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Oxfordshire

27th February 2025

Relevant Representation:

From CPRE Oxfordshire for Botley West Solar Farm Application

CPRE Oxfordshire is an independent charity that works closely alongside the other CPRE branches, as well as the national CPRE organisation to protect and enhance the countryside.

Whilst we recognise the urgent need to transition to net zero, that does not mean that all applications must be accepted, especially where, as this development is intended to be, they are in the Green Belt, on valuable agricultural land, and are harmful to heritage and recreation. The scale and location of this proposal makes it unacceptable at the cost of the countryside, our rural communities, or to the economy. Solar energy must be installed somewhere, but not everywhere. The target set in National Policy Statement for renewable energy infrastructure EN-3 is 70 GW of solar energy by 2035. The total land take for this is in fact relatively small with only 168,000 acres – 0.45% of England's land surface, similar to the land area presently occupied by golf courses. That means there is a wide choice of land on which to gain the required overall level of benefit arising from solar energy, and decision makers can be very discriminating in where they choose to locate solar development. In doing so weight must be given not only to the generalised benefit of renewable energy but to the fact that the panels will be in place for at least forty years, a period that will most likely be renewed at the end of its terms if no better method of generating renewable energy has been identified. That fact needs to be reflected in assessing the balance between the generalised benefit and the extensive harms arising across the Botley West site.

Instead, CPRE campaign for solar energy to be **on** rooftops.

It is CPRE's position that rooftops – both domestic and commercial – must be the preferred choice for solar energy as firstly no identifiable harm is caused as is in the case of even the most selective field mounting; and second the energy produced is used more efficiently with minimum transmission losses as it will be created directly above the point of use with any excess either being stored on site with batteries or sent to the grid to assist



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with the national demand. Point of use generation also reduces the demand from Distribution Network Operator.

Our current areas of concern and opposing views are:

Inadequate consideration of alternatives.

1. Insufficient information has been provided within the Environmental Statement (ES) regarding the alternatives studied across the country, within the curtilage Blenheim Estate or particularly on rooftops.
2. CPRE believe the process taken to identify alternative sites has been constraint led rather than being shaped by an understanding of the local topography.
3. The impacts of the scheme considered at the pre-application stages was limited.
4. The significance of the benefits of the scheme have been overstated.

Understatement of the Landscape Impact

5. This will be the largest-scale solar power station to be constructed in the world with such a close proximity to a large population, it will affect 15 parishes and 11,000 households, equivalent to approximately 24,200 people (using the latest ONS figure quoted for persons per household in England).
6. The applicant's assessment of effects in relation to the landscape and visual impacts concludes that there are no significant adverse effects on the landscape. We believe this to be untrue as the site will comprise of over 2 million solar panels at 2.3m high, the project proposes 156 power converter stations each up to 12m long and 3m high, six high voltage transformers each 18m long and 6 m high and over 100km of 2m high security fencing with only a 25m buffer from residential properties and heritage assets. The nature of the topography in the areas is undulating,



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especially in the northern section and the panels will be visible for many different viewpoints.

7. We believe no consideration has been given to the potential views from Blenheim Palace and views towards Oxford. This has been dismissed without testing potentially high sensitive landscape and visual receptors.
8. The extensive scale of the proposed development and the effects it would have in terms of transforming a rural, largely agricultural landscape into a quasi-industrial landscape has not been adequately recognised.
9. The mitigation of the scheme is not a landscape led approach, with screening compromising the landscape character and features, impacting the open aspect of the local landscape.
10. The site's topography and proximity to key PROW networks amplify this impact, with insufficient mitigation proposed.
11. We believe it is not possible to mitigate to any substantial degree the dramatic landscape and visual impacts that would occur because of a project of this scale. It would effectively transform a vast swathe of rural Oxfordshire into an industrial landscape, on a scale never previously seen.
12. Overall, the scale, longevity and geographical distribution of the proposed development would be likely to result in significant adverse impacts as a result of cumulated effects and that this is understated within the Environmental Statement.

