

Planning and Strategic Housing

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Your Ref: EN010147-000009

Our Ref:

Date: 22 May 2025

Dear Sirs,

RE: WEST OXFORDSHIRE DISTRICT COUNCIL WRITTEN REPRESENTATION TO BOTLEY WEST SOLAR FARM PROPOSALS

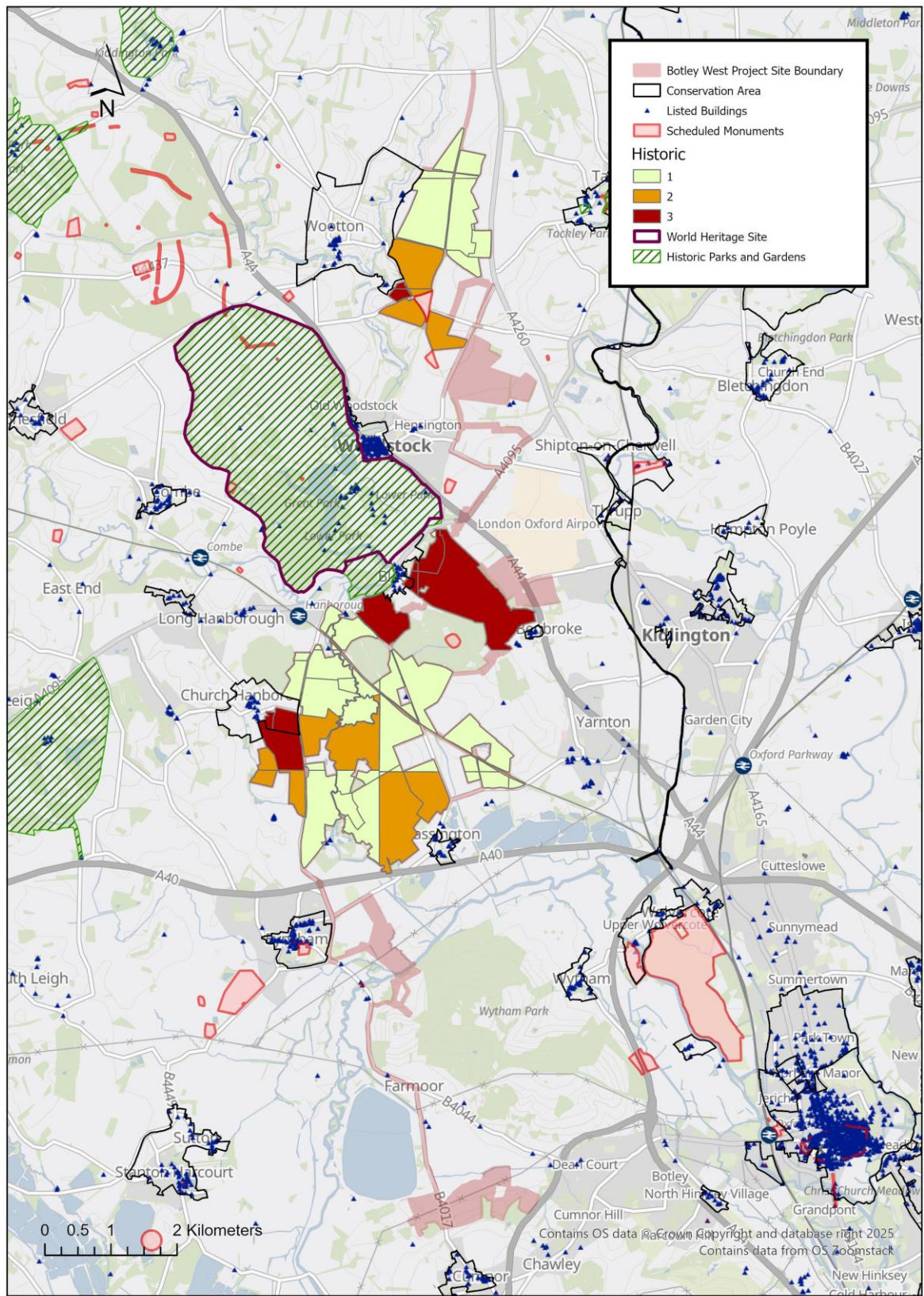
1. West Oxfordshire District Council welcome the opportunity to respond the Botley West Solar Farm and to engage in the Examination of the proposed development.
2. We wish to cross refer to the Local Impact Report prepared jointly by the Oxfordshire Host Authorities in support of this representation, as it is through the report that WODC explore the impacts of the proposed scheme and draw our conclusions about the suitability and sustainability of the development.
3. West Oxfordshire District Council wishes to make clear that it supports the development of appropriate renewable energy schemes in the District and has a good record of support for such infrastructure. In so doing the Council has placed significant importance on the protection of the environment to ensure that such proposals have thus far retained the high quality landscape, heritage and soil resources of the District.
4. The position with Botley West Proposed Development is that the Council recognises and endorses the need for increased renewable energy generation in the District, but that cannot be to the significant detriment of historic, built and environmental assets and West Oxfordshire's communities, especially where the impacts could be mitigated, so as to reduce them to more acceptable levels.
5. We consider that the Botley West proposals could be made acceptable in planning terms, but owing to the range and magnitude of detrimental impacts likely to arise from these proposals in their current form, West Oxfordshire District Council objects to the proposals as currently framed.
6. There is a concern that the extent and magnitude of the harms arising from the proposed development have been underplayed by the applicant, in that they have been characterised as 'temporary' or not significant for a range of impacts. The length of time that the development would be in place, coupled with the ongoing impacts post development (e.g. of the screen planting and ability to fully decommission elements of the scheme) are such that the Council questions aspects of the project assessment methodology.

