



Submissions on Adequacy of Consultation received during Pre-application and Acceptance

EN010147 - Botley West Solar Farm

Number	Name	Date Received
1	Penelope Marcus	11 February 2024
2	Sara Goldie	18 March 2024
3	Susan Langley (this Submission is representative of 13 other similar comments)	19 March 2024
4	Fiona Lewinton	19 March 2024
5	Nigel Pearce	21 March 2024
6	John and Joan Nicholas	21 March 2024
7	Michael Brown	28 March 2024
8	Stop Botley West (1)	13 June 2024
9	Stop Botley West (2)	19 June 2024
10	Rosemary Lewis	9 October 2024
11	Oxfordshire Estates Ltd and Dustin Dryden (1)	22 November 2024
12	North Leigh Parish Council	2 December 2024
13	Cassington Parish Council	9 December 2024
14	Oxfordshire Estates Ltd and Dustin Dryden (2)	11 December 2024
15	Helen Barr	12 December 2024



Planning
Inspectorate

Number: 1

Name: Penelope Marcus

Date Received: 11 February 2024

From: [Penelope Marcus](#)
To: [Botley West Solar Farm](#)
Subject: BOTLEY WEST SOLAR FARM - PVDP PROVISION OF INFORMATION EVENTS AND COMMUNITY ACCESS POINTS FOR THE PEIR CONSULTATION
Date: 11 February 2024 21:40:29
Attachments: [Timing of the 2023-24 PVDP Consultation Events .docx](#)

You don't often get email from [REDACTED]

I am attaching my response to PVDP's provision of Consultation events. I hope the attached research shows that PVDO has totally failed the requirement of the Planning Act 2008 to provide 'adequacy of representation'. I hope you agree that should PVDP decide to continue with the proposal for the Botley West Solar Farm, a new Statutory Consultation must be undertaken to fulfil its requirements to the community.

I would be grateful if you would take my response into account when you consider the proposal.

With many thanks,

Penelope Marcus

[REDACTED]
[REDACTED]
[REDACTED]

PVDP PROVISION OF INFORMATION EVENTS AND COMMUNITY ACCESS POINTS

Timing and location of the Consultation In-person Information Events and Community Access Points arranged by PVDP between 8 December 2023 and 19 January 2024

It is essential to consider the times and locations of the 'In-person Events' arranged by PVDP given the importance of the availability for residents in communities impacted by the proposed solar farm to attend the Events and visit the Access Points.

Working from the 2021 Census Results for each Parish, which provide the numbers and percentages of the three age groups, 0-17 years, 18-64 years, 65+ years, it is possible to consider whether and how convenient the times of the events were for members of the communities, and how potentially available those members would be to attend.

<https://www.gov.uk/government/statistics/transport-statistics-great-britain-2022/transport-statistics-great-britain-2022-domestic-travel#:~:text=How%20we%20commute,-Data%20Source%3A%20TSGB0108&text=The%20average%20usual%20commuting%20time,broadly%20similar%20to%20previous%20years.>

[https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/timeuseintheuk/march2023#:~:text=The%20pattern%20of%20daily%20time,and%2018%20minutes%2C%20respectively\).](https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/timeuseintheuk/march2023#:~:text=The%20pattern%20of%20daily%20time,and%2018%20minutes%2C%20respectively).)

By referring to the three Government documents above, it is possible to assess:

1. The percentage of employed adults between 18-64 years old in a community, which is approximately 76%
2. Working hours of those members of a community engaged in full-time employment which is likely to be roughly eight hours.
3. The travelling time of employed people of at least a half an hour journey. However, the communities involved are all not big employment centres in Oxfordshire and residents are likely to undertake much longer journeys to and from work, up to or even over an hour per journey.
4. It is reasonable to assume that employed adults, aged 18-64, having travelled home, but involved with family and having supper, might not potentially be available to attend local Information Events, or potentially to travel to Events elsewhere, during the times they were held. The earliest time they potentially might be free to attend an Information Event would be after 7.00pm.
5. Similarly, not all unemployed adults or adults aged 65 and older would potentially be free to attend the events at any time during the times the Events were being held.

*The number and age ratio of residents in the Parishes provided by 2021 Census

*Attendance figures Information Events provided by Stop Botley West, who monitored the attendance of all the Information Events.

BEGBROKE - Information Event, Tuesday 12 December 2023, 3pm-7.30pm

Population: 800

Population aged 0-17: 134

Population aged 18-64: 454

Population aged 65+: 218

Population aged 18-65+ as potential attendees of Information Event: $454+218=672$

Number of residents in full-time employment: $454 \times 76\% = 345$

Number of residents (18-64) not in full-time employment: $454 \times 24\% = 109$

Number of residents potentially able to attend 3pm-7.30pm = 109 plus 218 (65+) = 327, 49% of the community

Maximum number of residents potentially able to attend only 7.00pm-7.30pm = 345, 51% of community

Attendance for Begbroke Information Event 12 December 2023 3pm- 7.30pm: 46

BLADON – Information Event, Friday, 8 December 2023, 3pm -7.30pm

Population: 977

Population aged 0-17: 217

Population aged 18-64: 568

Population aged 65+: 190

Population aged 18-65+ as potential attendees of Information Event: $568+190=758$

Number of residents in full-time employment: $568 \times 76\% = 432$

Number of residents (18-64) not in full-time employment $568 \times 24\% = 136$

Maximum number of residents potentially able to attend 3pm-7.30pm:

$136 + 190 (65+) = 326$, 43% of community

Maximum number of residents potentially able to attend only 7.00pm-7.30pm = 432, 57% of the community

Attendance for Bladon Information Event 8 December 2023, 3pm-7.30pm: 68

CASSINGTON AND WORTON– Information Event, Friday 12 January 2024,
3pm- 7.30pm

Population: 794

Population aged 0-17: 154

Population aged 18-64: 388

Population aged 65+: 244

Population aged 18-65+ as potential attendees of Information Event: $388 + 244=632$

Number of residents in full-time employment: $388 \times 76\% = 295$

Number of residents (18-64) not in full-time employment: $388 \times 24\% = 93$

Maximum number of residents potentially able to attend 3pm-7.30pm: $93 + 244 (65+) = 317$, 50% of community

Maximum number of residents potentially able to attend only 7.00pm-7.30pm = 295,
46% of potential attendees – more likely 50%

NB: discrepancy because of incorrect numbers in 2021 Census

**Attendance for Cassington and Worton Information Event 12 January 2024,
3pm-7.30pm: 195**

**COMBE – No SoCC or other communication delivered to population, no Information
Event held, or Community Access Point set up**

Population: 774

Population aged 0-17: 167

Population aged 18-64: 428

Population aged 65+: 175

Population aged 18-65+ as potential attendees of any Information Event: $428+175= 603$

Number of residents in full-time employment: $428 \times 76\% = 325$

Number of residents (18-64) not in full-time employment: $428 \times 24\% = 103$

Maximum number of residents potentially able to attend 3pm-6.30pm events: $103 + 175 (65+)= 278$,

46% of potential attendees

Maximum number of residents potentially able to attend only after 7.00pm-7.30pm,
325, 54% of potential attendees.

Distance to nearby Information Event:

Hanborough IE, 13 December 2023, 1pm-5pm, 2.6miles, no bus link

Woodstock IEs, 9 December, 9 December 2023, 11am-3pm, 13 January 2024,

11am-3pm, 5 miles, hourly bus

CUMNOR– Information Event, Wednesday 17 January 2024, 3pm- 7.30pm

Population: 830

Population aged 0-17: 158

Population aged 18-64: 444

Population aged 65+: 247

Population aged 18-65+ as potential attendees of Information Event: 691

Number of residents in full-time employment: $444 \times 76\% = 337$

Number of residents (18-64) not in full-time employment: $444 \times 24\% = 107$,

Maximum number of residents potentially able to attend 3pm-7.30pm: $107 + 247 (65+) = 354$,

51% of potential attendees

Maximum number of residents potentially able to attend only 7.00pm – 7.30pm, 337,

49% of potential attendees.

Attendance for Cumnor Information Event 17 January 2024, 3pm-7.30pm:155

EYNESHAM – Information Event Friday, 19 January 2024, 2pm-6pm

Population: 5324

Population aged 0-17: 1071

Population aged 18-64: 2982

Population aged 65+: 1285

Population aged 18-65+ as potential attendees of Information Event: 4267

Number of residents in full-time employment: $2982 \times 76\% = 2266$

Number of residents (18-64) not in full-time employment: $2982 \times 24\% = 716$

Maximum number of residents potentially able to attend 2pm-6pm: $716 + 1285 (65+) = 2001$,

47% of potential attendees

Maximum number of residents potentially able to attend only after 7.00pm, 2266, 53%,

Therefore 53% not able to attend the Eynsham Event during 2pm-6pm

Attendance for Eynsham Information Event 19 January 2004, 2pm-6pm: 163

FARMOOR – No information Event held, or Community Access Point set up.

Population: 518

Population aged 0-17: 73

Population aged 18-64: 290

Population aged 65+: 151

Population aged 18-65+ as potential attendees of any Information Event: 441

Number of residents in full-time employment: $290 \times 76\% = 220$

Number of residents (18-64) not in full-time employment: $290 \times 24\% = 70$

Maximum number of residents potentially able to attend Event in Cumnor, 3pm-7.30pm:

$70 + 151 (65+) = 221$, 50% of potential attendees

Maximum number of residents potentially able to attend Event in Cumnor only after 7.00pm, 219, 50% of potential attendees

Distance to nearby Information Event:

Cumnor IE, 17 January 2024, 3pm-7.30pm, 2 miles, no bus

FREELAND – No Information Event held, or Community Access point set up

Population: 1521

Population aged 0-17: 252

Population aged 18-64: 779

Population aged 65+: 498

Population aged 18-65+ as potential attendees of any Information Event: 1277

Number of residents in full-time employment: $779 \times 76\% = 592$

Number of residents (18-64) not in full-time employment: $779 \times 24\% = 186$

Maximum number of residents potentially able to attend any event during 3pm-7.30pm:
 $186 + 498 (65+) = 684$, 53% of potential attendees

Maximum number of residents potentially able to attend only 7.00pm - 7.30pm events,
593,
46% of possible attendees

Distance to nearby Information Event

Hanborough IE, 13 December 2023, 1pm-5pm, 2 miles, no bus

Eynsham IE, 19 January 2024, 2pm-7.30pm, 2 x First and Last Miles buses available only for 2pm-5pm attendance

Cassington IE, 12 January 2024, 3pm-7.30pm, no bus

HANBOROUGH -Information Event, Wednesday 13 December 2023, 1pm – 5pm

Population: 3503

Population aged 0-17: 770

Population aged 18-64: 2009

Population aged 65+: 727

Population aged 18-65+as possible attendees of Information Event: 2736

Number of residents in full-time employment: $2009 \times 76\% = 1527$

Number or residents (18-64) not in full-time employment: $2009 \times 24\% = 482$

Maximum number of residents able potentially to attend Event any time during 1pm – 5pm,

$482 + 727 (65+) = 1209$, 44% of potential attendees

Maximum number of residents potentially able to attend an Event only after 7.00pm, 1527,

56% of potential attendees.

Attendance for Hanborough Information Event 13 December 2023, 1pm- 5pm: 80

KIDLINGTON - No Information Event held

Population: 14,644

Population aged 0-17: 2571

Population aged 18-64: 8761

Population aged 65+:3328

Population aged 18-65+ as potential attendees of any Information Event: 12,089

Number of residents in full-time employment: $8761 \times 76\% = 6658$

Number of residents (18-64) not in full-time employment: $8761 \times 24\% = 2102$

Maximum number of residents potentially able to attend any event at any time: $2102 + 3328 (65+) = 5430$,

45% of potential attendees

Maximum number of residents able potentially able to attend any Event only after 7.00pm, 6658,

55% of possible attendees

Distance to nearby Information Event:

Woodstock IEs, 9 December 2023, 11am-3pm, 13 January 2024, 11am-3pm, 3.6 miles, S7 bus

Begbroke IE, 12 December 2023, 3pm-7.30pm, 2.2miles, no bus

NORTH LEIGH – No Information Event held, or Community Access Point set up

Population: 1733

Population aged 0-17: 310

Population aged 18-64: 1008

Population aged 65+: 410

Population aged 18-65+ as possible attendees of any Information Event: 1418

Number of residents in full-time employment: $1008 \times 76\% = 766$

Number of residents (18-64) not in full-time employment: $1008 \times 24\% = 242$

Maximum number of residents potentially able to attend any event at any time: $242 + 410$ (65+) = 652, 46 % of potential attendees

Maximum number of residents potentially able to attend any Event only after 7.00pm: 766,

54% of potential attendees

Distance to nearby Information Event:

Hanborough IE, 13 December 2023, 1pm-5pm, 2.4 miles, S7 bus

Eynsham IE, 19 January 2024, 2pm-6pm, 5 miles, no direct bus

TACKLEY - No SoCC or other communication delivered to population and no Information Event held, or Community Access Point set up

Population: 1073

Population aged 0-17: 234

Population aged 18-64: 582

Population aged 65+: 249

Population aged 18-65+ as possible attendees of any Information Event: 831

Number of residents in full-time employment: $582 \times 76\% = 442$

Number of residents (18-64) not in full-time employment: $582 \times 24\% = 140$

Maximum number of residents potentially, if informed, able to attend any event at any time: $140 + 249$ (65+) = 389, 47% of potential attendees

Maximum number of residents, if informed, potentially able to attend any Event only after 7.00pm: 442,

53% of potential attendees

Distance to nearby Information Event:

Woodstock and Wootton IEs Saturday 9 December 2023, 11am -3pm and Saturday

13 January 2024, 11am -3pm, 5 miles, no direct buses

WOODSTOCK AND WOOTTON – Information Events Saturday 9 December 2023, 11am -3pm and Saturday 13 January 2024, 11am -3pm,
No SoCC or other communication delivered to the 200 residents in Wootton

Population: 3521

Population aged 0-17: 691

Population aged 18-64: 1978

Population aged 65+: 835

Population aged 18-65+ as potential attendees of any Information Event: 2813

Number of residents in full-time employment: $1978 \times 76\% = 1503$

Number of residents (18-64) not in full-time employment: $1978 \times 24\% = 475$

Maximum number of residents potentially able to attend the Events at any time:
 $1978 + 835 = 2813$

Maximum number of residents, potentially able to attend any Event only after 7.00pm:
1503

NB: No SoCC communication given to Wootton residents 200 of the 3521 Woodstock and Wootton residents.

Attendance at Woodstock Information Event held Saturday 9 December 2023, 11am-3pm: 57

Attendance at Woodstock Information Event held Saturday 13 January 2024, 11am-3pm: 175

YARNTON – No Information Event held

Population: 3227

Population aged 0-17: 709

Population aged 18-64: 1814

Population aged 65+: 689

Population aged 18-65+ as potential attendees of any Information Event: 2503

Number of residents in full-time employment: $1814 \times 76\% = 1379$

Number of residents (18-64) not in full-time employment: $1814 \times 24\% = 435$

Maximum number of residents potentially able to attend any event at any time: $435 + 689 (65+) = 1124$,

45% of potential attendees

Maximum number of residents potentially able to attend any Event only after 7.00pm:
1379,

55% of potential attendees

Distance to nearby Information Event:

Begbroke IE, Tuesday 12 December 2023, 3pm-7.30pm, 1.3 miles, no bus

Cassington IE, Friday 12 January 2024, 3pm- 7.30pm, 2 miles, no bus

Summary

1. Information Events were only held at Begbroke, Bladon, Cassington and Worton, Cumnor, Eynsham, Hanborough, and Woodstock and Wootton.
2. Total number of residents potentially able to attend Information Event in their own Parish: $672 + 758 + 632 + 691 + 4267 + 2736 + 2813 = 12,569$
(See tables for Parishes above)
3. No Information Events were held at Combe, Farmoor, Freeland, Kidlington, North Leigh, Tackley and Yarnton
Total number of residents of those Parishes who would have to travel to Events elsewhere: $603 + 441 + 1277 + 12,089 + 1418 + 831 + 2503 = 19,162$
(See tables for Parishes above)
4. **Total number of residents potentially able to attend Information Events: $12,569 + 19,162 = 31,731$**
5. Percentage of residents able to attend an Event in their own Parish: $12,569$ over 31731 ($12569+19162$): 40%
6. Percentage of all residents without an Event in their Parish, who would have to travel from their Parishes to attend an Information Event: 19162 over 31731 ($12569+19162$): 60%
7. **Total number of attendees: 988 (Figure supplied by Stop Botley West)**
8. **Percentage of attendees against potential number of attendees: 988 over 31731($12569+19162$): 3%**
9. **Number of potential attendees who did not receive SoCC and Information Event notice: 603 (Combe) +831 (Tackley)+200 (Wootton)=1631**
10. **Percentage of uninformed potential attendees 1631 over 31731 = 5%**
11. Total number of opening hours of Information Events: 38
12. **Total number of opening hours of Information Events, post 7.00pm weekdays and on Saturdays: 10**
13. Number of full-time employed residents potentially able to attend Events only after 7.00pm or on Saturdays: 17087
14. Percentage of residents potentially able to attend Events only after 7.00pm or on Saturdays: 17087 over total attendees of $31,731 = 54%$
15. **Therefore, only 10 hours of the allocated Information Time was made available to 54% of residents, while 26 hours were made available to 46% of residents.**
16. Of the 7 parishes where Information Events were not held (Combe, Farmoor, Freeland, Kidlington, North Leigh, Tackley and Yarnton), Farmoor, Freeland, Tackley, Yarnton, **had no bus routes** available to nearby Information Events, Combe, Kidlington, North Leigh had a bus route to only one of two available nearby Information Events.

Conclusion

- A. PVDP, in their Consultation leaflet distributed in November 2023 advertising the Consultation, states in Section 7, 'How will we Consult?':

*The consultation activities described in this section of the SoCC ensure inclusive, meaningful and open consultation. The activities include a range of methods **to ensure our consultation can be accessed by all members of the community.***

*These events will be held on different days of the week including weekends, with varied hours to **accommodate different availability within the community.***

(my emphasis)

- B. However, it is patently clear that PVDP's Provision of the Statutory Consultation for the 39,230* members of the population, who would be impacted by the Proposal, has been totally inadequate. It has failed significantly to '**ensure**' that the consultation would be or was accessed by all members of that population, or '**to accommodate different availability within the community.**' **It was never responsibly set up or organised to meet the requirements owed to the total population.**

*2021 Census figures for populations of Begbroke, Bladon, Cassington, Combe, Cumnor, Eynsham, Farmoor, Freeland, Hanborough, Kidlington, North Leigh, Tackley, Woodstock and Wootton, and Yarnton.

- C. From the outset of the Consultation on 30 November 2023, PVDP had already failed to ensure that the leaflet was distributed to the population of Combe, Tackley, and Wootton, totalling (774, 1073, and 200) 2074. The SoCC leaflet was not delivered to those populations then or subsequently.

- D. It is indisputable that PVDP, for the provision of the Consultation:

1. Did not examine the 2021 Census results, which would have provided them with the statistics of the size of the populations and of the age-groups who would be impacted by the Solar Farm.
2. It did not consider statistics for the percentage of the population that was employed.
3. It did not consider how full-time employment would affect the potential availability of the populations to attend the Information Events for the Consultation.