Impact on the Oxford Green Belt

13. The Botley West development is split into three interconnected areas. The Northern section around Tackley is outside the Green Belt but the central section – which is by far the largest – to the west of Yarnton, and the smaller southern section, between the Farmoor reservoir and Cumnor are both within the Oxford Green Belt.



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14. We oppose any development or further encroachment on the Oxford Green Belt. A significant proportion of this site (we estimate more than 75%) falls within the Green Belt, and we strongly oppose this. This would represent 3.1% of the Oxford Green Belt, marking almost certainly the biggest ever single loss of Green Belt land within the County. It would also cover over a 1/4 of the Green Belt within West Oxfordshire.
15. We strongly believe that the Green Belt remains a vital tool in promoting sustainable forms of living, safeguarding the open countryside and protecting the character of one of England's ancient cities.
16. We highlight the Overarching National Policy Statement for Energy (EN-1) 5.10.17 "When located in the Green Belt, energy infrastructure projects are likely to comprise 'inappropriate development'"
17. The revised NPPF, para 142 confirms, as all previous editions have done, that "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".
18. That is not consistent with the proposed development which is stated to endure for 42 years and renewal, if sought, will be likely to be granted if solar power remains an acceptable form of renewable energy. Even 42 years is however not consistent with keeping the land permanently open as Green Belt policy requires. The long-term nature of this development cannot be deemed as temporary.
19. As the NPPF acknowledges at para 160 *When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.* Para 153 says that such very special circumstances can include the benefit of renewable energy but that must "clearly outweigh" the harm through appropriateness and all other harms.



20. The December 2024 NPPF has also introduced the concept of Grey Belt land (essentially land that is either “previously developed” or that does not “strongly” meet any of three (out of five) Green Belt purposes a, b or d, and does not have very significant habitat or heritage value), on which, despite their remaining part of the Green Belt the criteria for release are relaxed. The criteria in the case of Grey Belt (para 155) are that development is not inappropriate where:
- (a) The development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - (b) There is a demonstrable unmet need for the type of development proposed;
 - (c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.
21. The largest section at Yarnton, is all Green Belt, based on the 1995 LUC Study, adopted by all Oxfordshire Councils, and its subsequent updates, and would therefore require very special circumstances clearly outweighing the harm to be shown. Because this is presented as a single development proposal, of which the Yarnton site is by far the largest area it is our submission that the whole development requires to be justified by very special circumstances clearly outweighing all the harms identified.
22. However, we believe there are no such very special circumstances as the excessive degree of harm which would arise across the Botley West site, means that little weight can be given to a generalised renewable energy benefit. Instead, the benefit of renewable energy could be realised on rooftops.
23. If the smaller Cumnor site is assessed individually due to the distance from the main site, it will be considered as Grey Belt. We believe the Cumnor site scores highly on protecting the countryside from encroachment and its release from the Green Belt would not meet the criteria of section (a) of para 155. This would undermine the purpose of the wider Green Belt. In relation to section (b) of the same paragraph, whilst there is an unmet need for renewable energy there is such a wide choice of alternative options for its generation (including roofs) that no great weight can be given to it on this particular site.



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24. Although the Cumnor site and the Botley West development as a whole does benefit from a viable grid connection at Farmoor this could as well service land outside the Green Belt, or roof mounted installations, causing significantly less, if any, overall harm.
25. It is significant not only that the period of permission sought of forty-two years is considerably more than a generation (usually taken to be 25-30 years) but also that it may well become permanent at the end of its term, given the structure is all in place and assuming solar energy is still considered necessary.
26. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The proposed development is stated to be for a period of 37.5 years and therefore cannot be deemed as temporary. This is a substantial length of time during which the openness of the Green Belt would be compromised, thus undermining the permanence for a significant amount of time.

Understatement regarding loss of productive farmland including loss of Best and Most Versatile land (BMV).