9. Map 1 indicates the extent of the project area with land parcels proposed for development in West Oxfordshire outlined. The land parcels outlined on the map align with the applicant's Land Plans document [APP-007].
10. West Oxfordshire District Council have considered the significance of impacts likely to arise from the Proposed Development, in relation to a series of impact pathways and for each individual land parcel, to make recommendations for project changes and mitigations, to address the impacts of development.
11. The Council recognises that the scale and location of the proposed development has been dictated by the availability of land and a suitable grid connection. The Applicant has stated that they consider it rational to propose a scheme which delivers the greatest possible decarbonisation and energy security benefit from the available land and available grid connection [PDB-014] and that this is the approach which the Applicant has taken to the location and design of the Project.
12. West Oxfordshire District Council consider that the scale of the proposed development should be dramatically reduced to address the harmful impacts of the scheme.
13. We consider each impact pathway below in line with the chapters of the applicant's Environmental Statement and the Host Authorities Local Impact Report.
 - Historic Environment
 - Landscape and Visual Impact
 - Ecology and Nature Conservation
 - Hydrology and Flood Risk
 - Noise and Vibration
 - Agricultural Land

Historic Environment

14. West Oxfordshire District Council's concerns relating to the impact on the historic environment primarily relate to changes within the setting of important heritage assets.
15. The Botley West scheme proposals are spread over a large expanse of the Oxfordshire countryside, which contains assets of the highest significance.
16. As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design and prominence, may cause substantial harm to the significance of heritage assets.
17. West Oxfordshire District Council have considered which land parcels contribute most to the setting and significance of heritage assets, with particular regard to Blenheim Palace World Heritage Site, Grade I Listed Buildings at Cassington and Church Hanborough and Conservations Areas at Wootton, Bladon, Church Hanborough and Cassington. The wider setting of these heritage assets include the topography, natural and built environment, land use and visual relationships, social and cultural practices. Such elements define the landscape character of the District and the Council consider that fundamental changes to the landscape character will therefore harm heritage assets of the highest significance.
18. Map 2 below indicates the land parcels that we consider contribute most significantly to the setting of heritage assets. Red parcels (Score 3) are those within or directly adjacent to a heritage asset, where development would have a direct impact on the setting of an asset. Orange parcels (Score 2) are those where the setting of a significant asset can be viewed from the surrounding countryside and where development would impact the landscape setting of an asset. Green Parcels (Score 1) form part of the wider countryside setting of heritage assets, but the topography of the countryside in these locations reduces the contribution that these parcels make to the setting of the assets.

