



The countryside charity
Oxfordshire

Campaigning to protect our rural county

CPRE Oxfordshire
20 High Street
Watlington
Oxfordshire OX49 5PY

Tel: 01491 612079
campaign@cpreoxon.org.uk
cpreoxon.org.uk

info@botleywest.co.uk

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Dear Sir/Madam,

Re: Botley West Solar initial consultation- CPRE Oxfordshire response

The Campaign to Protect Rural England (CPRE) Oxfordshire works to improve, protect, and preserve the landscape of Oxfordshire and its city, towns and villages for the benefit of everyone.

CPRE Oxfordshire welcomes the invitation to comment on the initial stage of consultation in relation to the Botley West Solar development. We are in general opposed to development on the Green Belt and are concerned that a significant proportion of this scheme falls within the Oxford Green Belt - a fact that has not been highlighted within the consultation process. The consultation process is currently lacking detail and clarity in many important areas which we highlight, including an environmental assessment and cumulative impact assessment.

Overview of concerns

CPRE Oxfordshire recognises the climate emergency we face and supports renewable energy as a means to tackle this.

However, in relation to this development:

- CPRE Oxfordshire believes the **consultation process is currently lacking in detail**. However, even a preliminary assessment of the impacts suggest that these would be unacceptable and could not be satisfactorily mitigated.
- CPRE Oxfordshire opposes any development or further encroachment of 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.
- CPRE Oxfordshire has concerns over the **cumulative impact** of this development.

As a result of this, CPRE Oxfordshire asks both PVDP and Blenheim Estate to reconsider their approach and instead work with both local authorities and local communities to develop a more appropriate and sustainable renewable energy strategy for the area.



CPRE Oxfordshire position on Renewables

The Pathways to Zero Carbon Oxfordshire report¹, produced by Oxford University and supported by our local authorities, sets out a number of routes the county could follow with regards to achieving zero carbon status. The most ambitious of these suggests that 10% of land in the county might be needed for renewable energy and a maximum of 1% for solar. Much of this could be accommodated by using existing roof space, brownfield sites or incorporated into new development. This means that there are choices to be made about greenfield sites and, working together, local authorities should be able to guide development to where it will cause least harm.

CPRE Oxfordshire believes that renewable energy is desirable in principle, but not at unacceptable cost to the countryside, our rural communities, or to the economy.

Renewables done well should:

- Prioritise the use of brownfield land.
- Benefit the local economy.
- Be supported and/or owned by local communities.
- Bring net benefits to wildlife.
- Avoid/minimise loss of productive agricultural land.
- Avoid use of designated land such as Areas of Outstanding Natural Beauty and Green Belt, and elsewhere avoid/minimise impact on landscape, tranquillity and cultural Heritage.

It is striking that, as currently proposed, the Botley West Solar development appears not to fulfil any of these criteria.

Solar farms

CPRE Oxfordshire is concerned about solar farms in the countryside for the significant visual harm and industrialisation of the landscape, and are opposed entirely to such development in Areas of Outstanding Natural Beauty (AONBs) and the Green Belt, such as the vast majority of this site.

We support developments on the roofs of new and existing buildings, or in other sites (outside of designated areas) where the visual impact is minimal and there is no significant loss of land for agriculture, recreation or biodiversity.

¹ <https://www.eci.ox.ac.uk/research/energy/pathways-to-a-zero-carbon-oxfordshire-report.html>



We hold this position because:

- We do not consider that the benefit solar farms offer in terms of renewable energy is necessarily sufficient to offset the environmental harm they create or the otherwise useful land that is lost.
- Oxfordshire already has a significant number of solar farms either constructed or with permission granted
- There is a readily available alternative in the form of using the roofs of existing buildings, especially warehouses.
- Landscape character - The scale and 'alien' appearance of solar farms are an obtrusive impact on the landscape and represent an unwelcome and inappropriate industrialisation of the countryside. Fields containing continuous rows of metal and glass bring a dramatic industrial scar to an otherwise rural environment which is further damaged by perimeter security fencing, floodlighting, CCTV systems, overhead line infrastructure and buildings housing associated apparatus including the battery storage units.
- Biodiversity - Ground-mounted solar arrays can result in direct habitat loss, habitat changes and disturbance or displacement of species.
- Broader environmental and social concerns - Considerable amounts of energy and material such as rare earths are required for the manufacture of photo-voltaic panels and batteries, predominantly in China. These issues, together with transport costs and impacts, and the full lifecycle costs including decommissioning, should be considered and fully accounted for in assessing the balance between environmental harm and solar energy.
- Food security –As global food prices rise and food security becomes an increasingly important issue, agricultural land in England, even of lower grades, should not be misused by giving it over to inefficient renewable energy schemes.

Our full Policy statement position on Renewable Energy can be found [here](#).