27. Paragraph 5.11.12 of NPS EN-1 states Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).
28. The ES Chapter 17 states 36.4% of the land is deemed to BMV. This equates to just over 1/3 of the total area with no mitigation measures to minimise the loss of BMV for the duration of the project.
29. The land not classed as BMV should not be underestimated in its ability to grow crops. The ES para 17.6.27 states on the assumption that approximately 1351.2 ha of the study Area comprises agricultural land that is used predominantly for arable cultivation, at 8 tonnes per hectare, this would produce in the order of 10,839 tonnes of wheat/annum.
30. The Government has strongly committed to maintaining food production in the Land Use Framework Consultation published February 2025. It states suitable locations for clean power generation are restricted by the capacity of the electricity grid and should take account of the potential of land for



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food production. The use of best and most versatile land for solar farms will erode food security in the UK.

31. The land affected within the Study Area comprises predominantly arable land, with the majority of it farmed on contract farming agreements, with two small areas still operating on farm business tenancy agreements that end by the middle of 2025. No consideration has been given to the impact on local tenant and contract farmers.
32. Minor consideration, in the ES, has been provided on how the land will be converted from arable to grassland and managed post installation. A considerable change in management will be required to manage grassland and associated sheep numbers required for an area this size.
33. Whilst we would maintain that none of the land in question should be ceded for this development, the BMV land (especially where it is also part of the Green Belt) should be prioritised for protection and the land take reduced accordingly.

Underestimation of impact of flooding in the local area

34. We are concerned about the impact of the construction and operation of the on surface runoff, erosion and subsequent downstream flooding in particular around Cassington.
35. Downstream of the site there is a history of flooding, for example at Cassington and further downstream the Thames regularly floods, for example on the Abingdon Road, causing considerable damage and distress. Therefore, any major change in land use in the catchment of the River Evenlode needs to proceed with the utmost caution.
36. The Environmental Assessment concedes that there is a paucity of studies on the impacts of solar farms on surface runoff, erosion and downstream flood peaks (Vol 3 appendix 10.2). The EA relies heavily on a single modelling study, from Maryland USA (Cook and McCuan, 2013), rejecting other published studies (such as, Pisinaras et al., 2014; Yavari et al., 2022)



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quoted by Cassington Parish Council because their climate (Mediterranean) was not relevant to Oxfordshire. The Mediterranean climate (with dry hot summers and wet mild winters) is often used as a surrogate for a future UK climate and may be more relevant than the eastern seaboard of the US. Even the Cook and McCuan study state that there is a potential for surface runoff to increase if the vegetation is not sufficiently maintained on the site.

37. All the available studies do conclude that increases in surface runoff are possible but depend on the climate, soils and management of the site. It is very likely that there will be serious soil compaction during the installation phase, resulting from the on-site heavy piling machinery. Compaction that will continue with the use of routine maintenance vehicles. In the flood modelling there appears to be no sensitivity analysis of the crucial hydraulic conductivity parameters (e.g Volume 3 Appendix 10.4: Hydrology Report).
38. There is little in the proposal documents about the management of the soils beneath the panels after installation other than a vague statement that it will be 'appropriately seeded' with mowing or light grazing.
39. Given the lack of real life studies, the lack of sensitivity analyses, the inadequacies in management plans and the serious consequences of possible downstream flooding we can see no justification for the statement 'that there will be no likely significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases' (document EN010147/APP/6.3).
40. We therefore recommend: Strict protocols are developed, and monitored, during, and after, the installation phase, particularly with regard to the use of heavy machinery on site during the installation.
41. A detailed design of the remedial measures is published and that the proposed filter strips and Swales are installed in a timely manner.
42. A comprehensive land and water management and monitoring plan for the operational phase is agreed and implemented.



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43. The remedial measures and management plans are independently reviewed.