Map 2 - Significance of Heritage Impacts in West Oxfordshire

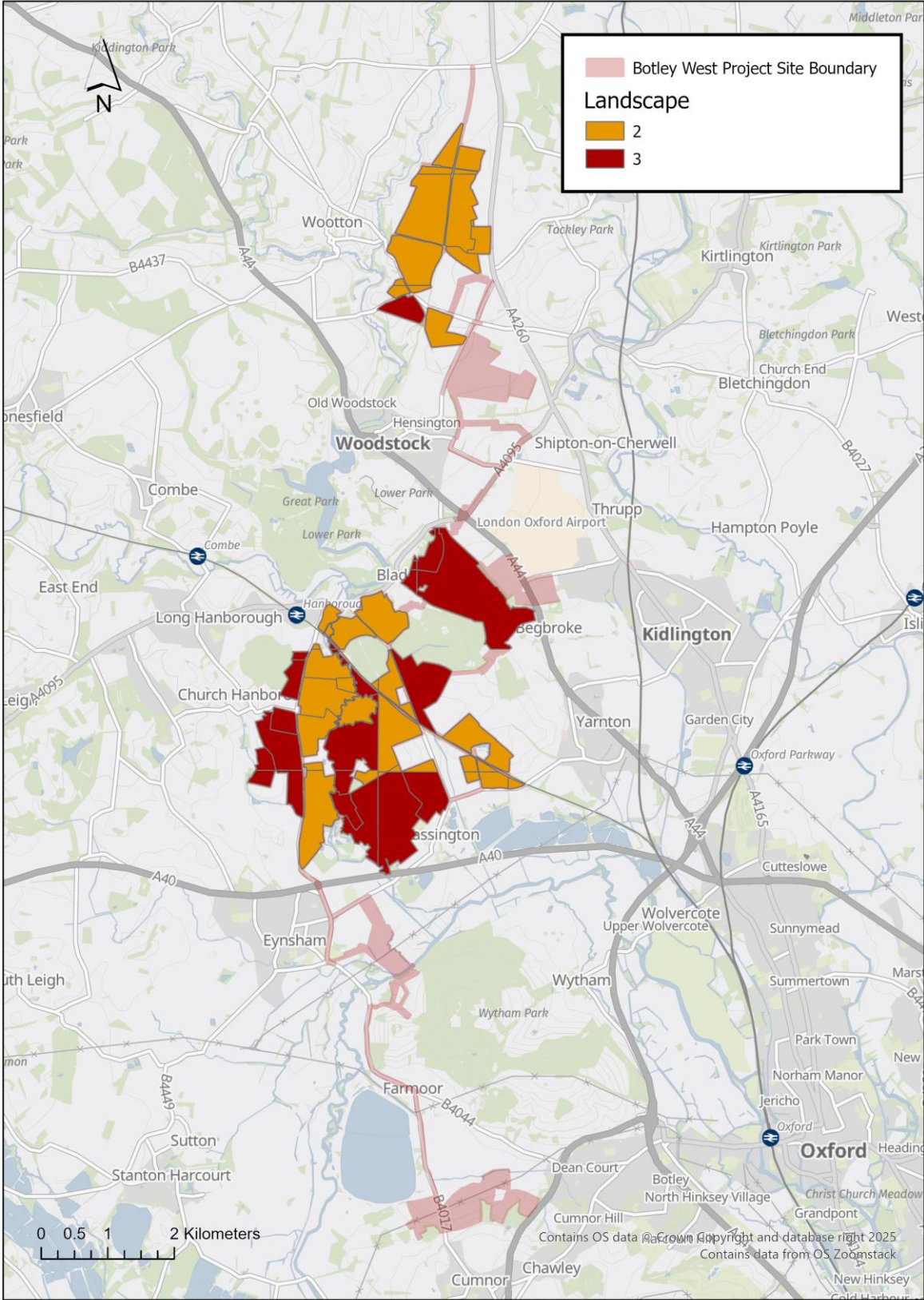


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Landscape and Visual Impact

19. West Oxfordshire District Council consider that a proposed development at this scale will fundamentally change the landscape character of the area from rural, arable fields to a semi-industrial landscape for the lifetime of the project. The Council consider that the Applicant's assessment of landscape impacts significantly underestimates the impact on local landscape character and views.
20. WODC seek to conserve and enhance the quality, character and distinctiveness of West Oxfordshire's natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity.
21. We provide a detailed description of how and where it considers the impacts on the landscape to be understated in the Local Impact Report and the concerns it has with the applicant's methodology for assessing impacts.
22. Our Written Representation seeks to draw the Examining Authority's attention to those areas of the proposed development where the landscape impact is considered to be most significant and where removal of development from land parcels would reduce the landscape impacts of the proposed development.
23. Areas indicated in red on the map (Score 3) below indicate areas of exposed, elevated and sloping land where the proposed development will be more prominent in the landscape. The council requests that these areas land parcels should be excluded from development to minimise harm to the landscape character of the area.
24. In addition to the impacts of the proposal on the landscape character of the area, the proposed development will result in significant visual impacts on sensitive receptors, primarily users of the public rights of way network (PRoW) across the project area. The development will, by its scale and nature, adversely affect the experience of PRoW users travelling through the area. In many locations, PRoW users will either travel between large areas of solar infrastructure or walk through corridors of hedgerows or tree belts with no, or very limited, views of the surrounding landscape.
25. The Applicant has proposed a range of mitigation measures including planting of hedgerows to screen views of the solar farm from the wider countryside. The Council consider that the removal of panels from land parcels adjacent to public rights of way will be much more beneficial in reducing the visual impacts of the proposed development and protecting views of the wider countryside.
26. The Council consider that in its current form, the proposed development would significantly detrimentally impact the public rights of way network across the project area both in terms of landscape and visual harm and the degradation of routes for the benefit of the local community.

