



The countryside charity  
Oxfordshire

Campaigning to protect our rural county

CPRE Oxfordshire  
20 High Street  
Watlington  
Oxfordshire OX49 5PY

Tel: 01491 [REDACTED]  
[campaign@cpreoxon.org.uk](mailto:campaign@cpreoxon.org.uk)

**Project: EN10147**

**Registration identification number is: 20055135**

11<sup>th</sup> September 2025

**Subject: Additional questions from, "Applicant's Response to the ExA's Second Written Questions" August 25.**

Dear Planning Inspectorate,

CPRE has reviewed the document titled "Applicant's Response to the ExA's Second Written Questions", issued in August 2025. CPRE Oxfordshire has reviewed the content in detail and would like to raise the following points and additional questions:

### **1. Response to Q2.11.4 – Best and Most Versatile (BMV) Land**

We welcome the clarification provided on the extent of BMV land that would be taken out of agricultural production if the proposed solar farm proceeds. However, we note with concern that the figure has increased from the original application. The applicant now acknowledges that 42.26% of the land to be used is BMV, a significant increase from the 38% stated in the original application. Despite this updated figure, the applicant has still not adequately demonstrated compliance with the requirements of NPS EN-3, which states that developers must justify: "Why the use of BMV land is necessary, and whether it is feasible to locate the scheme on lower-grade agricultural land, considering other material planning considerations."

We urge the Examining Authority to request a clearer explanation from the applicant on these specific requirements, in line with policy.

We also draw attention to increasing ministerial concern about the loss of BMV land to solar developments and the associated threat to food security. In July 2025, a joint letter from 30 Ministers and Lords was sent to the Prime Minister calling for a clear ban on large-scale solar installations on BMV land (ALC Grades 1, 2, and 3a). This aligns with CPRE Oxfordshire's position, that solar development should not occur on Grades 1 or 2 land, or on Grade 3a where it negatively affects landscape value. We enclose a copy of the Ministerial letter for your consideration.



## **2. Response to Q2.11.14 – Soil Sampling Data**

While the applicant has responded to Q2.11.14, they defer provision of soil data to Blenheim Palace. We request confirmation that Blenheim Palace will supply the full soil sampling plan as previously requested. Specifically, we ask for the following details:

- pH levels
- Phosphorus, potassium, and magnesium levels (in parts per million, not index values)
- Organic matter content
- Soil sampling data for the northern site

The applicant's reference to a Soil Management Plan, which includes taking samples to assess nutrient levels and determine fertiliser/lime application, directly contradicts their earlier assertion that the land is too degraded to support crop growth. If nutrient application is now proposed to establish grassland, this undermines the previous justification for removing the land from agricultural use.

## **3. Responses to Q2.13.3 and Q2.13.15 – Landscape and Visual Impact Assessment (LVIA) & Residential Visual Amenity Assessment (RVAA)**

CPRE maintains that the applicant has not sufficiently addressed the need for an RVAA. The current LVIA contains several deficiencies, and there remains no clear justification for omitting a proper Residential Visual Amenity Assessment.

We request that this issue be given further scrutiny, especially given the potential for significant visual impact on residential properties in the area.

## **4. ICOMOS Technical Review – August 2025**

We also draw attention to the latest technical review by ICOMOS (August 2025). It concludes that the proposed development, in its current form and cumulatively with other schemes, would have a significant adverse impact on the Outstanding Universal Value (OUV) of Blenheim Palace. ICOMOS makes four key recommendations which we fully support:

- 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.



We strongly urge the Examining Authority to ensure that these recommendations are followed.

## **5. Response to Q2.11.13 – Green Belt and Very Special Circumstances (VSC)**

### **- Economic Benefits**

The applicant's economic claims rely heavily on assumptions and the phrase "in the opinion of the Applicant". There is no quantitative evidence provided to support claims of local economic benefit during the construction or operation of the solar farm. While it is conceivable that some local employment might be created, Oxfordshire's unemployment rate is significantly lower than the national average, which limits the local labour pool. It is far more likely that construction would be subcontracted to external specialist firms. As such, the economic benefits claimed are speculative and unsubstantiated, and should be given minimal weight in any assessment of Very Special Circumstances.

