

BOTLEY WEST SOLAR FARM: DEVELOPMENT CONSENT ORDER EXAMINATION (ID20055258)

WRITTEN SUBMISSIONS

Prepared in response to Deadline 2 (D2)

1st July 2025

Project Name:	Botley West Solar Farm
Client Name:	Stop Botley West Group
Prepared By:	Various
Signed:	-
Date:	1 st July 2025
Reviewer	-
Signed	-
Date:	1 st July 2025
Revision:	1

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1. Introduction

1.1 Background

1.1.1 These Written Submissions are submitted by Marrons on behalf of Stop Botley West (“SBW”) Limited and are intended to address the information requirements set out in the Examining Authority’s Rule 8 letter, specifically in relation to Deadline 2. This includes, among other matters, comments on responses to Relevant Representations (RRs), comments on Written Representations (WRs), comments on the Local Impact Reports (LIRs) and nominations for any locations for Accompanied Site Inspection (ASI).

1.2 Previous Submissions

1.2.1 As set out above, SBW has previously made detailed Relevant Representations and Written Representations in relation to the project. In summary, SBW’s RRs and WRs raised the following points:

- There would be less than substantial harm to heritage assets up to the highest level of importance;
- There would be significant and extensive impacts upon the landscape character of the area and visual amenity given the Project’s design and scale;
- The project design and scale has not considered the necessary mitigation;
- There would be significant harm arising from the loss of a substantial amount of Best and Most Versatile (“BMV”) agricultural land;
- There would be substantial harm to a variety of Public Rights of Way (“PRoW”) which are of importance to the local community;
- There would be significant impact on the local economy because of reduced tourism; and
- There would be substantial harm to the Green Belt because of inappropriateness, conflict with the Green Belt purposes and loss of openness.

1.3 Structure of Submission

1.3.1 These representations are structured as follows:

- **Section 2** – Core Issues
- **Section 3** – Conclusions and Matters for the Examination Authority’s considerations

2. Core Issues

2.1 Historic Environment

- 2.1.1 The Written Representation made by Historic England identifies that the focus of their response is on highly graded designated heritage assets. There is also agreement between SBWAG and Historic England that the development would result in harm to the Outstanding Universal Value (OUV) and significance of the Blenheim Palace World Heritage Site (WHS), Blenheim Palace and the Blenheim Registered Park & Garden (RPG) which would be significant in EIA terms.
- 2.1.2 Historic England consider that the removal of solar panels from a number of fields which are located immediately to the south of Bladon would ‘avoid’ the harm to the WHS, the Palace and the RPG from the development. Whilst the principle of removing panels to alleviate harmful impacts on heritage assets is supported by SBWAG, the number and location of the panels proposed for removal are not considered to be extensive enough as to completely avoid harm to these heritage assets. There is concern that this approach is too narrowly focused on issues of proximity and potential visibility as being where the contribution to their significance from their setting is derived, with the areas proposed for removal positioned closest to Bladon and the WHS boundary. This ignores wider aspects of setting that SBWAG have consistently highlighted as contributing to the significance of the heritage assets at Blenheim and which on the basis of the above appear to have been undervalued by Historic England. As such, it is considered that the extent of the proposed mitigation should be reconsidered.
- 2.1.3 A number of gaps in the information submitted by the Applicant have been outlined by Historic England. SBWAG strongly supports Historic England’s requests for this further information, particularly in relation to the need for additional visualisations and information to fully understand all impacts on the historic environment. There is also agreement with Historic England’s conclusion that the Applicant has downplayed the magnitude of impact in relation to highly designated heritage assets and that further clarity is required to understand how this has been reached.
- 2.1.4 Whilst SBWAG is broadly in agreement with the points raised by Historic England in their Written Representation, it is noted that there are some omissions in the scope of their response and assessment which may have a bearing on the overall level of impact from the development on heritage assets; these are also set out in the ExQ1 by the ExA. Of particular note is Q 1.6.9 which relates to the assessment of the experience of Blenheim from the air – notably from Oxford Airport and RAF Brize Norton – as well as from the rooftop tours which are being offered in 2025. This panoramic experience of Blenheim within its countryside setting, whilst not reflecting the principal experience of the heritage assets, speaks to the relationship between Blenheim and its rural surroundings as contributing to its magnificence as a composition and the processional character of the approaches to and exit from the WHS. These experiential and intangible aspects of its setting in addition to the sequential views have been consistently highlighted by SBWAG as

being an intrinsic and important aspect of its setting and should be considered when assessing impacts on the heritage assets at Blenheim.