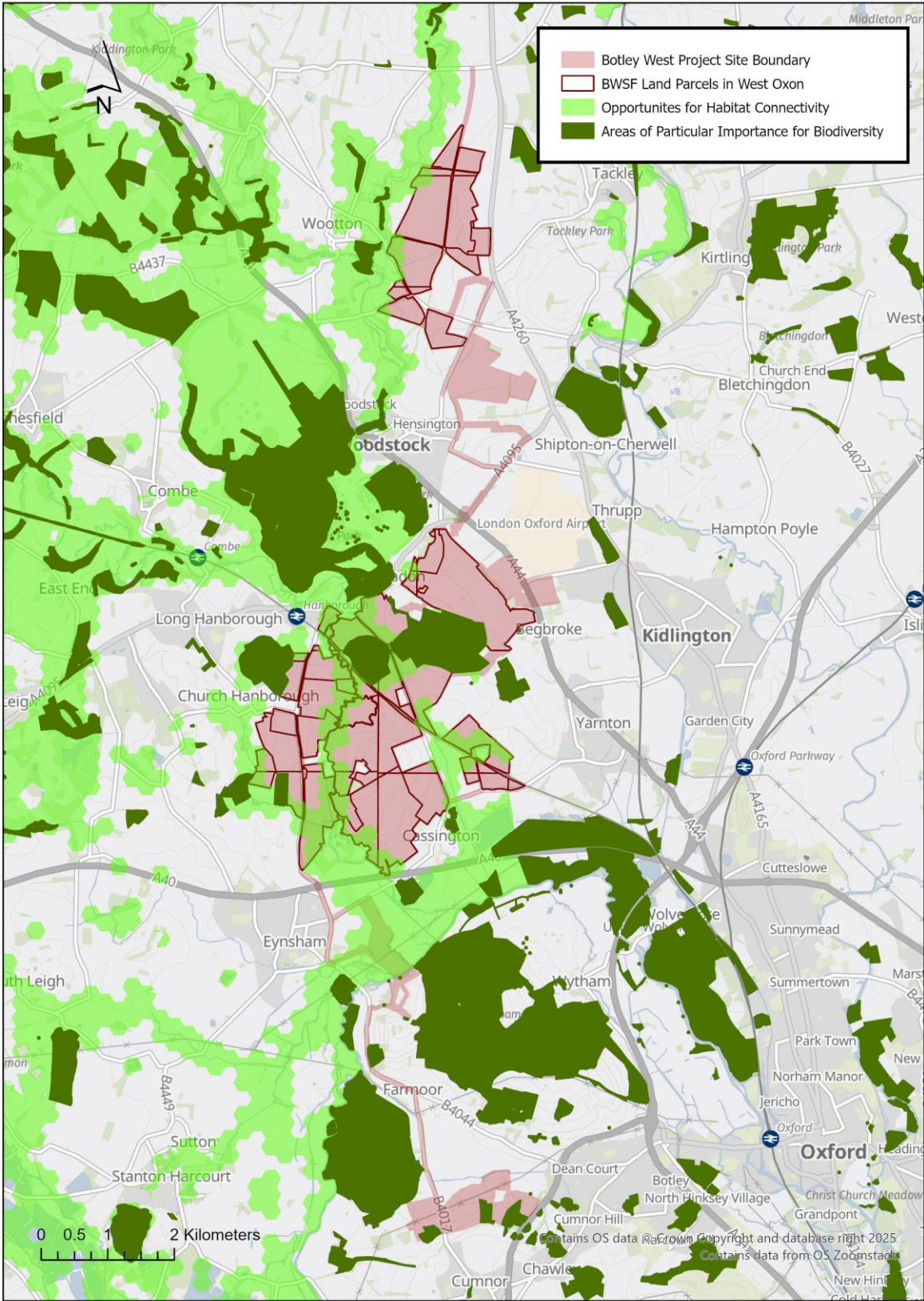
Map 3 - Significance of Landscape Impacts in West Oxfordshire