We continue to campaign strongly for a **Countywide Renewables Strategy**, putting the people of Oxfordshire in charge of where development is best placed, rather than speculative applications from landowners and developers. This strategy should prioritise brownfield sites and rooftop renewables, guiding necessary development to where it would do least harm.

Referring to our concerns in greater detail:

Lack of current information

This consultation lacks sufficient detail for robust assessment.

Assuming the scheme will progress under the NSIP process other schemes, such as the Oxfordshire Strategic Rail Freight Interchange (www.oxsrfi.co.uk), have provided far greater detail for consultation at this stage. A cursory glance at the www.oxsrfi.co.uk compared to www.botleywest.co.uk shows a striking difference in the provision of detail provided. For example, in the rail scheme, preliminary environment



reports were provided by the scheme at this stage. What assessments have PVDP/Blenheim already undertaken to assess the viability of the scheme and when are the findings going to be available?

At the next stage of consultation we would expect to see:

- Landscape & visual impact: A full landscape and visual impact assessment, including 3D visuals
- Environmental impact assessment: A full environmental impact assessment, including – although not necessarily limited to – many of the issues covered below.
- Neighbourhood Plans: A full assessment of how the proposal meets or conflicts with any relevant Neighbourhood Plans e.g. the Cumnor Neighbourhood Plan.
- Oxford Green Belt: A full assessment of the impact of the proposal on the Oxford Green Belt, including loss of permanence and openness and the coalescence of settlements. As proposed, over $\frac{3}{4}$ of the Botley West Solar Farm is on Green Belt land and will occupy almost as much of the green belt (3.1%) as all current Local Plan sites (3.5%), on which will be built c. 20,000 more houses.
- Biodiversity: A full assessment of biodiversity impacts and evidence to support any claims of biodiversity net gain. We would wish to see evidence of what could be achieved over and above alternative ways of managing the land whilst keeping it in food production. Given that a site of this scale is in our view unprecedented on agricultural land of this nature, we would need to understand what confidence can be placed in any claims related to nature improvements.
- Agricultural land: A thorough assessment of the land quality and classification. This should include information on the production achieved averaged over the last 10 years.
- Access to green space: An assessment of people's ability to access natural green space. We note that access to allotments, whilst welcome, is not the same as engagement in the open countryside.
- Footpaths & rights of way: A full report on the impacts of the proposal on the local rights of way network. We are clear that retention of existing footpaths, but corralled between high level fencing (or even hedges), running across an industrial site rather than open countryside, would still represent a significant loss of amenity. As proposed, the site includes extensive areas on either side of the Roman Akeman Street now part of the Oxfordshire Way long distance footpath and similarly the Green Lane Sustrans Dover Inverness cycle route.
- Archaeology & Heritage incl. UNESCO World Heritage Site: A full report on the impacts of the proposal on archaeology and heritage sites. Although we understand there to be no direct impact on the Blenheim World Heritage Site itself, we believe there would be substantial indirect impact through the significant change to its setting. We also note, for example, that panels are currently proposed right up to the medieval listed Hordley Manor at Wootton, as well as encroaching on a number of conservation areas
- Light pollution/dark skies: A full description of lighting proposals for the site and how dark skies would be maintained or enhanced.
- Design & access: A full design & access statement that sets out the details of the site, the panels and all supporting infrastructure, including but not limited to confirmation of storage plant site and pipework crossing the Thames.
- Transport & construction: A full assessment of the impacts of construction and an accompanying traffic and transport plan.
- Hydrology and flooding: A full survey and assessment of potential impacts
- Ancient Woodland – A full assessment of impacts and for the scheme to be redesigned to avoid the Ancient Woodland areas completely, given that the solar installations have the potential to cause damage to, and deterioration of, Ancient Woodland via both the direct and indirect effects of development. They are also likely to (1) damage the functional habitat connections between the separate areas of Ancient Woodland, such as the areas which are currently open habitats



between the trees and (2) break up or destroy working connections between woodlands, or ancient trees or veteran trees.

Given the importance of this irreplaceable habitat we would not expect to see the panels or associated infrastructure in such close proximity to so much Ancient Woodland or between areas of Ancient Woodland and any buffer zones must include proper assessment for ancient and veteran trees.

- Decommissioning and Restoration – A full report on how the site will be decommissioned, including recycling of panels and the disposal of any toxic waste. We also wish to see what proposals PVDP is offering with regards to any legally enforceable commitments to restoration of relevant land to agricultural usage / Green Belt. At the moment, we are very doubtful that any such commitments could be made to stand at the end of the period.

The Oxford Green Belt

A significant proportion of this site is on the Oxford Green Belt. This is not defined by the developer but we estimate around 75% of the site falls within the Green Belt. CPRE Oxfordshire strongly believes 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.

We are strongly opposed to any development on the Green Belt.

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'**"

We also would highlight the policy in the NPPF, 151 in relation to renewable development on the Green Belt:

"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."