4. It did not consider at what time residents, in full-time employment, would be able to attend Information Events.
5. It did not ensure that residents of all parishes would be able to attend Information Events:
 - a) the times at which they were held that would enable majority or full attendance.
 - b) Information Events were not held in seven of the 14 Parishes,
 - c) SoCC leaflets were not delivered to all residents.
 - d) **The only notice of the Events available to all residents was a half-page, p.15/24, in the SoCC delivered to Communities on 30 November 2023. This was 8-14 days before the Pre-Christmas Events, and six to seven weeks before the Post-Christmas Events.**
 - e. **There was no subsequent advertising by PVDP of local events in the Information Event communities.**
 - e) Such advertising was provided only by Stop Botley West
6. Residents of seven Parishes were obliged to travel to Events in other Parishes.
7. PVDP did not ensure that it was possible for such residents to travel by public transport to nearby Information Events, since there were no, or no direct, bus routes provided by public transport.
8. **Consultation Event timetables were not designed to ensure that all residents or a majority would have been able to attend them.**
9. No Event was all-day, for example from 10am to 6.00pm.
10. Three Events lasted only four and a half hours; four Events for only four hours.
11. Only four of the 9 Information Events were accessible until 7.30. Another until 7pm, one until 6pm, one until 5pm, and two until 3pm.
12. There were no evening events, starting, for example, at 7.30pm
13. **The length of the Event did not correspond to the size of the population: Eynsham and Hanborough with populations of 5324 and 3503 were 30 minutes shorter than those provided for Begbroke (pop 800), Bladon (977), Cassington (794), Cumnor (830).**
14. **The Events at the larger Parishes ended earlier at 5pm (Hanborough) and 6pm (Eynsham), while the smaller Parishes ended at 7.30pm.**
15. There were only two Events on a Saturday, both from 11am until 3pm.
16. **It would be preposterous to claim that it was a lack of interest or apathy on the part of Hanborough residents that only 80 people of 2736 possible attendees, attended the Hanborough Consultation, where it could be demonstrated that 30% of the Parish would be lost to the Solar Farm for over 40 years. NB: the Consultation ran once in Hanborough, mid-week, from 1pm to 5pm.**
17. Similarly, for Bladon and Cassington, where 50% of both Parishes would be lost to the Solar Farm for over 40 years, only 68 and 195 people respectively attended the Consultation Events.
18. It is regular practice for housing developers to consult residents on all-day Saturday sessions, and in evening sessions up to 9pm. Grosvenor Estates organised many, well-advertised, evening and all-day consultation events for the proposal for the Salt Cross Development. Residents actively took part in face-to-face discussions with consultants, and the results were subsequently published.

19. **Equally the locations and opening hours of the five Community Access Points, 30 November 2023 – 8 February 2024, to provide availability of hard copies of PEIR did not respond to residents' availability.**
20. Only at Kidlington Library were hard copy PEIR Documents available for six days a week. In the other Community Access Points, Botley Library, Eynsham Library, WODC Town Centre Shop, Witney and Woodstock Library, PEIR Documents were available at selected times during five days a week, until 5.00pm or 5.30pm.
21. Only in Botley, Kidlington, Eynsham, were PEIR documents available on one evening, Friday, after 5pm or 5.30pm until 7.00pm.
22. The WODC Town Centre Shop was closed on Saturdays.
23. At all the Access Points there was only room for one resident at a time, and there was not space for all PEIR Documents to be made available at the same time. Conditions for examining the documents were very cramped.
24. As an alternative to visiting an Access Point for PEIR documents, SoCC only provides the address of the project website (www.botleywest.co.uk) at the bottom of p.19, underneath the list of Community Access Points.
25. Another instance of failing adequately '**to ensure our consultation can be accessed by all members of the community.**'

The above comments and research will show how inept the provision of the Statutory Consultation for Botley West Solar Farm has been. Residents have been left in the dark about how to respond to it. That only 3% of total residents attended the Information Events shows the total failure on the part of PVDP to achieve PVDP's assurance and undertaking to ensure the Consultation would be accessed by all members of the communities' affected.

What is particularly unacceptable about PVDP's failure to undertake the research is that both the information and interpretation of it were easily available as public documents and did not involve the Project Team tramping the streets to undertake obtaining them.

The provision of the Consultation by PVDP for SolarFive Ltd from 30 November 2023 to 8 February 2024 has totally failed the requirement of the Planning Act 2008 to provide 'adequacy of representation'.

The project team appointed by PVDP has already been shown at this first stage not to 'professional', qualified, or up to the task of providing '*support and expertise throughout the consenting stages of Botley West Solar Farm*' (SoCC, 2 About Us).

Should PVDP decide to continue with the proposal for the Botley West Solar Farm, a new Statutory Consultation must be undertaken to fulfil its requirements to the Community.

Penelope Marcus
Hanborough
8 February 2024



Planning
Inspectorate

Number: 2

Name: Sara Goldie

Date Received: 18 March 2024

From: [REDACTED]
To: [Botley West Solar Farm](#)
Cc: "Robert Courts"; [REDACTED]
Subject: Botley West - REPEAT CONSULTATION
Date: 18 March 2024 09:49:01

You don't often get email from [REDACTED]

Dear Inspector,

Despite requests from MP Robert Courts, West Oxfordshire District Council (WODC), the Campaign to Protect Rural England (CPRE) and others asking the developer Photovoltaic Development Partners (PVDP) to delay until after Christmas, the consultation was rushed through to start on 30 November before many key investigations had been carried out by PVDP, leading to much missing information including the grounds for establishing the 'very special circumstances' which allows for building on the Green Belt, , and a Construction Traffic Management Plan, (our area already suffers with gridlock most of the summer during Blenheim events) in the Preliminary Environmental Information Report (PEIR) which meant many questions went unanswered at the consultation events and I believe a full consultation was impossible.

The Community Consultation leaflet (nearly overlooked in its plain white envelope in the middle of the Christmas post) read more like a sales brochure than an informative unbiased report. It made extravagant claims but gave no details or evidence. It gave very little objective information. For example, it didn't even mention the size of the site - despite this being one of the biggest cause for concern for villagers in our area. A flat plan doesn't show how the site will be viewed, from the surrounding area.

I work full time outside Oxford, and this made it impossible for me to attend my nearest in-person consultation event in Long Hanborough which was held on the 13th December from 1.00pm – 5.00pm, other local events were mainly day times, so again I couldn't attend, without taking time out of my working day. The consultation should be repeated, and local people given timely events to attend and have their questions answered, rather than being hood winked into the glossy brochure of a sales pitch, and treated like our homes, villages, and way of life don't matter.

Like my MP, Robert Courts, I am therefore asking for the consultation to be repeated with clearer maps and photomontages of all significant viewpoints, at least preliminary information on the missing topics, with day and evening events on more appropriate dates in ALL affected villages, along with "experts" available to answer our questions and concerns.

Yours sincerely,
Sara Goldie

[REDACTED]





Number: 3

Name: Susan Langley (this Submission is representative of 13 other similar comments)

Date Received: 19 March 2024

From: [REDACTED]
To: [Botley West Solar Farm](#)
Cc: [REDACTED]
Subject: Botley West
Date: 19 March 2024 15:26:35

You don't often get email from [REDACTED]

Dear Inspector

I am writing to request that the Botley West Statutory Consultation be repeated because it did not follow the official guidance in terms of sufficient, accessible and easily interpretable information with adequate time for participation, consideration and response.

My MP, Robert Courts, has also called on PVDP to repeat the consultation. This is necessary to make up for what he describes as the “lack of objectivity and detailed answers to questions on land use and special circumstances,” and the need for PVDP to provide “a real readiness to listen to and act on the well-founded concerns that residents rightly have.”

As one of those residents with well-founded concerns, I believe that a fresh consultation should include these essential components:

- events in the missing villages
- evening events for working people
- better advertising
- a more honest and objective Community Consultation booklet
- better and more spacious Information Access points
- important missing reports added to the PEIR - at least in a preliminary form
- a complete set of photomontages with photographs taken in better light and elevation, appropriate locations and in the most impactful directions
- a full set of experts available at each in-person event for scrutiny and consultation

Yours sincerely,

Susan Langley (Mrs.)
[REDACTED]



Planning
Inspectorate

Number: 4

Name: Fiona Lewinton

Date Received: 21 March 2024

From: [Fiona Lewinton](#)
To: [Botley West Solar Farm](#)
Cc: [REDACTED]
Subject: Need for a repeat consultation on the Botley West Solar Farm
Date: 19 March 2024 16:43:27

You don't often get email from [REDACTED]

Dear Inspector

As a resident of [REDACTED], I'm writing to explain why I think a repeat consultation on the Botley West Solar Farm is needed. Despite requests from MP Robert Courts, West Oxfordshire District Council (WODC), the Campaign to Protect Rural England (CPRE) and others asking the developer Photovoltaic Development Partners (PVDP) to delay until after Christmas, the consultation was rushed through to start on 30 November before many key investigations had been carried out by PVDP, leading to much missing information. For example, I read all the available information, but could find no information addressing the increased risk to food security caused by the loss of viable farmland, or explaining the grounds for establishing the 'very special circumstances' required to justify building on the Green Belt, or much detail at all on the Construction Traffic Management Plan. There was also a very limited selection of photos, including omission of many of the most significant view-points. So the Preliminary Environmental Information Report (PEIR) was therefore inadequate which meant many questions went unanswered at the consultation events and a full consultation was impossible.

The Community Consultation leaflet (nearly overlooked in its plain white envelope in the middle of the Christmas post) read more like a brochure than an informative unbiased report. It made extravagant claims but gave no details or evidence. It gave very little objective information. For example, it didn't even mention the size of the site - despite this being the biggest cause for concern for many local people I know. Some of the claims were even wrong

Consultation in-person events were on inappropriate dates (just before Christmas) at the wrong times (generally working hours only) and not available in some key places (especially in the north and east of the site). Key experts were missing from many venues. Those present were sometimes ill informed, often biased and, in some cases, aggressively so. Many people reported that their questions were not answered satisfactorily. The displays were not good enough: masterplan maps were unclear (eg roads not shown clearly, infrastructure difficult to see) the photographs were mostly just piled on tables in no logical order. 37 out of 55 photos had not been photomontaged and some key views were missing altogether. The massive PEIR files were almost impossible to navigate without hours of searching because there was no master index and insufficient cross referencing. Even individual chapters or appendices had no index. Insufficient copies of the non-technical summary were available and this too lacked an index, sufficient clarity and justifiable facts.

Like my MP, Robert Courts, I am therefore asking for the consultation to be repeated with clearer maps and photomontages of all significant viewpoints, at least preliminary information on the missing topics, with day and evening events

on more appropriate dates in ALL affected villages.

Best wishes
Fiona Lewinton



Planning
Inspectorate

Number: 5

Name: John and Joan Nicholas

Date Received: 21 March 2024

From: [REDACTED]
To: [Botley West Solar Farm](#)
Cc: [REDACTED]
Subject: Fw: Botley West Statutory Consultation on PVDP proposals
Date: 21 March 2024 18:17:57

You don't often get email from [REDACTED]

My apologies for the wrongly typed email addresses

From: [REDACTED]
Sent: 21 March 2024 6:01 PM
To: kbotleywestsolar@planninginspectorate.gov.uk
<kbotleywestsolar@planninginspectorate.gov.uk>
Cc: [REDACTED]

Subject: Botley West Statutory Consultation on PVDP proposals

Dear Inspector

We are writing jointly as two complainants to request that the Botley West Statutory Consultation be repeated because it did not follow official guidance in terms of sufficient, accessible and easily interpretable information with adequate time for participation, consideration and response. The consultation was started just before the Christmas holiday season when many people were focussed on the upcoming festive season and the significant social activity which takes place before it.

Our MP, Robert Courts, has called on PVDP to repeat the consultation. This is necessary to make up for what he describes as the "lack of objectivity and detailed answers to questions on land use and special circumstances," and the need for PVDP to provide "a real readiness to listen to and act on the well-founded concerns that many residents rightly have."

As residents, with well-founded concerns, we believe that a fresh consultation should include the following essential components. These should include full comparative cost/benefit analyses of this project of other potential solutions to the UK's need for non-fossil fuel power generation as well as a full analysis of how the dismantling will take place and how a guaranteed fund for the costs of dismantling will have been adequately set up.

In more detail:

- events in all villages
- evening events for working people as well as daytime events for those who prefer

better advertising of every address in the affected surrounding towns, villages and countryside areas as well as the provision of adequate carparking and public transport

- a more honest and objective Community Consultation booklet
- better and more spacious Information Access points with presentations focussed on specific topics.
- important missing reports added to the PEIR - at least in a preliminary form, in particular there was no information on how the sites will be dismantled after 40 years with, in particular details of how underground non-original materials as well those visible above ground will be dismantled and removed including the carbon deficit arising. There was also no analysis of what those costs might be and how adequate funds would be built up over the 40 years and guaranteed by the developer, operators AND at the very least guaranteed by the landowners for the total costs of dismantling, backed up by credit insurance with the premiums to be paid by the landowners
- a complete set of photomontages with photographs taken in better light and elevation, appropriate locations and in the most impactful directions rather than those presented many of which seemed designed to minimise the impact eg by taking them from the bottom of downslopes rather than from the highest points from which the industrial farms would be seen
- a full set of experts available at each in-person event for scrutiny and consultation
- presentations from independent experts given during the course of each consultation on issues affecting the environment and communities
- there does not appear to have been any analysis of why a solar farm of this magnitude would be more effective in reducing the UK's dependence on fossil fuels than investing in more wind power (at sea where a lot of infrastructure is already available) or other forms of power generation.
- there appears to have been no analysis of alternative locations for solar power generation. There needs to be a full cost/benefit analysis of the use of the open countryside proposed by the solar farm against the cost/benefits of alternative locations such as rooftops (domestic and commercial), carpark solar as well as the use of other non-community useable land such as beside railway tracks and over the huge acreage of railway sidings. The costs of each alternative are not just financial, but also environmental and well-being of communities. This sort of analysis is essential to determining whether or not the Botley West project is really the best way to approach the generation of power. Such analyses should be verified by independent consultants.

Yours sincerely

John and Joan Nicholas



Planning
Inspectorate

Number: 6

Name: Nigel Pearce

Date Received: 21 March 2024

From: [Nigel Pearce](#)
To: [Botley West Solar Farm](#)
Cc: [REDACTED]
Subject: Botley West Solar Farm - Call for a Repeat Consultation
Date: 21 March 2024 10:21:03
Attachments: [Response to Botley West Phase Two Consultation Leaflet.docx](#)

You don't often get email from [REDACTED]

Dear PINS,

I imagine other people will be writing to you about the inadequacy of PVDP's consultation for Botley West Solar Farm, and they will have many things to say. I want to concentrate on one aspect only, the extent of PVDP's dishonest propaganda.

I will keep it short because, according to Mark Owen-Lloyd of PVDP at a consultation event, PINS staff do not read long documents of carefully argued text, such as the ones that I and others have sent to PVDP/Botley West during the consultation process, and which they have almost completely ignored.

So: right from the start, PVDP have been highly selective in their presentation of information, and provided little or no wider context in which to place their proposal, assuming all along that there is no alternative to what they are proposing. Each document of theirs has been part of a biased sales drive, full of unsubstantiated assertions. Where they have quoted official sources, they have either misquoted them or quoted selectively, ignoring material from the same or related sources that undermines or contradicts what they claim.

Throughout the process, I have repeatedly complained to PVDP about their propaganda, giving them many examples of it, and asked them to be honest and objective. They have ignored me, and continued with their dishonest approach to engaging with the public. It therefore seems impossible that their two consultation leaflets in particular can allow local residents and businesses to make an informed judgement on whether the proposal should be supported in full, or in part, or not at all. Accordingly, *at the very least*, a Repeat Consultation is necessary, and I ask that PINS demand it of PVDP.

Assuming that Mark Owen-Lloyd was wrong in his claim of PINS's short attention span, I am attaching just one of the responses I have submitted so far to the consultation. It is six pages long. I am happy to send you the others, if that would help, including one on Agricultural Land Use, on which PVDP have been particularly misleading and, indeed, dishonest.

With thanks,

Yours faithfully,

Nigel Pearce



Botley West Solar Farm: Preliminary Environmental Impact Report

Response to

Phase Two Community Consultation Leaflet (with references to other PEIR documents)

From Nigel Pearce, 1 City Farm, Eynsham, OX29 4YA; 2 February 2024

1. Introduction

The Phase Two consultation material comprises thousands of pages of text, tables, photographs and specialised technical information that very few people will read. The sheer quantity of information, and often less than helpful signposts around it, is so daunting as to be actively off-putting.

In these circumstances, the Phase Two Community Consultation Leaflet, delivered to every household in the area, becomes vitally important to a proper understanding of what is proposed. It is what most people will read and often base their judgements on. It should not be a vehicle for selling the Project, but an objective and honest description of it and the context underlying it.

In my response of 10 December 2022 to the Phase One Community Consultation Leaflet, I wrote: “The most irritating aspect of your consultation leaflet and information events is the way you are treating the whole process as a sales drive, rather than as a bald statement of facts, and making exaggerated claims . . . In future consultations, I would like you to drop the sales pitch and propaganda. Try to be objective.”

I was hoping for more balance and honesty in the ‘Scoping Report’, but my comments clearly made no impression. In my response of 4 July 2023 to RPS’s ‘Scoping Report’, I wrote 2½ pages (800 words) detailing instances of blatant propaganda, culminating in “the most egregious paragraph, ‘Do Nothing’ (5.4.3)”. I wrote, “This paragraph reveals the extent to which RPS is prepared to ignore objectivity and depart from acceptable standards of behaviour. Hardly the balanced prose one would expect from planning professionals.”

The Phase Two Community Consultation Leaflet spews out the same spin, despite my, and no doubt others', clearly stated objections to the bias of earlier documents. The American writer Upton Sinclair was right when he said, "It is difficult to get a man to understand something, when his salary depends on his not understanding it." RPS/PVDP are simply blocking their ears.

2. Individual points

Page 3

Propaganda 1: It would have been more honest in the fourth bullet point to refer to measures "to minimise the impacts". These impacts are definite, not "potential", and it is not possible to "avoid" all of them.

Page 4

Propaganda 2: The IEA, which has a global not a national remit, is cited as highlighting that renewable electricity, "in particular solar, is key in reducing carbon emissions." Of course solar is important, and it has a good story to tell, but the IEA report cited does not single it out as being of unique importance. Instead, it repeatedly refers to five "key clean energy technologies" – solar PV, wind, batteries, electrolysers and heat pumps". It says that solar PV *and wind* are the leading means of decarbonising the electricity sector.

Propaganda 3: This blindness to the equal importance of wind is very evident in PEIR Chapter 5, 'Need, National Planning Policy and Alternatives Considered', which cites UK government documents. Not surprisingly, it mentions solar 81 times and wind just 7. But each time wind is mentioned in combination with solar as an *equal*, not a junior partner. Paragraph 5.3.1.34 of Chapter 5 goes on to say that the Draft National Policy Statement (NPS) EN-1 "sets out that the delivery of a large amount of solar generation capacity, *in particular* [my emphasis], is an essential element for delivery of the Government's energy objectives". EN-1 does not say this. It mentions wind 54 times and solar 12 times. All mentions of solar but one are in combination, "wind and solar", and the other is in a list of renewable sources. If anything is "in particular", it is offshore wind, which (in paragraph 3.3.50) is described as being "of particular importance this decade . . . in our generation mix". In addition, paragraph 3.3.22 mentions the "requirement for sustained growth in the capacity of onshore wind". This is a typical trick of RPS/PVDP, to withhold *basic*

contextual information that would help the general public. Withholding information is a form of dishonesty.

An admission: “Climate change poses one of the most serious threats to food production”. So why cover good greenfield farmland in 956ha of solar arrays?

Propaganda 4: “Solar is the most affordable form of electricity in the UK.” The source of this piece of information is Solar Energy UK, which describes itself as “an established trade association working for and representing the entire solar and energy storage value chain. We are funded largely by our membership . . .” In other words, a lobby group with a self-serving agenda.