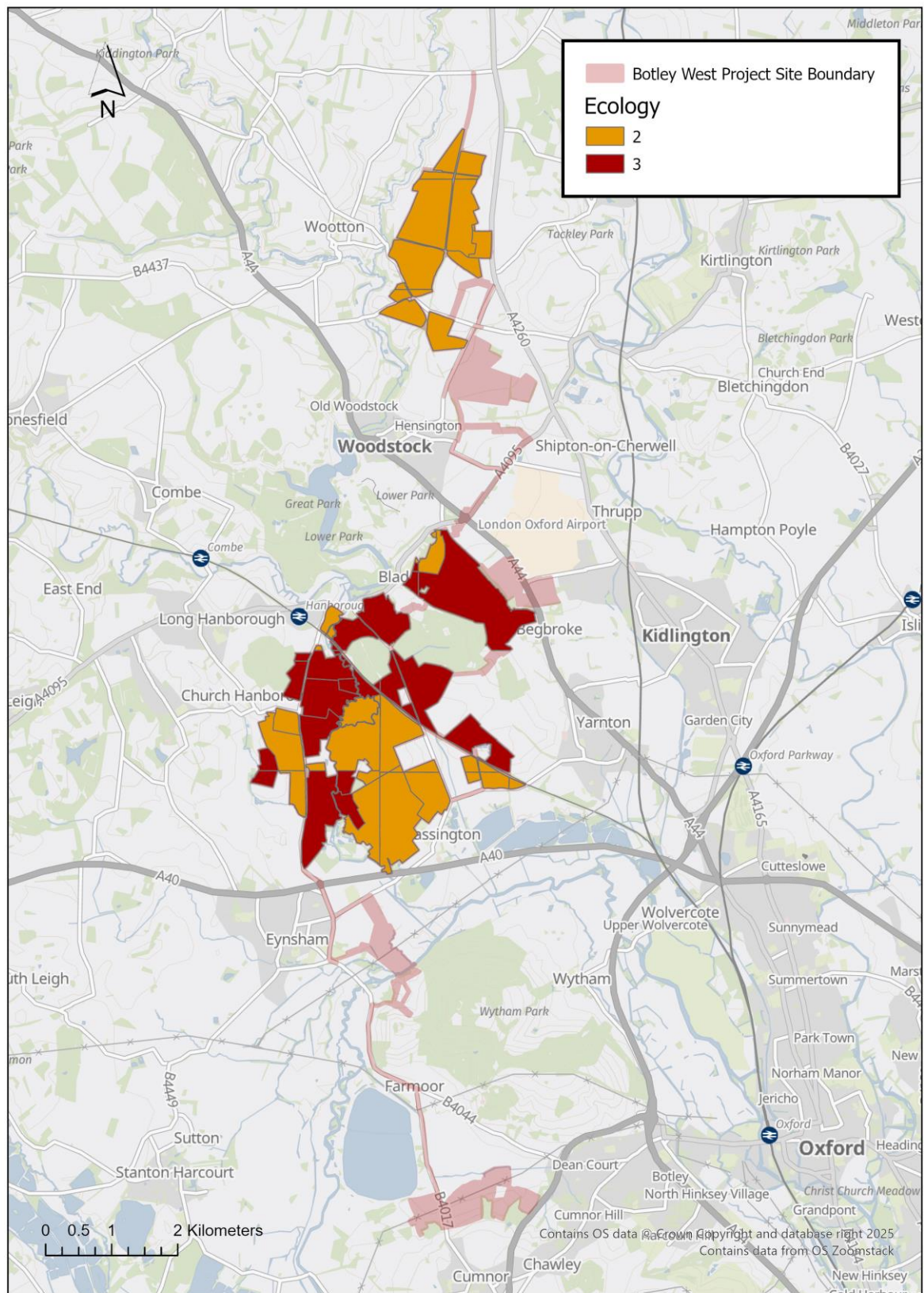
Ecology and nature conservation

27. West Oxfordshire District Council's assessment of ecological impacts arising from the proposed development is detailed in the Local Impact Report.
28. The LIR identifies a range of predominantly negative impacts to protected habitats and species across the project area which will likely require further mitigation, enhancement or changes to the project, in order to avoid or minimise harms.
29. These include impacts on bat populations, aquatic mammals and great crested newts, for which inadequate survey work has been undertaken by the Applicant and impacts on farmland birds and Ancient Woodlands, for which inadequate mitigation of impacts is currently provided.
30. WODC consider that the project could be amended to deliver further enhancement to trees and woodlands which would deliver additional benefits for protected species. There are several Ancient Woodlands within and adjacent to the site. Ancient Woodlands are irreplaceable habitats and any deterioration of these habitats must be for wholly exceptional reasons and unavoidable.
31. WODC consider that a 50m buffer adjacent to Ancient Woodlands would reduce the impact of edge effects of the proposed development and contribute to the protection of Annex II bat species associated with woodland (maternity roosts for both Bechstein's and Barbastelle bats). Ideally however, opportunities should be sought to connect woodland and contribute to the aims of the emerging Local Nature Recovery Strategy.
32. More appropriate mitigation for the impact on farmland birds needs to be provided within the project, as the proposed provision of skylark plots is inadequate and will likely result in the displacement of farmland birds to the periphery of the development or more open areas within the project. There may be opportunities to manage areas of archaeological interest for the benefit of farmland birds if such areas are to be excluded from development.
33. Red areas on Map 5 (Score 3) indicate areas of the proposed development that should be removed to mitigate the impacts on important ecological features and to improve ecological connectivity through the landscape. Orange areas indicate where enhanced mitigation is likely to be required to mitigate impacts on protected species, particularly farmland birds.

