

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

WRITTEN SUBMISSIONS

Prepared in response to Deadline 4 (D4)

22nd August 2025

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1. Introduction

- 1.1. This Written Submission (WS) have been prepared by Marrons on behalf of Stop Botley West Limited (SBW) to address the information requirements set out in the Examining Authority's (ExA) Rule 8 letter, originally issued on 20th May 2025 and as amended on 7th August 2025. This WS is made specifically in relation to Deadline 4 (D4), which, as set out within the Rule 8 letter (as amended) is for the receipt by the ExA of the following:
- Responses to Examining Authority's Second Written Questions (ExQ2)
 - Notification by Affected Persons of wish to speak at a Compulsory Acquisition Hearing
 - Comments on the Applicant's draft ASI itinerary
 - Comments on any other information and submissions received at D3
 - Any further information requested by the Examining Authority under Rule 17 of the Examination Procedure Rules
- 1.2. We are not aware that the ExA have requested any further information at this stage under Rule 17 of the Examination Procedure Rules and thus no comments are made in respect of this matter within this WS. Similarly, no comments are made in respect of the notification by affected persons of wish to speak at a compulsory acquisition hearing. Comments in respect of the other items listed, where relevant, are set out in turn below.
- 1.3. SBW have previously provided detailed Relevant and Written Representations to the Examination in February 2025 and subsequently on 1st and 22nd July 2025 (D2 and D3 respectively). SBW have also requested to be present at the Accompanied Site Inspections (ASI) and at the scheduled hearings in October 2025. These previous representations should be read in conjunction with this submission.

2. Responses to the Examining Authority's Second Written Questions

- 2.1. The ExA issued their second written questions and requests for information on 30th July 2025. One of the questions, reference 2.6.6 is directed to SBW. The question is set out below:

Community Impact Report

Figures 6.1a and 6.1b of [REP2-081] show an archaeological excavation site and a fragment of pottery. Please identify these figures in relation to the project site, or indicate if they are not related to the site.

- 2.2. The figures referenced by the ExA in the Community Impact Report submitted by SBW (dated 28th June 2025) were taken from an archaeological dig commissioned by the applicant at the end of the track from Orchard Field Lane in Bladon. At the point of writing, SBW have not had sight of the dig report and this has not been made public.
- 2.3. The dig relates to field 2.1 to the north-east of Bladon, as shown on the map below. The field is subject to the Change 2 application proposed by the applicant.

