public House. A popular start and end point for walkers across the northern site. Concern over loss of business as the area will be less attractive to walking groups.

Devaluation of the property market and difficulties in selling property

- 13.24 While recognizing that loss of value of an individual property is not a material concern in planning, it should be noted that material considerations **do** include:
- scale and dominance,
 - impact on the character or appearance of the area or the community
 - the impact on the local economy. This has not been assessed by the Applicant.
- 13.25 Twenty-four of the people responding to the SBW survey of most impacted residents reported that they had tried to sell their properties recently. Responses showed that:
- 6 had sold after considerably reducing the asking price,
 - 12 tried and failed to sell despite reducing the price with potential purchasers citing BWSF as the reason they pulled out,
 - 5 said they wanted/needed to sell but hadn't started the process due to actual or feared lower valuation than previously received.

- No one had sold at or near the asking price.

- 13.26 One particularly sad example is the owner of a 7,000 sq ft house whose deteriorating health means she is no longer able to cope with the house and garden. Her son writes "First marketed in early 2023 at £3.5m, the price has been reduced to £2.5m but still remains unsold with the majority of viewers expressing concerns about the potential solar plans". The view from the house looks directly to where solar farm would be. It is obvious from speaking to the family that the ongoing situation has seriously impacted the owner's mental health and is causing considerable anxiety and growing worry for the family.

14.0 Public Rights of Way (APP-045, -052, -053 Chapters 8, 16 & 17)

- 14.1 Para 7.8 of the LIR states “The application does not adequately consider the impacts of the development on users of the PRoW network. In its current form the proposal cannot be supported from a PRoW perspective.” We endorse this statement.
- 14.2 Neither the Applicant nor the LIR include mental health within their assessment of health issues, especially in regard to access to PRoW and open countryside. Whilst we agree with the LIR that impacts on physical health are likely to be neutral, we believe impacts on mental health are likely to be, indeed already are, negative.
- 14.3 The Issue of Public Rights of Way (**PRoW**) crosses over several chapters in the ES. The quality of viewpoint photographs and photomontages illustrating the experience of PRoW users’ experience of walking within and adjacent to the BWSF site is discussed in the Landscape and Visual Amenity section. Our remaining concerns are gathered here in this section.
- 14.4 26km of Public Rights of Way lie within or adjacent to the BWSF site. These are all widely used by many local residents and, the long-distance paths (LDP) especially, by walkers from much further afield. Historically important ancient tracks include Akeman Street, Dornford Lane (part of National Cycling Route - 5), The Oxfordshire Way, Frogwelldown Lane. LDPs include Shakespeare Way, Thames Path, Oxford Green Belt Way. This is an unprecedented number of significant pathways for any solar farm application in the UK.
- 14.5 The topic of PRoW is clearly one of great concern to local residents with nearly 500 mentioning the topic in their Relevant Representations. The loss of the lived environment as presently enjoyed is a real concern from those who look out onto the open rolling countryside and regularly traverse it along paths that many use daily.
- 14.6 The Applicant has maintained throughout their application documents and at consultation events that “*you won’t see the panels*” and have consistently assessed any visual impact as negligible following their mitigation. The equally consistent retort from residents is “*neither will we see the open countryside*”.
- 14.7 The mitigation proposed is to plant an unspecified amount of new hedging (a conservative estimate is 100km) and to fill gaps within existing hedging. What they have consistently ignored, through ignorance or deliberate downplaying, is that this actually makes the matter even worse because these oppressive dense hedgerows are unlikely to be removed at decommissioning 40 years later so the open nature of the countryside will be lost for ever.

- 14.8 The most commonly expressed concern of residents is that while the panels and 2.1m high fencing on each side would be unpleasant to walk through, and a real or perceived threat to safety in the event of meeting a stranger or aggressive dog, the proposed mitigation of high dense hedges will be even more oppressive as can be seen here in one example of the Applicant's own 15 year photomontages. It would require a lot of detailed surveying on the ground to judge whether the various hedges would become more of an eyesore than the panels behind them – local opinion (based on the applicants' own photomontages) is that the result would be more oppressive. No total length is given, no planting or maintenance schedules provided.
- 14.9 The conclusion is that the Applicant's proposed actions would have a detrimental effect on Human Health and destroy the current views of open countryside while walking within it for ever.

View from Purwell Farm to Church Hanborough (spire on horizon)

The current view



SBW photomontage of panels



Applicant's 15 year photomontage



- 14.10 There is serious concern about closure of PRowWs due to pile driving, installation of panels, erection of fencing, planting of new hedgerows, cable trenching, HDD drilling. No assessment has been made of the cumulative impact of all these activities on access to PRow which will, in effect be within a building site for the stated 2-year duration of the Construction stage.
- 14.11 Closures are only mentioned when a footpath itself is being worked on (e.g. trenching through or under) not when access to it is restricted during all these other activities. The total length of time that access to PRow is denied should be explained as it severely impacts residents' options for walking.
- 14.12 Bridleways being enclosed by fencing is potentially dangerous. In the event of a horse being spooked, e.g. by construction noise or other users of the path, there will be no escape route. The horses could decide to jump over or run through the fencing. This is likely to lead to an accident to either horse, rider or others involved in such an incident. This has not been taken into consideration in anyway.
- 14.13 Oxfordshire Ramblers point out that, on average, there are 3 walks per month which would be badly affected by the presence of solar panels, likely security fencing, and spoiled views over the countryside.
- 14.14 Paragraph 16.9.28 stated. "Given the rural context, whilst many residents are unlikely to make regular use of the public footpaths affected by the Project, most people would likely also have a high capacity to adapt by selecting alternative routes or physical activity opportunities to avoid any temporary disruption or disturbance."
- 14.15 The SBW survey on use of PRow refutes this. 67% of respondents said they had **no** alternative route without driving to somewhere outside the area. Only 10% of respondents would continue to walk on PRow turned into tunnels in this way, 41% would either walk less or give up walking altogether