Map 4 - Local Nature Recovery Strategy



Map 5 - Ecological Impacts

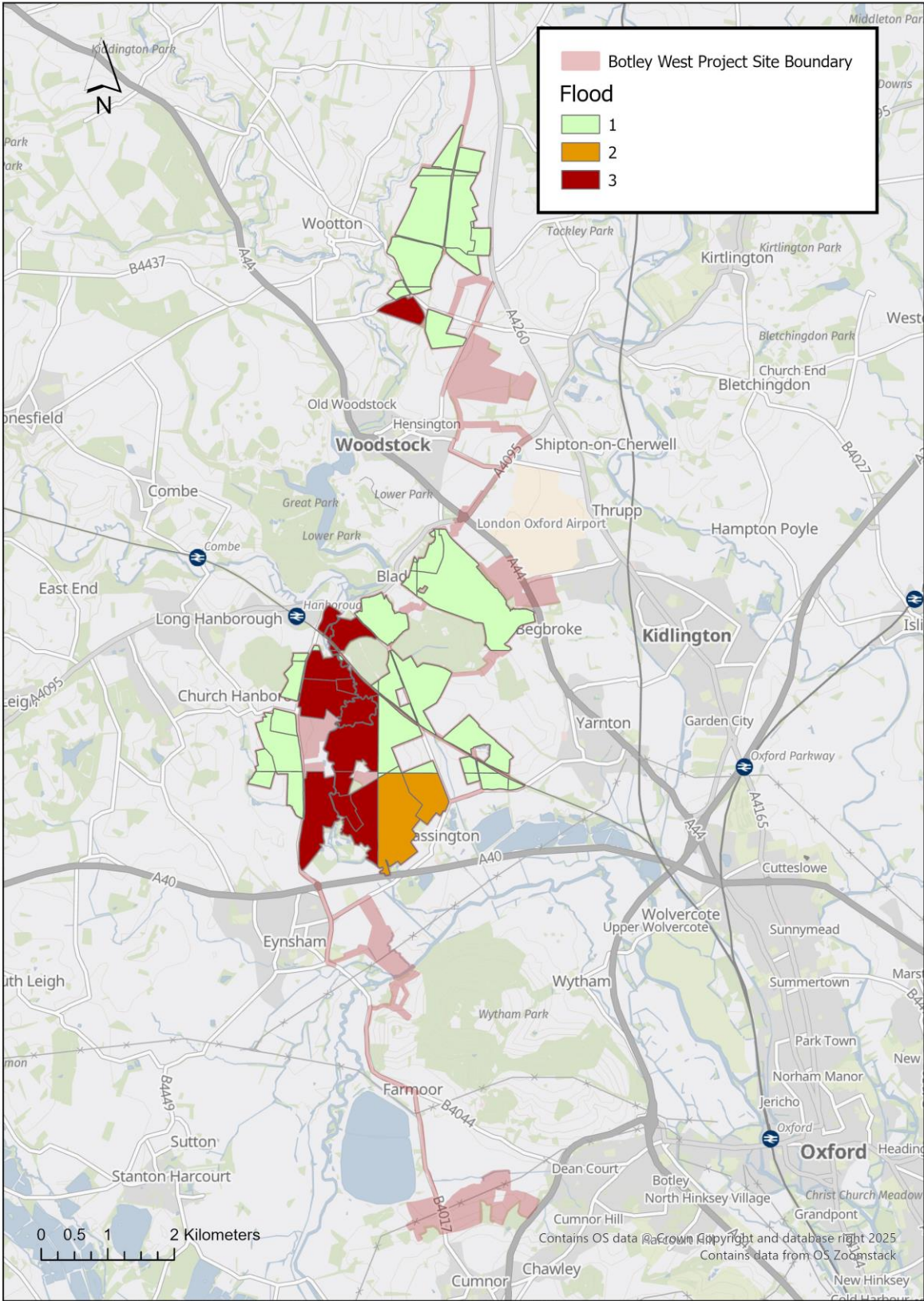


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Hydrology and Flood Risk

34. WODC recognise that the proposed development has been restricted in areas at risk of fluvial flooding, but have previously highlighted concerns about surface water drainage to the north of Cassington [RR-1102].
35. The village of Cassington is at particular risk of impacts of surface water flooding having experienced property flooding (at Bell Close and Elms Road) on a number of occasions in recent years. The existing issue of surface water drainage is recognised in evidence prepared by the Applicant and this will require careful consideration through project design, to reduce and not increase the flooding risks to people and property in proximity to the scheme.
36. The development proposals indicate the introduction of buffer strips, bunds, ponds and ditch widening to the north of Cassington, designed and positioned to mitigate the surface water impacts of the proposal and provide betterment compared to the existing baseline position. However further work on the modelling of proposals needs to be undertaken, to confirm the effectiveness of these measures to mitigate flood risk.
37. The proposed development relies on the construction and operational management of the land to effectively drain the site for surface water flows. Where this is not secured, flood risk could be increased due to increased rates of runoff. The surface water drainage proposals that included in the application require significant information and calculation to confirm their acceptability. The Council requires information on how the land management, particularly during the operation will address any issues around sheeting off the solar panels to reduce bare ground and channelling of water in any specific way. The inspection and maintenance regime is key to mitigating any potential effects and should be included in any operational plans.
38. Red areas on Map 6 (Score 3) indicate land parcels that include areas of flood zone 2 which in most cases are already excluded from development. Orange areas (Score 2) are areas recognised as being at risk of surface water flooding, where development may create additional risk to existing properties. Green Areas (Score 1) are areas at less risk of flooding.