### **- Educational Benefits**

The proposed visitor centre is presented as an educational asset. However, any major renewable project could incorporate such a facility, regardless of location. Moreover, Oxford already has an outstanding international reputation for education, and it is unlikely that a visitor centre at a solar farm would meaningfully enhance this. In addition, the Hill End Outdoor Education Centre near Cumnor already serves this purpose exceptionally well. Therefore, the claimed educational benefits do not constitute a valid justification for development in the Green Belt.

### **- Sustainability**

The applicant has still not provided a clear explanation as to why this site in Oxfordshire is appropriate for a solar development of this scale, particularly when it entails significant loss of BMV land, and loss of Oxford's Green Belt. Both of these are strong and valid reasons to question the site's suitability and to conclude that Very Special Circumstances do not exist in this case.

CPRE Oxfordshire maintains serious concerns regarding the proposed development at Botley West and believes the applicant has not sufficiently demonstrated compliance with national policy, nor provided the necessary evidence to justify development on high-value agricultural land and within the Green Belt.

We respectfully ask the Examining Authority to give full weight to the above points and ensure all outstanding questions are answered in full.



The countryside charity  
Oxfordshire

Yours sincerely



Lisa Warne  
Director CPRE Oxfordshire



The countryside charity  
Oxfordshire





The Prime Minister,  
10 Downing Street,  
London,  
SW1A 2AA.

11 July 2025

## **Protect our BMV agricultural land from large-area solar farm development**

Dear Prime Minister,

The need for effective policy to transition away from fossil fuels and decarbonise our energy system is clear and indisputable. However, in pursuing this goal, we must not sacrifice our nation's food security or the integrity of our agricultural landscape.

While planning guidance discourages development on Best and Most Versatile (BMV) land, there is no legal ban. The classification of large-area solar farms as Nationally Significant Infrastructure Projects (NSIPs) and the additional powers granted to them as Critical National Priorities mean the planning process now permits these developments to be approved on the UK's most valuable farmland.

Analysis from SolarQ indicates that solar installations are being disproportionately sited on better quality farmland, Agricultural Land Classification (ALC) Grades 1 to 3 (that includes BMV land Grades 1, 2 and 3a) rather than on poorer-quality land. There is three times more Grade 5 land (the lowest quality) than Grade 1 land in England, yet solar installations occupy over 20 times more Grade 1 land than Grade 5 land (0.68% vs 0.03%). This reflects a seriously flawed approach to land use and planning.

The consequences of continuing on this path are profound. The UK currently imports 46% of its food, making it the world's third-largest food importer. Arable land is already under pressure, having declined to just 14.8 million acres—the lowest level since the Second World War—with nearly 100,000 acres lost annually. Meanwhile the population of the UK continues to rise; it has risen by more than 10 million since 1990. Climate projections suggest the proportion of UK land classified as BMV could fall from 38% today to just 11% by 2050. At such a critical time, large-scale solar farms are removing hundreds of hectares of productive farmland from cultivation.

We are therefore calling for:

1. An unequivocal ban of large-area solar installations on Best and Most Versatile (BMV) agricultural land (ALC grades 1, 2 and 3a).
2. In light of the likely reduction of BMV land as a result of climate change, inclusion of ALC Grade 3b in the BMV category.

3. A policy promoting a rooftop-first and brownfield-first approach to siting solar installations at local, regional and national levels.

The transition to Net Zero must not come at the cost of our food production and proud agricultural industry. We urge you to take immediate action to safeguard the land that will feed future generations.

Yours sincerely,

**Robbie Moore MP**

**Kevin Hollinrake**

**MP Sir David Davis**

**MP Roz Savage MP**

**Helen Whately MP**

**Llinos Medi MP**

**Stuart Andrew MP**

**Nick Timothy MP**

**George Freeman**

**MP Sarah Bool MP**

**Andrew Rosindell MP**

**Ben Obese-Jecty MP**

**Sir Edward Leigh MP**

**Greg Smith MP**

**Dame Karen Bradley MP**

**Dr Caroline Johnson**

**MP Danny Kruger MP**

**Andrew Snowden MP**

**Sir Christopher Chope MP**

**Richard Fuller MP**

**Lord Mott**

**Lord Alton of Liverpool**

**Baroness Hodgson of**

**Abinger Baroness Redfearn**

**Lord Curry of**

**Kirkharle Lord**

**Thurlow**

**Baroness Meyer**

**Baroness Harris of**

**Richmond Baroness Mobarik**

**CBE Lord Taylor of Holbeach**