- 2.1.5 In respect of the Written Representations made by ICOMOS, SBWAG disagree with the assessment that the development would have ‘*no direct impact on the OUV*’ of the WHS. Again, this appears to relate to the absence of consideration of aspects of setting wider than visual elements such as historic functional associations and the time depth inherent in the landscape. Additionally, ICOMOS note their interest in sustaining the quality of rural landscapes ‘*which in this instance contributes to the setting of the WHS*’. Further clarification is therefore requested as to how ICOMOS has concluded no direct impact on the OUV given the acknowledged contribution of the rural setting of the WHS to its significance. This is also considered pertinent given ICOMOS’s previous advice in their Technical Note (March 2024) that the development would likely have an adverse impact on the property’s OUV.
- 2.1.6 ICOMOS also continue to propose the omission of substantial areas of panels for the scheme in response to the heritage sensitivities. It is noted that the ExA have requested ICOMOS provide an updated plan showing the excluded areas (Q 1.1.10 of the ExQ1). SBWAG welcome this request and the opportunity to review.
- 2.1.7 SBWAG also do not agree that the use of tall hedgerows as standard treatment along the edge of all panel arrays to provide mitigation as supported by ICOMOS would be acceptable. As raised in SBWAG’s Relevant Representations, the introduction of hedgerows and planting to screen the panels will in itself have an impact on the landscape qualities that forms the setting of heritage assets, resulting in the significant compartmentalisation of the present field pattern. Furthermore, the proposed hedgerows will be permanent thereby sustaining the impact of this element of the scheme beyond the operational lifespan of the development. SBWAG’s concerns about the Applicant’s approach to consider the effects of the scheme as a whole as temporary despite the permanent impact of the potentially intrusive and incongruous hedgerows has been previously raised, and is also highlighted as a concern in the Joint Local Impact Report prepared by the Oxfordshire Host Authorities (OAH).
- 2.1.8 The Joint Local Impact Report has been reviewed and SBWAG are largely in agreement with the heritage points and concerns raised, particularly around the absence of information and the reliance of the Applicant on visual links to heritage assets. SBWAG supports the OHA’s suggestion that the Applicant revisit their assessment of historic landscapes to understand what contribution this makes to the OUV of the WHS in particular; the OHA state that they do not consider ‘minor adverse’ does justice to the extent or totality of change within areas of historic character. Additionally, the need to review the Archaeological Evaluation before commenting on impacts more fully is also supported; this was also highlighted by Historic England in their Written Representation.

- 2.1.9 The Joint Local Impact Report includes an independent review undertaken by LUC on behalf of the OHA. SBWAG is broadly in agreement with the concerns and points raised in their review and notes in particular the reference to UNESCO guidance which sets out that any adverse effect to the OUV should be considered unacceptable.
- 2.1.10 SBWAG has also undertaken a review of the Applicant Responses to Relevant Representations. In respect of heritage, these largely reiterate the position and methodology set out in the submission rather than introduce new information or set out revised impact assessments. In respect of the view towards Oxford identified by SBWAG as being omitted from the baseline heritage assessment, the Applicant states that the city of Oxford was not identified as a heritage asset requiring detailed assessment by themselves, or any consultee or stakeholder during the consultation process. They do acknowledge that the city is visible from certain areas of the site, whilst asserting that there would be no impact on the Oxford Central (University & City) Conservation Area or any of the heritage assets within it due to the presence of the existing modern development and infrastructure within the intervening area.
- 2.1.11 Given the high heritage sensitivities associated with this view – including return views from key locations within the city centre – and the extent of solar panels proposed within the view, it is requested that the extent of any visibility is tested as part of the additional viewpoint analysis required by Historic England to confirm the level of any impact. The importance of this view is also highlighted by its inclusion in our proposed viewpoint locations.
- 2.1.12 Overall, it is clear there remains a broad agreement between SBWAG, Historic England, ICOMOS and the OHA that the development would impact a large number of generally highly graded heritage assets and that this could be reduced by the omission of areas of panels within the site. SBWAG would also continue to highlight their concerns regarding the unsoundness of the Applicant's evidence base and the need for further clarity on matters as set out in their own previously submitted Written Representations, as well as those of Historic England and the OHA.

