

Botley West Solar Farm, Deadline 4 Response
3 September 2025
From Mary Ann Canning

ExA Q2.1.5, Design Principles

The applicant continues to maintain that they have followed an iterative process in developing the current layout. However, only minimal amendments have been made to the design since the first public consultation.

Their **Approach to Design Note** at Annex 4 sets out laudable principles, but in reality these have not been adhered to.

On p144, Paragraph 4.7.6 of NPS EN-1 is quoted:

*“Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate **good design in terms of siting relative to existing landscape character, land form and vegetation**”*

I would question whether such good design has been implemented;

The Applicants Approach, p145, states that they have sought to:

“to create a development that:

*“1) Is capable of balancing the need to provide renewable energy at scale and pace **whilst at the same time being able to be absorbed into the landscape in which it is situated, without significant harm arising;**”*

*“2) Makes a **significant and long-lasting positive contribution to the wider landscape character of the area, and, after the development has been decommissioned, a lasting landscape legacy with new and improved access for the public;**”*

*“3) **Contributes significantly to the biodiversity of the area both during the lifetime of the Project, as well as post decommissioning;**”*

These statements are all laudable, however, the development, as proposed, demonstrably fails to achieve **all** these objectives

The Applicants Approach is then summarised from p146:

“a) Bringing together a team of experts familiar with solar development, to apply their combined experience in producing a development that maximised the benefits and avoided or minimised harm. This includes locally based planning and environmental consultants, with extensive experience in solar development, experts in NSIP communication and consultation, leading planning layers in the solar, and leading land referencing consultants.”

*“b) Engaging in informal then formal consultation/engagement exercises to enable the Applicant to identify then **respond to concerns raised;**”*

“c) Entering into a Planning Performance Agreement with the host authorities, to ensure there was a means by which information relating to the project could be shared and discussed and Statements

of Common Ground resolved.”

*“d) **Actively using the EIA process to drive continuous improvement to design and layout, including sustainability and responding to climate change.**”*

I would question whether items b) and d) in particular have been adhered to.

I would also question whether any of the Core Principles set out below have been upheld, p148:

“The Applicant had four self-imposed overarching Core Principles within which every decision on layout had to be tested. These were:”

*“- To develop a ‘**landscape led**’ layout for the installation areas – seeking to protect and/or enhance existing landscape character and habitat features by an analysis of the character and morphology of the landscape, and extensive surveys to understand the existing ecology of the area;”*

*“- To develop a layout and landscape strategy which would **avoid or minimise extensive, uninterrupted views, of large areas of solar arrays and other electrical infrastructure, and so avoid or minimise harmful visual impacts, and help with the visual aspects of openness with the Green Belt.** This was the design brief for the landscape architect, who then constantly reviewed draft layouts to ensure this principle was observed;”*

*“- **Apply appropriate buffers or stand-off distances between the development and sensitive receptors** including residential and other sensitive land uses (e.g. educational areas); heritage assets and their setting; landscape features (hedgerows, woodland and individual trees); watercourses; sensitive ecology; and generally, where possible **use such buffers to maintain a sense of openness to minimise harm to the Green Belt;**”*

“- To deliver as much benefit as possible within the Order Limits, including maintaining the ability to produce renewable energy to the level to meet the Connection Offer; to maximise Biodiversity Net Gain – through landscape, new habitats, soil and ecology management plans – of at least 70%, consistent with achieving other objectives; increased and/improved public access throughout the site; a continuation of agricultural use; and by providing community benefits in terms of an area for educational use and food growing.”

ExA Q2.6.3, Suggested Omissions by ICOMOS-UK

The applicant continues to disagree with the necessary removal of large areas of panel, suggesting that the land makes little contribution to the OUV of the WHS:

E.g. in answer to my comment at REP3-105, it was stated that:

“The Applicant considers that the further removal of panels as requested by OHS (and ICOMOS-UK) are unnecessary in that these changes would not lead to any reduction in the perceived level of harm to the OUV of the WHS. The Applicant accepts that much (if not all) of the land identified by OHS as a concern could be considered to fall within the setting of the WHS; the issue is more that how the level or nature of the contribution of that part of the setting to the OUV of the WHS.”

However this does not appear to be the expert opinion of either ICOMOS-UK, or ICOMOS itself, where its Technical Review (EN010147-001530-202508) concludes on p8 that:

“ICOMOS does not consider that removing the areas marked 2.1, 2.2, 2.5, and 2.20-2.26 from the development is sufficient to reduce the substantial harm this project will have on the Outstanding Universal Value of the property.”

*“In light of the above, ICOMOS concludes that the proposed development, its current form, individually and through cumulation with other proposals in the wider setting of the property, presents a **significant adverse impact** on the Outstanding Universal Value of Blenheim Palace through a cumulative transformation of its wider rural setting.”*

This review further amplifies the concerns of ICOMOS-UK and goes on to recommend that the following actions be taken before any further decisions on the approval or implementation of the project:

- *“Commission a Landscape Character Assessment focused specifically on the way in which the wider setting supports the Outstanding Universal Value of Blenheim Palace;*
- *Require a revised and enhanced Heritage Impact Assessment for the Botley West Solar Farm that independently defines attributes of the Outstanding Universal Value, addresses the full range of experiential and cultural dimensions of setting, and integrates the findings of the Landscape Character Assessment;*
- *Undertake a cumulative impact assessment that considers the Botley West Solar Farm alongside other approved or proposed developments in the setting, including recent and planned urban expansions;*
- *Assess the current planning and management system for the property’s setting, including the adequacy of policy protections in the absence of a buffer zone, and consider introducing additional safeguards.”*

I consider it is essential that these recommendations are implemented to resolve the disagreement on panel removal across the proposed development.

REP3-105 Suggested areas to be omitted from the Proposed Development

Subsequent to my request for this map, I note that Stop Botley West Limited have provided plans with labelled overlays depicting omissions proposed by ICOMOS, Historic England, the Local Authorities and Oxford Airport, in their Responses to Examining Authority's Second Written Questions (ExQ2, 1, 2 and 3). It would be useful to have confirmation of the Applicant's agreement with the areas shown.

The total area of proposed omissions would be offset by the increased efficiency of panel output since the development was first planned in 2019, with the potential efficiency by the time the project is implemented in 2028/29 being nearly double that at the time of the initial design. I realise that I am a layman over this, but I am sure there are figures that can back this up.

REP3-105 - Landscape and Visual Effects

I am pleased to note that the Applicant's LVIA is being updated in response to OHA and others' comments.

However, the preparation of a Residential Visual Amenity Assessment is still being resisted by the Applicant. The cumulative effect of such enormous areas of panels makes this essential, as the impact on residents surrounded by panels towards the horizon cannot be compared to a more usual scale of development. The buffers suggested to private residents, at 25m, are lower than any other NSIP proposal so far submitted. Even a 100m buffer will do little to mitigate the sheer area of panel that will be viewed from some properties. Such views would

be even more intrusive from the upper floors and their boundary hedges or any mitigation planting would do little to offset this damaging effect.