Is the claim accurate? Not really. The source cited is the Government’s ‘Electricity generation costs 2023’. Figure 2 on page 24 of this document shows that the Levelised Cost Estimates (LCOE) for projects commissioning in 2025, in real 2021 prices, are broadly the same for offshore wind, onshore wind and large-scale solar. Onshore wind costs a little less than large-scale solar and offshore wind a little more. Table 10 goes on to show that the pre-development costs of onshore wind and large-scale solar are the same; construction costs for onshore wind are lower; fixed operation and maintenance costs are lower; and variable operation and maintenance costs are higher.¹ As Chapter 5 of the PEIR admits in paragraph 5.3.1.15 “wind and solar are the lowest cost ways of generating electricity”. Another example of selective bias and the withholding of basic contextual information from the leaflet that most people will read.

The comparison only with a combine-cycle gas turbine power plant is also misleading, suggesting as it does through omission that solar is uniquely cheaper by 35%. The 35% is roughly the same for offshore and onshore wind as well. In a consultation leaflet of this sort, that information should be made available for contextual comparison.

Page 5

Propaganda 5: OXLEP’s ‘The Oxfordshire Energy Strategy’ is cited as the source of “Oxfordshire’s ambition to increase their solar generating capacity from 300 MW to 1900 MW by 2030”. This quote, confusingly, does not appear in the Energy Strategy

¹ Figure 6 of EN-1 says that by 2035, commissioning costs for large-scale solar will be cheaper than for onshore wind, and more so for offshore wind. This is some distance away in time, and seems rather speculative.

itself, but in the separate Delivery Plan, and again highlights the kind of contextual information that is not included in the consultation leaflet. First, it fails to mention the separate existing solar generating capacity in Oxfordshire (in place, planned or approved) of over 800 MW. Second, it ignores the results of a study by the Low Carbon Hub and others, which *is* included in 'The Oxfordshire Energy Strategy'. This calculated the theoretical generating capacity of *rooftop* solar in the county: "the study found that the total annual solar resource striking suitable Oxfordshire rooftops was equivalent to 2,055 GWh/year. This is equivalent to 57% of the total Oxfordshire electrical demand based on 2015 usage of 3,600 GWh." Of course, such a theoretical maximum is unlikely to be reached in full, but it does further call into question the need for such a vast ground-mounted solar farm in Oxfordshire.

Page 6

A query: Regarding the visualisations, with whom were the "agreed local viewpoints" agreed, and what were the criteria for the choices?

Page 7

Propaganda 6: It is claimed that the "Landscape and Ecology Masterplan set out on page 16" of the leaflet, which has only been "explored" thus far, "will deliver a **minimum Biodiversity Net Gain of at least 70%**" [original emphasis]. This makes a good headline, but is it feasible? I asked BTO, RSPB and BBOWT.

RSPB said: "In theory, this is possible if the existing farmland has little habitat value under the BNG metric (which is entirely possible as arable farmland will score for hedgerows and probably not much else). This metric is based on habitats and not species populations, some of which may well decline as a result of the application (open field farmland birds would be an obvious example). The habitats provided may well boost other species, which may not correspond to those lost.

BTO said: "BNG is usually calculated on the basis of the "Defra metric", which uses areas of different habitats lost and gained to estimate changes in "biodiversity units". To my knowledge, the latter have not been ground-truthed in respect of numbers of species or abundances of species whose presence is implied, so the 70% will refer to these units. I would think that asking to see details of this calculation would be a very reasonable request. However, I think a 70% increase on these terms IS feasible: they are probably looking at the loss of intensively farmed fields, wherein skylarks may be the most conspicuous species of conservation concern, and replacing some of

them with woodland, scrub and ponds, which will deliver support for many more species per unit area (although not skylarks, lapwings or grey partridges, for example). Lack of consideration of individual species is a key limitation of the current BNG process *and it's obvious that compensation in such a context can't involve the same species that have been lost* [my emphasis]. Presumably this is behind the focus on management for skylarks."

BBOWT replied to the consultation on 5 December, and concluded: "At the moment there is insufficient evidence and detail to enable the true potential impact of the Botley West Solar Farm on our local natural environment to be known. More research is needed on the effects of solar panels on wildlife. Therefore a precautionary approach should be taken and the solar farm should not proceed until detailed assessments of the impacts of solar farms on biodiversity are carried out and the impacts of previously constructed solar farms in the UK are known. The proposed solar farm is clearly absolutely huge so its potential impact on our local wildlife cannot be underestimated."

In other words, the context is complicated and multi-layered, and the 70% claim is over-simplified and misleading.

Maps on pages 8–13

Propaganda 7: Apparently, there will be "hundreds of skylark plots located across the site to encourage birds to nest within the solar arrays". Another good headline, but again, is it feasible?

RSPB said: "Skylark plots. This comes down to where they are and how they are managed. There is information on Skylark plots available [here](#). It may be possible to fit Skylark plots into a solar farm, but as the advice states, they should be away from field boundaries and tramlines/pathways to reduce predation risk. There is some uncertainty about whether plots in between arrays might be subject to increased avian predation as arrays may provide vantage points/perches for avian predators."

BTO said: "The skylark plot plans seem strange to me: this is an option specifically to improve the quality of winter cereal fields for skylarks, more for access into the crop than for any specific habitat created in the plots themselves. I am not clear what the habitat between the panels will be - usually I have seen this to be grazed or mown grass. Cultivating patches as "fallow plots" in such a matrix would be good for a lot

of biodiversity, I think (relative to grass alone at least), but I think skylarks are unlikely to use areas in between the vertical structures represented by lines of solar panels. However, there is little direct evidence, to my knowledge, of what species will use the habitats around solar panel installations and I think research into what would be promoted there by managing the habitat differently is long overdue - and I'd be very interested in talking to anyone who might want to undertake such work. So another valid question to ask here is what evidence they have to support the idea that the "skylark plots" will help the species (or other species for that matter)."

Once again, the glib headline conceals a complicated reality.

A query: For both the southern and central sections of the site, "Approximately 30% of the site is proposed to be mitigation and enhancement areas". However, this does not appear to be the case for the northern section. Will the north miss out on mitigation and enhancement?

Pages 14–15

Propaganda 8: The "Opportunities Beyond Solar" look good, but they are all only being "explored". So we don't know how many will come to some sort of fruition. Biodiversity Net Gain is just an aim, when on page 7 it seemed to be definite. Even the "commitment" to community funding is being "explored". Much is being promised, but how much will be delivered?

Page 16

Propaganda 9: The PEIR is supposed to provide "the initial findings" of the environmental assessment so far carried out "to help consultees develop an informed view of the potential [actually, definite] environmental impacts of Botley West and our proposed approach to assessing and mitigating them". As mentioned earlier, the sheer quantity of mostly technical information, and the difficulty of finding one's way around it, and reading across to different documents for a fuller picture, means that the PEIR as a whole is in practice almost the opposite of helping to provide an informed view. Within that mass of material, the Phase Two Community Consultation Leaflet, which should be the most helpful document, because most widely read, is biased, incomplete, inaccurate and misleading.

So no, not helpful.

NP, 2 February 2024



Planning
Inspectorate

Number: 7

Name: Michael Brown

Date Received: 28 March 2024

From: Michael Brown [REDACTED]
Sent: Thursday, March 28, 2024 3:00 PM
To: Harrold, George [REDACTED]
Cc: Shorland, Gina [REDACTED]
Subject: Your ref. EN010145 Botley West Solar Farm

You don't often get email from [REDACTED]

Dear Mr Harrold,

As a resident of [REDACTED] I have been logging on regularly to the Botley West part of the PINS website, and have been reading the entries under 'Section 51 Advice'. I would be grateful for your advice in regard to Sec.51.

The Botley West pre-application Statutory Consultation finished on 8th February and I see that there was due to be another Sec. 51 meeting between the developer, PVDP and PINS arranged in late February. However there is no Meeting note yet about that meeting on the PINS website.

I have noticed from the three existing Meeting notes that PINS have offered advice to the developer on a number of aspects. Despite those meetings I do not believe that the Statutory Consultation was adequate. In my wife and my Response to the developer about the Consultation we explained in some detail why we believed it was not adequate. I received a short formal acknowledgement but so far nothing else.

With help of others I have therefore put together a manageable list of Reasons why the Consultation was not adequate, and attach a copy to this email. Whilst I appreciate that I cannot ask you at least at this stage to comment on my list or on the adequacy of the Consultation, it does seem to me that at Sec.51 meetings between PINS and the developer it might be helpful if PINS was at least to refer to the issue of inadequacy of consultation and to indicate that PINS had heard from residents about this. This might be similar to the summarised concerns received from the public mentioned under 'Other matters' in the Meeting note of 13th September 2023. I should add that the feeling of inadequacy of consultation is widespread not only locally but also others such as CPRE, which has proposed in their corresponding Response to the developer to the Statutory Consultation, that because of the inadequacies the consultation should be re-run.

Whilst I understand that the stage for PINS's formal attention to the adequacy of consultation does not arise until it is considering whether a DCO Application satisfies criteria for Acceptance for Examination, nevertheless it would also seem to be something relevant to the PINS process of providing feedback to a developer submitting draft application documents as envisaged in the Meeting notes referred to above including the last note of the meeting on 24th January 2024.

Thank you for your consideration of these matters,

Regards,
Michael Brown

Reasons why BWSF statutory consultation was not adequate and should be re-run.

1. Major subjects not addressed in PEIR
 - 1.1 Green Belt – very special circumstances
 - 1.2 Biodiversity Net Gain Assessment
 - 1.3 Environmental Management Plan
 - 1.4 Construction Management Plan
 - 1.5 Impact assessment on Blenheim World Heritage Site
 - 1.6 Thames crossing and damage to floodplain meadows
 - 1.7 Decommissioning Plan
2. Bias in Phase Two Community Consultation Leaflet
 - 2.1 Marketing not informing – sales brochure
 - 2.2 Absence of objective, honest and complete statement of fact
 - 2.3 Some key facts missing: total area of site, infrastructure on maps
 - 2.4 Some claims exaggerated, misleading or just wrong
3. Consultation Events defects
 - 3.1 Poor displays
 - 3.2 Missing experts, of those staff present some uninformed, dismissive and/or biased so questions not answered satisfactorily
 - 3.3 Significantly incomplete information
 - 3.4 Very limited times, dates and venues – inaccessible to many residents
 - 3.5 Maps etc not clear.(eg roads not shown clearly, infrastructure difficult to see, photos piled on tables, 37 of 55 photos not montaged, many key views missing, masterplan fragmented into 10 separate sections so impossible for consultees to judge or appreciate the total size with all infrastructure shown)
 - 3.6 Massive files impossible to navigate, no master index
 - 3.7 Vital analysis not done eg special circumstances for Green Belt or impact assessment for Blenheim World Heritage site
 - 3.8 Insufficient copies of Non-Technical Summary
4. Other misleading aspects preventing proper understanding of BWSF proposal
 - 4.1 Absence in both Phase Two Community Consultation leaflet and Non-Technical Summary of any mention of photomontages
 - 4.2 Partial selection of viewpoints
 - 4.3 Small and partial selection of photomontages
 - 4.4 Absence of impact of secondary/project sub-stations
 - 4.5 Absence of location of Temporary Compounds
 - 4.6 Effects on the historic environment
 - 4.7 Labyrinthine documentation with no master contents list and lack of cross-referencing
5. Advertising
 - 5.1 No local advertising eg village magazines
 - 5.2 Information Access Points: cramped space, no posters displayed, restricted opening days and times
 - 5.3 Event venues: no signage boards or posters displayed outside
 - 5.4 Community Consultation Leaflets “invisible” – delivered with Christmas post in plain white envelopes
6. Website
 - 6.1 Many attempted file downloads crashed due to size, especially on mobile devices so information inaccessible
 - 6.2 No search facility within or between sections



Planning
Inspectorate

Number: 8

Name: Stop Botley West (1)

Date Received: 13 June 2024

From: [RELewis](#)
To: [Botley West Solar Farm](#)
Subject: Re: Botley West Solar Farm Project Ref: EN010145
Date: 13 June 2024 09:12:45
Attachments: [AOC Main.pdf](#)
[AOC Annex 1.pdf](#)
[AOC Annex 2.pdf](#)
[AOC Annex 3.pdf](#)

Dear Caroline

Thank you for your e-Mail of 3 May.

I am contacting you again, this time on behalf of the Stop Botley West community campaign group, to update you on our response to the statutory public consultation on the Botley West Solar Farm proposal.

Stop Botley West (SBW) has produced an Adequacy of Consultation (AoC) report on the public consultation - please find the report and annexes attached here. We assessed the consultation according to the Gunning Principles as well as relevant official guidance. In addition, the report references the 1,400+ responses we received to our impartial survey of local residents' experience of the public consultation.

Our report details how the developer's approach to engagement with the affected communities did not have sufficient regard to the relevant guidance and, in our view, did not meet the standards required for a public consultation. The consultation was not adequate or legitimate and we believe it should be conducted again in order to achieve proper, meaningful engagement with the public.

Some of the key issues identified are:

- There was insufficient information on many subjects to allow consultees to understand what is proposed and form an informed opinion.
- There was a failure to provide adequate accessibility to information and events
- Information, maps and photomontages were of inadequate quality and scale
- The documents provided were very difficult to navigate having no master index or search facility across the many separate volumes.
- There was a failure to include some affected villages in the consultation area or for consultation events.

We have sent our AoC Report to the three Local Authorities affected by the proposed development: West Oxfordshire, Cherwell and Vale of White Horse District Councils to help inform their own AoC Reports.

Our AoC report has also been sent to the developer, PVDP. We have offered to meet the PVDP spokesperson, so far without response.

We see, from the Inspectorate's meeting note of 13 March 2024, that PVDP advised that the targeted consultation was to address ONLY changes to the red line boundary and cable routes and that the Inspectorate questioned why it was not to be a full consultation.

We too wonder this and believe that the scope of this targeted public consultation needs to be significantly expanded to address the numerous serious inadequacies in the previous public consultation.

Having had early sight of our AOC, PVDP have ample opportunity, in their targeted consultation, to address the issues we have identified.

We very much appreciate your decision recently to put several key consultation responses in full on the PINS website. We would be pleased if you would also post our full AoC report on the site.

We hope that you will find our AoC report of interest. Please do let me know if you have any questions or comments on it.

Kind regards
Rosemary Lewis
SBW Community Liaison

SBW Adequacy of Consultation Main Report

SBW AOC Appendix 1: Survey Results

SBW AOC Appendix 2: Accessibility by Village

SBW AOC Appendix 3: Readability

[Redacted]

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- | [Redacted]
- | [Redacted]

[Redacted]

AOC ANNEX 1: SURVEY OF LOCAL RESIDENTS



Contents

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1. Introduction

The statutory public consultation on the Botley West Solar Farm (BWSF) proposals took place from Thursday 30th November 2023 to Thursday 8th February 2024, with consultation events between 8 December 2023 and 19 January 2024. The consultation was run by the developer, PVDP.

The Stop Botley West (SBW) campaign undertook to carry out a survey of local residents to ascertain the effectiveness of this consultation. SBW worked with an independent consultant to ensure that the survey design was unbiased and that the questionnaire allowed respondents to express their views effectively, regardless of their stance on the proposals. Great care was taken to avoid leading questions, to make questions clear and concise, to provide a wide range of possible responses and to include ample space for free text responses where people wished to clarify or add to their answers. The questionnaires were made available in a variety of ways:

- in hard copy with 11,000 copies delivered to homes in the local towns and villages most affected by the BWSF proposals - with drop-off points in local village pubs/shops
- at the various consultation events, where members of the SBW team would invite individuals to complete the questionnaire as they left the consultation event
- on-line – with on-line submission

In total this produced 1,442 responses (significantly more than the 661 responses received in a similar exercise on the informal consultation conducted in November-December 2022/23).

2. Consultation Arrangements

2.1. Awareness of the consultation

Of the 1,442 respondents, 1,345 (93.27%) were aware of the consultation on the proposals.

Of the 1,337 people who indicated how they had first become aware of the consultation, 53% said it was from SBW, nearly 16% was by word of mouth, 4.64% heard from the local council, and 5.83% by a range of other means including local village groups, posters (probably SBW), and parish councils.

Only 14.81% said they first heard about it from the developers of BWSF, which potentially indicates that the developer's efforts to advertise their consultation had been inadequate.

2.2. Means of accessing the consultation

Respondents were asked how they accessed the consultation and, to reflect that some may have done a number of things to inform themselves, they were allowed to give multiple responses.

- 57.5% had read the Botley West consultation leaflet, produced by the developer
- 51% had attended in-person event(s)
- 31% had accessed information on the developer's Botley West website
- 4.5% attended the developer's community webinar
- 12% said they did not access the consultation although they would have liked to

2.3. Suitability of consultation arrangements

More than half (52.3%) said they had not received adequate information before the consultation. 82 people (over 6%) said they had accessibility issues that had impacted on their ability to participate in the consultation. Nearly half of these cited mobility issues, though it is not clear to what extent this was a result of accessibility issues at the actual venue.

However, 22 people specifically said that they had not accessed (taken part in) the consultation due to "format and/or venue inadequate for my needs", which indicates that the consultation arrangements overall were lacking in their ability to take account of the needs of those who are less able. These 22 people who had wanted to take part were effectively excluded from the consultation.

Furthermore, 77 people (which may include some or all of the above 22) said they didn't access the consultation due to "difficulty accessing the venue/webinar" – which again indicates a level of exclusion of some groups.

In total, 594 individuals said they had not accessed the consultation for various reasons. Of these, 388 (65%) said it was because the time, date or day was not suitable. A couple of key reasons for this were frequently cited in the comments:

- the consultation ran over the Christmas period
 - Many people pointed out that this time of year is incredibly busy for everyone with family and social commitments, and lots of preparation during December. For some, it is also a busy time at work – more so in January

- Some respondents specifically expressed their scepticism that the Christmas timing (a repeat of the timing of the informal consultation last year) was a deliberate choice by the developer to make it difficult for people to engage fully.
- A further comment was on the length of consultation documentation – off-putting in itself, and even harder to make time to explore fully at such a busy time of year
- the timings of the consultation events made it difficult for those in ‘conventional’ 9-5 employment
 - This potentially discriminated against professional people, and others working conventional hours. Many people commented that the consultations finished too early for them to get there after work. Typical comments included:
 - “Some of us work during the day, so can't pop into the village hall in the middle of the afternoon” and “It ran over an inconvenient time, including the evening rush hour and mealtime” and “(Location) consultation could have done with being much later in the day to enable me to attend after work”.

To make this more difficult, some pointed out that the developer’s consultation leaflet – setting out the dates and venues – had landed through their letterbox quite late in the process, leaving “Not enough time/notice to organise around available events”. One even complained that the “Leaflet arrived after the in-person event had taken place in my most convenient location”.

Even the timing of the on-line event was unhelpful in this regard, as evidenced by the comments “Was travelling home from work at the time of online event” and “There was only one webinar with no alternatives for me to join at a more convenient time.”

Respondents made clear suggestions as to how the timings of the consultation events could have made them more accessible to enable higher levels of participation, including:

- later finish times, such as 8pm
- some weekend events
- avoiding the Christmas and New Year period

One person commented that the times were simply “over too short a period given the scale of the development”.

Other hindrances to attendance included:

- lack of parking (e.g. at Woodstock and Bladon venues)
- difficulty of getting there by public transport
- This is not the fault of the developer – more a reality of the site of BWSF being surrounded by, and therefore impacting on, more rural areas which are generally not well served by public transport across the county. However, this means that the availability of adequate parking is essential for consultation venues – and this was clearly not taken into account.
- lack of a local consultation venue (for example, there was no consultation event held in either Yarnton or Tackley)

This last point, combined with the limited timing of the consultation events, made access for working people even harder.

It is worth noting that there were only 8 locations in total, and only 9 dates on which in-person consultations took place. Four of these were between 8th and 13th December, and five were between 12th and 19th January; i.e. within two relatively short windows. This seems totally inadequate for a consultation on a development of such a scale and with such wide-ranging implications.