SBW Public Rights of Way Survey

Use of PRow	
For walking	70%
For running	14%
For cycling	12%
For horse riding	4%
How often do you use PRow?	
Daily	45%
3/4 days per week	24%
Weekly	21%
Monthly	7%
Occasionally	4%
Could you walk from home to a PRow without panels	
No	46%
Yes	35%
Don't know	19%
If BWSF happens what would you do:	
Stop walking	16%
Use/drive to a PRow outside the area	49%
Walk less often	25%
Walk as before but through panels	11%
Impact of closure of nearest PRow during construction?	
Significant, no other nearby option	57%
Moderate, alternative(s) but not as convenient	37%
Negligible, plenty of other options/not a regular walker	6%

and 49% would drive to an alternative PRow outside the area. These results are not good for human health, traffic congestion or the environment.

- 14.16 The applicant (unlike SBW) has not carried out a detailed survey of local residents to justify what is said about use of PRow or alternative options.
- 14.17 In **APP-212 App 16.4** the table shows proposals to introduce new/enhanced pathways/cycle ways but there is no explanation of why these routes have been proposed or whether they have local support. Two examples:
- 14.18 The proposed footpath “upgraded” to a cycle path on the Central site starts in Bladon and heads towards the A44 but stops in the middle of a field leaving the cyclist stranded. It serves no useful purpose and there is no local support for the change.
- The proposed new footpath along the Lower Road is badly designed.
 - It crosses this busy and fast road twice - a real hazard to all road users
 - It skirts 2 properties by 5m - a negative impact on privacy, security and residential amenity.
- 14.19 Since these are all within the red line boundary and, therefore surrounded by panels, residents do not see them as the benefit that the Applicant claims.
- 14.20 It should also be remembered that, as acknowledged by the Applicant, PRow through the area affected are not only used by local residents but by visitors from Oxford and the wider area as well as visitors to Blenheim from further afield – especially those paths which are part of named long-distance routes.
- 14.21 Chapter 16 Human Health (EN010147/APP/6.3) should provide both measures of health gain from walking in the open air and the reduction in health gain created by siting solar panels on one or both sides of PRow.
- 14.22 There is considerable data about various aspects of the health of the population living in the area where solar panels would be sited, but when it comes to adverse effects from the project, the document only provides general suggestions (as in paragraph 16.9.25). When it comes to assessing the health effect of the project on the local population, the Applicant makes assumptions without any evidence and does not provide any figures regarding the likely effect.
- 14.23 Crucially, the applicant claims (para 16.9.3.) that “the magnitude of the change due to the project is **low.**” **At no point does the applicant quantify the level of change.**
- 14.24 Several residents have expressed concerns relating to impact of changes to PRow on amenity and mental health. Over half of RRs mentioned footpaths or walking. Negative impacts like overwhelming impact, tunnels, high fencing, oppressive hedging, loss of restorative benefits, safety concerns.
- 14.25 Concern for mental health of vulnerable people led one resident to ask, at Issue Specific Hearing 1, *“Has the Applicant given any consideration to neurodivergent people in their health assessment with regard to high hedges and footpath enclosure”?*

- 14.26 A resident of Cassington writes: *“I live with a medical condition called myoclonus as a result of a serious trauma [a few] years ago. Loud noise or sensory overload is catastrophic. Without this walk [PRoW 152/6/10] through the countryside and the opportunity to get to know my fellow villagers I don’t know what I would have done when my life changed so dramatically. This walk, if it becomes fenced by solar panels and the hedgerows which Botley West say are mitigation, will be changed utterly. With sensory overload of noise from the work needed to install the solar factory – concrete piling, cabling, transport, the cost to my health will be substantial”*
- 14.27 At the elevation of Cumnor village, the view towards Farmoor reservoir would no longer be open fields but a view of solar panels and fences, other industrial infrastructure and, if the development by the National Grid was allowed, a very large electricity substation, none of which would or could be hidden because of the difference in elevation. Although the developer would be obliged to preserve the Public Rights of Way within and immediately adjacent to the power station, the amenity value of those rights of ways would be lost, as instead of walking across open fields with views of the surrounding countryside, people would be walking along narrow canyons between high fences backed by solar arrays.
- 14.28 A hamlet near Woodstock sits at the midpoint of two popular circular walks that includes commanding views over the vale. A local resident writes: “These footpaths are used extensively by those living in Woodstock and were very much a life-line during the pandemic. These plans (impacting fields 1.16, 1.17, 1.18) will totally transform our hamlet idyll and the footpaths around it. To add insult to injury, the developers are proposing to carve a track between fields 1.17 and 1.18 to lay a cable connection between them. This track would obliterate this ancient existing footpath which currently winds its way via a charming tunnel of mature hedgerows and trees.”

Extracts from a few of the many RRs commenting on physical and mental health include:

- 14.29 **Emily Lemaire** Detrimental to Mental Health. For those of us who rely on the tranquility of our natural surroundings for mental well-being, the introduction of a large solar farm will be profoundly detrimental. Daily walks in the serene environment, which offer a respite from the stresses of everyday life, will be disrupted. Instead of being surrounded by nature, we will be confronted with vast expanses of metal and glass. This significant change in the landscape will undermine the restorative benefits that nature provides, leading to a decline in mental health and overall well-being.
- 14.30 **Carol Browning**. It will adversely impact the lives of those who use the public footpaths and amenity spaces for enjoyment and physical and mental health benefits. These spaces will be covered with panels and accompanying security fencing both of which will industrialise public amenity spaces and create enclosed corridors. These will be unattractive and as a female lone

SBW Public Rights of Way Survey - new footpaths

	None	Negligible	Moderate	Significant
Benefits of new footpaths through panels:	51%	35%	6%	4%
Benefits of a few footpaths upgraded to cycle paths	40%	40%	8%	4%

walker, I would avoid for reasons of personal safety.

