

# Bladon Parish Council

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## Botley West Solar Farm Phase Two Community Consultation Feedback

### Bladon Parish Council's Initial Opinion

Bladon Parish Council (BPC) welcomes the opportunity to provide comments on the Phase Two Statutory Consultation.

After reviewing the information provided it is clear that this proposal is lacking detail in many areas and that the detail will only be available when the Environmental Statements are submitted with the Development Consent Order (DCO).

This lack of information means that Bladon Parish Council is unable at this stage to provide detailed comments on issues such as the impacts on the landscape character of the area and the local biodiversity, the loss of amenity for the public and the loss of good quality agricultural land and Green Belt.

Based on the limited information provided it is obvious that Bladon Parish and its residents will be significantly affected by this development.

The maps provided show that approx. 53% of Bladon Parish (176 hectares) has been earmarked for the development and all of those 176 hectares falls within the Green Belt. Development on Green Belt around Bladon is in contradiction to the National Policy Planning Framework (NPPF) unless exceptional circumstances can be proved.

No exceptional circumstances have been given in any of the documents available and BPC feels that, due to this being a major planning consideration, the exceptional circumstances should have been provided as part of this consultation.

BPC feels that the loss of all the Green Belt around Bladon is unacceptable, especially when considering the other developments proposed in the area. These other developments will be removing large areas of open countryside just outside the boundaries of the designated Green Belt and if the BWSF development is approved, it will result in near continuous development between Oxford and Woodstock.

The predominant land use around Bladon village is for arable farming and a significant amount of this land is classed as Best and Most Versatile Agricultural Land. The use of such land goes against the NPPF principles of protecting high quality agricultural land from development. BPC is also concerned with the loss of arable production at a time when food security is an issue.

Bladon village is surrounded by rolling farmland and much of the landscape is open and visually sensitive. The views southwards out of the village and towards the development have been identified as being important in The Bladon Conservation Area - Conservation Area Character Appraisal. Even with the limited information provided, it is clear that the area around Bladon will be physically and visibly changed. In addition, enclosing of the Public Rights of Way (PRoW) with 2.1m high fencing will create unattractive corridors that will deter users and prevent the free roaming of the larger wildlife in the area.

BPC believes that the development will have a significant impact on the surrounding communities and, should the development be granted permission, the current suggested community benefits are far from adequate to compensate for such impacts and should be significantly increased.

The £50,000 per annum (£59 per MW based on 840MW's) community fund suggested is not comparable to the community funds that other renewable energy projects have provided.

For example Tower Hill Solar Farm agreed with Tytherington Parish Council a community fund of £875 index linked per MW per annum for their considerably smaller 6.46MW development. For reference £875 uplifted to Dec 23 price base is approximately £1,189.

Research has shown that the average £'000 per MW for solar developments is £3,000 and it should be noted that £3,000 is an average and there are developments that have agreed £5,000 per MW per annum.

Also, due to the extreme size of this development, it will affect significantly more communities than the just one or two villages affected by the Tower Hill Solar Farm, and to expect £50,000 to be shared between approximately 10 other parishes makes the usefulness of the fund redundant.

From the information available at this time, it is not clear how any benefits provided by the creation of solar power under this proposal can outweigh the detrimental impact on the Green Belt and biodiversity, the permanent physical and visible changes to the landscape, the loss of amenity for the public and the loss of BMV agricultural land from arable production.

Further detailed comments are provided in the attached annex, and although the greatest impact felt by Bladon Parish residents will be from the middle section of the proposal, some of the comments below may also be relevant to the whole of the proposal.

# **ANNEX**

## **Phase Two Consultation Comments - Bladon Parish Council**

### **1. Masterplan & Visualisations**

- 1.1 Due to the poor quality of the uploaded and printed masterplan documents provided, it is not easy to identify some of the infrastructure required for the development; for example, it is not easy to identify the location of the proposed fencing without zooming in quite a lot on the on-line documents.
- 1.2 BPC requests that additional plans be provided to show proposed infrastructure and proposed landscaping separately.
- 1.3 BPC understands that at this stage not all the visualisation for viewing points that have been identified are available.
- 1.4 Of the visualisation's provided, none show how a PRoW enclosed on both sides by a 2.1m fence and fields of panels will create a corridor effect for the users of the footpath.