It is also worth noting that the attendance at Woodstock – the only venue which had a consultation event on two dates - was 3 times greater on 13th January (175) than on 9th December (57). This would seem to indicate that more than one date at a location leads to an increase in attendance, and also (in this case at least) that the January date attracted more attendees than the December date, perhaps providing more evidence that the choice of December dates effectively reduced attendance rates. This is further supported by the attendance figures in December (68, 57, 46 and 80; an average of 62.75 attendees per event) being significantly lower than the attendance figures in January (195, 175, 155, 49 and 163; an average of 147.4 attendees per event).

It is highly likely therefore that the venues with only a December consultation date (Bladon, Begbroke and Hanborough), all of which are significantly affected by this proposed development, were effectively discriminated against in the consultation process, because it was harder for their residents to engage fully in the process.

2.4. Coverage of the consultation

The following table summarises where respondents live (or the village/town to which they are closest), giving a sense of the geographical spread of people engaging in the consultation. 1226 people responded.

Begbroke	30	Filchampstead	1	Swinford	3
Bladon	109	Freeland	38	Tackley	21
Botley	25	Glympton	2	Thrupp	1
Cassington	108	Hampton Poyle	1	Woodstock	107

Chipping Norton	5	Kidlington	16	Wootton	60
Church Hanborough	71	Long Hanborough	134	Worton	7
Combe	4	North Leigh	36	Wytham	0
Cumnor	130	Oxford	23	Yarnton	62
Eynsham	141	Shipton-on-Cherwell	2	Other (specify below)	50
Farmoor	30	Stonesfield	9		

3. Public Experience of the Consultation Process

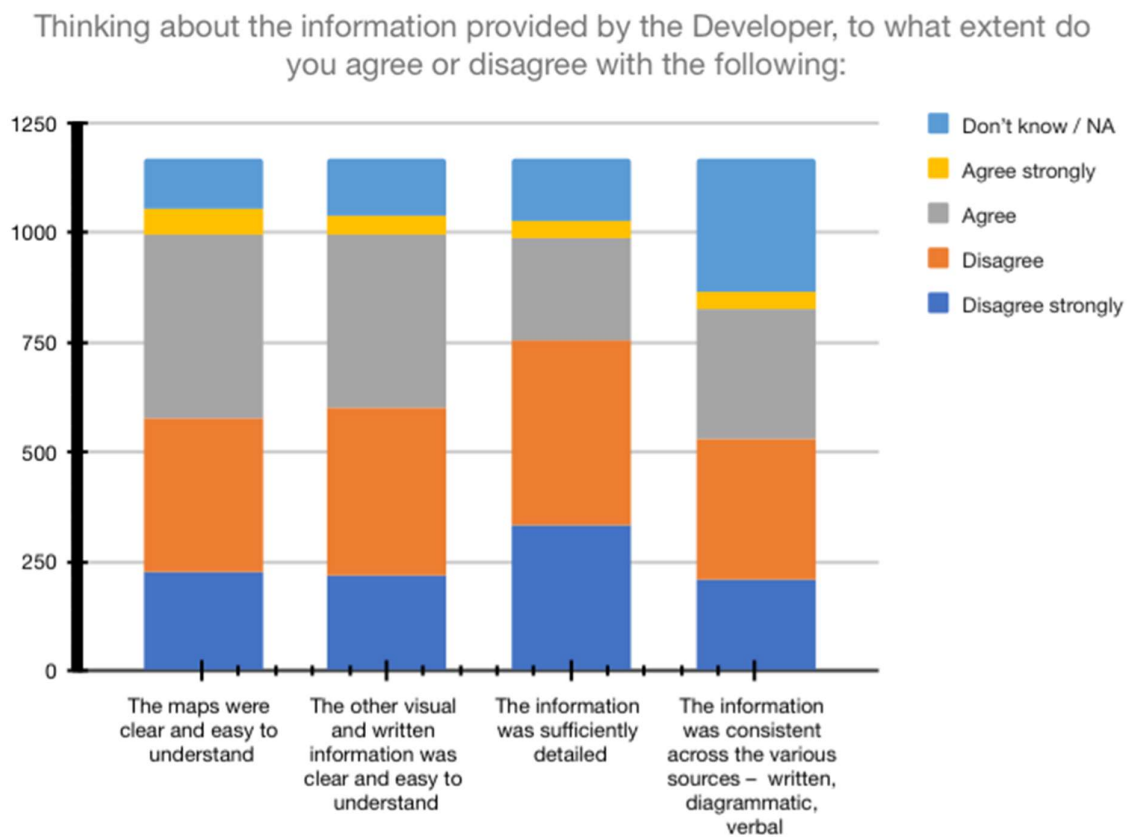
3.1. Clarity of information provided

1169 people responded to four questions on this, based on the extent to which they agreed with the following 'positive' statements:

Statement	Disagreed	Agreed
The maps were clear and easy to understand	49.3% disagreed including 19.3% strongly	41% agreed including just 5% strongly

The other visual and written information was clear and easy to understand	51.3% disagreed including 18.6% strongly	37.7% agreed including just 3.9% strongly
The information was sufficiently detailed	64.5% disagreed including 28.7% strongly	23.3% agreed including just 3.3% strongly
The information was consistent across the various sources – written, diagrammatic, verbal	45.3% disagreed including 17.8% strongly	28.8% agree including just 3.3% strongly

In each case between 10% and 26% respondents selected 'don't know'.



As can be seen from the above table, in each case there is a higher (and in 3 cases much higher) percentage of people disagreeing than agreeing with these statements. Most significantly, the percentage of people strongly disagreeing is around 20% (ranging from 17.8% to 28.7%), whereas the percentage of people strongly agreeing is just 3%-5%.

So not only is disagreement greater than agreement on all these statements, this disagreement is strongly felt by many; whereas very few people strongly agreed.

Based on the balance of opinion, we must therefore conclude that:

- the maps were not sufficiently clear or easy to understand
- the other visual and written information was not sufficiently clear or easy to understand
- the information was not sufficiently detailed (the extent and strength of feeling on this is particularly clear, with 2/3 respondents identifying this as an issue)
- the information was not sufficiently consistent across the various sources

603 people provided comments to justify why they disagreed with the statements in the above table. Many pointed out the poor quality of the maps (being out of focus, very difficult to read, lacking in detail, not displayed properly, etc) and one even said that the consultants had agreed that the “map visibility was poor”.

Another said “No roads were named, no features such as churches marked so difficult to orientate oneself.”

One respondent commented that “Photos were taken from an angle to ensure the panels look smaller” and the “Height of the panels were not made obvious”.

One commented “I received two different accounts of the proposed use of CCTV and security lighting along the fences from two different reps of the consultation company. The information about the impact on wildlife was inadequate/over optimistic ie the only thing a deer fence affects is deer, otherwise birds and animals are all being taken care of by the plans of PVDP’s ecology officer and anyway, Blenheim’s responsible for the land and will continue to be so, not PVDP.”

For those who might have wanted to talk to the Ecology Officer, they were disappointed – comments included:

“There was no one there able to address my many questions on biodiversity” and from someone who had not attended an event: “Heard from attendees that experts in ecology not available at in person events, so no point in trying to attend as I have ecological questions.”

The consultants who were there apparently did not give the public much confidence in their answers:

“I asked a series of questions of one of the company representatives and they answered with phrases like I should think so or I expect this is likely. Do not inspire confidence.”

“We asked about the images showing landscapes before and after installation of the panels. There was a lack of those along the Lower Road. We were told this was because the hedges prevented them being seen. This is not true. The land rises and is visible over the hedges. Also at this time of year the leaves have fallen and the landscape is clearly visible.”

Throughout the comments made by those who had attended in-person events, there was a theme of feeling that the information was being presented in a way that deliberately emphasised the claimed benefits and skirted around the more difficult questions. There was also a theme of there being a lack of clear and substantiated facts.

One lengthy comment sums up these two themes rather well:

“At no point did I see a detailed map of the entire proposed solar farm and I believe that it is something that would make it absolutely clear how enormous this proposal is; something I think PVDP don't want people to understand. There were numerous allusions to the benefits to local communities Botley West would bring, but no facts, figures or guarantees to back up these suggestions. Certainly short on definitions of terms; e.g. upgraded footpaths, buffer zones, horizontal directional drilling and 'Botley West is committed to establishing an environmental and longstanding legacy across the area', I think we have that already and B W is poised to destroy it. Possibly if I had the time or energy to wade through the folders on the back table, (presumably the whole report,) there might have been all of the information lacking in the displays, but nowhere did I see any assessment of the numbers of heavy plant, square footage of fencing, tons of decent topsoil removed (and sold ?) habitats lost. Right at the end of the displays there was a simple timeline showing only the hope of a date for submitting the application for the project, I would like to know how long the area would be subjected to the construction phase.”

Some people identified very specific questions they felt remained unanswered. For example:

- “How is Biodiversity Net Gain calculated to be at least 70%?”
- “What are the exact cabling options (with their pros/cons) for the part of the route not yet finalised in the plans? I'm particularly concerned about the crossing of the Thames near Swinford given the vulnerable floodplain meadow plants in that area.”
- “Where can I find a detailed map and table with the area (hectares) of the different types of agricultural land by grade (not lumped together)?”
- “What is the evidence that bats (especially the high number of red-list/rare species) are NOT impacted by vast areas of solar panels. As this scale of solar panels hasn't been really realised anywhere, how can you be certain that this has no effect on the acoustics used by bats. Surely large areas of smooth reflecting panels will affect how well bats can use their acoustics? I think you need to provide evidence for this, especially for the scale at which solar panels are covering the landscape. See, e.g. <https://appliedecologistsblog.com/2023/09/18/editors-choice-609-bat-activity-falls-byoverhalf-at-solar-farms/> “
- “What measures exactly will be put in place to improve water quality and reduce run-off into the Evenlode and other surface waters?”

Others identified areas where, based on their own expertise, the developers seemingly have insufficient evidence or understanding to back up their claims of adequate mitigation of impact. For example:

“The mitigation of the impact on the environment and wildlife also included 3 sentences about putting in skylarks nesting sites, bat and bird boxes and bee hives. They just stated that these will be provided. As a zoologist, I know that you can't just pop in a bird box (or bat box or skylark nest site or bee hive) and expect the local animals to move in. They have to be sited with an understanding of their behaviour, territory size, migratory patterns etc etc. 3 sentences stating that these would be present does not show any due diligence on behalf of these animals. You have not shown how the impact on these animals can be mitigated. I believe this is because it hasn't even been considered.”

Many people commented on such things as:

- “Maps scattered in a heap”
- “Large ring binders of supporting documents, some with contents spilling out, were heaped on a stage at the far end of the room, difficult to get at and peruse”
- “The number of photographs showing the existing locations for the development were very limited, overly selective and unclear”
- “Photographs are badly printed; extremely dark and with poor contrast”
- “No guide to consultation documents and cross-referencing inconsistent and confusing”

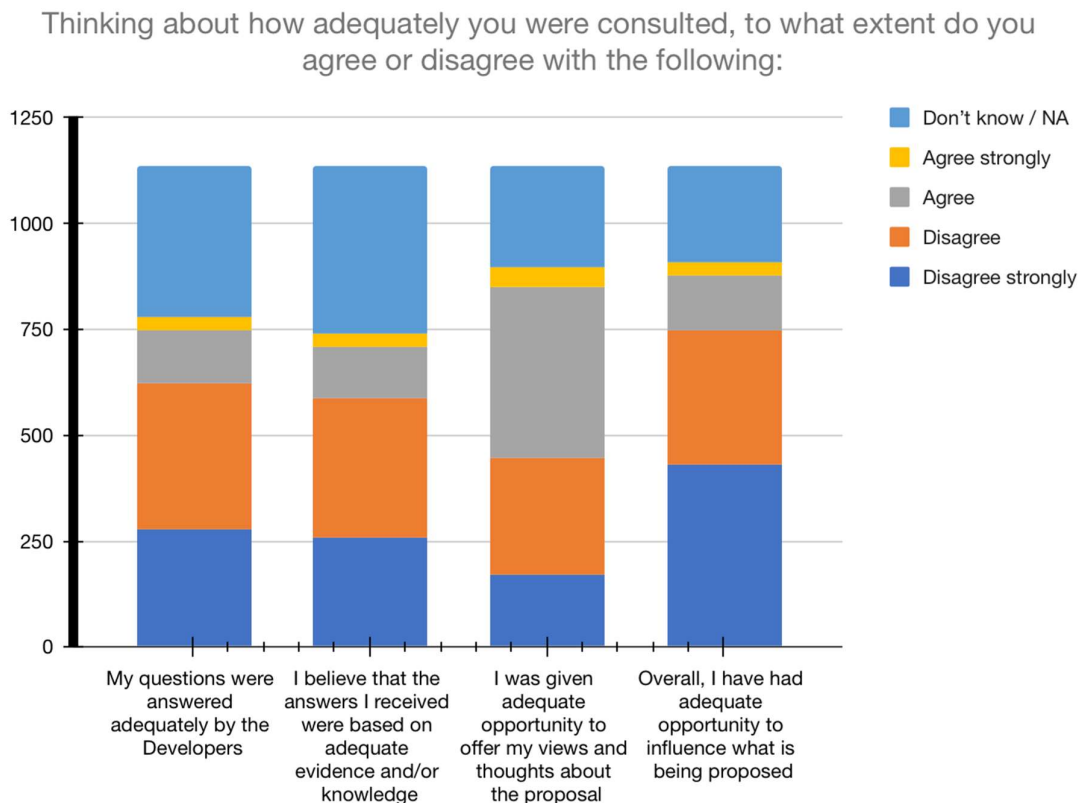
This indicates a lack of helpful organisation, making access to relevant information unnecessarily difficult. Whether by accident or design, this is not conducive to an effective consultation.

3.2. Adequacy of the consultation

1137 people responded to four questions on this, based on the extent to which they agreed with the following ‘positive’ statements:

Statement	Disagreed	Agreed
My questions were answered adequately by the Developers	54.6% disagreed including 24.6 strongly	13.8% agreed including just 2.6% strongly
I believe that the answers I received were based on adequate evidence and/or knowledge	51.6% disagreed including 22.6% strongly	13.5% agreed including just 2.8% strongly
I was given adequate opportunity to offer my views and thoughts about the proposal	39.2% disagreed including 14.8% strongly	39.5% agreed including just 4% strongly
Overall, I have had adequate opportunity to influence what is being proposed	66% disagreed including 37.9% strongly	14% agree including just 2.8% strongly

In each case between 20% and 32% respondents selected ‘NA/don’t know’.



In relation to the question about whether they had been given adequate opportunity to offer their views and thoughts about the proposal, there was an even split, with 39.5% agreeing that they had and 39.2% thinking they had not; although significantly more people felt strongly that they had not (14.8%) compared with the 4% who felt strongly that they had.

For all the other three questions, there is a much higher percentage of people disagreeing than agreeing with these statements, and the percentage of people strongly disagreeing (22.6 – 37.9%) is very much more than the percentage of people strongly agreeing (2.6 – 2.8%).

So, again, we see a pattern where disagreement is much greater than agreement with these three positive statements, and disagreement is strongly felt by many; whereas very few people strongly agreed.

Based on the balance of opinion, we must therefore conclude that:

- questions were NOT answered adequately by the developers
- the answers received were NOT perceived to be based on adequate evidence and/or knowledge
- individuals did NOT believe they had adequate opportunity to influence what is being proposed

A very significant finding is that a massive 66% (2/3) of respondents did NOT believe they had adequate opportunity to influence what is being proposed; and more than half of these (38% of

respondents) felt that strongly. This is a severe indictment of an exercise that is defined as a 'consultation'.

602 people provided comments to justify why they disagreed with the statements in the above table, leading to the conclusions above.

Many people cited examples of where their questions were not answered adequately by the Developers. Comments included:

"Answers received were either vague or had little up to date & objective evidence provided."

"Answers to key questions have been vague, misleading or inaccurate or missing."

"Answers give very vague and focused on the benefit and not on the impact."

"No information was available on how responsibly the millions of panels would be decommissioned at the end"

"Not enough clear information about long term effects"

"Reps present were prepared and briefed with insufficient background information and unable to answer basic questions such as- why place panels on North facing slopes, and what height is the new proposed power station. Also what happens after 40 years and MANY MORE questions"

"The reps of the solar farm were advised very poorly and were not at all sure of their information"

"Developers couldn't answer my questions"

"Not enough knowledge was held by event staff."

"Concerns were brushed aside and given ridiculous answers such as "EVs will need the electricity - BW is our only option"

"The representatives listened to questions but in each case definitive answers were not given. Facts were very difficult to establish."

"Most of the developer's representatives were inadequately informed to answer questions."

"The people there to answer questions were very nice but seemed quite ignorant of the area and weren't able to answer questionsThey also seemed totally unaware of historical and ecologically vital water meadows at Eynsham where it is proposed that cable lines cross (one of the options)."

There were specific concerns about inconsistencies in the information provided:

"Some answers from different representatives were contradictory."

"At 2 different consultation locations, answers were inconsistent, too many questions were answered with "that's something we're working on", or "that's not my field". Selective research reports were quoted to support the case, when there is a plethora of contradictory evidence, especially on wildlife issues."

Several respondents had very particular interests, and possessed relevant expertise themselves; and they were clearly asking quite detailed questions about specific aspects of the proposals.

Many of these individuals felt that the answers to their questions lacked evidence of appropriate

levels of knowledge and understanding; and they were disappointed at the lack of availability of appropriate experts to address their concerns.

Comments included:

“The relevant specialists - flood, engineering and ecology - were not present as they left the meeting a few hours early.”

“Hydrologist not present. Those present were unable to understand concerns or flooding”

“No ecologist came”

“No experts present for areas of concern - biodiversity and flood risk” “No data on flooding - I provided some to developer!

No data on Wildlife surveys - I provided data on impact “

“Some people we needed to talk to about cabling were not present”

“Did not feel that the respondents had adequate depth of knowledge in specific areas - heritage, security, biodiversity - and that their "experts" in those areas were not present.”

“Nobody with technical expertise present at consultation I attended”

“The developers have provided no evidence that wildlife will not be negatively affected. Brown hare, owls and other birds of prey use this land. Also several species on the red list including yellow hammers and field fares. The representative I spoke to was patronising and clearly did not give value to my opinion. His claim was that wildlife inhabited the edges of fields only. It is both laughable and offensive to be told that this enormous solar farm project will not cause harm to the environment.....”

“I am particularly concerned about the local ecology, biodiversity and potential increase in flood risk. When questioned about the ecology and biodiversity the representative was unable to provide any hard evidence for

“a net gain within the area of at least 70%” based on any previous studies involving industrial scale changes to the habitat.”

“I asked a scientifically based question about albedo levels, but the reply I got was highly unscientific and dismissive, along the lines of “we’ve never seen this so we’re not going to measure it”.

“Speaking to Mark Owen Lloyd I asked if he could explain how, by curious coincidence, the power output calculation 840 MW arrived at being able to power 330,000 (all the homes in Oxfordshire) houses as this was rather a unique selling point (USP). Very good marketing hype. I raised this as my own calculation backed by a Solar Research Institute showed this to be a much smaller number. He first claimed that the original reply to this question was published on their website. However, this calculation starts from the assumption that 840MW can be achieved without evidence of the underlying calculation and then by some rather dubious and opaque calculations suggests that 330,000 houses might be powered for a small instance of time in a good summer probably around midday.

He then subsequently claimed that the calculations had been checked by Blenheim (by whom?) and said the original calculations had been made by an engineer in Berlin.”

The above comment is a particularly good example of where the ‘facts’, as presented, were not substantiated when specific questions were asked; and there was obvious frustration at the

apparent lack of concern and absence of clear answers to questions relating to perceived risks. One comment captured this rather well:

“They had no answers to the flooding that we have most years if we have torrential rain!
They said it would be looked into! Should be looked into from the beginning!!!!”