2.2 Landscape

Responses to Applicant's Responses to Relevant Representations

- 2.2.1 Below is we set out our commentary on several of the points used in justification as part of the Applicants Responses to Relevant Representations

Determination of significance

- 2.2.2 The LVIA maintains that judgements of a Moderate level of effect are considered to not be significant and is not commensurate with the other ES chapters or industry good practice.

'For the purposes of the Project, those effects of Moderate adverse or below are considered to be not significant. Taking the proportionality approach to the assessment,

it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors'. (RR-0102-004)

Buffer to the residential properties

- 2.2.3 There is no evidence to support the justification of the 25m buffer to individual properties and settlements. Good practice would advise a minimum of 50m, but due to the size, scale and disparate nature of the proposals, we recommend 100m.

Temporary nature of the proposals

- 2.2.4 The Proposals are not reversible; it is now commonly considered that the length of time an NSIP will be in place is a 'life span'. The associated planting and other changes to the landscape are permanent – hedges will not be removed for example and therefore the visual experience and landscape character will be irreversibly changed. This is not considered in the LVIA and the responses confirm this position.

'The environmental effects of the Project are considered reversible unlike for those arising from residential development'. (RR – 0339-3)

Mitigation planting

- 2.2.5 There continues to be no consideration of the harm as a result of the landscape mitigation and a continued persistence that the level of harm experienced by visual receptors on public rights of way (where they cite significant effects) will be reduced once the planting has matured. Repeatedly the applicant sets out that the mitigation is to reduce the impact of the views of the solar array but does not acknowledge that the mitigation in itself changes the visual experience. Statements such as *'overtime, along with substantial areas of existing woodland planting, would break up the overall mass scale of the Project within views'*

'This over time, along with substantial areas of existing new woodland planting, would break up the overall mass of the Project within views. Low-lying solar panels following the existing contours, along with gaps between rows and available views under the panels, would further dilute the absolute visual effects of the Project'. (RR-02005-3)

'Existing public to the north and rights of way would have managed hedgerows and trees south, where appropriate, which other time would limit available views to the solar arrays'. (RR-02005-3)

- 2.2.6 The impacts of the proposed planting on the landscape character, as well as the visual experience, have not been considered. This is evidenced by statements such as *'in addition,*

proposed planting could have a longer term benefit reinforcing the landscape character of the local landscape’ (RR-0205-11)

2.2.7 The LVIA judges that the landscape character will not be changed.

‘The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Landscape Masterplan’ (RR-0339-3)

‘The project is considered fully reversible, unlike residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries, which provide structure to the landscape, would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed’. (RR-1086-15)

Blenheim Palace

2.2.8 There is no evidence to support the position that there are no views from the Blenheim Place WHS

‘The proposed solar farm has been carefully designed to ensure that no part of the development would be visible in any of the defined key views out of the Blenheim Palace WHS, or indeed from any location within the WHS’. (RR-0413)

Views to and from Oxford

2.2.9 There is no evidence to support the position that there is no impact on the views to and from Oxford

‘Therefore, long distance views towards Oxford would remain available from higher ground. It is acknowledged that these views would be interrupted by the Project, but it is considered that the inherent character of distant panoramic views would remain, within which built elements such as large overhead power lines and other development is commonplace’. (RR-1007-030)

Nominations for Locations for ASI and Important Views

2.2.10 **Appendix 1** contains a map which sets out the important viewpoints we would urge the Inspector to visit relevant to:

- Heritage – red
- Landscape - green

- Residential – purple

2.2.11 We have set these out on the base mapping provided as part of the LVIA in order that they are clear and easy to read. In summary the views cover:

Blenheim Palace (Red views a and b, Green View b)

2.2.12 No views were recorded within the WHS of Blenheim Palace as part either the LVIA or the HIA. The recommendation is that views are recorded from the terrace and the Column of Victory, these are designed views referred to in the Management Plan, and from the rooftop which is now open as part of the Roof Restoration Project.