### **2. Buffer Zones & CCTV and PCS**

- 2.1 Since the Phase One Consultation, the buffer zone behind the properties in Bladon has been increased to 25m.
- 2.2 BPC does not consider a 25m buffer as acceptable due to the impact the proposal will have on the Bladon Conservation area, the recreational facilities in Bladon and also the residential properties.
- 2.3 BPC requests that the buffer zones in the area are substantially increased.
- 2.4 BPC also concerned with the possible locations of the 81 CCTV that are proposed to be located at the gates and the 4-6 substations proposed within Bladon Parish. It is not clear from the information provided where the proposed gates are to be located and thus where the CCTV is to be located.
- 2.5 BPC would like consideration to be given to the location of the CCTV and for the locations to avoid impacting the users of the PRoWs and of Bladon Recreation Ground.
- 2.6 BPC is also concerned with the location of the PCS and the noise that will be generated from their operation. The PEIR indicates that the noise level will be 67db at 10 metres.
- 2.7 There are several PCS located in Bladon Parish including near the residential areas of Heath Lane and Church Street, in the field adjacent to Bladon Recreation Ground and in close vicinity to many footpaths that run through the development.
- 2.8 BPC is concerned that the topography of the Parish has not been taken into account when assessing the noise impact from these PCS and other noise making pieces of infrastructure. There are many locations around Bladon Village where the topography means that sound bounces around and is magnified.
- 2.9 It is likely that the due to this effect that the sound from the PCS will be heard at St Martin's Churchyard and the burial site of Winston Churchill, and by the users of the PRoWs.
- 2.10 BPC requests the ES takes into account the topography when assessing all noise impacts.
- 2.11 BPC also requests that the locations of the PCS's are kept as far away as possible from residential and recreational areas and also away from the PRoW's.

### **3. Rights of Ways and Fencing**

- 3.1 It is proposed that fencing will be erected adjacent to all existing and proposed PRoWs within the development. This fencing will create a corridor effect along the PRoWs.
- 3.2 It is not possible from the information provided to see how wide the PRoWs will be and thus the width of the corridors. BPC is concerned that due to Oxfordshire County Council's on-line definitive map not having a record of the widths of many of the PRoWs that are identified in the proposal that only the minimal legal requirement for PRoWs will be used. These are currently: -
  - Footpaths Cross-field/other 1m
  - Footpaths Field-edge 1.5m
  - Bridleways Cross-field/other 2m
  - Bridleways Field-edge 3m
- 3.3 The creation of narrow corridors with 2.1m fencing either side will impact both the users of the network and the wildlife in the area.
- 3.4 There are concerns about personal safety when walking along the corridors that will be created by the high and continuous fencing.

- 3.5 There are hundreds of kilometres of PRowS throughout the development. There is over 5.8km of PRowS in the development area behind Bladon Village between Bladon Heath and the A44.
- 3.6 This 5.8km represents all of the PRowS available and easily accessible by Bladon residents.
- 3.7 Of the 5.8km of PRowS, all but approximately 840m will be surrounded on both sides by solar panels and 2.1m fencing. The remaining 840m will have solar panels and fencing one side. This means that users of the PRowS around Bladon will have not any PRowS available to them that are not surrounded by a continuous view of solar panels and fencing. The only other option for recreational walking is within the grounds of Blenheim Palace.
- 3.8 The amenity of the PRowS network will be impacted and the creation of corridors will make the footpaths no longer attractive to users of the network for recreational purposes. This loss of amenity will have a negative impact on health and wellbeing.
- 3.9 BPC request that development in the proximity of the PRowS is avoided and that if this is not possible then the width of the PRowS should include a considerable sized buffer so that amenity of the PRowS can be preserved.
- 3.10 Larger wildlife such as Badgers, Foxes and Deer will no longer be able to freely roam across most of the proposal, which includes 176 hectares within Bladon Parish. This inability to free roam will affect their natural pathways and their behaviour and may force many of the larger wildlife out of the area. The loss of larger wildlife will have a negative impact on the biodiversity in the area.
- 3.11 BPC also request the negative impact on the larger wildlife be considered in the relevant Environmental Statement (ES) and that mitigation be provided to prevent the loss of this wildlife from the area.