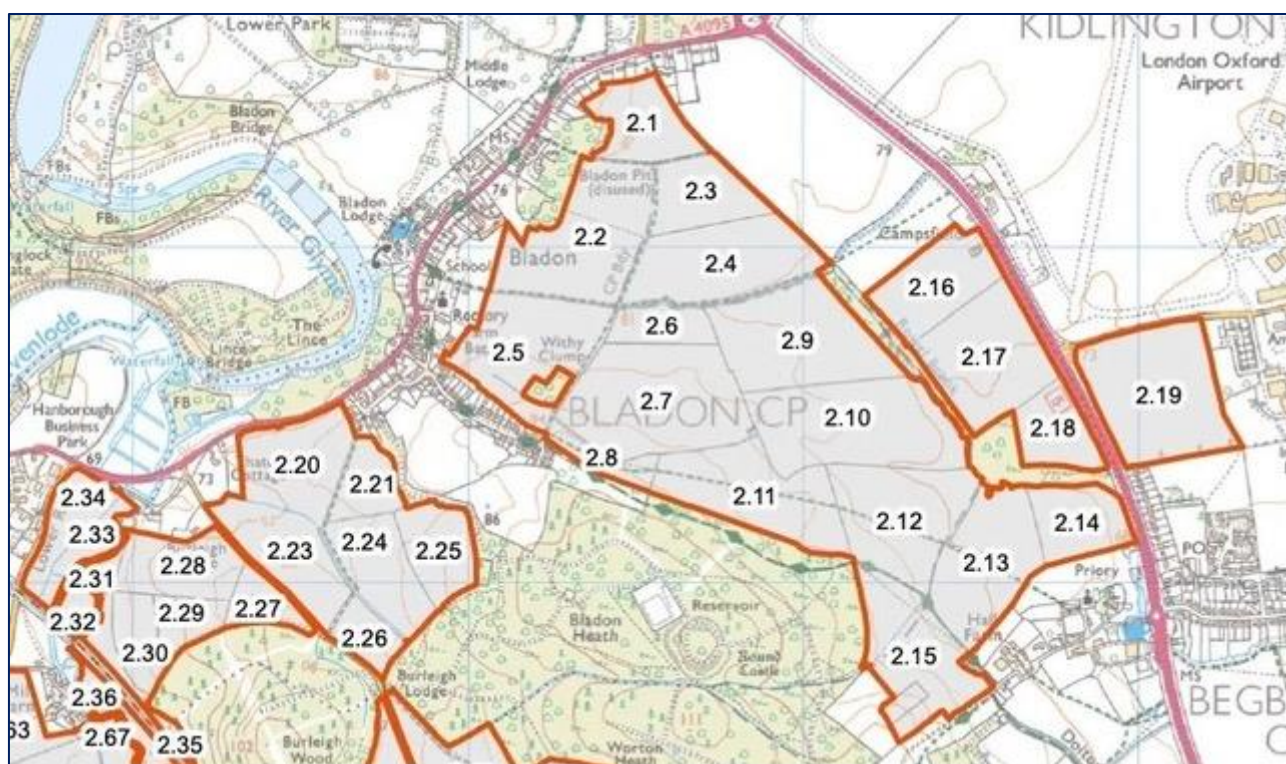


Figure 1- Plan showing field locations, including field 2.1 as referenced above

- 2.4. In addition to the question directed specifically to SBW, the ExA directs part 4 of question reference 2.13.8 to all Interested Parties. This question is set out below:

Landscape mitigation and decommissioning

In the applicant's response to the Rule 17 letter [REP2-029], the applicant states "the proposed landscape mitigation would be retained after the removal of the infrastructure elements and will continue to provide a positive long-term contribution to and reinforcement of the character of the landscape, in line with the management guidelines for the area. Should the proposed landscape mitigation be considered detrimental to landscape character at decommissioning, then it could be removed. However, as it follows the currently management guideline this is unlikely to be recommended."

To all IP

4) The ExA recognises that the proposal would have visual impacts on the landscape, and several IP's have expressed concerns as to how adverse they would be. The ExA nonetheless is considering all stages of the development and is considering the future condition of the landscape post-decommissioning. What would your reaction be if, at this stage, areas of landscape mitigation (for example, planting hedgerows along public footpaths) were excluded from the applicant's plans and not implemented? This would of course result in un-mitigated visual effects being endured during operation but, at decommissioning stage, the original landscape character could be restored closer to that presented, enjoyed and described in the book by Forever Fields [REP1-101].

- 2.5. This question balances unmitigated visual effects during operation against the restoration of baseline landscape character and visual amenity post decommissioning. From a landscape and visual impact point of view, the extent of the adverse impact would likely be marginal or equal to the long term beneficial restoration of the baseline landscape, however this would involve enduring the immediate effects of the proposal for a number of years before the beneficial restoration is delivered.
- 2.6. The question suggests the necessity of accepting one of two alternatives, each of which are undesirable. In our view, there are other alternative to consider, as the mitigation hierarchy set out. They include omitting panels and other solar infrastructure from visually sensitive areas (as recommended by ICOMOS and the District Councils- see also section 4 below) and ensuring that panels and infrastructure are designed and sited in a way that is sympathetic to local landscape. In SBW's view, these approaches to avoiding, minimising and mitigating harm to the visual landscape must also be considered.

3. Comments on the Applicant's Draft ASI Itinerary

- 3.1. The applicant submitted their draft ASI itinerary at D3 with a document reference EN010147/APP/13.5.
- 3.2. SBW provided a nominations for locations for ASI at D2 and the reasoning behind these nominations is set out within the submission document made by SBW at that stage. We note that the applicant's draft ASI itinerary does not include a number of these.
- 3.3. Whilst SBW maintain the reasoning for all of the nominations made at D2, we would particularly wish to raise two locations which we consider are essential to be included, as follows.
 - (i) In Cassington, three properties were included within the nominations:
 - Farways, Yarnton Road
 - The Elms, Yarnton Road
 - 40 Eynsham Road
- 3.4. We would strongly urge that at least one of these properties is included within the ASI itinerary. Currently, no views looking north from Cassington are included, a view that would be highly impacted by the proposals.
 - (ii) Dornford Cottage, Wooton
- 3.5. We are of the view that the ExA should visit Dornford Cottage as part of the ASI's to observe the lack of mitigation at a location where there is a wide expanse of panels.
- 3.6. In addition to the locations set out above (and within the submission made at D2), SBW have specifically requested their representation at the ASI's in email correspondence issues on 18th July 2025. SBW maintain this request.