Begbroke and Bladon (Red view c, e,f,d, Green view d,c,e,)

2.2.13 It is important that kinetic views are appreciated travelling along the PRowS between Bladon and Begbroke. This is the setting of Blenheim Palace, the Conservation areas of Bladen and Begbroke and is a landscape which will provides a transitional landscape between the settlements and potential visual interconnectivity with the WHS.

2.2.14 Between Bladon Heath, Begbroke woods and Burleigh woods are large swaths of solar on rising ground with views from the Shakespeare Way.

Church Hanborough (Red view h, green view f)

2.2.15 The PRow south of Church Hanborough offers distinctive views from the localised ridgeline across the adjacent landscape. There is the opportunity to experience large swathes of the solar array in the location.

Cassington (Red view g)

2.2.16 Views approaching Cassington from Purwell Farm are experienced from a PRow across an open landscape which will be an extensive area of solar. This PRow approaches the northern edge of the Conservation Area and lies within the Green Belt.

Residential receptors

Glint/Glare Ref	Address	Nearby Properties	Total at location	SBW notes
N34	Dornford Cottage, Wootton, OX20 1ES	N4, N5, N6	4	No existing vegetation. Wide expanse of panels 50m - 1km. PRowS around and across the middle of this field.

N95	Amhurst Cottage, Shipton Slade Farm, OX20 1QQ	N93, N94, N96	6	No existing vegetation, panels stretch from 25m to 2km from property boundary. Several PRoWs circle & cross panel field. View from PRoW to BP Column of Victory
N96	Reeves Cottage, Shipton Slade Farm, OX20 1QQ			
None	118b Grove Rd, Bladon, OX20 1PU	92-126 Grove Rd,	18	G&G assessment ends at 90 Grove Rd (M1). 92-126 omitted.
None	108 Grove Rd, Bladon, OX20 1PU			
None	124 Grove Road, Bladon, OX20 1PU			
M52	39, Manor Rd, Bladon, OX20 1RU	M53	5	Panels visible from kitchen and lounge windows. PRoW alongside boundary
M51	37, Manor Rd, Bladon, OX20 1RU			Some existing deciduous vegetation, wide ranging views beyond
M64	Burleigh House, Bladon, OX20 1RX	M56	1	Panels highly visible on two sides through ground floor windows. May be sold by Oct
M134	College Farm, Lower Rd, Church Hanborough, OX29 8AE	M104-107, M142	7	Panels extend from 25m to 2km across valley. New footpath within 5m, No existing vegetation
M133	Pelican House, Lower Rd, Church Hanborough, OX29 8AE			
M140	Gooseye Farm, Church Hanborough, OX29 8EH		1	Panels on 3 sides, little existing vegetation. Screening would overwhelm property
M377	Village End, Spring Hill Rd, Begbroke, OX5, 1RX	M378, M379, M380	4	No existing vegetation, Main living room upstairs,, adjacent PRoW, on airport flight path
	4 Hall Farm Paddocks, Spring			

	Hill Rd, Begbroke, OX5 1FW			
M372	Spring Hill Farm, Spring Hill Rd, Begbroke, OX5, 1FW	M373	1	Elevated position, panels 500m but wide ranging views to W and N, 5 footpaths intersect nearby - highest point on central site
M279	Farways, Yarnton Rd, Cassington, OX29 4DY	M272- M273, M280-282	14	No existing vegetation, panel views uphill 1.5km, prone to flooding
M274	Yarnton Rd, Cassington, OX29 4DR			
	Cassington Recreation Ground	M227- M233	10	Community Asset, some existing vegetation screens in summer.
S47	Lake View House, Tumbledown, Cumnor, OX2 9QE		2	Elevated position of property means no screening possible. Lake View may be sold by Oct