- 14.31 **Daniel Rossati**. Many people move out of cities to escape the hectic nature of urban life, often it’s a matter of mental health, they simply need to be near

nature to function. Cast your mind back to Covid lock down, how important was access to nature? Many people, stuck in their urban houses without access to fields and greenery really suffered. If you suffer the way people did throughout Covid but during normal times and have actively moved to the countryside to help cope, then it's likely to be impossible to justify wrecking the very environment that we're trying to fix the climate to save. I feel this way strongly; Greenbelt, Farm and wood land is precious, if the cost of tackling climate change is the loss of everything in the natural countryside we hold dear, it is a pyrrhic victory. There are better ways to be an environmentalist than sacrificing our beautiful, precious countryside.

- 14.32 **Judith Mary Roberts.** The applicant chooses to assess PRow purely on how they link communities, rather than for their recreation and their physical and mental health benefits. Careful consideration should be given to the health, safety and wellbeing impacts on the dense population that lies within this project's area
- 14.33 **Elizabeth Poskitt.** Tourism brings millions of pounds to the area each year to enjoy recognised formal sites such as the UNESCO World Heritage Site of Blenheim Park Palace and Wall but also to visit the attractive towns and villages in this part of Oxfordshire and to walk the countryside for the pleasure of being out in the open and experiencing nature. These opportunities are important not only to the tourists but also local people whose mental and physical health are benefitted from experiencing this environment.
- 14.34 **Stephen Westaby.** Both physical and mental health are promoted by recreation in the countryside. This has considerable economic consequences as evidenced by numerous scientific publications. Bladon Heath is a popular area in this context. I was a heart surgeon and reflected on patient deaths whilst walking this productive agricultural land. Many of my colleagues do the same. When the lead for BWSF was asked by a Professor of Medicine "why, given that only 1% of England's countryside is destined for solar energy, would you destroy this particular environment?" the answer was "because that's what Blenheim gave us!" As you might appreciate, this was regarded as derogatory beyond belief.
- 14.35 **Nigel Robert Gunn.** Exposure to green space and the opportunity to exercise on locally available land have both physical and mental health benefits. The main PRows used by the residents of many villages will be severely degraded in terms of their visual aspect, from one of open farmland to one of a largely artificial landscape dominated by solar panels. The developer's DCO application acknowledges that Combe village lies in a 'zone of theoretical visibility'. The highly prized views in and around Combe will thus be compromised. In Cassington parish the most heavily used public rights of way from the village will be surrounded in large parts by solar arrays. Both the northern and southern sections of BWSF will be similarly impacted. Even though an extension of the network is offered with extra "permissive" footpaths, the consultation fundamentally ignores why people want to walk in the countryside – i.e. for their mental well-being. This would not be achieved by walking through a forest of fencing and solar arrays.

15.0 Agricultural Land Use (APP-054 Chapter 17)

Introduction

- 15.1 Agricultural land use is a cornerstone of our food security, economic development, and ecological stability. With a growing global population and increasing pressure on natural resources, the efficient use and management of agricultural land have become critical.
- 15.2 We endorse these statements from the LIR paragraph 7.13
- 15.3 Approximately 40% of the land proposed for solar panels would be sited on the best and most versatile agricultural land contrary to local policy. The use of conservation grazing and small-scale horticulture is not considered a viable replacement for loss of arable land
- 15.4 It is questioned why the location of panels has been amended to avoid areas of archaeological interest and to allow for skylight plots but not to reserve areas found to be of higher quality agricultural grades.
- 15.5 Local data for crop yields indicates steadily improving trends for wheat yields since 2005.
- 15.6 Wheat production is crucial to UK's food security and agriculture contributed £840m turnover to Oxford's food economy in 2022.

Classification of Agricultural Land

- 15.7 Arable Land
The 1400ha of land proposed for Botley West Solar Farm (BWSF) is predominantly arable land. Arable land refers to land used for growing crops that require regular planting and harvesting, such as cereals, vegetables, and tubers. This is the most intensive form of land use, which requires fertiliser application, and crop rotation.
- 15.8 Grassland
Grassland is used for livestock grazing. It often occupies areas unsuitable for crop cultivation, such as hilly terrain. There is little grassland proposed for BWSF.
- 15.9 Land Classification
Land is classified based on the following table (Table 15.1) and the results from a soil survey carried out for the Developer is shown in Table 15.2.
- 15.20 Frequent references by the Applicant (in the press and in answers to questions submitted) to BWSF being low or poor quality land are totally untrue. Only land in ALC grades 4 and 5 are correctly defined "poor" or "very poor". 100% of the land in BWSF is in grades 1, 2 or 3, which is moderate to excellent quality.
- 15.21 Government guidance
This emphasizes careful planning to ensure solar farms do not compromise high-quality agricultural land. There is no evidence that this has been observed.
- 15.22 Land Suitability:
The guidelines state that BVM land is not appropriate for solar panels
- 15.23 Flood risk
Large-scale solar farms in complex river catchment areas may increase flood risks due to changes in water runoff patterns. Some soil types drain better

than others, affecting how solar panels interact with the land. For example, clay-heavy soils may lead to waterlogging and runoff issues. This site has 10 watercourses and has therefore complex hydrology. This has not been accounted for in planning to put a solar farm on this land.