One respondent was particularly concerned that they received inadequate answers to their questions, when they had raised these same questions in the informal consultation a year earlier. He/she was not impressed.

“When I asked about the general effect on sound as panels are hard surfaces and will reflect sound differently, the effect on animals that use echo location (bats), and the noise that rain & hail would make when falling on the panels I was told they hadn’t done any work on that and to include it on my feedback form. When I pointed out that I had done that at the previous consultation feedback and obviously it had been ignored, I was told to do it again!”

In relation to the majority view that there is inadequate opportunity to influence what is being proposed, a number of comments indicated why this view prevailed:

“The whole operation of consultation seems like window dressing and a hoop to jump through for the developer. I feel they will never take our serious views and questions into account”

“The feedback form to the second consultation was as loaded as the first in terms of questions. It is geared to elicit positive responses.”

“The personnel at the consultation were not experts in the fields that I wanted to question. They were more interested in telling me about the plans than hearing my views.”

“I think the information was overwhelming and felt the representatives were glossing over those areas they did not want to discuss.”

“I wasn't given the opportunity to express my views”

“They listened and nodded but didn't really care about villagers’ views”

“When asked about food security and loss of agricultural land Mark Lloyd said that solar panels were preferable to agriculture as they didn’t cause river pollution. He was primarily concerned with pushing the project forwards with no thought of the impact on local residents.”

“The people who presented the consultation seemed to me to be biased towards enabling the Botley West Solar Farm. There wasn’t sufficient attention given to the damage which the solar panels would create. If my grandchildren were to ask me whether I had done enough to safeguard their future relationship with the countryside I would have to say “I tried but they wouldn’t listen”.”

“There was no 'consultation'. Just 4 planners from RPS whose agenda was seemingly to reject any compromise & push forward a very chaotic display of unconnected photos & location maps”

“issues of key importance to me were not addressed. In fact I believe they may have been deliberately sidelined.”

“None of the developers were writing down any of my questions/concerns and therefore it felt as if the consultation was a 'dead process' in terms of me being in consultation with them equally or that they were treating my views with any importance to their process.”

“Although I was spoken to politely throughout, I was made to feel like a spoiler if I did not support the scheme. I was told that basically in terms of planning considerations there will always be winners and losers and the fact that I will be a loser will not carry much weight in the decision-making. It was also asserted that BW has to be supported as there are no alternatives to achieve decarbonisation.”

“From the very early stages it was quite clear the consultation was simply a box ticking exercise and local feeling will not influence the outcome. Questions were clearly biased and designed to produce the result the developer required - of course we are all concerned about climate change, of course we all agree more renewable power is needed - but I fear these answers will be spun to indicate locals also support an inappropriately huge solar farm that will blight our lives for decades, which of course we do not.” Perhaps the most telling comment is:

“I was one of a group of 3 people listening to the main representative. He said - quote - if 100% of people in the area are against it, it will make no difference. We have satisfied all of the government criteria for it to go ahead so it will”

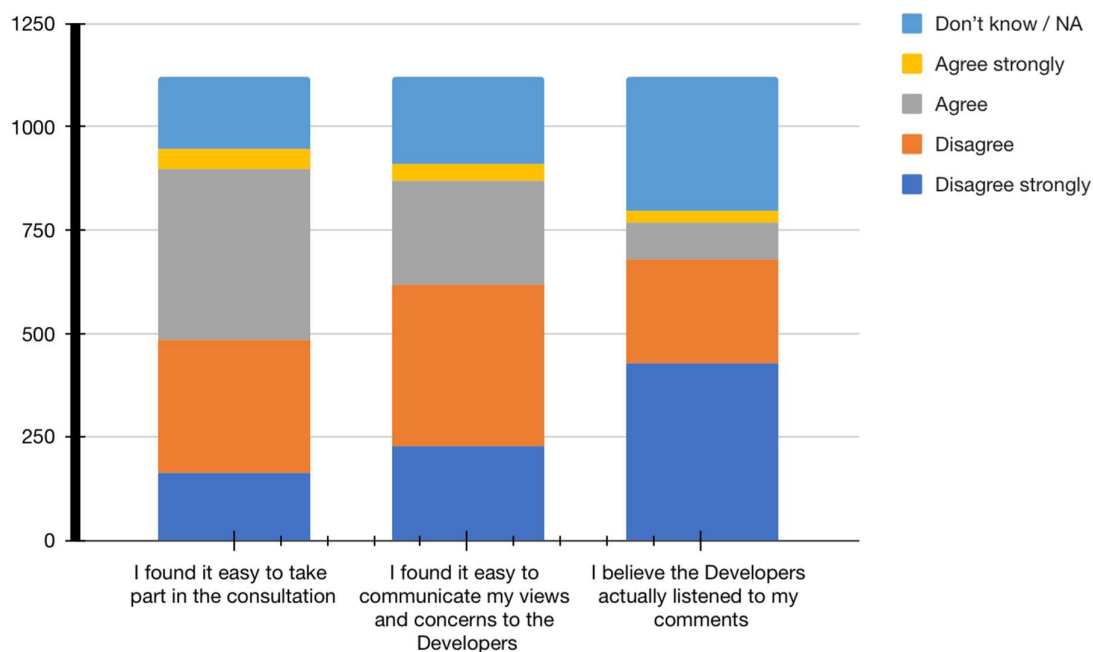
3.3. Ease of taking part in the consultation and communicating views and/or concerns

1122 people responded to three questions on this, based on the extent to which they agreed with the following ‘positive’ statements:

Statement	Disagreed	Agreed
I found it easy to take part in the consultation	43.4% disagreed including 14.5 strongly	41.9% agreed including just 4.2% strongly
I found it easy to communicate my views and concerns to the Developers	55.3% disagreed including 20.1% strongly	25.8% agreed including just 3.7% strongly
I believe the Developers actually listened to my comments	60.7% disagreed including 38.4% strongly	10.4% agreed including just 2.5% strongly

In each case between 15% and 29% respondents selected ‘NA/don’t know’.

We are keen to understand how easy it was to take part in the consultation and communicate your views and/or concerns. To what extent do you agree or disagree with the following:



There was a fairly even split between those who reported they had found it easy to take part in the consultation (42%) and those who had not found it easy (43%), although there was a slight differentiation between those who felt strongly about this, with 14.5% feeling strongly that it was not easy and only 4.2% feeling strongly that it was easy.

Whilst the views are relatively evenly split on this, it is not a particularly good result that only 42% of the respondents found it easy to take part in the consultation, and this does raise the question of how many people may not have taken part because they didn't find it easy to do so. Whatever the precise answer to that, this won't have helped the response rate to the consultation – and, of course, we do know that the relatively small number of events, the timing of the consultation itself (over Christmas) and the restricted times of week/day of the consultation events have all been cited as problematic, even before one considers the process of actually submitting a response to the consultation.

When it comes to how easy it was to communicate their views and concerns to the developers, and whether they felt the developers actually listened to their comments, the results paint an even more unsatisfactory picture.

Over half of the respondents (55%) said they did not find it easy to communicate their views and concerns to the developer, and 36% of these (20% of respondents) expressed that view strongly.

Only just over a quarter of the respondents (26%) said they had found it easy to communicate their views and concerns to the developer, and very few of these (14% of this group; 4% of respondents) expressed this view strongly.

The results were even more stark regarding the statement “I believe the Developers actually listened to my comments”.

61% of respondents disagreed with this statement, and nearly 2/3 of those (38% of respondents) disagreed strongly. In contrast, only 10% of respondents said they do believe the developers actually listened to their comments, with just a quarter of those (a mere 2.5% of respondents) feeling this strongly.

So it is clear that the majority of those taking part in the consultation do not believe that the developers were listening to their comments, to the extent that many expressed this view strongly.

Based on the majority views, we must therefore conclude that:

- it was not sufficiently easy to take part in the consultation.
- respondents did NOT find it easy to communicate their views and concerns to the developers
- respondents did NOT believe the Developers actually listened to their comments.

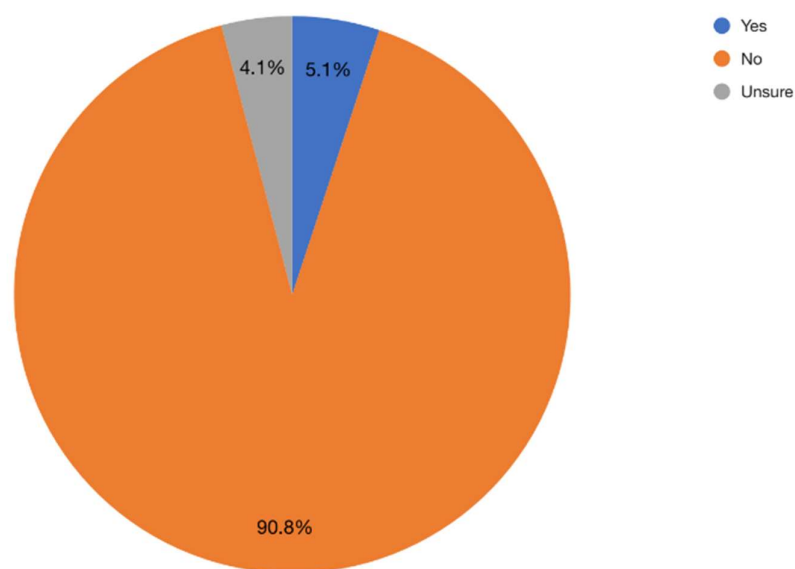
The last point is very consistent with the results in section 3.2 above, that individuals did not believe they had adequate opportunity to influence what is being proposed.

Looking at the figures, the extent and strength of feeling on those points (not being listened to and feeling unable influence) are very similar.

4. Level of Support for the Current Plans

The focus of the questionnaire was specifically on the effectiveness and adequacy of the consultation, but in one simple question at the end respondents were asked a simple Yes/No question, to determine the overall balance of feeling towards the BWSF proposals. It is clear that amongst the respondents to this survey, the vast majority are against the proposals.

Do you support the current plans for the construction of Botley West Solar Farm?



5. Conclusions

It is notable that the conclusions below, based on analysis of a survey of the public's experience of PVDP's formal consultation process from December 2023 to January 2024, bear an uncanny resemblance to the results of a similar survey of the public's experience of PVDP's informal consultation held in November to December 2022. See Appendix below for comparison.

It seems that PVDP have learned nothing from feedback on that process, as the recently conducted formal consultation is similarly flawed.

Timing and availability of consultation events was inadequate

There were serious issues raised about the timing and availability of the consultation events.

- the consultation was held over the Christmas period, with around half the consultation events in the busy pre-Christmas month of December
- this is very similar to the timing of the informal consultation a year previously
- so we have a repeated timing issue, leading some to question if this was a deliberate attempt to discourage participation
- it is worth noting that prior to the formal consultation PVDP were asked by SBW to change the timing, precisely because of the clash with the Christmas period
- there were only 8 in-person consultation locations in total, and only 9 dates on which inperson consultations took place, and many people raised concerns about the restricted locations and timings of these, which made it difficult for people working 'conventional hours' to access them
- this seems totally inadequate for a consultation on a development of such a scale and with such wide-ranging implications

Clarity of information provided was inadequate

- the maps were not sufficiently clear or easy to understand
- the other visual and written information was not sufficiently clear or easy to understand
- the information was not sufficiently detailed (*The extent and strength of feeling on this point is particularly notable, with 2/3 respondents identifying this as an issue*)
- the information was not sufficiently consistent across the various sources

The consultation was inadequate

- questions were not answered adequately by the developers
- the answers received were not perceived to be based on adequate evidence and/or knowledge
- individuals did not believe they had adequate opportunity to influence what is being proposed

A very significant finding is that a massive 66% (2/3) of respondents did NOT believe they had adequate opportunity to influence what is being proposed; and more than half of these (37.9% of

respondents) felt that strongly. This is a severe indictment of an exercise that is defined as a 'consultation'.

Taking part in the consultation and communicating views and/or concerns was not easy

- it was not sufficiently easy to take part in the consultation
- respondents did not find it easy to communicate their views and concerns to the developers
- respondents did not believe the developers actually listened to their comments

Consistent with the extent and strength of the perception that there was not adequate opportunity to influence what is being proposed, 61% of respondents felt the developers were not listening, and nearly 2/3 of these (38.4% of respondents) felt that strongly.

The vast majority of respondents do not support the current plans

91% of respondents said they did not support the current plans for the construction of Botley West Solar Farm. Only 5% do, and 4% said they were unsure.

Appendix to Annex 1: Conclusions about the informal consultation process in November-December 2022

- the vast majority of respondents are dissatisfied with the process, and with the extent and quality of the information provided to them
- there were an inadequate number of face-to-face and on-line consultation events
- the consultation events were not promoted effectively, with many people being unaware of them
- the design of the consultation feedback form was perceived to be biased in favour of the developers, and people found it difficult to express their views fully
- the above means that the reported consultation responses from PVDP are highly likely to artificially inflate the level of support for their scheme
- staff (representing PVDP and its partners) were unable to adequately answer questions raised
- only 6.6% of people who wrote to the developer felt that they got a helpful response

The overall conclusion must be that the consultation was inadequate in both its reach and its content.

STOP BOTLEY WEST CAMPAIGN, OXFORDSHIRE, May 2024

AOC ANNEX 2: WAS THE INFORMATION ACCESSIBLE?



Contents

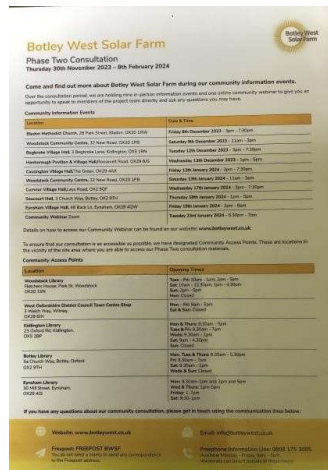
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1. Advertising and signage

In this rural area parish magazines are the primary source of local information. Many of these are published and distributed monthly during the first week of the month with a deadline for material of around 14th of the previous month.

PVDP issued their first press notification on 16th November and started the consultation on 30th November. This meant the earliest that the information could be circulated to villages in parish magazines was early January.

PVDP did not advertise ANY events locally - no posters advertising the consultation event venues were displayed at or near ANY venue, except Woodstock where a small-print A4 notice was displayed in a backstreet



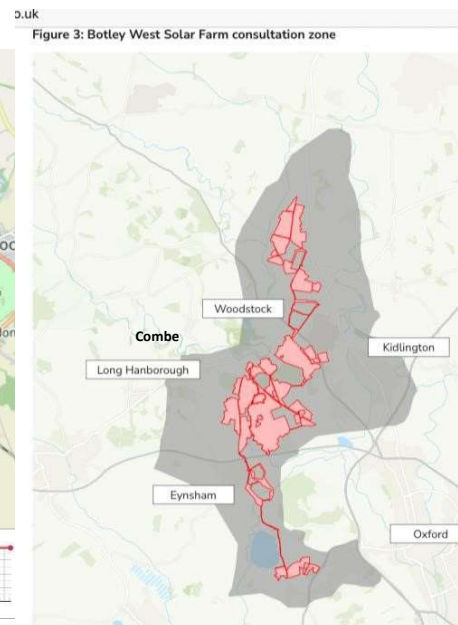
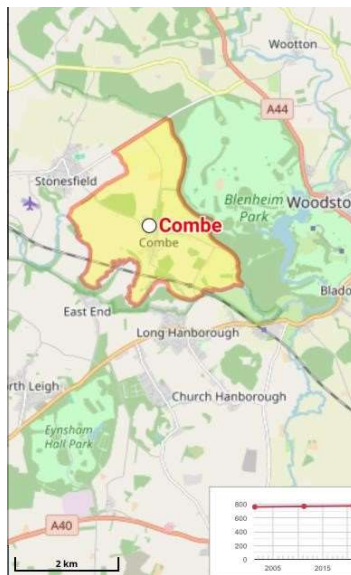
pub and inside the event venue half hidden on a crowded noticeboard. SBW supplied local posters and directions to every venue except Botley which consequently had the lowest turnout of 49.

2. Community Consultation Leaflet

2.1. Entire village of Combe omitted

In the SOCC, PDVD stated: 'A Consultation leaflet will be posted to all properties in the Core Consultation Zone - an initial distance of 2km from the edge of the proposed solar development areas ...'

'The CCZ extends beyond 2km in certain areas, eg to incorporate the whole of Kidlington so as not to bisect the village. It has been reduced in other areas where there are no property interests within a 2km limit from the boundary of the proposed development.'
A list of included PCs followed.



Despite there being significant 'property interests' in and around the area, The Parish of Combe (population 775) was completely excluded from the CCZ despite being within 2km of the boundary of the proposed site - as close as nearby North Leigh and Freeland which were included, and considerably closer than areas of Kidlington and Botley.

2.2. Feedback from first consultation ignored

PVDP stated 'We have also considered how our posted materials are presented to encourage engagement with them following feedback regarding the plain envelopes our phase one leaflets were posted.' However, they ignored this feedback and leaflets were delivered exactly as for the first consultation in plain envelopes with no sender's identification. Delivery was also delayed by and muddled up with the Christmas post.

2.3. Missed delivery

Some areas within 2km of the site did not receive the leaflet at all and several received them late - a week after the start of the consultation and, in some cases, AFTER that area's consultation event. Examples of missing booklets as of 8 Dec included:

Bladon - Church Street; Church Hanborough - at least 2 properties omitted, including one highly affected one; Long Hanborough - Main Road, Millwood End, Oliver's Close, Regents Drive; North Leigh - Common Road; Woodstock - Manor Road, whole of Park View Estate

2.4. Missing or misleading information

The leaflet failed to even mention the size of the site (3,400 acres). It made many unsubstantiated claims (eg on biodiversity net gain). It claimed that PVDP were already working with other organisations who reported they hadn't been contacted. The maps in the leaflet showed no infrastructure and minor roads through the site were difficult to see.

3. Information Event venues

3.1. Northern section omitted

There was NO Information Event for the entire northern section of the site. A provisional list of venues included Kidlington and Tackley but these were both removed in the later published version of the SOCC.

3.2. Eight parishes omitted

Of 15 affected villages (Botley excluded), 8 were omitted from the list of in-person event venues despite being adjacent to the site. The villages of Combe, Farmoor, Freeland, North Leigh, Kidlington, Tackley and Wootton and Yarnton, comprising 20,000 residents = 61% of the total population of 32,000, were unable to attend an event in their own parish. Of these 8 parishes, 5 (Farmoor, Freeland, Tackley, Wootton, Yarnton) had no bus routes to nearby Information Events.

3.3. Timing in Christmas period

Attendee numbers before and after Christmas provide evidence of the error PVDP made in ignoring the call to delay the consultation until January. The 4 pre-Christmas events were attended by a total of 252 people. The 5 post-Christmas events were attended by a total of 737 people.

3.4. Minimal accessibility outside working hours

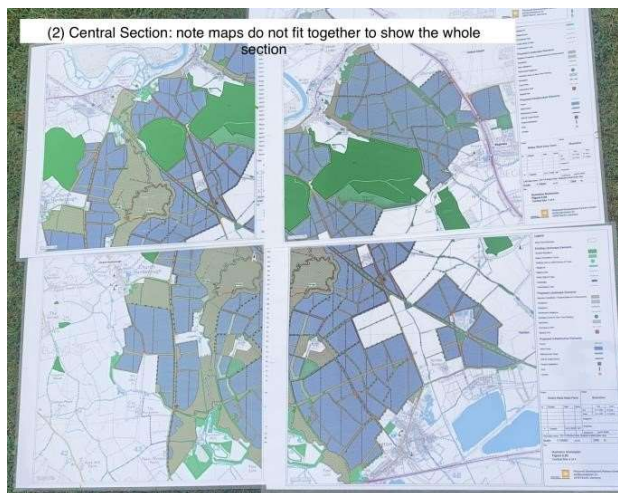
Out of 38 hours of consultation, only 6 hours were post 6pm with 8 hours on Saturdays. For the 54% of affected residents in full time work this severely limited their access to the consultation.

