



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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6th November 2025

Subject: Response to deadline 7 – 10th November 2025

Dear Planning Inspectorate,

Soil sampling data – Response to Q2.11.14:

It is welcome that Blenheim Estates has now submitted the soil sampling data. That dataset clearly contradicts the repeated assertions by the applicant and Blenheim Estates that the land is “poor quality.” At the Open Hearing 1 on Tuesday 13 May 2025, [REDACTED], Chief Executive Officer of Blenheim, repeatedly asserted that the Estate “achieves poor yields from poor soils.” The submitted soil analyses do not support that claim.

RB209, the accepted UK guidance on soil fertility used by DEFRA, Natural England and the Environment Agency, is explicit about the relationship between nutrient indices and yields. RB209 states the recommended soil indexes for both arable and grassland. Section 1 “Principles of nutrient management and fertiliser use” (updated June 2023), page 24 states: “Typically, maximum yield of arable crops or of grass is reached at Index 2 for phosphorus (P).” The manual also notes that when levels fall below this target, yields may be reduced and additional phosphate should be applied; it does not state that land below a given index is unsuitable for farming. As for potassium (K) and magnesium (Mg), RB209 (Section 1, page 24 and page 30) recommends an index of 2- for potassium and an index of 2 for magnesium for both arable and grassland. The majority of the soil samples provided are at or above the RB209 recommendations, and organic matter levels are consistently high. On the basis of the submitted data, we therefore reject the claim that the land is of low productivity.

Lack of compliance and failure to justify land use:

We consider that the applicant has still not satisfied key policy requirements relating to Best and Most Versatile (BMV) land and the Green Belt. In particular, the applicant has not demonstrated compliance with the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3), which requires developers to justify:



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“Why the use of BMV land is necessary, and whether it is feasible to locate the scheme on lower-grade agricultural land.”

The applicant has not adequately explained why this specific site is appropriate for a solar development of the proposed scale, nor why lower-grade land could not reasonably be used instead. When combined with the substantial loss of Green Belt, these omissions strongly indicate that the necessary “Very Special Circumstances” have not been demonstrated.

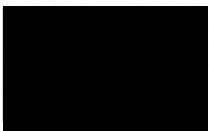
Residential Visual Amenity Assessment (RVAA):

The RVAA finally submitted by the applicant is of extremely poor quality. It contains numerous errors and omissions, and it relies on inadequate photography and mapping. The Examining Authority has already highlighted these shortcomings in its letter dated 23 October 2025. We support the ExA’s concerns and request for, “There shall be a distance of no less than 250 metres between the edge of any part of the proposed operational solar array and any residential dwellinghouse”, In addition we would ask for a thorough reassessment of the RVAA to correct the deficiencies and fill the evident gaps in the evidence base.

Conclusion:

There remain substantial omissions and unresolved issues in the applicant’s submission. The soil data does not support assertions that the land is poor quality; the applicant has not justified the use of BMV land in accordance with NPS EN-3; and the RVAA is deficient and needs a comprehensive review. We have just highlighted the issues pertinent to CPRE we also understand that there are many other issues still outstanding or lacking evidence. Given these gaps in the evidence base, we believe the Examining Authority cannot currently reach a fully informed decision.

Yours sincerely



Director CPRE Oxfordshire