#### **4. Cumulative Effect of other Developments**

- 4.1 In response to the EIA Scoping Opinion, BPC asked that the developer produce a map to show all of the proposed developments in the surrounding area of the development.
- 4.2 These maps have been provided but it appears that Figure 19.1 Cumulative Developments – Overview does not include the sites shown on Figures 19.2 and 19.3, which show the Cumulative Developments for Cherwell and Vale of the White Horse and Oxford.
- 4.3 This omission means that the full impact of the developments is not illustrated, for example it does not show the ribbon of development starting at Wolvercote Roundabout and going along most of the A44 into Woodstock.
- 4.4 Table 19.7 in Chapter 19 of the PEIR states that there has been no cumulative effect identified for most of the categories in the table including Landscape and Visual Resources, Ecology and Nature Conservation and Agricultural Land Use and Public Rights of Way.
- 4.5 BPC would like to understand how once built, the developments in Eynsham, Begbroke and Yarnton, which will be surrounding the proposal and will remove huge areas of land that are currently shown on the plans as open countryside, does not create a cumulative effect on the landscape, ecology, agricultural land or PRowS.

#### **5. Ecology and Biodiversity**

- 5.1 Due to the lack of information at this stage, such as no baseline assessment and no agreed biodiversity metric, it is not possible to understand how the development will be able to create 70% biodiversity net gain (BNG), especially as, at the moment, the only suggestions are bat and bird boxes, bee hives and log piles.
- 5.2 At various points in Chapter 9 - Ecology and Nature Conservation, the land within the proposal is referred to as 'intensive managed agricultural fields'. BPC would like the ES to explain how they have assessed that land as intensively managed.
- 5.3 The farmland around Bladon has not been managed intensively and been managed in such a way that the ecosystem is flourishing in the area.
- 5.4 Although the PEIR covers the possible impact on certain wildlife it only concentrates on the species that have been identified as important and does not consider the impact on other wildlife in the area such as deer and foxes.
- 5.5 BPC also request the negative impact on the larger wildlife be considered in the relevant Environmental Statement (ES) and that mitigation be provided to prevent the loss of this wildlife from the area.

#### **6. Heritage & Conservation Area**

- 6.1 The PEIR does not appear to take into account the Conservation Area Character Appraisal for Bladon's Conservation Area, which identifies important views out of the village towards the south.

- 6.2 BPC asks that the Conservation Character Appraisal is taken into account when assessing the impact of the development on the area.
- 6.3 The PEIR does not acknowledge that St Martin's Church in Bladon is of historical significance.
- 6.4 St Martin's is the resting place of Sir Winston Churchill and is visited by a large number of tourists annually and plays host to several memorial events every year.
- 6.5 BPC asks that the impact of the proposal on St Martin's and its visitors is assessed as part of the application.
- 6.6 BPC is also concerned that proposal will have detrimental impact on Blenheim World Heritage Site and other historic and heritage sites in the area due to the visibility of the proposal by all visitors approaching the area along the A44.
- 7. Community Benefits including Improvements to Rights of Ways**
- 7.1 The suggested value of the community fund is considerably lower than funds created from other renewable energy developments. Also, to expect such a low sum to be shared with so many parishes makes the fund redundant and worthless.
- 7.2 It is not clear which groups have been approached for input into possible community projects or the outcomes of those discussions. For example, have local allotment groups or parish councils been contacted to see if there is a demand for more allotments in their areas?
- 7.3 It is not clear why Cherwell Collective and Cutteslowe Community Larder have been approached and not similar charities in West Oxfordshire. The Cherwell Collective and the Cutteslowe Community Larder do not currently serve residents in West Oxfordshire.
- 7.4 The suggested change of footpaths 132/2/10, 265/26/10 and 124/12/10 to create a cycle path will require a legal order to allow cycling along the route.
- 7.5 BPC is concerned that the change of the footpath into a cycle route will cause conflict between cyclists and both the existing vulnerable users of the path and the regular vehicles which use the road to access the properties along the lane. It should be noted that the start of the proposed cycle route is continuously used by children and parents accessing the school and that the remainder of the path is used extensively for recreation.
- 7.6 It may be appropriate to improve the bridleway that runs from Heath Lane directly to Begbroke to make it more accessible to cyclists, which are allowed to cycle on a bridleway.