3.5. Disproportionate event length

The length of events did not correspond to the size of the population: Eynsham and Hanborough with populations of 5324 and 3503 were 30 minutes shorter than those provided for Begbroke (pop 800), Bladon (977), Cassington (794), Cumnor (830).

4. Displays within venues

4.1. Maps



- no whole site map was shown at any greater scale than 1:35,000; most were at 1:100,000
- 10 sectional maps were at scale 1:10000 (should be 1:2500)
- no plan showed how the sections fitted together (further details in Annex 1)

4.2. Photomontages

Very few visualisations were available and most of the key views were omitted. A handful were displayed on easels the rest piled randomly on tables with no clear indication of which area of the site they represented. One 1:100,000 map had coloured dots showing the viewpoints but



4.3. Display boards

these were not numbered to match the photographs. For further details see Annex 1.

These contained exactly the same information as the Community Consultation leaflet using the same 'sales speak' with no objective information.

4.4. Non-Technical Summary

Insufficient copies (2-5) were available. No attention was drawn to them as a source of accessible information. They were generally left on side benches mixed up with the 20 volumes of the PEIR with no room to sit and read - even though there was usually plenty of space on tables with chairs dedicated to completing feedback forms. It contained no index.

4.5. PEIR

Volumes were randomly scattered on benches/tables with no seating. There was no master index. Even PVDP's 'experts' were unable to find specific pieces of information requested by individual members of the public.

5. Information Event Personnel

5.1. Missing 'experts'

At SBW's request, PVDP agreed to send a list of which personnel were present at which event. They failed to do so. It would appear that the hydrology/flood expert did not attend any consultation (even Cassington which is a notorious area for severe flood problems) and neither did Blenheim Estates who are supposed to be responsible for land management. The ecology expert was also a frequent absentee.

5.2. Missing spokesperson

Mark Owen-Lloyd of PVDP - the key spokesperson for the entire project - promised to be and has claimed to have been at all 9 consultation events but this is not true. He did not attend Hanborough or Cumnor.

5.3. Inconsistent expertise

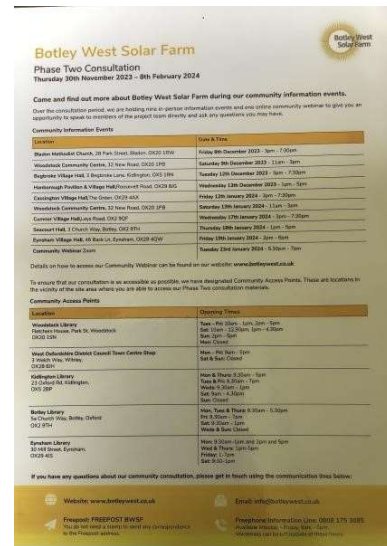
Personnel who were present were not easily identifiable - even as to whether they were from PVDP the developers, RPS the consultants or Counter Context the PR firm - badges worn were not colour coded and were difficult to read. Counter Context could not answer any detailed question about the proposals. Even RPS 'experts' sometimes failed to answer questions in their own area of expertise or gave contradictory answers.

5.4. Attitude of personnel

The overwhelming view of those attending events was that it was more a presentation than consultation, they weren't being listened to, that PVDP and RPS personnel were sometimes aggressive and that nothing they said would affect the outcome.

6. Community Access Points

No posters or signs were displayed outside or inside any of the five Community Access Points indicating the presence of the documents. In answer to a question from SBW, PVDP said this poster was displayed at every Information Access Point but it was not - as confirmed by librarians.



No use was made of any public buildings nearer to the affected villages, though parish halls and churches would have been more convenient and spacious than the libraries and could have been used.

NONE of the five Community Access Points contained any maps bigger than A3 size and at no better scale than 1:10,000.

There was very limited access to Community Access Points outside working hours due to limited opening, apart from Botley (which had other highly significant issues) and Kidlington.

Botley Library. The PEIR documents were still in the 3 large boxes in which they were delivered. These boxes were in a closed room marked 'Staff Only, No Entry'. Inside this room was one small table filled by a computer and monitor and another completed covered with boxes and cleaning materials. It was more as storeroom for unwanted items than office or study area. No notice - even on the "Staff only" door in the main library advertising its presence or indeed the consultation itself.



Botley Library: Information Access Point. Behind this door. No notice advertising the documents available or the Consultation.



Botley Library: Information Access Point. In storeroom behind door marked 'No Entry'. No poster advertising it's presence or anything about the Consultation. No table space.

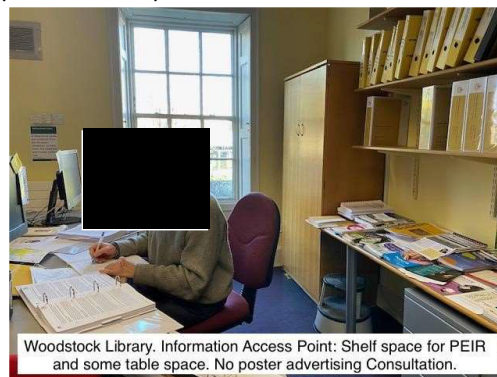
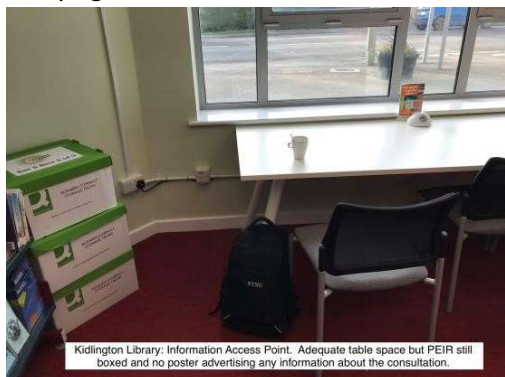
Eynsham Library. Only open for 2 mornings and 4 afternoons each week, closed every lunchtime. The space allocated was totally inadequate. A small desktop already holding a computer was the only table space and the 20 volumes of the PEIR were stuffed in boxes beneath the table. The librarian was apologetic and said the library was too small to provide adequate access. She had not been warned how many volumes would be lodged or how much space would be needed - no site visit had been made by the developer. On the morning the PEIR was delivered she complained that there was too much material to cope with but was simply told "you have a legal obligation to house it" and the boxes were left in a pile for her to find a solution.



Eynsham library : Information Access Point. Inadequate table space. PEIR boxed and half hidden under table. No advertising of Consultation.

Kidlington Library can be considered adequate in terms of space provided for reading but PEIR documents mostly still in piled up in boxes with no explanation.

Woodstock Library. Closed Mondays and every lunch time. Nearest to the site and can be considered adequate in terms of location with limited but just about adequate space provided for accessing and studying the PEIR documents but insufficient space to spread out map sections.



WODC Shop, Witney. Only open 9am-5pm Monday-Friday. 7 miles from the site.

7. Summary of accessibility by village¹

BEGBROKE - Information Event, Tuesday 12 December 2023, 3pm-7.30pm. 46 attended.

- No Community Access Point
- Population: 800
- No signs to direct people to the venue anywhere in Begbroke. Nothing at the entrance to the car park or on the lane leading to the venue. The car park had about 12 spaces. Nearly ALL were filled by PVDP, RPS or Counter Context's own cars.
- Many experts missing, no Ecology expert present.
- Already packing up at 7pm when some working people arrived with only a few minutes to look at the massive amount of information. Less than 50% of residents could potentially attend during working hours.

BLADON – Information Event, Friday, 8 December 2023, 3pm -7.30pm. 68 attended

- No Community Access Point
- Population: 977
- No parking, no disabled access, dangerous narrow pavement approach, insufficient room to display documents. Road outside extremely busy with commuter traffic on a Friday late afternoon. Not a single notice anywhere in Bladon indicating the location. Church or Primary School (in evening) would have been more appropriate venues. 57% of residents unable to attend during working hours

BOTLEY - Information Event, Friday 18 January 2024, 1pm - 5pm. 49 attended.

- Community Access Point in Botley Library inadequate - see 2.6(5) for details.
- Population 1370

¹ *2021 Census figures for populations of Begbroke, Bladon, Botley, Cassington, Combe, Cumnor, Eynsham, Farmoor, Freeland, Hanborough, Kidlington, North Leigh, Tackley, Woodstock and Wootton, and Yarnton.

- Complete lack of advertising resulted in the lowest turnout of any event because it was the ONLY event for which SBW did not supply placards, posters or leaflets due to limited budget and location outside the red line area.
- PVDP did not advertise ANY events and it could be argued that this was a deliberate ploy to cut the numbers of those able to find and attend events. The low turnout of 49 shows what would have happened elsewhere if advertising had been left to PVDP. Turnouts averaging 170 at the other 4 January venues were entirely due to the efforts of SBW.

CASSINGTON & WORTON – Information Event, Friday 12 January 2024, 3pm- 7.30pm. 195 attended.

- No Community Access Point
- Population: 794
- Adequate location and accessibility. Many concerns expressed about inability of staff to answer questions. In particular, despite the well-known flooding issues Cassington has, no hydrologist was present. No Ecologist present either. Only advertising supplied by SBW outside and on the door.



Cassington Consultation: As at ALL EVENTS Advertising of venue throughout the village by Stop Botley West group. NO advertising by PVDP

COMBE

- No Community Consultation Leaflet delivered.
- No Information Event
- No Community Access Point
- Population of 774 completely disenfranchised

CUMNOR – Information Event, Wednesday 17 January 2024, 3pm- 7.30pm. 155 attended.

- No Community Access Point
- Population: 830
- No hydrologist, no ecologist. Mark Owen-Lloyd absent (though later claimed he'd been at every event) and his replacement spent quite a lot of the time in a side room away from the public, not in the hall. Consultees reported that they were met with ignorance or arrogance and that answers to their questions were unavailable, inadequate or contradictory.

EYNESHAM – Information Event Friday, 19 January 2024, 2pm-6pm, 163 attended

- Community Access Point: Eynsham Library see 2.6(6) for details.
- Population 5324
- A reasonably accessible venue with adequate nearby parking. Many experts missing.

-
- This event ran for only 4 hours despite the large population, finishing before any of the working population could attend.

FARMOOR

- No information Event
- No Community Access Point
Population 1521
- Distance to nearest Information Event at Cumnor = 2 miles, no bus

FREELAND

- No Information Event
- No Community Access Point
- Population 518
- Distance to nearest Information Event at Hanborough = 2 miles, no bus

HANBOROUGH (comprising Church Hanborough and Long Hanborough) Information Event, Wednesday 13 December 2023, 1pm – 5pm. 80 attended.

- No Community Access Point
- Population 3503 (CH approx 250, LH 3250)
- Finally, a suitable, well known, central venue with sufficient parking resulting in higher attendance despite no signage guiding visitors to the location (other than that provided by SBW).
- However 1pm to 5pm on a weekday is not a suitable time for working people and 12 days before Christmas is a totally unsuitable date.
- Again no Ecology expert present. And, as at other venues, many people left this consultation angry or visibly upset reporting arrogance and bias among RPS experts with frequent mentions of inability of staff to answer their questions. Mark Owen-Lloyd of PVDP was absent (though later claimed he'd been at every event)



KIDLINGTON

- No Information Event held
- Community Access Point: Kidlington Library see 2.6(7) for details.
- Population 14,644
- This is the largest village adjacent to the site, yet it had no information event. •
Distance to nearest Information Event at Begbroke = 2.2 miles, no bus

NORTH LEIGH

-
- No Information Event
- No Community Access Point
- Population: 1733
- Distance to nearest Information Event at Hanborough = 2.4 miles, half-hourly bus

TACKLEY

- No Information Event
 - No Community Access Point
 - Population: 1073
- Distance to nearest Information Event at Woodstock = 5 miles, no direct bus

WOODSTOCK - Information Events Saturday 9 December 2023, 11am - 3 pm. 57 Attended. Also Saturday 13 January 2024, 11am - 3pm. 175 attended.

- Community Access Point: Woodstock Library (see section 6 above for details)
- Population: 3521
- Inappropriate venue with very limited parking - the Community Hall is on a narrow residential cul-de-sac, with just 4 parking spaces outside and a further 6 spaces in the car park behind (all used by staff running the consultation). The date chosen was a Saturday just 2 weeks before Christmas - clashing with many local events and opportunities for working people to do their Christmas shopping.



Severe traffic congestion and very limited parking at Woodstock Consultation Event venue



Woodstock Consultation Event. As at all venues, roadside advertising provided by Stop Botley West, only a small notice on the door provided by Developer

- The Town Hall, better known and central, would have been a far more appropriate location. Not a single notice in Woodstock advertised the event or

- advised the location. Several complaints from people who had difficulty finding the location and were then unable to park.
- As they left, several people were close to tears of frustration and desperation that their questions weren't answered and that their concerns and objections had been ignored. The mood was of resignation that the consultation was meaningless and that the project would go ahead regardless same issues apply as to the 9 Dec event. Traffic chaos. No Hydrologist, no Ecologist.

WOOTTON

- No Information Event
- No Community Access Point
- Population: 602
- Distance to nearest Information Event at Woodstock = 2.5 miles, no bus

YARNTON

- No Information Event
- No Community Access Point
- Population: 3227
- Distance to nearest Information Event at Begbroke = 1.3 miles, no bus

8. Contradictions with Statement of Community Consultation (SoCC)

In the Statement of Community Consultation November 2023 in Section 7, 'How will we Consult?', PVDP stated:

'The consultation activities described in this section of the SoCC ensure inclusive, meaningful and open consultation. The activities include a range of methods **to ensure our consultation can be accessed by all members of the community.**'

'These events will be held on different days of the week including weekends, with varied hours **to accommodate different availability within the community.**' [our emphasis]

However, it is patently clear that PVDP's Provision of the Statutory Consultation for the 43,632* members of the population who would be impacted by the proposal, has been totally inadequate. It has failed significantly to ensure that the consultation could be accessed by all members of that population, or 'to accommodate different availability within the community.'

In the SOCC, Section, PDVD stated: 'A Consultation leaflet will be posted to all properties in the Core Consultation Zone - an initial distance of 2km from the edge of the proposed solar development areas ...' Despite this, consultation leaflets were not delivered to the village of Combe (pop. 774) just 2km from the site.

In summary, regarding adequacy of making the consultation accessible to all, PVDP failed to:

- ensure that residents in full-time employment would be able to attend Information Events
- ensure that those in the northern section of the site had access to an Information Event in their area
- ensure that residents of all parishes would be able to attend Information Events in easily accessible venues
- ensure that all residents received Community Consultation Leaflet in time or at all
- ensure sufficient advertising in the rural communities - such advertising was provided only by Stop Botley West
- provide any evening events extending beyond 7.30pm
- provide Community Access Points with sufficient room to study all PEIR Documents
- provide Community Access Points with adequate opening times

9. References:

Transport Statistics: <https://www.gov.uk/government/statistics/transport-statistics-greatbritain-2022/transport-statistics-great-britain-2022-domestictravel#:~:text=How%20we%20commute,-Data%20Source%3A%20TSGB0108&text=The%20average%20usual%20commuting%20time,broadly%20similar%20to%20previous%20years.>

Time Use Statistics:

[https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/timeuseintheuk/march2023#:~:text=The%20pattern%20of%20daily%20time,and%2018%20minutes%2C%20respectively\).](https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/timeuseintheuk/march2023#:~:text=The%20pattern%20of%20daily%20time,and%2018%20minutes%2C%20respectively).)

UK Labour Market Statistics: [REDACTED]

STOP BOTLEY WEST CAMPAIGN, OXFORDSHIRE, May 2024

AOC ANNEX 3: READABILITY OF COMMUNITY CONSULTATION LEAFLET AND NON- TECHNICAL SUMMARY



Contents

AOC ANNEX 3: READABILITY OF COMMUNITY CONSULTATION LEAFLET AND NON-TECHNICAL SUMMARY 1

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 3. Results for a sample of text from two sections of the Non-Technical Summary on the Flesh-Kincaid Calculator 13

1. Community Consultation Leaflet: Summary of findings

The consultation leaflet is difficult to read for a number of reasons. Scores on The Gunning Fog Index or the Flesh Kincaid Reading Test are significantly high. Texts for a wide audience generally need a fog index less than 12. Texts requiring near-universal understanding generally need an index less than 8. The lowest score in THE Community Consultation Leaflet is 15.28. The highest (the Introduction) is 17.59.

The text is inaccessible to a wide audience not solely because it contains a high density of polysyllabic words. As the edited sections of the text show (pasted after the table), words of 3+ syllables are often clumped together.

The text is heavy with compound noun phrases which do not have a clear referent (see table). Processes are represented with noun phrases which delete agency of performance and obscures exactly what is being done when, where, and by whom.

There is a heavy use of plurals which obscures precise detail. There are very few finite verbs in the text. Instead, there is a heavy use of modal verbs (incomplete conditional actions), and verbs which are present continuous: i.e. no specific action has been completed or recorded.

Fog Index Reading Level By Grade

- 17: College Graduate
- 16: College Senior
- 15 : College Junior
- 14: College Sophomore
- 13: College Freshman
- D A N G E R L I N E----- 12:
- High School Senior
- 11: High School Junior
- Easy Reading Below This Line--- 10:
- High School Sophomore
- 09: High School Freshman
- 08: 8th Grade
- 07: 7th Grade
- 06: 6th Grade
- 05: 5th Grade

Clear time-specific syntax is conspicuous by its absence. Finite verbs are suppressed. This, alongside dense abstract polysyllabic vocabulary and a high degree of complex word formation results in a consultation document that is neither accessible nor proportionate in communicating the scope of the project to the communities that the booklet is designed to address. Interestingly, the Gunning Fog Index score is actually lower in the sections of the PEIR Non-Technical Summary we have scanned.