Generalised Description of the Agricultural Land Classification Grades

Grade & standard colour notations	Description of agricultural land	Detail
1	Excellent quality	No or very minor limitations on agricultural use. Wide range of agricultural and horticultural crops can be grown. High yielding and consistent.
2	Very good	Minor Limitations on crop yield, cultivations or harvesting. Wide range of crops but limitations on demanding crops (e.g. winter harvested veg). Yield high but lower than Grade 1.
3 (subdivided)	Good to moderate	Moderate limitations on crop choice, timing and type of cultivation, harvesting or level of yield. Yields lower and more variable than Grade 2.
3a	Good	Moderate to high yields of narrow range of arable crops (e.g. cereals), or moderate yields of grass, oilseed rape, potatoes, sugar beet and less demanding horticultural crops.
3b	Moderate	Moderate yields of cereals, grass and lower yields other crops. High yields of grass for grazing/ harvesting.
4	Poor	Severe limitations which restrict range and/or level of yields. Mostly grass and occasional arable (cereals and forage), but highly variable yields. Very droughty arable land included.
5	Very poor	Severe limitations which restrict use to permanent pasture or rough grazing except for pioneering forage crops.

Table 15.1: Agricultural Land Classification divisions (ALC)



Table 17.17: ALC Site survey results

ALC Grade	Quality	Area (ha)	Percentage%
1	Excellent	2.1	0.2
2	Very good	96.9	7.2
3a	Good	391.2	29
3b	Moderate	797.0	59
Non Agricultural	Non Agricultural	64.0	4.6
Total surveyed		1351.2	100.00
Total un-surveyed agricultural land		67.0	
Total area of land within the Project site		1418.2	

- 17.6.38 The ALC survey work that has been undertaken to date has identified that:
- approximately 36.4% of the land surveyed to date comprises land within the category of BMV agricultural land (ALC Grades 1-3a); and
 - approximately 59% of the land surveyed to date comprises lower quality Subgrade 3b agricultural land.

Table 15.2: BWSF Survey Results for ALC

Ref: PEIR Volume 3 Appendix 17.1 prepared by RPS Consultancy for PVDP November 2023

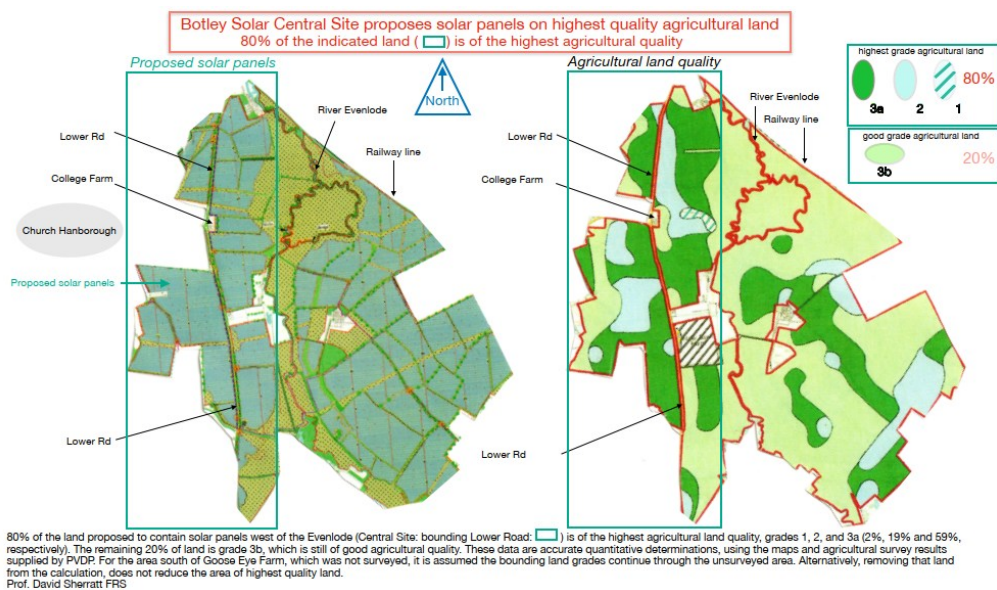


Figure 15.1: Analysis of ALC of the Central Site (ref: Professor Dave Sherratt)

15.24 A further analysis (Figure 15.1) using the same data of the soil survey data provided by the Developer (Table 15.2) is at variance particularly in the Central site where this analysis indicates that 80 per cent is of the Best & Most Versatile (BVM) land. An analysis of the land classification over the whole of the BWSF site, by the same author, would suggest that the percentage BVM is over 40 percent.

Management of the land under the panels

15.25 Agrovoltatics combine PV and agricultural production by growing crops or allowing grazing around or under the panels. The panels reduce the solar radiation reaching plants but with the loss fraction varying with solar farm design parameters such as panel angles, height and spacing. Panels will reduce direct solar radiation more than diffuse radiation. The loss or gain of biomass productivity this reduced radiation causes depends on the fraction of solar energy the plant uses, the fraction that is surplus to what it can use and indeed may stress the plant, and the impact of solar reduction on environmental factors such as ground and air temperatures and moisture, and the effects of these on crop pests and disease. These processes vary with time of day and year and the type of plant. A further issue is how biomass under and around panels is harvested; this may be by grazing animals, machines or by hand. This complexity and the effects of PV on yields is reviewed by Toledo and Scognamiglio (2021) reviewed by Stallknecht et al. (Stallknecht, Herrera, et al. (2023) 'Designing plant-transparent agrivoltatics', Scientific reports. Nature Publishing Group UK, 13(1), p. 1903. doi: 10.1038/s41598-023- 28484-5. 2023).

15.26 There is scant discussion in the ES as to how the land with solar panels is to be maintained and managed.

Farming Response

15.27 Evidence from current farmers of average or better than average yields? (See evidence submitted by TL with information from Professor Dave Sherratt, James Price etc.)