Understatement of the impact upon Public Rights of Ways (PROW)

44. Linked to the landscape impact, there is an underestimation of the significance of the effect of the development and the impact on both the physical resource and the visual amenity value for users of the PROW network.
45. The majority of the public rights of way have been retained and the applicant has sought to improve the connectivity of footpaths and have provided the addition of new cycle and permissive paths.
46. However, the existing and new public rights of way will be aesthetically ruined by being encased between high security fences and solar arrays totally alien to the Oxfordshire countryside.
47. In addition, to mitigate against the impact of panels it has been proposed the rights of way network will be screened by new hedgerow planting. This will block the natural views and hinder the openness of the countryside in the location.
48. No consideration has been given to the Oxfordshire Way which crosses the site from Sansom's to Sturdy's Castle.
49. Minor consideration has been given to the impact of Dornford Lane and ancient drove road and public bridleway, which will be used as an access route. The drove road has hedgerow on either side of the path which is 15 or 20 foot deep, contains veteran and ancient trees and has numerous species of birds and bats. To enable the drove road to be used for access the adjacent hedgerow will need to be removed destroying the habitat it provides.
50. The plans involve no extinguishments and only 3 permanent diversions, which are relatively insignificant, the longest adding 38 metres to the path.



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The alleged diversion of Oxford Green Belt Way is not understood as no diversion of public rights of way which form part of it is proposed. This is cold comfort when the aesthetic value of the paths concerned is lost.

Underestimation of the heritage harm of the scheme including archaeological significance and designated heritage assets

51. We consider the development is in many respects, non-compliant with the obligations detailed in the Blenheim Palace World Heritage Site Revised Management Plan 2017. This plan was written by Blenheim and endorsed by WODC and other members of a steering committee that included the International Council on Monuments and Sites (ICOMOS).
52. An ICOMOS Heritage Alert has been raised regarding the inappropriate nature of the proposed development and hugely significant impact this would have on the Blenheim Palace WHS and surrounding environment and views. We fully support this alert.
53. This development puts retention of Blenheim Palace World Heritage Site status in jeopardy, the impact of which would be very significant not just to the Blenheim Palace Estate, local economy but also that of the UK overall.
54. We believe the Preliminary Environmental Impact Report PEIR assessment on the wider setting of the Outstanding Universal Value of the Blenheim Palace World Heritage property as 'Minor Adverse' to be inaccurate
55. The Environmental Statement plays down the likely significance of impacts arising from the proposed development on heritage assets. The protected Historic Monument of Sansoms Platt, a Roman town, and Akeman Street, the major Roman Road between Cirencester and St Albans to the North of Woodstock will be undeniably and unduly affected by the proposed development.
56. We also challenge the applicant's assertion that "the results of the historic environment assessment to date have been considered within the design of the project," as inaccurate, especially as areas highlighted in Blenheim Palace's own aerial footage and shown in PVDP's report, show further



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Roman town remains, “below ground heritage assets”, adjacent to the protected Historic Monument boundaries which is in land included in the development proposals and would be directly impacted and damaged.

57. This Blenheim Palace World Heritage Site Revised Management Plan 2017 states that it relies on the local government protections afforded it under the West Oxfordshire District Council Local Plan rather than adding a buffer area around it which could not be built on / developed. Appropriate buffer areas have not been included within this planned development. Given the NSIPs process is being followed for this proposed development, rather than that of local government, we assert that the NSIP process must ensure plans are changed to include appropriate buffers.

Understatement of the Biodiversity and Ecological Impact.

58. We consider the biodiversity improvement benefits are being overstated and would like to see the amount of Biodiversity Net Gain increased to 100%.

59. Significant adverse effects have been identified on the wintering birds as a result of habitat loss.

60. We have concerns as to the effectiveness of proposed mitigation measures especially on skylark and lapwing populations. These are both priority species and found in Chapter 15 of the NP.

61. Skylarks are unlikely to use proposed skylark plots when surrounded by solar panels as they require long, unbroken sightlines and minimal perches for predators.

62. We raise concerns about the vibrations caused from installation on the local bat population.

63. Wildlife movement will be severely restricted across the expansive site due to the security fencing required.



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Overall, it is CPRE Oxfordshire's view that the scheme as submitted is contrary to National Policy Statements EN-1 and EN-3, National Planning Policy Framework, the policies of the West Oxfordshire Local Plan 2031, Cassington Neighbourhood Plan, Eynsham Neighbourhood Plan, Woodstock Neighbourhood Plan.

We strongly oppose this proposed development.

In addition, consideration has not been given for the provision of rooftop solar as providing electrical energy for local use.