3. Local Impact Report

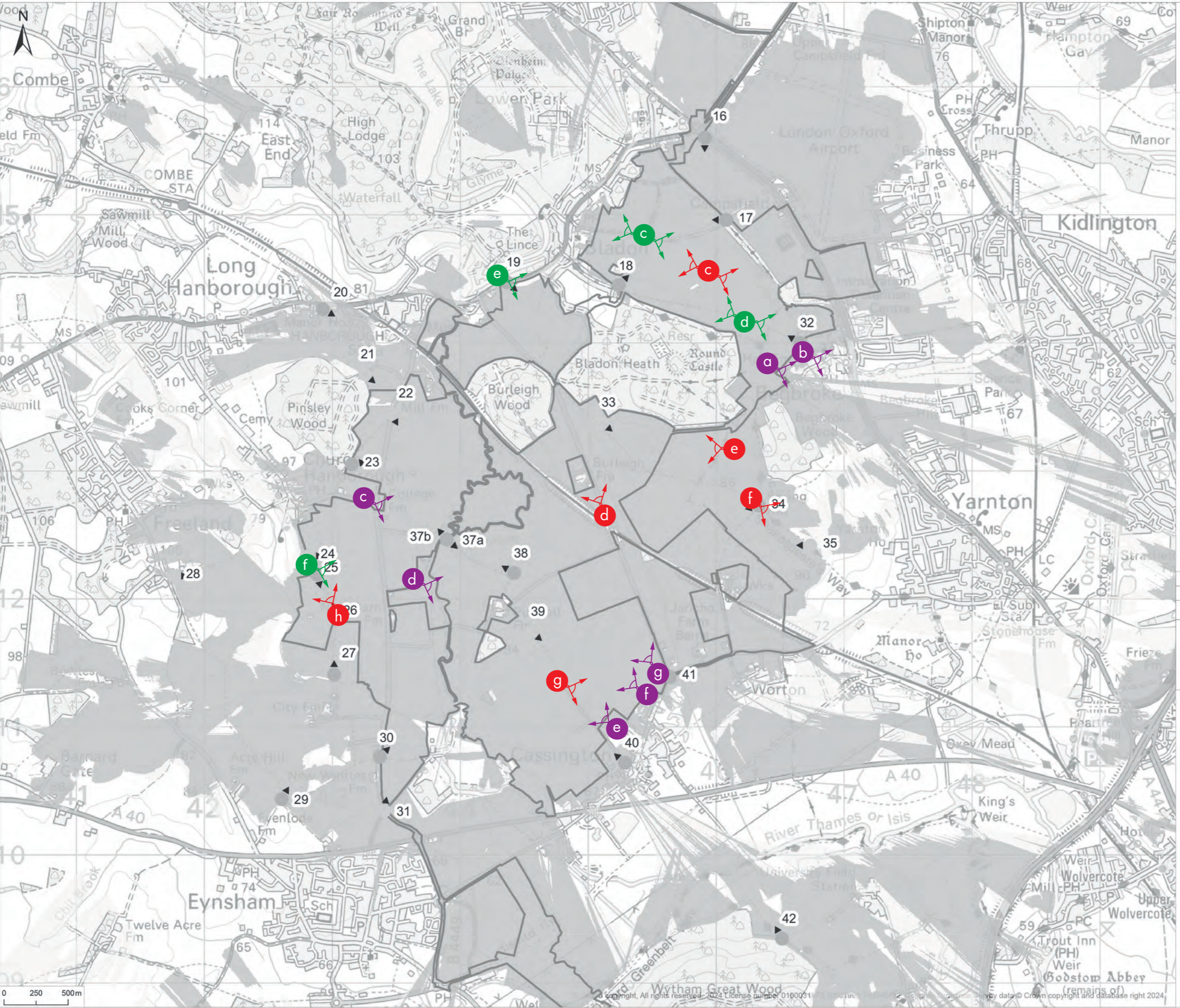
3.1 Comments

- 3.1.1 SBW has prepared a detailed Community Impact Report which is intended to respond to the Host Authority's Local Impact Report. This forms Appendix 2 of these submissions.



Waterfront House, Waterfront Plaza
35 Station Street, Nottingham, NG2 3DQ

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Legend

Application site

Viewpoints

a

Landscape Viewpoints

a

Heritage Viewpoints

a

Residential Viewpoints

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PROJECT
Botley West Solar Farm

CLIENT
Stop Botley West

TITLE
Accompanied Site vSsit Viewpoint Locations Plan

STATUS	FINAL	DATE	JULY 25
SCALE	NTS	CHECKED	SB
DRAWN	TW	REV NO:	ORIGINAL SIZE
N241175	(08)005	-	A3



Legend

Application site

Viewpoints

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Landscape Viewpoints

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Heritage Viewpoints

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Residential Viewpoints

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PROJECT

Botley West Solar Farm

CLIENT

Stop Botley West

TITLE

Accompanied Site Visit Viewpoint Locations Plan

STATUS

FINAL

SCALE

NTS

DATE

JULY 25

DRAWN

TW

CHECKED

SB

JOB NO:

