

**The West Oxfordshire group of Oxfordshire Ramblers** – welcomes the fact that in their response of 14 October, the Inspectorate took the Applicant to task for the nature of their response about residual effects [REP4-037]. I quote “this comes across as being very dismissive of anyone’s view but your own.” Our experience of the attitude of the Applicant from the very beginning of what was supposed to be “consultation” with the public has been that we did not have points of view that were worthy of even receiving acknowledgement – or rather, only an auto-acknowledgement of receipt and a claim that they would get back to us if needed. By the third time we put in a comment, we were used to receiving no further response to complaints about poor presentation of both arguments and diagrams – note: it took the Applicant over a year to discover the existence of the OCC Definitive Map of Public Rights of Way.

It seems that they have still not found the subsidiary information available about the widths agreed for particular PRoWs, which could have helped them to make sensible proposals about the widths of new (or modified) PRoWs: it seems that the Applicant is still confused about the usual widths of paths and bridleways (and the more recently designated Restricted Byways) – in paragraph 12 of their document of 14 October the Inspectorate picked up the discrepancies between footpath widths of 3 or 5m and “footpath/cycleways” of 9m. (This last figure is most unlikely, since only major roads are that wide.)

At no point has the Applicant written anything that acknowledges that it might be useful to consult the members of Oxfordshire Ramblers (nearly 2,500 people as of 13/10/25) when proposing to create a solar “farm” that would affect over 60 PRoW, some of which such as the Roman Akeman Street, the medieval Dornford Lane, and several promoted routes are valued by visitors from outside the county. Not only do we (and other local walking groups) have experience, between us, of walking every route being considered, but we often have needed to find the best engineering solution for protecting and repairing paths damaged by floods or the inevitable wear and tear created by walkers, horse-riders and cyclists. (Not surprisingly, the membership of local Ramblers includes people with appropriate expertise: this includes someone with a doctorate in geological engineering who is on the WO committee and has advised at European level. He has on occasion advised about a solution where paths – especially ones that are centuries old - have been disturbed and have needed to be repaired.) Of course, discussions take place between Ramblers and the landowners – usually farmers – who understand any particular local conditions, and are responsible for maintaining paths unless safety concerns mean that County officers can assist. The Applicant has shown little respect for the knowledge of local landowners, even those most immediately in danger of being affected.

Some of the documents recently submitted by the Applicant seem to actually try to be difficult to follow. For instance: in the revised Landscape and Visual Resources Clarification Note (**EN01047/App/15.3**) the writer keeps referring to “visual receptors”. It is only late in the documents that this is explained: that “high sensitivity visual receptors” are actually “people using PRoW” – people have two of these receptors because they have two eyes!

Concentrating on what people can see when using footpaths has the unfortunate effect of giving the impression that sight is the only human sense that is affected when people are using PRoW. (Unfortunately, this seems to be an unintended consequence of the way the application needs to be presented.) It takes only a moment’s reflection to be aware that people walking/riding along PRoW also enjoy what they can hear around them, so for instance, it matters whether the bird populations would be reduced because of changes in the composition of hedgerows. (CPRE has already pointed out that skylarks, in particular, are likely to be affected, because of the distance they travel along the ground before rising

[or after landing] and they actually depend on the agricultural cycle; so “skylark plots” won’t be beneficial.) And the existing hedgerows provide shelter and food for some animals as well as birds – not to mention butterflies and moths – these creatures do not need to be at risk of extinction for them to matter to people who see and hear them. And people enjoy the seasonal fruit such as blackberries, elderflowers and elderberries. There is a document somewhere that refers to replacement hedges as being “species rich”, but it is unlikely that any thought has been given to how long it might take for different kinds of hedging plants to be large enough to offer shelter for plants, birds and smaller animals. (Note: local people would also like to know what provision is to be made for the deer? – muntjak and roedeer – that are currently to be found on the pastures and in woodlands. Their existence is being ignored, presumably because they are not an endangered species, but people will still not want to see more than usual of them being found as roadkill.)

In contrast to the obscure writing mentioned above, some writers of documents prepared for the Applicant work on the assumption that if they repeat something often enough, their audience will be convinced. For instance, in Appendix 8.6: Public Rights of Way and Recreational Routes Assessment. **EN01047/APP/6.5** the writers are finally using the correct references for PRoW to be found on Ordinance Survey Maps. BUT: the writers claim again and again that “hedgerow planting is considered an enhancement measure with a consequent beneficial effect”. Perhaps they think that if they say this often enough, members of the public who have previously used these PRoW might be convinced of the beneficial effect of turning many of them into oppressive tunnels: that is most unlikely. The Inspectorate reported the answers they received to a question about whether people were in favour of omitting “landscape mitigation”: “the overwhelming response was that neither solar panels nor 3m hedges were considered to be appropriate in the views from footpaths, and the proper mitigation would involve greater buffers that would not require such tall hedges to be planted”. Oxfordshire Ramblers totally concur with this view.

Finally, Ramblers would like to suggest that if the Applicant was going to assess the impact of their proposal on Public Health, they should have done some research into the health data available about the people in the area concerned. Not surprisingly, the fact that the area proposed for the solar farm is so strongly rural has a positive impact on the health of the people living there. Not only does the 2024 report from the Director of Public Health for Oxfordshire stress the need for all areas to “improve physical health by ensuring access to all green spaces and other green infrastructure”, but detailed local health data can be obtained from the “Local Insight Profile” published by the Oxford Consultants for Social Inclusion (OCSI) - [REDACTED] We have only had access to the data for Freeland + Hanborough and North Leigh, but both reports stress the importance for the local population of “rurality”, the advantage of the physical environment experienced and that the area benefits from a low level of air pollution. This data is presented as actual percentages, not vague concepts such as “moderate”, “minor” etc. The Applicant does not take into account such local data when assessing the impact on Public Health.

[I apologise that the following is being presented too late to have an impact, but I still feel it should be said: I have known for some time – because of being asked in my role as Footpath Officer to support challenges to changes to PRoW – that the regulations regarding PRoW are included in the Highways Act 1980 (with later modifications). Only very recently have I discovered that the criteria for assessing impacts on Health related to PRoW are the same as those for making changes to public highways: and thus produced by Highways England. This means that the impacts on Public Health in relation to use of PRoW are not presented as actual numbers but in ranges such as “moderate”, “minor” etc. This lends itself to results in the current application which cannot be challenged: e.g. moderate + moderate

could actually still be moderate, but without actual figures, it is impossible to guess. (Note I am not a statistician, but received enough training by NICE to be able to be a useful member of one of their Technology Appraisal Committees for 9 years - sufficient to be able to join in challenges to results presented by international pharmaceutical companies.))

In conclusion: we contend that building the huge “Botley Solar Farm” in the area proposed is not the best use of the land involved. This is not to reject the value of solar energy, but we suggest that smaller, co-operative ventures like the successful project at Southill – near Charlbury, in West Oxfordshire – should be encouraged.

**Dr. Judith Wardle, Chair of West Oxfordshire Ramblers.** This document - with the exception of the paragraph in square brackets, which is a personal contribution - was discussed and approved, after small revisions, at the group's AGM on 1 November 2025.