15.28 Roderick John Craig

“During period of drought the grass under ley will be a serious fire risk.” As a retired farm manager of this land, he is well aware of its composition and productivity. He reports in his Written Representation “Some of the soil types to be found in the area scheduled for panels are impermeable and will increase the risk of flooding on the land covered with solar panels. This eroded soil will eventually reach the lake at Blenheim which has recently been dredged out which I find somewhat bizarre.”

He is also critical of the plans to manage the land under the solar panels. “It is argued that a grass under sward can be grazed by sheep or mown. Mowing for compost will do nothing for conservation and I do question who is going to want to graze and shepherd sheep amongst such a large area of solar panels.”

- 15.29 Frequent references by the Applicant (in the press and in answers to questions submitted) to BWSF being low- or poor-quality land are totally untrue. Only land in ALC grades 4 and 5 are correctly defined “poor” or “very poor”. 100 per cent of the land in BWSF is in grades 1, 2 or 3 which is moderate to excellent quality.
- 15.30 Other comments - including by Dominic Hare at the Open Hearings that “it’s poor land that won’t be missed” or has been “drenched with pesticides and fertilizers” are untrue, unhelpful and an insult to the hard-working farmers in this community.

Lack of Engagement

- 15.31 Stop Botley West had one meeting with the Applicant on 19 January 2024 where we asked for clarification on the figure of 38% BMV land with the BWSF site. Specifically, what the percentage would be for land actually being proposed for panels. An answer was promised “to follow”. After repeated unanswered requests for this information, SBW declined a further meeting with the Applicant until this, and other outstanding questions were answered. This question has not been answered.
- 15.32 Frequent references by the Applicant (in the press and in answers to questions submitted) to BWSF being low- or poor-quality land are totally untrue. Only land in ALC grades 4 and 5 are correctly defined “poor” or “very poor”. 100% of the land in BWSF is in grades 1, 2 or 3 which is moderate to excellent quality.
- 15.33 Comments by the Applicant and Dominic Hare at the Open Hearings that the land is “poor land that won’t be missed” or has been “drenched with pesticides and fertilizers” are untrue, unhelpful, upsetting and an insult to the hard working farmers in this community.

Selected Relevant Representations

- 15.34 Simon Leedham, Grove Rd, Bladon. Loss of agricultural land - 45% of the middle section will be built on Grade 3a (best and most versatile land). These productive fields yield 2 crops per year including rape seed, maize, barley, and root vegetables and have generated increased yields under recent regenerative farming efforts. Social value of the land - much of the land, particularly that around the villages (e.g. Bladon to Begbroke) is criss crossed with footpaths and public rights of way which are in daily use by many residents and are heavily relied upon for recreation and mental wellbeing.
- 15.35 Helen Devenport, Cumnor. It is also fascinating to watch the cycle of the seasons, seeing the various crops in the fields (barley, wheat, beans, corn

etc.) sown, grow and be harvested, while animals browse in other parts of the valley.

16.0 Conclusion










In summary, of the issues that we have addressed, we largely agree with the LIR's summary of impacts. Our own summary follows, and this leads us to conclude that the Botley West Solar Farm should not be approved in its current form.




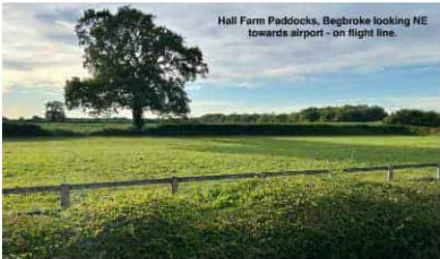

ISSUE	IMPACT
Green Belt	Negative
Historic Environment	Negative
Landscape & Visual Amenity	Negative
Ecology and Nature Conservation	Negative
Hydrology and Flood Risk	Negative
Ground Conditions	Not assessed
Mineral Safeguarding	Not assessed
Traffic and Transport	Negative
Public Rights of Way	Negative
Noise and Vibration	Negative
Climate Change	Not assessed
Socio Economics	Jobs - Neutral Tourism - Negative
Human Health	Physical health - Neutral Mental health - Negative
Agricultural Land Use	Negative
Waste and Resources	Not assessed
Air Quality	Not assessed
Aviation Impacts	Not assessed
Cumulative Effects	Not assessed






Appendix A Photographs and montages from 12 impacted

MAP	Address	Image	Photomontage
1	Dornford Cottage, Wootton, OX20 1ES See also Video Attachment 1	 View to NE from a property on Dornford Lane	 Photomontage from Dornford Cottage, looking NE.
2	Amhurst Cottage, Shipton Slade Farm, OX20 1QQ		
3	118b Grove Rd, Bladon, OX20 1PU 108 Grove Rd, Bladon, OX20 1PU See also Video Attachment 2 124 Grove Road, Bladon, OX20 1PU	 View from 118b Grove Rd, Bladon looking South  View from PProW looking N towards Grove Rd, Bladon (108 is White House). Panels to within 50m of properties  124, Grove Rd, Bladon View from garden fence	