The Botley West scheme currently makes **no mention** on its website of the significant proportion of the site that falls within the Oxford Green Belt. We consider this to be **inappropriate development which does not demonstrate very special circumstances.**

The argument that there are wider environmental benefits associated with increased production of energy are unfounded in this case as:

- This is a developer led proposal and no alternatives have been considered. A county wide strategy is urgently needed, which we would be supportive of and are certain could deliver the renewable energy required with less impact on the Green Belt and overall countryside.



- No environmental assessment has been undertaken to our knowledge and, if so, has not been made available for consultation.
- Other solar developments would not require encroachment of the Green Belt,

We also point to Local Plan policy that supports the case that development within the Green Belt should not be allowed:

Vale of White Horse Local plan: Core Policy 41: *“Renewable Energy (excluding wind energy) The Council encourages schemes for renewable and low carbon energy generation. Planning applications for renewable and low carbon energy generation (excluding wind energy) will be supported, provided that they do not cause a significantly adverse effect to:*

- i. landscape, both designated AONB and locally valued*
- ii. biodiversity, including protected habitats and species and Conservation Target Areas*
- iii. the historic environment, both designated and non-designated assets, including by development within their settings*
- iv. the visual amenity and openness of the Green Belt v. local residential amenity, and*
- v. vi. the safe movement of traffic and pedestrians.”*

We highlight above areas where this scheme does cause a significantly adverse impact.

A significant proportion of this development is in the Oxford Green Belt.

We **strongly oppose any further development of the Green Belt**

This scheme poses a significantly adverse impact on the Green Belt

We consider this an inappropriate development which does not demonstrate special circumstances.

The Cumulative Impact

This development would cover over 1,000 hectares over three sites: Woodstock/Blenheim, Eynsham and Cumnor. The size of the project is enormous and we believe that it would become the 2nd largest solar farm development in the Europe. This scheme is ten times the size of any current UK based solar farm development and would see Oxfordshire taking as a conservative estimate over 5 times its share (by land



area) of required development. (Source: Government’s Energy Security Strategy suggests a large increase in solar power, from 4% of the UK’s energy to c.12%.)

In addition to this there are many other smaller solar farm developments within the county; see CPRE Oxfordshire’s map of solar developments across the county [here](#).

The cumulative impact of this scheme along with other proposals must be understood and addressed. We believe there are unacceptable adverse effects on:

- The Oxford Green Belt
- Visual impact, openness and setting of the general countryside
- Food security in relation to use of agricultural land

Both the Cherwell and West Oxfordshire Local Plans identify the need to address this cumulative effect:

Cherwell Adopted Plan 2011-2031: Policy ESD 5: (p93) *“Renewable Energy Planning applications involving renewable energy development will be encouraged provided that there is no unacceptable adverse impact, including cumulative impact, on the following issues, which are considered to be of particular local significance in Cherwell: The Green Belt, particularly visual impacts on openness”.*

West Oxfordshire Local Plan 2031 (Adopted September 2018)

8.43” When assessing proposals for renewable energy the cumulative impacts of existing operational consented and proposed developments will need to be considered and, if necessary, suitable mitigation measures proposed, to minimise impacts on biodiversity and landscape character and quality. Applicants will need to demonstrate that cumulative effects do not become a significant or defining characteristic of the wider landscape. Special attention and protection will, in particular, need to be given to the landscape and biodiversity of the Cotswolds AONB, the Lower Windrush Valley Project, the Windrush in Witney Project

CPRE Oxfordshire believe the cumulative impact of this scheme has an unacceptably adverse effect in relation to several factors, including the Green Belt, the general countryside and food security.

We call for an urgent countywide renewables strategy in order that required solar energy is best placed where it causes least harm; driven by public consultation not developer and landowner speculative applications.



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Conclusions

CPRE Oxfordshire recognises and supports the urgent need to address the climate emergency, with renewable energy playing its part in this challenge.

However, we should not approve and react to this emergency with an unconsidered developer led approach. The cumulative impact of developments must be considered and we call for an urgent Oxfordshire Renewables Strategy so that the county can play its part to meet the renewables targets set in the Government's Energy Security Strategy in a way that causes the least harm to the countryside which forms such an integral part of the county we love.

It is our belief that the Botley West Solar Farm would represent inappropriate development because of its impact on the openness and permanence of the Oxford Green Belt and the cumulative impact on the rural character of a huge swathe of Oxfordshire's countryside.

We do not believe that very special circumstances exist to justify the development, given that there are alternative approaches that would be much less harmful and yet could still deliver the pathway to a zero carbon Oxfordshire.

If PVDP/Blenheim are nonetheless determined to proceed with the proposal, it is clear that much more information is required to look at the impacts in detail and this should be provided in a fully transparent and timely manner to allow local communities adequate opportunity to engage in the process.

Yours faithfully,
Helen Marshall
Director, CPRE Oxfordshire