Results

Flesh-Kincaid Grade Level: **14.3**

Flesch Reading Ease Score: **26.6**

Reading Level: **College graduate** (Very difficult to read)

Average Words per Sentence: 19.2

Average Syllables per Word: 1.9

Sentences: 128

Words: 2460

Score	Estimated Reading Grade Level
90 to 100	5th grade
80 to 90	6th grade
70 to 80	7th grade
60 to 70	8th and 9th grade
50 to 60	10th to 12th grade (high school)
30 to 50	College
0 to 30	College graduate

Results for 70+% of the text in the Community Consultation Leaflet on the FleshKincaid Scale

TEXT ON PAGES 4-5: THE GUNNING FOG INDEX IS **17.59**

- The number of major punctuation marks, eg [.] , was 30
- The number of words was 738
- The number of 3+ syllable words, [highlighted in blue](#), was 150

The need for Botley West We need to take action against climate change[.] We also need to improve the UK's [energy security](#)[.] Botley West can support this by providing [affordable](#), [renewable](#), and [homegrown electricity](#)[.] Phase Two [Community Consultation](#) Leaflet Botley West Solar Farm 2 Met Office,

'Record breaking 2022 [indicative](#) of future UK climate', July 2023 3 IEA, 'Net Zero Roadmap Update', [September](#) 2023 4 Solar Energy UK, 'Solar farms and food [security](#) the facts', [September](#) 2022 5 UK Government, 'PM [recommits](#) UK to Net Zero by 2050', [September](#) 2023 6 UK Government, 'British [Energy Security Strategy](#)', April 2022 Local climate targets [Oxfordshire](#) has set [ambitious](#) climate targets for the county, which Botley West would [contribute](#) to. The [Oxfordshire Energy Strategy](#), signed up to by all councils within [Oxfordshire](#), agreed a target of a 50% [reduction](#) in carbon [emissions](#) by 2030, and 100% net zero carbon [emissions](#) by 2050. 9 The need for [home-grown energy infrastructure](#) As gas prices rise and [energy](#) bills increase, the UK is in need of a more [reliable](#) and secure supply of [energy](#). This is [essential](#) in making us more [resilient](#) against [potential](#) blackouts, meet growing [energy](#) demands and improve our [energy security](#). It can be [achieved](#) by increasing our own [generating capacity](#) and number of [generating](#) assets, through [renewable energy](#) projects such as Botley West. Building [infrastructure](#) where it is needed most Within [Oxfordshire](#), there is a need to increase [electricity generation](#) to support demand. The county is committed to [extensive](#) growth and intends to lead on [energy innovation](#). 9 These targets lead to a need to increase the [capacity](#) of [electricity generation](#) within [Oxfordshire](#). This includes both the [development](#) of connecting [infrastructure](#), through [substations](#) built by [National](#) Grid and other [electricity suppliers](#), as well as new [generating](#) stations, such as Botley West. Botley West has secured a grid [connection](#) with [National](#) Grid in close [proximity](#) to the site, allowing for supporting both [Oxfordshire's ambition](#) to increase their solar [generating capacity](#) from 300 MW to 1900 MW by 2030, as well as supplying [electricity](#) to an [area](#) where the demand is growing and where there is [capacity](#) to [accommodate](#) it. Impacts of climate change The effects of climate change can be seen around us, both [nationally](#) and [globally](#). Wildfires have broken out more [frequently](#) across Europe and our own weather has been more [temperamental](#). 2022 was the first year in which a [temperature](#) above 40C was recorded in the UK. 2 To tackle climate change the [International Energy Agency](#) (IEA) has highlighted that [renewable electricity](#), in [particular](#) solar, is key in reducing carbon [emissions](#) and [achieving](#) 2030 targets. 3 Climate change poses one of the most [serious](#) threats to food [production](#) in the UK. The [Department for Environment](#), Food and Rural Affairs (DEFRA) has [estimated](#) that climate change could reduce the UK's stock of high-grade [agricultural](#) land by three [quarters](#) by 2050. 4 The need for ground-mounted solar The UK has set [ambitious](#) and [legally](#) binding targets to [eliminate](#) carbon [emissions](#) and [achieve](#) net zero carbon [emissions](#) by 2050. 5 [Largescale](#) solar [development](#) is [recognised](#) as having an [important](#) role to play in helping [achieve](#) this target. The British [Energy Security Strategy](#), published in April 2022, outlined the aim to increase the UK's solar [capacity](#) fivefold by 2035 – [equivalent](#) to around 70 [gigawatts](#) (GW) total [generation capacity](#). 6 To [achieve](#) this, the UK must install an [average](#) of 4.15 GW in solar [capacity](#) per year. Whilst rooftop solar is also part of this [solution](#), projects such as Botley West are [essential](#) to be able to reach these targets, due to its [ability](#) to produce power on a much more [efficient](#) scale. The [affordability](#) of solar Solar is the most [affordable](#) form of [electricity](#) in the UK, 7 which means that it can help to reduce [household energy](#) bills caused by the [continued](#) use of gas. Botley West could reduce our [reliance](#) on foreign gas imports, providing an [equivalent](#) amount of [electricity](#) for up to 330,000 homes. The [Department of Energy Security](#) and Net Zero (DESNZ) has [identified](#) solar as being central to the future of [electricity generation](#) in a recent report, with solar [estimated](#) to be roughly 35% cheaper than costs predicted for [combined-cycle](#) gas turbine power plant in 2025. 8 7 Solar Energy UK, 'Everything Under the Sun' The Facts About Solar Energy', March 2022

TEXT ON PAGES 14-15 THE GUNNING FOG INDEX IS 15.28

- The number of major punctuation marks, eg [.], was 32
- The number of words was 562
- The number of 3+ syllable words, [highlighted in blue](#), was 116

Opportunities Beyond Solar Botley West Solar Farm is committed to [establishing](#) an [environmental](#) and longstanding [legacy](#) across the [area](#). We are committed to working with the [community](#) to inform what a package of [community benefits](#) could look like. We are seeking to take a [considered](#) approach to [delivering community benefits](#) through Botley West. Our proposed approach is built upon three key forms of [potential community benefit](#): 1. [Community](#) funding. we are committed to ensuring funding is [available](#) to support local [initiatives](#) for each year that the solar farm is [operational](#). 2. Onsite [benefits](#). we are proposing to [deliver benefits](#) to local [communities](#) through the design the project, such as by increasing [connectivity](#) through new footpaths and providing areas for [community](#) food [production](#). 3. Helping to reduce [energy](#) bills. in [addition](#) to the wider effect that increased solar [capacity](#) may have on UK [electricity](#) prices, we are [actively](#) exploring [potential mechanisms](#) through which the project could [directly](#) supply [electricity locally](#) at a discounted rate. During and since the last phase of [consultation](#), the

project team has been in [discussion](#) with a number of local groups to [understand](#) how best the project can [benefit](#) the local [community](#)[.] We have engaged with[.] We are exploring [various](#) on-site [benefits](#) that Botley West could [deliver](#) to local [communities](#)[.] As part of our approach to [deliver community benefits](#), we are committed to supporting the local [community](#) by[.] Phase Two [Community Consultation](#) Leaflet Botley West Solar Farm [Establishing a Community Benefit Fund](#) - As part of Botley West's [objective](#) to [establish a legacy](#) across the [area](#) through working with the [community](#), we are committed to exploring making a fund [available](#) that will be [similar](#) in size to Blenheim's [bursary](#) fund of £50,000[.] We are seeking feedback on the [potential](#) projects and [initiatives](#) that this fund could support[.] Local [Agricultural](#) Groups – [allocating](#) areas of the site for [community](#) arable farming and [community allotments](#)[.] Blenheim Estate – becoming the [environmental](#) steward for the site to maintain the [legacy](#) of the [area](#) and ensure that [environmental benefits](#) are [delivered](#)[.] The Estate has a [wellestablished](#) track record of [delivering](#) green projects and their own Green Report reflects the same visions as the project[.] The findings from the Estate's [monitoring](#) data will ensure the [accountability](#) of any [environmental commitments](#)[.] Local Farmers – [understanding](#) the [opportunities](#) for sheep to graze the land[.] Cherwell [Collective](#) – an [organisation](#) looking to [empower](#) those who may struggle to live [sustainably](#) by providing [locally](#) grown food to [communities](#)[.] [Cutteslowe Community](#) Larder – seeking to provide food to the [community](#) at low or no cost to combat food [poverty](#) and reduce food waste[.] [Biodiversity](#) Net Gain - aiming to create a [standard-setting environmental legacy](#) with a [minimum biodiversity](#) net gain of 70%[.] More details about our [biodiversity](#) plans can be found on page 17[.] [Increasing Recreational Use](#) – Botley West is exploring [improvements](#) to [connectivity](#) across the site through working with Blenheim and new proposed footpaths and cycle tracks[.] More details about our [recreational](#) plans can be found on page 18[.] Exploring [Community Energy Opportunities](#) - The team also [appreciate](#) that [energy](#) bills are becoming a real burden for many people[.] Botley West is exploring the creation of a retail [energy company](#) to sell part of the [energy generated](#) by Botley West to the local [community](#) at a discounted rate[.] 14 | [Opportunities Beyond Solar](#) [Opportunities Beyond Solar](#) |

TEXT ON PAGES 16-17: THE GUNNING FOG INDEX IS 15.48

- The number of major punctuation marks, eg [.] , was 36
- The number of words was 596
- The number of 3+ syllable words, [highlighted in blue](#), was 132

[Environmental Impact Assessment](#) (EIA) As part of our [Development](#) Consent Order (DCO) [application](#), we are [undertaking](#) an [Environmental Impact Assessment](#) (EIA) to inform our [proposal](#) and the design[.] This is a process that involves [various](#) studies being [undertaken](#) and [mitigation](#) measures proposed to reduce or remove any [significant environmental](#) impacts that are [identified](#)[.] The EIA process is helped by feedback received through [consultation](#)[.] The process is split into three main areas[.] the EIA scoping report, the [Preliminary Environmental Impact Report](#) (PEIR) and the [Environmental Statement](#) (ES)[.] We submitted our EIA Scoping Report to the Planning [Inspectorate](#) (PINS) on 15th June 2023[.] PINS consulted with [statutory consultees](#) and published their Scoping [Opinion](#) on 24th July 2023, which will guide our EIA work[.] We are now consulting on a [Preliminary Environmental Information](#) Report (PEIR) which provides the [initial](#) findings of these [assessments](#) to help [consultees develop](#) an informed view of the [potential environmental](#) impacts of Botley West and our proposed approach to assessing and [mitigating](#) them[.] This has built upon the [initial](#) EIA scoping report, the Planning [Inspectorate](#) (PINS) Scoping [Opinion](#) and [environmental assessments](#), in [addition](#) to the [consultation](#) feedback[.] Our DCO [application](#) will include an [Environmental Statement](#), containing the full details of the [environmental assessments undertaken](#) for Botley West and the [mitigation](#) and [enhancement](#) measures proposed[.] Phase Two [Community Consultation](#) Leaflet Botley West Solar Farm 16 |

[Environmental Impact Assessment](#) [Environmental Impact Assessment](#) | 17 Landscape and [Visual](#) As part of the ongoing EIA process, we have been assessing the [potential visual](#) impact of the site upon the local [area](#)[.] [Therefore](#), we have [developed](#) a Landscape [Masterplan](#) which includes the landscape and [ecological strategy](#) for [implementation](#), longterm [maintenance](#), and [management](#) of the Project site[.] We have been exploring the [potential](#) of the following [mitigations](#)[.] • Creation of woodland belts[.] • Planting of lengths of new [hedgerows](#) along lengths of PRoWs and [reinforcement](#) of existing field [boundary hedgerows](#)[.] • Meadow grassland to [perimeter](#) of solar array areas and areas of [enhancement](#)[.] • Planting of [individual](#) trees where [appropriate](#)[.] We've taken [several](#) steps to [mitigate visual](#) impacts[.] This includes expanding the [minimum](#) buffer zone to 25 metres between the solar arrays and any building and increasing buffer zones near [residential](#) areas[.] An [area](#) of solar [development](#) has been

removed to enhance [safety](#) for Oxford Airport[.] Furthermore, there will be no [permanent operation](#) of [security](#) lighting, instead there will be infrared sensors, which provide no visible light, and [manually operated](#) lighting will only be in the [vicinity](#) of [transformers](#)[.] [Visualisations](#) of how Botley West could look can be found on the project website ([www](#)[.] [botleywest](#)[.] [co](#)[.] [uk](#))[.]

[Local Ecology](#) and [Biodiversity](#) In assessing the local [ecology](#) and [biodiversity](#) of the project site we have been [undertaking site-specific](#) surveys, [investigated habitats](#), and [studied](#) the [various species](#) in the [area](#)[.] There are [mitigation](#) measures that the project [incorporates](#) to ensure the effects on [ecology](#) is [minimised](#)[.] These include[.] • [Establishing](#) a [minimum](#) 5m buffer zone for [hedgerows](#), trees, ponds and woodland, an 8m buffer for [watercourses](#) and 15m for [ancient](#) woodland • [No removal](#) of [hedgerows](#), woodland, [waterbodies](#), or [watercourses](#)[.] • [Establishing](#) new skylark plots between the solar arrays[.] • [Creating](#) a new [landscape-scale corridor](#) along the River [Evenlode](#)[.] [To deliver](#) this, PVDP is working with Blenheim Estate to ensure there is a long term [environmental stewardship](#) in place, with the [primary](#) goal of supporting the project to [achieve](#) a [substantial biodiversity](#) net gain within the [area](#), of at least 70%[.] This could include[.] • [Establishing](#) bee hives on the site[.] • [Providing](#) log piles and other [refugia](#)[.] • [Putting](#) bird and bat boxes on trees[.]

TEXT: PAGES 18-19: THE GUNNING FOG INDEX IS 15.45

- The number of major punctuation marks, eg [.] , was 34
- The number of words was 605
- The number of 3+ syllable words, [highlighted in blue](#), was 126

[Land Use and Agriculture](#) In assessing land use and [agriculture](#), we have been conducting a number of [Agricultural Land Classification](#) (ALC) surveys[.] From our [initial assessments](#), [approximately](#) 62% of the surveyed land falls under the [category](#) of [lower-quality](#) Subgrade 3b [agricultural](#) land, while 38% consists of Best and Most [Versatile](#) (BMV) [agricultural](#) land (ALC Grades 1-3a), with the [majority](#) of that land classed as 3a, which [represents](#) pockets of land across the site[.] The ALC Survey Map can be found in Figure 17[.] 3 of the PEIR[.] Botley West intends to [implement](#) a [comprehensive](#) Outline Soil [Management Plan](#)[.] At the end of Botley West's [operational](#) life, a [comprehensive decommissioning](#) plan, commencing two years before the lease concludes, will be [executed](#)[.] Our [commitment](#) is to remove all [infrastructure](#) except public highway cables, keeping the [National Grid](#) [substation](#)[.] The land will return to its [original](#) use, and not become [brownfield](#) land, with a [dedicated](#) reserve to cover [decommissioning](#) costs[.] We will be working with [landowners](#) and [relevant stakeholders](#) to explore how [particular](#) features of our [proposals](#) – such as planting, landscaping, and [permissive](#) access – could provide [continued benefits](#) by remaining in place beyond the life of the solar farm[.]

[Recreation and Amenity](#) In accessing the [recreation](#) and [amenity](#) of the site, the Botley West team have been exploring ways to increase the [connectivity](#) of the site through proposing new footpaths and cycle tracks[.] As a part of this, we will [establish](#) a new footpath to connect [Cassington](#) and Church [Hanborough](#)[.] Additionally, we are enhancing the existing footpath connecting Bladon to [Campsfield](#), located near the airport north of Begbroke, to transform it into a [dedicated](#) cycle route[.] Furthermore, we are exploring more [opportunities](#) where we can [facilitate](#) new routes and upgrade current ones[.] Regarding the current Public Rights of Way, our [primary](#) aim is to preserve them without [disruption](#)[.] While [temporary diversions](#) may be [necessary](#) for [safety](#) during [construction](#), our [objective](#) is to [minimise](#) [inconvenience](#) to users[.] Throughout [operation](#), all existing routes will remain [unaltered](#)[.]

[Hydrology and Flood Risk](#) Solar farms provide the [opportunity](#) to reduce the flood risk of an [area](#)[.] Botley West is [actively](#) exploring ways to [mitigate](#) the [potential](#) impacts of the project on [hydrology](#) and flood risk during [construction](#) and [operation](#)[.] This includes conducting [hydrogeological](#) risk [assessments](#) for [sensitive](#) areas[.] The [mitigation](#) measures we have [already](#) put in place include[.] • [Incorporating](#) a drainage [strategy](#) in [various](#) project [components](#) to [mitigate](#) surface water runoff and flood risk[.] • [Establishing](#) [temporary](#) haul roads[.] • [Planting](#) seeded [vegetation](#) between solar PV modules to manage surface water and [erosion](#)[.] • [Implementing](#) shallow channels with seeded [vegetation](#) along the [perimeter](#) to capture excess water after heavy rainfall[.] • [Employing](#) trenchless methods for crossing [watercourses](#) and flood defences[.] • [Maintaining](#) a 10m buffer zone between [watercourses](#) and project [development](#)[.] In [addition](#) to these [mitigation](#) measures, we are [developing](#) [Pollution Prevention](#) Plans, an [Infrastructure](#) Drainage [Strategy](#) and a Code of [Construction](#) Practice which follow [environmental guidelines](#)[.]

Traffic, Access, and Construction Botley West is committed to reducing traffic and construction impacts[.] We've actively worked with Oxfordshire County Council Highways to address traffic concerns[.] To minimise disruptions, we'll include a detailed Construction Traffic Management Plan (CTMP) in our Development Consent Order application[.] This CTMP will be produced collaboratively with Highway Authorities and set out routeing and traffic controls[.] Additionally, we'll create a travel plan for our construction staff to minimise local road traffic[.] The materials used for the construction and the lifetime of the project will be as recyclable as practically possible[.] Up to 99% of materials in a solar panel are recyclable, and there are well-established industrial processes to do this[.]

2. Analysis table for Community Consultation Leaflet

ANALYSIS TABLE FOR LANGUAGE USED IN COMMUNITY CONSULTATION BOOKLET

Page	Statement	Modal tense (actions which may, or may not happen)	Non-finite tense (action not completed, or guaranteed)	Process and agency unclear	Vocabulary without a clear referent
2	could deliver 840 MW of clean...affordable power	could			Affordable (see also pp.4) (no calibration of scale of affordability – or to whom)
3	proposed environmental enhancement measures		Proposed	Proposed environmental enhancement measures	Enhanced
8	proposed mitigation measures		Has been proposed	(who is going to do what and where?)	(from what to what? – deletion of framework to make statement accountable)
14	proposed a new cycle route		Our proposed approach		
16			New proposed footpaths		
3	Potential impacts on the environment and local communities	Potential	Proposed approach	proposed mitigation measures (14, 16, 17&3, 20)	New recreational connectivity (code for extending a footpath between Cassington and Church Harborough along a route lined with solar panel fencing. What is being connected?)
14		Potential		mitigation and enhancement areas (11)	Boosting connectivity (10)
16		Potential		enhancement of what?	Between what and/or whom?
		Potential		mitigation	Increasing connectivity (14)
		Potential		OED mitigation (n 7a) extension or	
		Potential		palliation of an offence, fault, etc., abatement or minimization of the loss or damage resulting from a wrongful act.	
		Potential		in mitigation (Law): by way of extension or palliation (esp. of an offence) in order to obtain a favourable modification of judgment, a penalty, damages). (the use of the word mitigation throughout suggests that some harm or damage will result from the project	
		Potential		(no agency and scale to calibrate what is being mitigated. Measure(s) plural hides what exactly is to be done)	
		Potential		See also pp.6,16 x 2 and 17	
4	Climate change could reduce the UK's stock of high-grade agricultural land	could			Home-grown electricity (re-wording of UK energy supply that implies that solar panels are a nutrient grown in people's back gardens)
5	its ability to produce power on a more efficient scale				
5	Has secured				
5, 10	In close proximity to the site			When and who are the parties?	
5	capacity			Where exactly?	
6	Agreed local viewpoints			Of what?	
6	The project may look	may		Agreed by whom?	
6					Mitigation measures (see comment for p.3)
7	Has an agreement			(with whom and when)	

Page	Statement	Modal tense (actions which may, or may not happen)	Non-finite tense (action not completed, or guarantees)	Process and agency unclear	Vocabulary without a clear referent
7	Enough electricity for the equivalent of 330,000 homes				Omits quantity – actually only for 3 hours per day
7	Affordable power				Unspecified claim – affordable (how), and to whom?
7, 17, 18, 20	Increased minimum buffer zone distances				Plural and nominalisation masks the precise distance
7	Significant increases to the buffer zones See also p. 16 significant environmental impacts				Plurals hide quantity of increase and no calibration of significant.
7			seeks to		
7	Increase recreational use and access across the site				How is increase measured? What is the baseline? What kind of recreational use?
7	New footpaths and cycle paths				Plurals hide quantity and mask those already in existence, See comments on maps pp 8-12
7	Minimum biodiversity net gain of at least 70% See also p. 17				What is the baseline and how has this figure been calculated. There is a reference to p.16 of the booklet but p.16 does not unpack the figures
7	Removed solar development directly south				Development not present in first booklet
7			is exploring (7) we are exploring (9) (no firm commitment)		Dynamic (active)? forceful? effective? Word sounds punchy but lacks any precise referent) and wide-ranging community benefits package. (ref to p.15 but all details prefaced by phrase 'is exploring'. No guarantees
9					See comment p. 3. What are visual impacts?
8	Mitigate against visual impacts				
9	All public rights of way... will remain open following the construction of Botley West		(sequence of tenses is unclear, and construction doesn't have time specificity. Text obscures the fact the these routes will be closed for unspecified periods of time while BW is under construction)		
9	Areas for community food growing				What does this mean – and which areas? Is this something the 'community' has asked for?
9	skylarks				Why these birds?