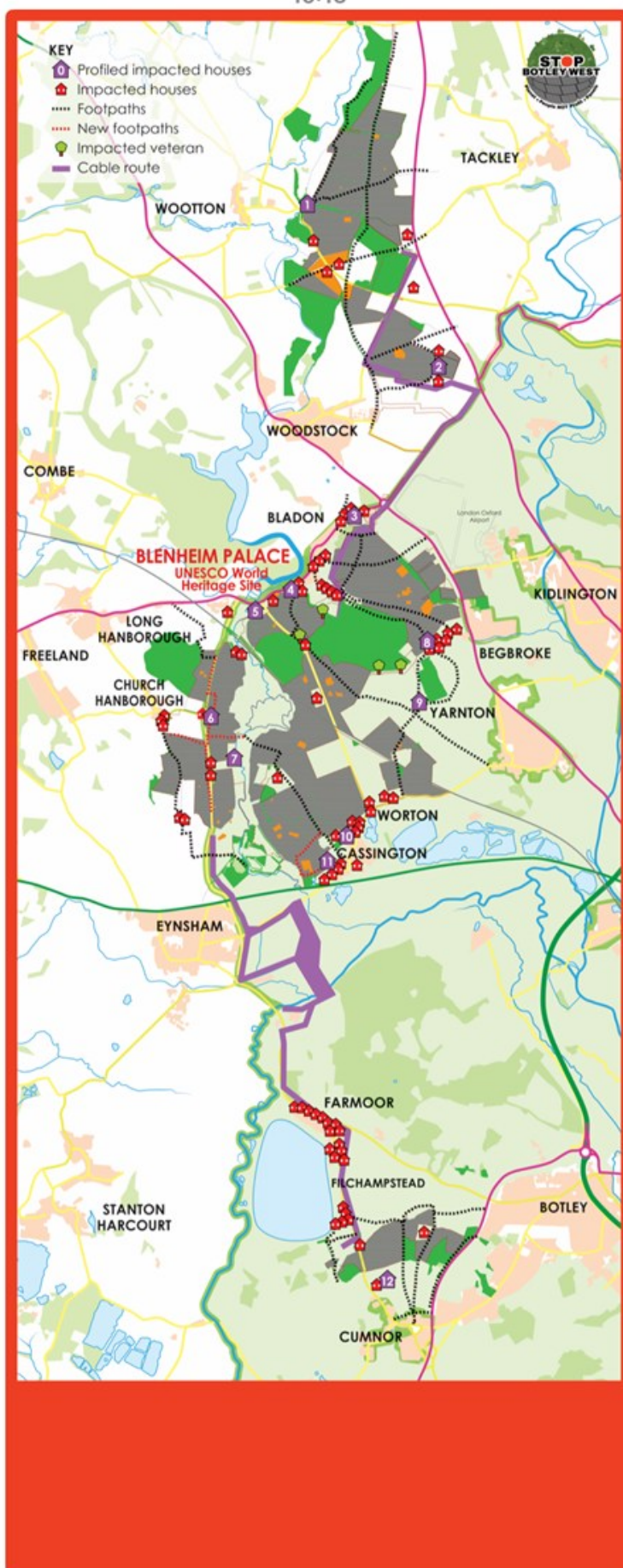
locations

SBW MAP	Address	Image	Photomontage
4	39, Manor Rd, Bladon, OX20 1RU		
	37, Manor Rd, Bladon, OX20 1RU		
5	Burleigh House, Bladon, OX20 1RX		
6	College Farm, Lower Rd, Church Hanborough, OX29 8AE		
	Pelican House, Lower Rd, Church Hanborough, OX29 8AE		

SBW MAP	Address	Image	
7	Gooseye Farm, Church Hanborough, OX29 8EH	<p>View from Purwell Farm west to Church Hanborough (spire on horizon). Gooseye Farm in centre.</p> 	
8	Village End, Spring Hill Rd, Begbroke, OX5, 1RX	<p>Village End, Spring Hill Rd, Begbroke. PRow on right, wide sweep of panels within 25cm. Field is on London Oxford Airport flight path</p> 	
	4 Hall Farm Paddocks, Spring Hill Rd, Begbroke, OX5 1FW	<p>Hall Farm Paddocks, Begbroke looking NE towards airport - on flight line.</p> 	
9	PRoW near Spring Hill Farm, Spring Hill Rd, Begbroke, OX5, 1FW	<p>View from PRow at Spring Hill, close to Spring Hill Farm. Panels to horizon</p> 	

10	Farways, Yarnton Rd, Cassington, OX29 4DY	 <p>Property at Farway, Yarnton Rd, Cassington looking north uphill towards Bladon. Panels would stretch uphill from 25m away to the horizon.</p>	
	Yarnton Rd, Cassington, OX29 4DR	 <p>Property of the Elms, Yarnton Rd, Cassington looking north uphill towards Bladon. Panels would stretch uphill from 25m away to the horizon.</p>	
11	Cassington Recreation Ground	 <p>Cassington Recreation Ground looking N uphill towards Bladon Heath.</p>	
12	Lake View House, Tumbledown, Cumnor, OX2 9QE See also Video Attachment 3		
	Heidersbach, Cumnor, OX2 9QE	 <p>Heidersbach, Cumnor looking N over valley of panels 100m away.</p>	

Appendix B SBW map showing closest impacted properties



Appendix C Summary of properties for Assessed Glint & Glare

		Start	End	Diff	No reflections	Existing vegetation	Existing or proposed vegetation	Recommend Mitigation		>3 months	<3 months	
Column B:				Sum:	Sum:							
▼ N				118	15							
	N	1	2	2	2							
	N	3	35	33			33		✓	✓		
	N	36	37	2				2				Moderate impact (2)
	N	38	70	33			33		✓	✓		
	N	71	75	5		5						Existing protects (5)
	N	76	77	2	2							
	N	78	79	2		2						Existing protects (2)
	N	80	89	10	10							
	N	90	92	3			3		✓		✓	
	N	93	96	4				4				Moderate impact (4)
	N	97	110	14			14		✓	✓		
	N	115	117	3			3			✓		
	N	111	114	4			4		✓	✓		Low impact (4)
	N	118	118	1	1							
▼ C				455	24							
	C	1	2	2	2					✓		
	C	3	6	4			4		✓		✓	
	C	7	134	128			128		✓	✓		
	C	135	136	2			2		✓			Reduce to <3, low impact (2)
	C	137	138	2			2		✓	✓		
	C	139	141	3			3		✓	✓		Reduce to <3, low impact (3)
	C	186	192	7			7		✓		✓	
	C	193	214	22	22							
	C	142	185	44			44		✓	✓		
	C	215	218	4			4		✓		✓	
	C	450	455	6			6		✓		✓	
	C	219	280	62			62		✓	✓		
	C	281	281	1			1		✓	✓		Low impact (1)
	C	282	376	95			95		✓	✓		
	C	377	377	1				1		✓		Moderate (1)
	C	378	449	72			72			✓		
▼ S				114	28							
	S	1	6	6			6		✓		✓	
	S	11	13	3			3		✓		✓	
	S	7	10	4			4		✓	✓		
	S	14	18	5			5		✓	✓		
	S	19	44	26	26							
	S	45	47	3			3		✓		✓	
	S	48	49	2	2							
	S	50	59	10			10		✓		✓	
	S	60	103	44			44		✓			
114	S	104	114	11			11		✓		✓	
▼ (blank)				687	67							
Total				687	67	7	606					Stated Total = 699