Map 6 - Flood risk and hydrology impacts



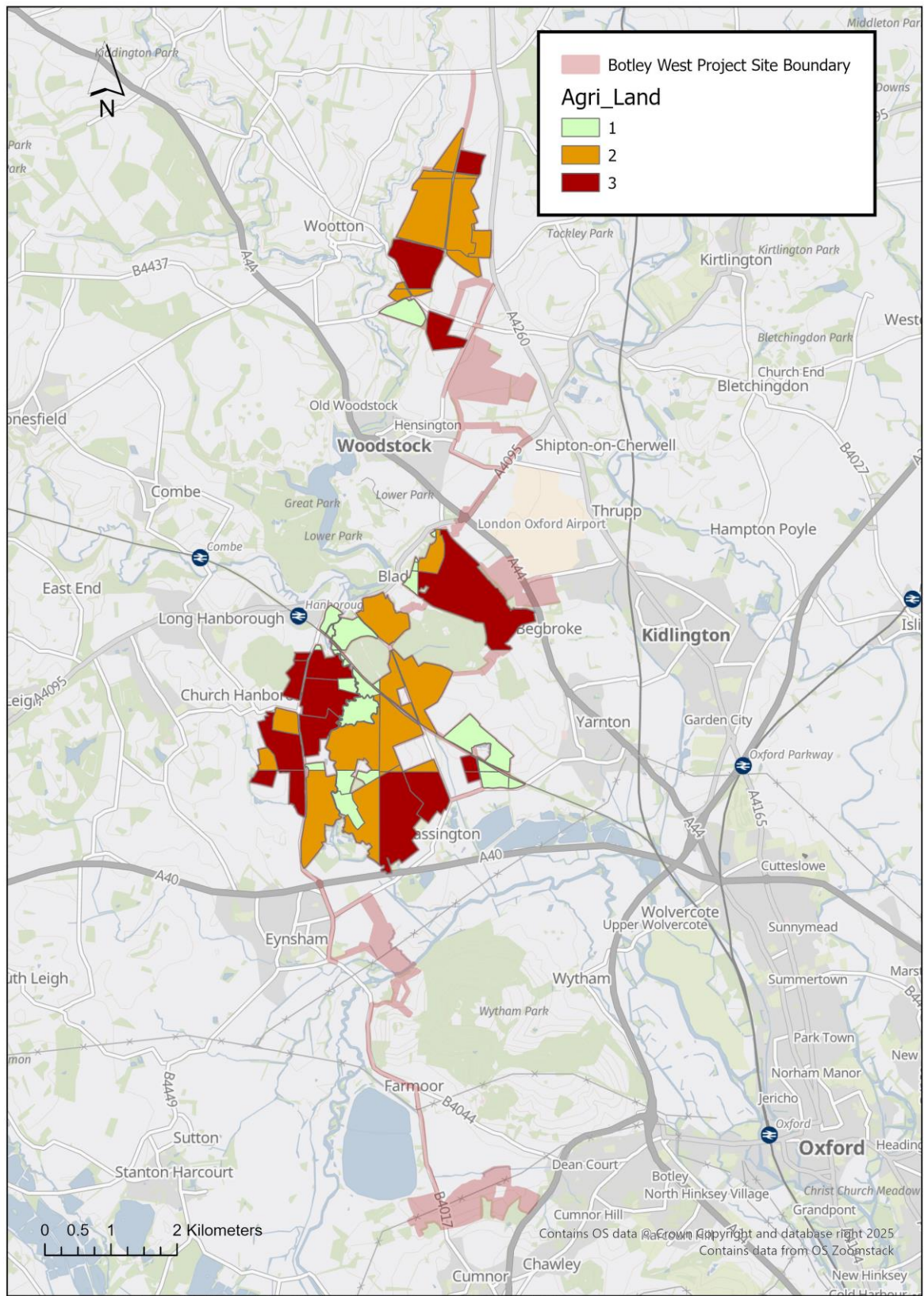
Noise and Vibration

39. WODC have previously highlighted concerns regarding the noise impacts of the proposal during the operational phase of the development, particularly noise impacts of the Power Converter Stations and Sub Stations.
40. The Applicant has assessed the impacts on noise sensitive receptors in proximity to the proposed development (primarily residential properties neighbouring the site) but it is not clear that the assessment extends to users of the public rights of way network and associated impacts on the tranquillity of the countryside.
41. The modelled noise emissions levels for Power Converter Station (PCS) units is up to 92 dB(A) (**APP-213**) There are 156 such units proposed across the project area. The applicant's baseline assessment of background noise, from both long term and long term monitoring positions indicates sound levels well below this with maximum daytime noise level of 69 dB at LT6, adjacent to Lower Road within the Central Site. The background noise at this monitoring position is dominated by road traffic.
42. The Applicant's solar design parameters have previously indicated a noise impact of 67 dB at 10m distance from each PCS. A rough calculation, based on the development of 156 PCS units across the site equates to an area of 5ha, where the noise impacts would exceed the monitored baseline position adjacent to a main highway.
43. The Council consider that noise impacts of the project will have a detrimental impact on the environmental quality and amenity of the countryside, particularly in proximity to public rights of way, contrary to Local Policy.

Agricultural Land

44. Significant areas of best and most versatile agricultural land would be taken up by panel development and permanently lost in the case of the grid connection substation.
45. National Policy Statements state that solar development should avoid "the use of Best and Most Versatile agricultural land where possible". It goes on to define BMV land as those in Grades 1, 2 and 3a of the Agricultural Land Classification.
46. For developments in West Oxfordshire, the Council require that all development proposals are required to show consideration of efficient and prudent use of natural resources, including minimising their use on the soil resource. Any proposals for a solar farm involving best and most versatile agricultural land would need to be justified by the most compelling evidence which demonstrates why poorer quality land has not been used in preference to best and most versatile agricultural land.
47. The applicant's mapping of Best and Most Versatile Agricultural Land included in their Agricultural Land Classification and Soil Survey Report [APP-223] indicates significant coverage of BMV across the project area. Approximately 40% (216ha) of the land proposed for solar PV would be sited on Best and Most Versatile (BMV) agricultural land.
48. WODC request that areas of best and most versatile agricultural land should be removed from the project in order to protect the soil resource and to avoid any long term issues that may impact the quality of the soil resource such as inadequate decommissioning and remediation at the end of the project.
49. Map 7 shows land parcels with high concentrations and coverage of best and most versatile agricultural land shaded red (Score 3). Parcels with low coverage or no indication of best and most versatile agricultural and are shaded green (Score 1).

