

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

WRITTEN SUBMISSIONS

Prepared in response to Deadline 5 (D5)

12th September 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 sets 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 5 (D5), which, as set out in the Rule 8 letter (as amended), is for the receipt of the ExA of the following:
1. Notification by Interested Parties and Affected Persons of wish to speak at an Open Floor Hearing
 2. Comments on Responses to Examining Authority's EXQ2 (if required)
 3. Comments on any other information and submissions received at D4
 4. Submission of the Applicant's Second Change Request in accordance with the timetable set out in PD-011
 5. Any further information requested by the Examining Authority under Rule 17 of the Examination Procedure Rules
- 1.2. This response has been prepared to address these requirements, where necessary.
- 1.3. No comments are required by SBW in respect of items 4 and 5 listed above. Item 4 is for the applicant to address at this stage (albeit SBW will provide comments on the change request once this has been reviewed following submission). In respect of item 5, the only request made by the ExA under Rule 17 for submission at deadline 5 is a request for the applicant to provide an updated compulsory acquisition tracker, land and rights negotiations tracker and book of reference. No information of SBW is therefore requested.
- 1.4. In respect of Item 1 listed above, SBW would like to express their wish to speak at an Open Floor Hearing. In addition, SBW would also like to be present at the Accompanied Site Inspection (ASI) and Issue Specific Hearings (ISH). Formal registration has been completed using the event participation form accordingly, in line with the Rule 13 and 16 letter dated 5th September 2025.
- 1.5. Responses in relation to items 2 and 3 listed above are set out in the following section of this WS.

2. Comments on Responses to Examining Authority's EXQ2 and other information/submissions made at D4

- 2.1. SBW have reviewed the responses to the ExA's EXQ2 and other information/submissions made by the applicant and all other parties at D4, following which the following comments are made, specifically in relation to the core issues of the historic environment impacts and landscape and visual impact matters.

Historic Environment

- 2.2. SBW welcome the findings of the Technical Review provided by ICOMOS which concludes that the proposed development individually and cumulatively presents a significant adverse impact on the Outstanding Universal Value (OUV) of the World Heritage Site (WHS) at Blenheim Palace.
- 2.3. ICOMOS's concerns regarding the lack of adequate protection of the WHS's setting provided by the Management Plan, especially given the absence of a buffer zone, reflect points previously and consistently raised by SBW in previous submissions. In particular, SBW have, from the outset, raised concerns with the absence of the assessment of aspects of setting other than visual from the Applicant's heritage reports and the contribution these make to then heritage assets at Blenheim Palace. ICOMOS have raised similar concerns, stating that setting should be understood more broadly incorporating 'perceptual, cultural and experiential dimensions'. SBW welcome the opportunity to review the Applicant's forthcoming updated assessments.
- 2.4. In addition, it is also noted that ICOMOS state that the removal of the areas proposed by the Applicant would be sufficient to reduce the 'substantial harm' that the project would have on the OUV. It is understood that this relates to the areas proposed by Historic England to be removed and which are anticipated as part of Change Request 2 rather than others previously proposed by the joint authorities and ICOMOS-UK. SBW welcome the opportunity to review the proposed changes and updated heritage reports, and note ICOMOS's reference to 'substantial harm' to the WHS.
- 2.5. The Applicant notes at Q1.6.16 that they welcome Historic England's assessment that the impact on the WHS would be less than substantial. We would like to reiterate that less than substantial harm remains a high bar, particularly where highly graded heritage assets of international significance could be affected. Additionally, it is noted that the Applicant does not attempt to reconcile this within their current assessment of negligible adverse impact as identified in the current ES.
- 2.6. The Applicant also states at REP3-089 that the driver for changes to the scheme is the WHS due to its international significance. However, SBW would like to highlight that other highly

graded heritage assets in particular should still be taken into consideration and mitigation measures applied in respect of one asset may not be appropriate to another. SBW is therefore concerned that the Applicant is overlooking other impact on highly graded assets that require mitigation by focusing areas of change on the WHS.

- 2.7. SBW notes the delay with the archaeological investigations and the subsequent reporting. Notwithstanding the Applicant's view that the geophysical survey has been reliable to do, we look forward to the opportunity to review and comment on these when available as we share Historic England's view that any remains will be of intrinsic interest and require individual review.

Landscape

- 2.8. We understand that a revised LVIA will be submitted at Deadline 5 which will respond to some of the comments raised by the ExA. Within this, we would expect there to be a reconsideration of the following:
- The assessment threshold for significance which is currently at odds with the rest of the supporting reports. The applicant has made reference to this being reviewed in the resubmitted LVIA.
 - There remains outstanding issues with the judgement on the impact of the proposed mitigation. It is quoted as that it *"serves its purpose and works as a positive enhancement measure"* and that there will be *"no loss of existing landscape elements attributable to the proposed development. In terms of visual effects, the screening by the proposed mitigation planting would change views from several footpaths/PRoWs, however the overall quality of the available views would not be affected"*. It is our view that there will be an impact on views which contribute to the landscape character and the experience of the wider landscape and the quality of the views.
 - We expect the updated LVIA to consider the change in views as a result of the introduction of the mitigation measures, particularly the hedgerows along the publicly accessible routes.
 - No RVAA has been submitted yet and there remains questions over the extent to which buffers will be increased and the evidence to support the judgements on the impacts of residential receptors.
 - The selected photomontage locations to be justified.
 - Addressing the comments from ICOMOS and Historic England on the relationship between the wider setting of the WHS and its OUV baseline in order to understand the

contribution of the landscape character makes to the property and its assets and to support judgements on the effects of the proposals on the landscape character. The HIA and the LVIA are contradictory in their judgement of the sensitivity of the landscape surrounding the WHS and this needs to be reviewed with the benefit of a clear evidence base.

- 2.9. SBW welcome the opportunity to review and comment on the revised LVIA once this has been submitted.

3. Summary

- 3.1. This Written Submission has been prepared 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 5.
- 3.2. This document provides comments in respect of each of the items in turn and should be read in conjunction with the previous submissions made by SBW at previous deadlines.
- 3.3. As set out above, SBW would request the opportunity to speak in person at the Issue Specific Hearing and Open Floor Hearing, scheduled for the 9th and 10th October 2025, as well as the opportunity to be present at the Accompanied Site Visit on 7th October 2025. Relevant attendees on behalf of SBW have been registered online via the Event Participation Form.



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