Assessed locations by Impact Classification

		Moderate Impact	Low Impact	No impact
Published total	699	M377, N 36-37, N93-96	N111-114, M135-136, M139-141, M181	
Mapped total	687	7	10	670
No reflections	67			
Mitigation recommended	7			
Existing vegetation - no mitigation recommended	7			
Existing or Proposed vegetation - no mitigation recommended	606			
Total	687			

Appendix D Residential Amenity Survey summary data

Residential Amenity Summary Data					
Distance from Red-line Boundary	0-100m	100-250m	250-500m	500-1000m	1000-1500m
	25%	17%	13%	12%	7%
Have you experienced traffic congestion near your property in the past in the event of					
	Significantly	Moderately	Negligible	Not at all	Blank/Don't Know
Roadworks, temporary traffic lights	53%	29%	8%	4%	6%
Blenheim Palace traffic	40%	22%	13%	12%	13%
Rush hour congestion	58%	25%	9%	3%	5%
How do you think BWSF will affect traffic near your property					
	Significantly	Moderately	Negligible	Not at all	Blank/Don't Know
during construction?	84%	7%	2%	4%	3%
during operation?	38%	32%	11%	5%	14%
during decommissioning?	77%	9%	3%	3%	8%
Benefits/improvements due to					Blank/Don't Know
	Significantly	Moderately	Negligible	None	
25 m buffer zone around properties	4%	5%	40%	43%	7%
New and reinforced hedgerows	6%	14%	50%	25%	5%
Skylark plots, bee, bird & bat boxes	7%	14%	46%	25%	8%
Local employment opportunities	4%	10%	44%	26%	15%
New/enhanced footpaths]	5%	11%	36%	39%	8%
Outdoor learning area for schools	5%	8%	39%	32%	17%
Community agriculture (allotments)	6%	10%	38%	34%	14%
Residential amenity refers to the quality of a dwelling's living conditions and the benefits of its space. It can impact the health and well-being of residents, and how they use their homes. In considering the proximity of BWSF to your property would affect your residential amenity as defined here:					
	Significantly	Moderately	Negligible	Not at all	Blank/Don't Know
The outlook from my home	37%	13%	22%	21%	7%
Noise	34%	26%	15%	10%	15%
Flooding	36%	19%	15%	14%	16%
Security and safety	22%	23%	19%	15%	20%
Right to privacy	31%	16%	21%	19%	13%
Safe access to your property	14%	18%	29%	24%	15%
Access to open countryside	79%	8%	5%	4%	4%
Physical and mental health	69%	14%	4%	6%	6%
Enjoyment of Public Rights of Way	80%	7%	3%	5%	4%
On balance, what is your opinion of the Botley West Solar Farm proposal as described in the information provided?					
	In favour	Opposed	Don't know		
	4%	91%	5%		

Business Summaries

Impact of proximity of BWSF to:	Significant	Moderate	Negligible	Not at All	Blank/Dont know	Total
Appeal of the business	55%	18%	14%	5%	9%	100%
Number of customers (footfall)	45%	14%	18%	9%	14%	100%
Income	55%	9%	18%	9%	9%	100%
Safe access to your premises	36%	14%	23%	9%	18%	100%
Noise	59%	5%	23%	5%	9%	100%
Physical and mental health of staff	41%	14%	9%	9%	27%	100%
Health and safety of customers	32%	18%	18%	9%	23%	100%

Survey of residents considering selling their property

Have you sold or attempted to sell your property or business recently?	
Sold near the asking price	0
Sold after reducing the price considerably	6
Tried and failed to sell	12
Would like to but not tried because of concerns on value	5
If applicable, has the sale or failure to sell affected:	
Your financial situation	15
Your life plans (eg to move for a job, to be nearer relatives)	12
Your mental health	13
No serious consequences	0

Public Rights of Way (PRoW)

Public Rights of Way

Use of PROW	PROW used for		PROW used for		
For walking	70%		70%		
For running	14%		14%		
For cycling	12%		12%		
For horse riding	4%		4%		
How often do you use PROW?	Frequency of use		Frequency of use		
Daily	45%		45%		
3/4 days per week	24%		24%		
Weekly	21%		21%		
Monthly	7%		7%		
Occasionally	4%		4%		
Could you walk from home to a PROW without panels	%		%		
No	46%		46%		
Yes	35%		35%		
Don't know	19%		19%		
If BWSF happens what would you do:					
Stop walking	16%		16%		
Use/drive to a PROW outside the area	49%		49%		
Walk less often	25%		25%		
Walk as before but through panels	11%		11%		
Impact of closure of nearest PROW during construction?					
Significant, no other nearby option	57%		57%		
Moderate, alternative(s) but not as convenient	37%		37%		
Negligible, plenty of other options/not a regular walker	6%		6%		
Total					
	None	Negligible	Moderate	Significant	Don't know
Benefits of new footpaths through panels: %	51%	35%	6%	4%	4%
Benefits of a few footpaths upgraded to cycle paths: %	40%	40%	8%	4%	7%

