Botley West Solar Farm, Deadline 3 Response 22 July 2025

From Mary Ann Canning

The response below is limited to the main points concerning topics that I have some understanding of as a retired Landscape Architect. and is based largely on Responses to ExA's First Written Questions: Q1.6 Cultural Heritage and Q 1.14 Landscape Resource and Visual Amenity.

ExA Q1.6.14, WHS Buffer zone

EN010147-001282: OHA's Response to Botley West Solar Farm, p.62 I agree with all aspects of the OHA answers to this question: the approach taken by ICOMOS-UK was too narrow, merely concentrating on intervisibility. It does not reflect current understanding of the concept of setting, for example the need to consider the wider contribution to the setting of the 18th and 19th century working landscape, and the importance of the sense of arrival at the designed landscape through this rural agricultural setting.

Therefore I agree with their conclusion that the areas highlighted for omission by ICOMOS are not sufficient to provide a 'sufficient buffer to protect the rural landscape that is important to the setting of Blenheim Palace'. Their reasons given are important – such as the lack of consideration of the potentially detrimental effects of landscape mitigation (hedges, tree planting) on the understanding, appreciation and experience of the WHS from the surrounding landscape. I do welcome the removal of panels from the escarpment above the Evenlode valley, to help reduce the prominence of the panels in longer views to the WHS.

I note that some of these areas have been put forward for omission in EN010147-001239-Applicant's Change Request 2 Notification (Rev 0). However having viewed these (with some difficulty, as the plans aren't clear), I consider they are insufficient to have the required effect, and the escarpment is not included.

ExA Q1.6.15, Blenheim Palace WHS - Assessment of Setting (1)

I cannot agree with the Applicant's response that they have sought to enhance Public Rights of Way, when in fact this has involved diversions in places and tall divisive hedgerows. These hedgerows are likely to be permanent features and will prevent expansive views out across the landscape over long distances (i.e. the reason for many walkers' choice of route).

ExA Q1.6.16, Blenheim Palace WHS - Assessment of Setting (2)

The Applicant's response on the level of harm is unclear, but it appears that, in the opinion of others, the methodology used is questionable. I would also like to endorse the comments by SBW which highlight the interconnectedness of the villages affected by the proposals, (EN010147-001254-Stop Botley West - Comments on responses to RRs, paras 6.5 - 6.10). The network of villages around the WHS has evolved over at least the last 1000 years, as demonstrated by the numerous ancient rights of way, historic churches with their spires visible over long distances.

ExA Q1.6.17, Response to Historic England DL1 Submission

The Applicant appears to dismiss many of HE concerns over Attributes 1, 4, 5 and 7. For example:

Attribute 1, the way the family have influenced the wider estate (its setting) to support its running of the estate has not been assessed.

Attribute 5 – the response only addresses the ancient oak woodland area of High Park within the Park boundary. This was part of the former Wychwood Hunting Forest and formed the original setting into which Blenheim Palace was constructed. This has been ignored. The Wychwood Forest boundary c1219 extended east to include the fields and meadows around Long Hanborough and Church Hanborough, and south to include Eynsham and land to the east of the River Thames. I have attached a plan of Wychwood Forest, which illustrates the extent of the forest. It also shows Pinsley Wood in much the same shape as the present day. Views across from these areas are important in helping to illustrate the evolution and time depth of the setting to the WHS. (See attached figures 1 and 2 – map and detail, ref: study by Della Hook, prepared for Lawson Price as part of a landscape project funded by English Heritage, and published by the Friends of Wychwood.)

ExA Q1.11.12 Green Belt - definition of openness

EN010147-001282: OHA's Response to Botley West Solar Farm p.116-117 sets out reasons why this proposal cannot be considered appropriate development for the Green Belt, based on the criteria for defining openness set out in new PPG Guidance, February 2025. I.e. that development should be viewed in spatial 3D terms, not a flat two dimensional footprint. It also makes the point that visual impact should also be considered – i.e. visual intrusion can result from development that appears out of place in the countryside, especially when it extends over very large areas.

The other important consideration is the duration of development and its ability to be remediated. The forty-year lifespan of these solar arrays and their infrastructure **cannot be considered temporary**. Factors affecting reinstatement including many unknowns, such as future ownership, viability of the owner at the time, land degradation due to soil compaction by vehicle movements, etc.

ExA Q1.14.4 Residential Visual Amenity Assessment

Having read EN010147-001254-Stop Botley West - Comments on responses to RRs, I would endorse the important point made that the continued lack of a RVAA is of particular concern to the large number of residents directly adjoining fields of solar arrays, as well as those within 100m. (Note: I am not personally affected – living at least 1.5km from any panels.)

The cumulative effect of so many individual impacts on residential properties and the fact that the views from many of these are completely dominated by panels into the distance, including on rising ground, makes the need for an RVAA imperative.

Appendix A sets out photomontages of representative properties as assessed by SBW and clearly demonstrates the high degree of impact on many residents.

ExA Q1.14.9 Suggested areas to be omitted from the Proposed Development

The map requested, which would depict as labelled overlays omissions proposed by ICOMOS, Historic England, the Local Authorities and Oxford Airport has not been provided, as far as I can tell. This would be a very useful tool to assess potential areas to be removed.

ExA Q1.14.10 Levels of Significance in LVIA Methodolgy

I struggle to understand the Applicant's answer to this question, however EN010147-001283 OHA Response to Rule 17 letter covers the concerns felt by many over the methodology used.

ExA Q1.14.11- 15 As for Q1.14.10