N241175

DWG NO:

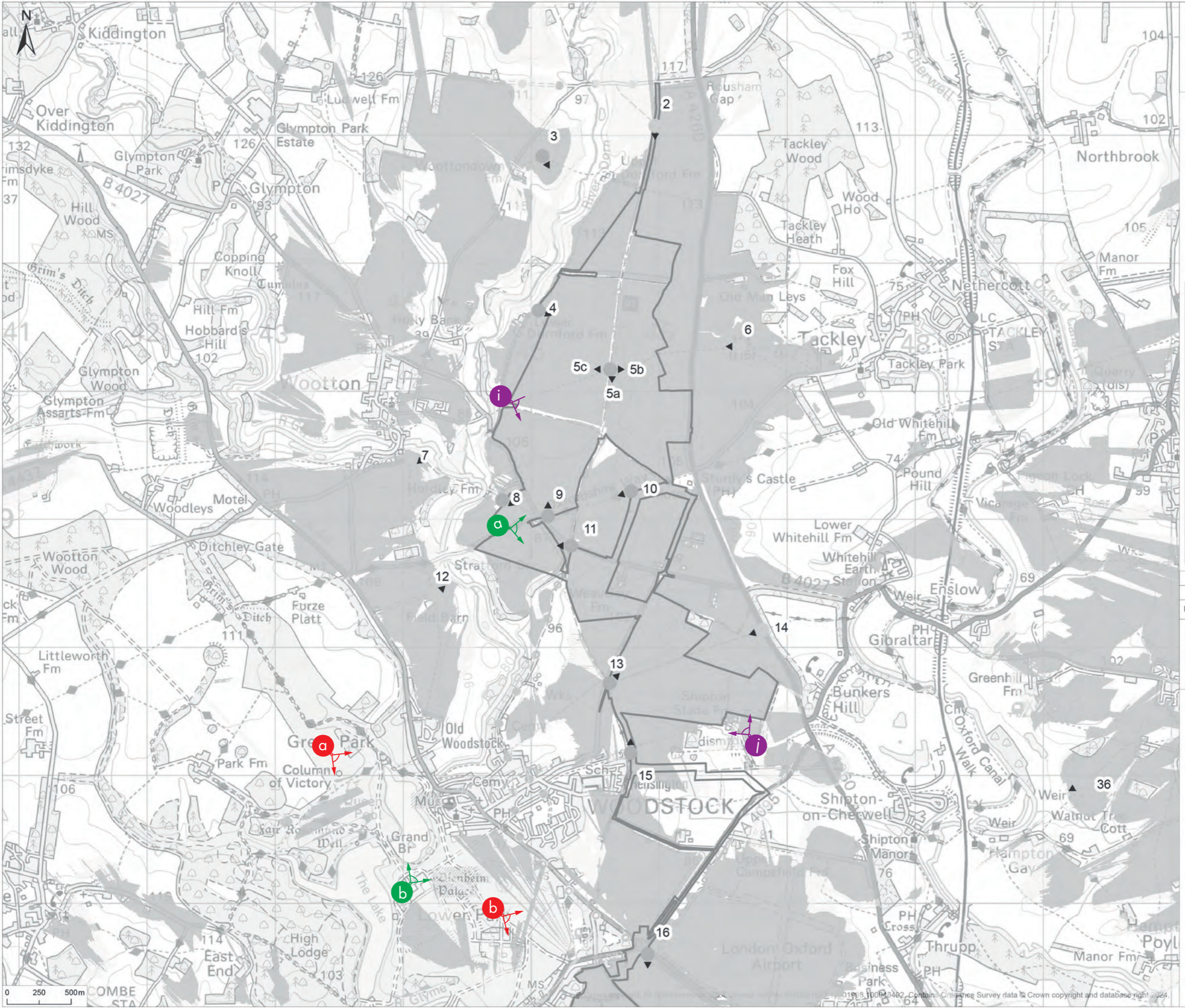
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Legend

Application site

Viewpoints

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Residential Viewpoints

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PROJECT

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TITLE

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STATUS FINAL

SCALE NTS

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JOB NO: N241175

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