Appendix E Illustrations of SBW activity

Meetings and Events



Selection of leaflets, placards, posters, banners created for SBW



Forever Fields exhibition (November 2023)
160 artworks, 100 artists, 1100 visitors



Forever Fields book



Examples of distributed leaflets

SAVE BLENHEIM PALACE



STOP BOTLEY WEST

If built, the proposed Botley West Solar Farm (BWSF) - at 3,400 acres one of the biggest in Europe - would reach within 100m of Blenheim Palace Park, ruining the setting of this historic site and **threatening its UNESCO World Heritage Site status**

The majority landowner of the BWSF proposed site is often just referred to as "Blenheim" but is actually a separate group of private companies and trusts owned by a small number of individuals NOT including "Blenheim Heritage Foundation Trust" (BHFT) which is the Charity responsible for the upkeep and safeguarding of the Palace itself.

BHFT, and therefore the Palace, would not benefit financially from the solar farm at all but **would** be harmed by the industrialisation of the surrounding countryside and by the potential loss of Blenheim Palace's UNESCO World Heritage Site status.

It would be enormously helpful if you could find a moment to contact UNESCO and also your local MP to express your concerns for the future of "Britain's Greatest Palace"

UNESCO: <https://unesco.org.uk/contact/> Start your message: **FAO James Bridge**
Your MP: Most use the address: 1stname.surname.mp@parliament.uk



More uncomfortable truths about Botley West Solar 'Farm'


1. **Nowhere in the world has a solar farm** this vast been built so close to human habitation - and for very good safety and wellbeing reasons. BWSF would be within 1.5km of 11,000 properties
2. **It would remove thousands of tons of food** each year at a time of growing concern about food security.
3. **Solar is the least efficient way to produce green energy** with an operating efficiency of 20-22% in the UK (works in daylight only), Onshore Wind 35-40%, Offshore Wind up to 51% (whenever the wind blows), Mini Nuclear 90%+ (24 hours/day regardless of weather)
4. **Solar panels deliver no biodiversity** or natural gains for wildlife or the environment. Indeed, existing habitats would be damaged.
5. **Botley West may never pay** back the carbon debt it accumulates in the production, transportation, installation and removal of panels. There is a huge amount of carbon generated in all these operations.
6. **Botley West would overwhelm heritage sites** including a UNESCO World Heritage Site, other historic listed buildings and Winston Churchill's Grave in Bladon Churchyard all within Oxford's Greenbelt.
7. **Solar Panels would be highly visible** at ground level. They would not be 'landscaped to only be seen through gaps in the hedges', as claimed. There would be over 50 miles of 8ft high security fencing.
8. **40 years is NOT TEMPORARY!** It would be in place for half a lifetime with no guarantee that fields would be returned to agricultural use. It could then be a brownfield site ripe for further industrialisation.

The research evidence for these statements is available on our website

To find out more about the campaign to oppose this unprecedented and inappropriate proposal

PLEASE visit
<https://www.stopbotleywest.com>



 @stopbotleywest

where you can also sign our petition, donate and register for updates.

HOW BIG ?? It's even bigger now!



The Developer has sent their latest proposal to the Planning Inspector (PINS).

This reveals their plans for Botley West Solar Farm to be even bigger.

HERE ARE THE HIGHLIGHTS ...

- o 2,660,570 solar panels on the site.
- o It's "temporary". For 42 years!
- o The site covers 1400 hectares and now includes rare meadows.
- o "The site is away from main settlements". **NOT TRUE.**
11,000 properties within 1.5km.
- o "Low flood risk" **NOT TRUE** for Cassington & Farmoor.
- o "Very special circumstances" to build 75% on Oxford's Greenbelt.
- o 111km of 2m high fencing surrounding every field.
- o 306 CCTV cameras and security lighting with motion sensors.
- o 156 Power Converters (12m long) emitting 69Db sound.
- o 2,151,366 piles driven 1-2m into the ground causing permanent and irreversible damage.

Surely this turns the landscape into an industrial site?

HERE's WHAT THEY'RE NOT SAYING

1. No figure for underground cable length.
2. No figure for track length or composition.
3. No figure on lorry movements during construction or operation affecting the narrow country lanes and winding streets around Bladon, Cassington, Woodstock, Farmoor, Freeland, Wootton.
4. No Map indicating positioning of access points, tracks, fencing, cabling, converters, etc
5. NO guarantee that the panels will be removed after 42 years OR decommissioned responsibly.
6. Silent on where panels will be manufactured. Expected to be China where factories use forced labour and are powered by power stations burning fossil fuels.

HERE's WHAT YOU CAN DO NOW

1. **E-mail your councillors (Parish, District & County) by 11th July.**
Councils have until 13th July to respond to the Inspector about this report. Send your concerns to them.
E-mail addresses are on the Act Now page at Stopbotleywest.com
2. **E-mail the Inspector yourself by 25th July**
Send a short E-mail to: support@pinssupport.zen desk.com.
You will get an immediate acknowledgement containing a link to submit your full comment via a response form.
3. **Come to one of the SBW Roadshow Events to learn more**
EYNSHAM CARNIVAL, 1pm - 5pm on Sat 1 July
Queen Elizabeth Playing Fields, Oxford Road, Eynsham, OX29 4BS
KIDLINGTON 7:00pm on Wed 19 July
Exeter Hall, Oxford Rd, Kidlington OX5 1AB

Go to the EVENTS page on the SBW website for news of further meetings

GO TO www.stopbotleywest.com
Planet and People NOT Profit and Panels