Map 7 - Agricultural Land impacts

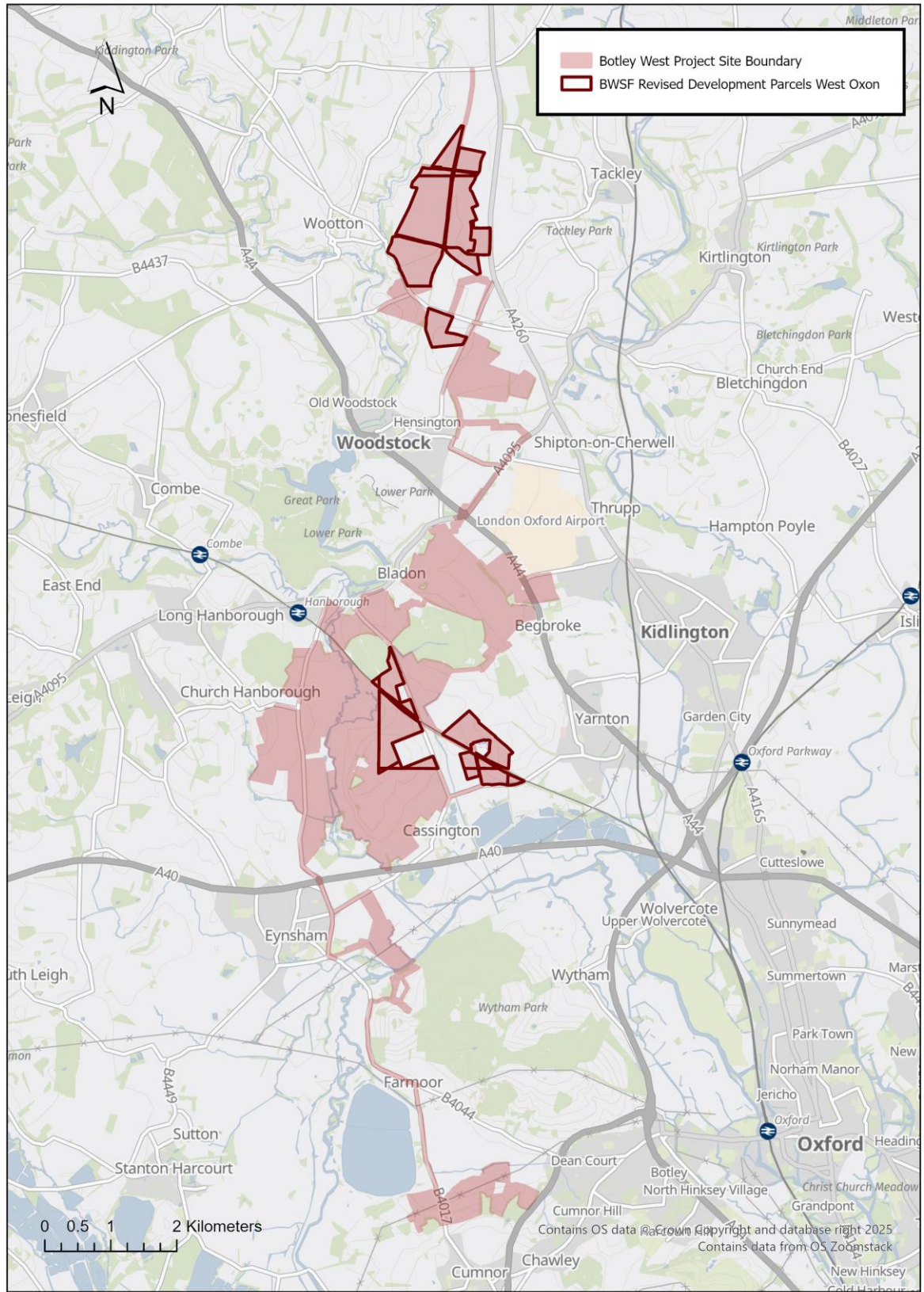


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Conclusion

50. The mapping and commentary above primarily relate to the spatial impacts of the proposed development, identifying where West Oxfordshire District Council consider the proposed development should be reduced to minimise harmful impacts of the environment, resources and communities.
51. There are other non-spatial impacts that West Oxfordshire District Council assess through the Local Impact Report, including impacts on waste, socio economics and climate change, but it is these spatial impacts in particular that are critical to the Council's view about the suitability and sustainability of the proposed development.
52. In totality the cumulative impact of such a major development, in its current form, would be transformative to the detriment of many of the special and protected characteristics that make West Oxfordshire such a special place to live in. In light of this assessment West Oxfordshire District Council have undertaken mapping of the proposed scheme to identify where cumulative impacts, against a range of receptors and topics overlap and where it is considered that the scheme should be decreased in scale through the removal of panels (see map 8 below).
53. There has been no meaningful engagement by the Applicant to seek to address issues as they have arisen. Rather it is the case that the proposed mitigation of impacts on sensitive receptors is inadequate with minimal buffers to ancient woodland, inadequate habitat compensation for ground nesting birds and incomplete survey work for bats of national importance alongside small/inadequate stand offs against heritage assets thus robbing them of their setting and importance. Other key national policy directives, such as retaining the Green Belt free of inappropriate urbanising development and ensuring that the best and most versatile agricultural land is not sterilised have been set aside too willingly.
54. It is with some regret that the Council is not able to be more supportive, but the scheme as proposed will result in major harm lasting for a generation. Furthermore, it is a lost opportunity to demonstrate how necessary infrastructure such as strategic renewable energy generation, could be sensitively and appropriately inserted into a historic and attractive landscape and leave a lasting legacy beyond the lifetime of the plan, to the benefit of the landscape, heritage assets, nature and the receiving population.
55. In order to arrive at a development proposal that would address the harmful impacts of the project, West Oxfordshire District Council have identified a number of parcels that could potentially accommodate some development. (See Map 8) The scale of the project would undoubtedly be dramatically reduced but would likely still pass the threshold for a Nationally Significant Infrastructure Project with capacity to generate significant levels of energy.
56. There may be other parcels that could accommodate some development beyond those identified by the Council, but development proposals must be guided by the characteristics of the West Oxfordshire environment and seek to conserve and enhance the quality, character and distinctiveness of West Oxfordshire's natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity.

Map 8 - West Oxfordshire revised Development Parcels



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