



Begbroke and Yarnton Green Belt Campaign (BYG)

Deadline 7, BYG: on the Visibility of Solar Panels; Oxford Airport; and Aerial Views.

So far in the Examination process, crucial representations submitted by BYG have related to:

- the Applicant's flawed site selection process;
- the Applicant's lack of any experience in the development of utility scale solar projects;
- the Applicant's failure to provide any credible information on funding;
- the need to put in place cast-iron guarantees for decommissioning of the project if approved.

These areas of concern will be discussed further in our Closing Statement.

However, given that D7 is the final deadline for IP submissions we would like to return to other representations we have submitted which we believe have been inadequately addressed during the examination.

1. Visibility of Solar Panels

1.1 In REP1-092, BYG submitted evidence that BWSF solar panels would be highly visible from the A44 on the approach towards Woodstock from Oxford. This would especially be the case on the approach to the last roundabout before Woodstock itself. This should be considered in the light of extensive housing developments along the A44 already arising from Cherwell's adoption of its Local Plan Partial Review.

1.2 The Applicant has not disputed the evidence we provided nor submitted any comment on this issue. We suggest this needs to be considered carefully in the Examination since it has a direct impact on those visiting the World Heritage Site which is Blenheim Palace.

2. Oxford Airport

2.1 In REP4-043, we pointed out that the removal of panels close to the southern end of the London Oxford airport runway would not remove a remaining risk to pilot safety in the event of engine failure which would arise from the lack of adequate landing sites. We provided evidence that incidents of

this kind are random in nature. It would be inevitable that they will occur outside the provisional safety cone, with resulting danger to human life.

2.2 We also highlighted the evidence provided by [REDACTED] in EV5-007 that *"ultimately it is the aircraft operators who take the risk. But our duty of care is to ensure that we have done our best to mitigate risks associated with the use of the airport"*. In other words, the airport does not consider itself responsible for dangers due to engine failure other than those arising immediately after take-off.

2.3 The issues raised in our submission were subsequently strongly reinforced in REP5-137 submitted by [REDACTED], a health professional with practical experience of dealing with fatal incidents due to engine failure.

2.4 When the Applicant commented on our submission in REP5-005, the actual points that we had raised were ignored. We believe that this issue does require serious consideration as it highlights the unsuitability of the site for a solar project of this scale.

3. Aerial Views

3.1 Finally, in our submissions REP2-064 and REP3-085, we provided evidence indicating a significant impact on aerial views of Blenheim. Historic England agreed that this issue should be reviewed. The Applicant responded to the ExA's request that this be considered by updating ES Appendix 7.4 and including the following statement (CR2-037).

The Project would be visible from the air and would therefore be seen by people flying into and out of London Oxford Airport. A small number of flights from the airport are specifically for sightseeing and are likely to include views towards the Blenheim Palace WHS; for other flights this is more of an incidental view. Following the implementation to the design of the project as set out in the Applicant's Change Request 2 Notification Report [EN010147/APP/16.2] [REP2-045], there is clear separation between the developed areas of the Project and the WHS, with the gap between the Project and the WHS occupied by built development as well as farmland and managed grassland. The landscape to the north, west and south west of the WHS would remain unchanged, as would the views of the place and the designed landscape. The images used on the airport's website to promote sightseeing flights show the Botley West Solar Farm Environmental Statement September 2025 November 2024 Appendix 7.4: Heritage Impact Assessment Page 41 palace in the foreground and the designed landscape extending beyond the buildings; these images would not need to be amended. The number of people experiencing views of the WHS from the air is very low when compared to other visitors and local residents, but the change in the setting represented by the Project may negatively affect their experience and understanding of the WHS to a limited extent.

3.2 This statement follows the pattern established in many responses by the Applicant of simply failing to address the specific points raised. For example,

there is no mention of our submissions, the images we provided, or the reference we made to satnav systems. The impact is going to be far greater than suggested by the Applicant. As we pointed out, aerial images are increasingly being used by the general public in many navigation systems. These are both hand-held and vehicular.

3.3 Quite apart from this, Oxford Airport already has the busiest flying school in the UK. It will shortly be increasingly busy following a new contract awarded the flying school FTEJerez for training British Airways pilots. The continuous circuit flights made by trainees over the Development could hardly be described as an “incidental view”; nor the many flights to and from the airport by private planes.

3.4 The airport has reported that over 12,500 passengers used the airport in 2024, with 320 different international destinations involved. We believe that this is a serious issue needing appropriate consideration in the Examination. It surely qualifies as an additional point to those raised in the damning Technical Review issued by ICOMOS International in considering the harm to the OUV of the WHS.

3.5 As a reminder we show below the visualisation we included in our submission, the accuracy of which has not been disputed by the Applicant.

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[Note: mock-up made prior to planned removal of a small number of panels.]