4. Comments on any other information and submissions made at D3

Omissions

- 4.1. To date, various omissions have been recommended by a number of IP's including Historic England, ICOMOS, West Oxfordshire District Council, Vale of White Horse District Council and London Oxford Airport.
- 4.2. Within the ExA's first set of written questions and requests for additional information, it was requested that the applicant "provide a plan with all these omissions shown as overlays, with each layer being identified with the name of the proposer" (paragraph 1.14.9).
- 4.3. The applicant has failed to provide this plan, instead referring to the change request made. At 2.13.11 of the ExA's second written questions, this is again requested.
- 4.4. Whilst the ExA has requested the applicant provide this, SBW have prepared their own maps to show the proposed omissions. These are provided as an appendix to this document to assist the ExA in light of the applicant's failures to do so.
- 4.5. SBW are currently in the process of identifying a series of suggested omissions to assist in the examination and these will be provided in due course.

Heritage

- 4.6. SBW welcome the further questions for the applicant raised by the ExA on impacts on specific heritage assets and the further consideration from the Applicant on the omissions proposed by ICOMOS-UK which we note have not been explored in detail.
- 4.7. We also note and welcome Historic England's clarification in their comments on Deadline 2 submissions about their views on the impacts on a number of heritage assets. In particular, that they consider the impact on the Church of St Peter & St Paul (Church Hanborough), the Church of St Peter (Cassington) and the Church of St Michael (Begbroke) would be low adverse.
- 4.8. Historic England also helpfully clarify their position regarding the impact from the development on the Registered Park & Garden and the World Heritage Site at Blenheim Palace which they consider to be a modest level of less than substantial harm. This is considerably greater than that identified by the Applicant. SBW would however request that this is clarified in respect of what this equates to in EIA terms and also whether this position reflects the scheme with the omissions previously proposed by Historic England.

- 4.9. It is understood that further information and assessments will be forthcoming as part of the submission of Change Notification 2 and SBW look forward to the opportunity to review these documents alongside the applicant's answers to the second written questions.

Landscape

- 4.10. SBW have reviewed the applicant's response to other D2 submissions, dated July 2025 and would make the following comments in respect of this.

Residential Visual Amenity Assessment

- 4.11. SBW have previously raised the fact that a Residential Visual Amenity Assessment (RVAA) has failed to be submitted, despite it being agreed in the scoping response. The applicant's response to this matter relies on GLVIA3 guidance and in particular the Technical Guidance Note 2/19 Residential Visual Amenity Assessment(LI TGN 2/19).
- 4.12. Previous comment has been raised regarding the outcomes of the LVIA, relating to methodology and determination of significance, which in turn also challenges the justification of not undertaking the RVAA. This point is further challenged by the ExA within their second written questions at 2.13.15.
- 4.13. The applicant continues to maintain that a 25m buffer is appropriate, however as has previously been stated, there is no evidence to support this. SBW maintain that 100m would be recommended taking account of the size, scale and disparate nature of the proposals, with good practice advising a minimum of 50m.

Impacts on landscape and visual receptors

- 4.14. In respect of this matter, the applicant's response is similar to previous responses and does not fully address the points raised by SBW and others.
- 4.15. To this end, SBW welcome the ExA's further questions to the applicant on a number of points that have been raised in previous responses. SBW look forward to reviewing the applicant's responses to these questions and requests for further information and will comment upon them as and when they are published.

5. Summary

- 5.1. This Written Submission has been prepared by Marrons on behalf of Stop Botley West Limited to address the information requirements set out within the Examining Authority's Rule 8 letter, as amended, relating to Deadline 4.
- 5.2. The document provides comments in respect of each of the items in turn. This document should be read in conjunction with the previous submissions made by SBW at previous deadlines.
- 5.3. SBW would be very happy to address any questions that the ExA may have on the comments made. As previously requested, and referenced again above, SBW would request the opportunity to be present at the ASI's in due course.



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