Page	Statement	Modal issues (actions which may or may not happen)	Non-modal issues (actions not completed, or guaranteed)	Process and agency unclear	Vocabulary without a clear referent
10	Buffer zones				DED buffer 2 (narrative; spec. used attributively to designate a spot, zone, etc., lying between two others, usually owing allegiance to neither, and serving as a means of preventing hostilities between them)
10	Potential and visual impacts	Potential of the following mitigations			Impacts (on what- and what are these impacts?)
10			We are offering to assist (No specific guarantee or timetable)	We are offering to assist (what - and how)	
10	Salt Criss... and Harborough railway station				So far as I can see from the map the 'new cycle path' does not extend to the railway station
11	Upgrade a footpath between Blisdon and Bigglesby ... New circular walk near Casington		We are proposing x2 with new planting proposed underneath		
12					
13	Approximately 30% of the site				How much of 20% is approximately?
13			We are considering		A number of labelling options (how many - and what are the options)
13	It is intended to cross existing features		It is intended		Features such as the river Presumably River Thames? And what are the other features?
13	National Grid is likely to locate their substation		is likely to (no firm commitment)		Within or directly next to (when is it? - and what does directly next to mean?)
13, 14, 17	Visualisations	Could look to guarantee that this is how they will look			Photographs? Drawings - who has created these and from whose perspective? How binding are they?
14			We are seeking to take	Local initiatives (who has initiated them?) Committed to ensuring funding is available (from where and how much?)	

Page	Statement	Modal tense (actions which may or may not happen)	Non-finite tense (action not completed, or guaranteed)	Process and agency unclear	Vocabulary without a clear referent
14	In addition to the wider effect that increased solar capacity may have on UK electricity prices.....	May have	We are actively exploring (i.e. not inactive)! – and no firm commitment to this		<p>Helping to reduce energy bills UK electricity prices This is extremely misleading and fails to account for the market-driven mechanisms for establishing electricity prices</p> <p>The marginal producer of electricity in the UK is most often gas because it is one of the most expensive sources, so is chosen last in the 'merit order' on the spot market. But it serves a vital role because gas-fired power stations can be easily switched on and off at short notice to make sure that supply balances to meet demand. Renewable energy sources, on the other hand, are unpredictable due to changes in weather, while nuclear energy provides a fairly constant source of power that is difficult to turn on and off.</p> <p>This means that, although generation methods that have low marginal cost (including renewables and nuclear) produce the majority of UK electricity, the price that is paid for it in both wholesale and retail markets is set much higher, at the marginal cost of generating electricity with gas https://www.instituteforgovernment.org.uk/article/explainer/electricity-market#:~:text=Electricity%20suppliers%20buy%20the%20electricity,-ahead%20market</p>
14	Seeking to provide food to the community at low or no cost to combat food poverty and reduce food waste	May struggle to live sustainably	Allocating areas (not delivered) Looking to empower (not achieved) Seeking to provide food (not done)	We have engaged with (doesn't guarantee agreement of specific proposals) Understanding the opportunities (doesn't commit to precise action) Seeking to provide food to the community at low or no cost to combat food poverty and reduce food waste (how?)	
15	Green projects		We are exploring Will ensure the accountability Aiming to create	Findings....will ensure the accountability (findings is vague, and findings have no agency in ensuring accountability. Accountability to whom?)	Various onsite benefits Environmental benefits Reflects the same visions (in reverse – what visions – green is a blanket term
15		Fund could support	Exploring the creation of a retail	That will be similar in size to £50,000 (imprecise)	To sell part of the energy generated by Botley West (how large or small a part)
16	That are identified			Studies being undertaken That are identified (by whom?)	
17	Bee hives, log piles and other refugia bird and bat boxes	Could include			Refugia is undefined. There are only 2 attested examples in OED – hence not very accessible vocabulary to use – and misleading. I don't think log piles can be classed as refugia. Where do the logs come from? An isolated area forming a natural refuge (refuge.n.4d) for plants and animals. In later use also: a managed, artificial, or legally protected habitat of this type

Page	Statement	Modal tense (actions which may, or may not happen)	Non-finite tense (action not completed, or guaranteed)	Process and agency unclear	Vocabulary without a clear referent
17	No removal of waterbodies				Waterbodies is a coinage. It ought to be water bodies. The coinage occludes exactly what kind of topographical water is included in this designation. An area or mass of water, esp. as forming a topographical feature (lake, river, sea, etc.); a body of water (see <i>body</i> n., V.183). Aren't wetlands water bodies? If so, how does this statement account for drilling cables in Swinford Meadows? wetland . An area of land that is usually saturated with water, often a marsh or swamp
17	No permanent operation of security lighting				Is this only in the vicinity of Oxford airport or does this apply to the whole site?
17	Infra-red sensors, which provide no visible light				To humans, perhaps, but what about bats – or even some species of birds?
18	Outline Soil Management plan		Intends to implement		
18	The land will return to its original use				How is this possible for land classed as 3a)
18	At the end of BW's operational life.... A comprehensive decommissioning plan		Will be executed		Why can there be no plan at the start at the operational life of the site? Two years before the end of the lease keeps everyone in the dark
18	Dedicated reserve				dedicated to what? And what will it reserve?
18	To its original use		Land will return		How is this possible with grade 3a land.
18			Not become	Not become brownfield Negative results in non-specification at what it will become	Why not say outright the land will be classed as greenfield?
18	New routes and upgrade current ones		We are developing		Referent unclear
18	Temporary diversions.... safety	May be necessary			Diversions where? And for how long? Safety of whom?
18	Minimise inconvenience to users		Our objective is to Not identical to 'we will not'		What kind of inconvenience and who are the users? And what are they using?
19	Pollution Prevention Plans Infrastructure Drainage Strategy Code of Construction Practice		We are developing		Surely a drainage strategy needs implemented before consultation especially given flooding in area. Merton has recently been denied permission to build 500 homes in Yarrinton because of the village's history of flash flooding
19	Drainage strategy				In various project components Which ones? And what are the components

Page	Statement	Modal tense (actions which may, or may not happen)	Non-finite tense (action not completed, or guaranteed)	Process and agency unclear	Vocabulary without a clear referent
19			We have already put in place	Incorporating, Establishing, Planting, Implementing, Employing, Maintaining <i>Present participles are incompatible with past tense of 'already put in place' – especially seeded vegetation</i>	
	Seeded vegetation				What on earth is this?
19	Construction Traffic Management Plan		We'll include		
19	Up to 90% of materials in a solar panel are recyclable				A solar panel? <i>What about the particular materials of the solar panels they intend to use. What happens to the 'nearly 10% of the other materials?' What about the other materials used in construction such as cables, concrete etc?</i>
19	Well-established industrial processed			<i>Established by whom and what are the processes? Where will they be carried out?</i>	
19	CTMP		Will be produced collaboratively		
19	Travel plan for construction staff		We'll create		
20	Heritage Impact Assessment			Have also been commenced <i>When, and by whom?</i>	
20	to achieve this				<i>What is antecedent of this?</i>
20	May employ a no-dig approach	may			
20	Could utilise 'concrete shoes'	could			
20	Significant ... Less significant				<i>How is this calibrated, and by whom?</i>
20	Effects on heritage assets			Are considered reversible <i>By whom? And what exactly does reversible mean</i>	<i>What kinds of effect?</i>
20	Are deemed insignificant			<i>How is significance measured? And by whom?</i>	
20	Environmental mitigation				<i>What does this mean?</i>

3. Results for a sample of text from two sections of the Non-Technical Summary on the Flesh-Kincaid Calculator

Results

Flesh-Kincaid Grade Level: **12.1**

Flesch Reading Ease Score: **32.3**

Reading Level: **College** (Difficult to read)

Average Words per Sentence: 13.6

Average Syllables per Word: 1.9

Sentences: 71

Words: 967

Score	Estimated Reading Grade Level
90 to 100	5th grade
80 to 90	6th grade
70 to 80	7th grade
60 to 70	8th and 9th grade
50 to 60	10th to 12th grade (high school)
30 to 50	College
0 to 30	College graduate

Fog Index Reading Level By Grade

17: College Graduate
 16: College Senior
 15 : College Junior
 14: College Sophomore
 13: College Freshman
 -----D A N G E R L I N E----- 12: High School Senior
 11: High School Junior
 ---Easy Reading Below This Line--- 10: High School Sophomore
 09: High School Freshman
 08: 8th Grade
 07: 7th Grade
 06: 6th Grade
 05: 5th Grade

TEXT ON PAGES 1-2 : THE GUNNING FOG INDEX IS 13.61

- The number of major punctuation marks, eg [.] , was 44
- The number of words was 535
- The number of 3+ syllable words, [highlighted in blue](#), was 117

1 [Introduction](#) 1[.] 1 Purpose of this [Non-Technical Summary](#) 1[.] 1[.] 1 This [Non-Technical Summary](#) provides an [overview](#) of the [Preliminary Environmental Information Report](#) (PEIR) prepared for the [Botley West Solar Farm](#)[.] The PEIR has been prepared by RPS for [Photovolt Development Partners GmbH](#) (PVDP) on behalf of the [Applicant, SolarFive Ltd](#)[.] ([SolarFive](#))[.] [SolarFive](#) is a licence holder under the [Electricity Act 1989](#) and also a [registered company](#) in England and Wales ([company no](#)[.] 12602740)[.] 1[.] 1[.] 2 This [Non-Technical Summary](#) forms part of the [documents](#) submitted by the [Applicant](#) in support of the [application](#) for [development consent](#) for the [Botley West Solar Farm](#) ([hereafter](#) referred to as 'the Project') and has been written in a [non-technical language](#) and [summarises](#) the [information](#) contained within the PEIR[.] 1[.] 1[.] 3 The purpose of PEIR is to present the [preliminary](#) findings of the [Environmental Impact Assessment](#) (EIA) being [undertaken](#) for the Project, for the purposes of [statutory consultation](#) in [accordance](#) with Sections 42 and 47 of the [Planning Act 2008](#) (PA 08)[.] PA 08 was [introduced](#) to provide a new [development consent](#) regime for '[Nationally Significant Infrastructure Projects](#)' (NSIP)[.] 1[.] 1[.] 4 The Project is classed as a NSIP for the purposes of PA 08 and [requires](#) an [application](#) for a [Development Consent Order](#) (DCO)[.] The [Applicant therefore](#) intends to submit an [application](#) for [development consent](#) to the [Secretary of State](#) via the [Planning Inspectorate](#) (PINS), as [required](#) under PA 08[.] 1[.] 1[.] 5 The PEIR has been published as part of the [consultation](#) process, which also includes a series of [community consultation](#) events in [accordance](#) with the process set out in the [Statement of Community Consultation](#) (SoCC)[.] 1[.] 1[.] 6 For access to the full PEIR, please refer to the [National Infrastructure Planning Website](#)[.] [Botley West Solar Farm](#)[.] Details of how to view the full PEIR and its volumes, or to obtain further copies of this NTS, are provided at the end of this [document](#)[.] 1[.] 2

[Overview](#) of the Project 1[.] 2[.] 1 The UK [Government](#) has [legislated](#) to commit the country to [achieving](#) net zero carbon [emissions](#) by 2050, and to [de-carbonising electricity](#) by 2035[.] The [Government's](#) '[British Energy Security Strategy](#)' (April 2022) also expects a [five-fold](#) increase in solar power [generation](#), to 70GW,

by 2035[.] These commitments mean that the UK urgently needs more renewable forms of electricity to be produced[.] The Project's generation output will be vitally important if the Government's commitments are to succeed, significantly helping to deliver the transition to net zero[.] 1[.] 2[.] 2 The Project is formed of three separate but related solar farm areas with interconnecting cables, which together would generate renewable power through photovoltaic (PV) panels[.] The Project aims to deliver approximately 840MWe of power to the National Electricity Transmission System (NETS), Botley West Solar Farm Preliminary Environmental Information Report [.] Non-Technical Summary [.] November 2023 Page 2 providing secure and clean energy of an equivalent level to meet the needs of approximately 330,000 homes[.] 1[.] 2[.] 3 The Project's solar arrays (comprising all the mounting structures, frames and foundations) will be connected by underground electrical cables within each section of the site, and via underground electric cable to the substation at the grid connection point[.] The interconnecting cable route will largely follow the public highway, but some parts will cross land controlled by the Applicant[.]

TEXT ON PAGE 17 :THE GUNNING FOG INDEX IS 14.31

- The number of major punctuation marks, eg [.] , was 28
- The number of words was 400
- The number of 3+ syllable words, highlighted in blue, was 86

Operational Development 5[.] 5[.] 1 During the operational phase, activity on the Site will be minimal and will be restricted principally to landscape and ecology management, equipment/infrastructure maintenance and servicing including cleaning and replacement of any components that fail, and monitoring to ensure the continued effective operation of the development[.] Operational and maintenance staff may require access to the Site during daylight hours, seven days a week[.] 5[.] 5[.] 2 The undeveloped areas of the site will be designed and managed to enhance the landscape and ecological value of the area[.] The Applicant and the landowners are keen to secure these and any other benefits that the local community and other stakeholders may wish to promote[.] Discussions are advanced in respect of allowing land to be given over to community groups for small scale food production, and for some parts of the site to be given over to sheep farming[.] Further details in respect to these elements will continue to be developed and refined, including the relevant management plans for these and other areas of the site[.] The intention is to report this information within the Environmental Statement that will accompany the Applicants' DCO submission[.] 5[.] 5[.] 2[.] 1 For clarity, the Project does not incorporate any battery storage[.] Energy generated by the Project will be stored, as required, by Battery Energy Storage Systems (BESS) that are connected to the Grid elsewhere, including the EDF 50MW BESS located at Cowley substation[.] 5[.] 6 Decommissioning and Enhancement 5[.] 6[.] 1 The consent being sought by the Project is a temporary one[.] The Project will have a 35 year lease with the option to extend to 42 years[.] Within this timeframe the Project will be constructed, become operational and be decommissioned[.] Decommissioning is anticipated to start 2 years before the end of the lease and is expected to be completed in that time[.] All infrastructure associated with the development is anticipated to be removed, and exception to this is assumed to be all cables in the public highway (as it could either remain in situ or removed as part of decommissioning)[.] The National Grid substation will however remain and the remaining land will revert back to its previous use[.] 5[.] 6[.] 2 A decommissioning and enhancement plan, to include timescales and transportation methods, ecological and landscape enhancements and other environmental improvements, will be developed in consultation the local planning authority, local community and key stakeholders and form an integral part of the DCO application.

STOP BOTLEY WEST CAMPAIGN, OXFORDSHIRE, May 2024



Planning
Inspectorate

Number: 9

Name: Stop Botley West (2)

Date Received: 19 June 2024

Dear Mark,

Thank you for your email of 14th June announcing that the targeted consultation started on 14th June and runs until 28th July.

It is disappointing that no advance warning has been provided (cf 14 days given - as required - for the statutory consultation). In fact, apart from the notice in Oxford Times (circulation 3000) on Thurs 13th and e-mails on Fri 14th to those who had already been in touch with the Developer, no information reached the vast majority of those affected in the CCZ until Monday when postcards started to arrive (and why postcards rather than the booklets themselves?). Only Botley Library, in the least affected community, had received the Information Change Note booklets by Monday 17th morning, removing 4 days - including a weekend - from the consultation period. The other 4 CAPS had nothing.

You should also be aware that the advertised "zoomable map" file crashes when attempting to download to many mobile devices from the Botley West site and that there is no hard copy of the map at any of the CAPs.

SBW will respond to the targeted consultation but we note that it does not address issues raised with you at our meeting in January. This means that any amendments that you may have made in the light of our queries are not available for consultation. It is assumed that this is because it is a targeted consultation but it is also a missed opportunity and it is of particular concern that you "do not anticipate any further rounds of consultation later this year" (p5, Information Note).

Prof Alex Rogers suggested a meeting in his letter to you on 10 May, and in your email of 30 May you agreed and promised to get back with some dates - which we have yet to receive. It would be appreciated if a date could be found before 5th August.

Regards
Rosemary
for Stop Botley West Campaign



Planning
Inspectorate

Number: 10

Name: Rosemary Lewis

Date Received: 9 October 2024

From: [Re Lewis](#)
To: [Botley West Solar Farm](#)
Subject: PINS File ref: EN010145 BWSF Targeted Consultations
Date: 09 October 2024 08:39:35
Attachments: [Lack of Engagement.pdf](#)

You don't often get email from [REDACTED]

Dear Caroline

I am writing about the recent targeted consultations and about the level of engagement reported by key stakeholders with a couple of questions that I'd be grateful if you could answer.

In a meeting note with PVDP dated 13 March the Inspectorate questioned why the consultation was targeted as opposed to full. The targeted consultation included none of the missing areas from the PEIR highlighted by feedback but, instead, itemised 57 changes necessitated by mistakes or incomplete planning at an earlier stage. Only change 50, the Thames river crossing, was due to feedback received.

The statutory consultation had been rushed through over the Christmas period, despite calls by MPs and many key stakeholders for it to be delayed until January. Consequently, it was incomplete (see CPRE's list of omissions in the attachment) and full of errors requiring two further consultations. Had it been held in January, more work could have been completed, many of the later changes and two further consultations could have been avoided and a fuller consultation on all the key issues could have been conducted. This indicates poor governance on the part of PVDP.

Regarding the targeted consultations:

1. When we spoke in September, you stressed that the Developer merely needed to show they had carried out their consultations in accordance with the SOCC although, I note from the examples you sent, that the QUALITY of some aspects of the consultation is also relevant.

The first attached document shows that the Developer did NOT carry out the two targeted consultations in accordance with the SOCC and that the quality of some aspects was so poor as to make meaningful consultation impossible (especially regarding the poor quality of information, the unreferenced, unscaled maps and absence of photographs of locations on **private land to which the consultees have no access**). Additionally we have obtained evidence of several more veteran trees on private land that could be damaged by the proposed cable

trenches along new routes introduced in consultations 3 and 4 which appear to have been overlooked and not mentioned by the Developer in consultation 4.

Question: As well as being of very poor quality and inaccessible, the Developer's targeted consultations failed to accord with the SoCC and failed to address key omissions or responses received from the statutory consultation. Is this sufficient reason for them to be required to reconsult?

2. Lack of meaningful engagement with the Developer. Over the past months the StopBotleyWest campaign and many other Key Stakeholders have repeatedly responded to the 4 consultations run by PVDP highlighting the many issues not yet addressed, the failure of PVDP to answer their questions and the lack of engagement with the Developer.

The second attached document outlines our key concerns and evidence from other stakeholders eg the local district councils, Oxford Airport, Gardens Trust, CPRE all of whom comment on the lack of engagement. These statements contradict the Developer's claim to have "worked closely with stakeholders since 2022 at all stages of the project".

Question: Will the Inspector take account of the lack of engagement reported by so many stakeholders in deciding whether to accept the DCO application for examination?

With thanks and best wishes
Rosemary Lewis

Attachment 1.



Attachment 2.

Lack of Engagement with Councils and other Key Stakeholders

The Developer's claim to have "worked closely with stakeholders since 2022 at all stages of the project" is demonstrably untrue as is well documented in responses from OCC, Oxford Airport, Cherwell and Vale District Councils and others. A summary is given below from 7 of these key stakeholders.

1. **Stop Botley West Campaign (SBW).** The Developer has failed to engage fully with SBW or our supporters, contrary to the advice they received on several occasions from the Inspectorate. They have ignored a huge number of responses received from the public and a significant one from WODC despite several opportunities to make modifications before the 3rd and 4th consultations. These are all of serious concern. Many questions have gone unanswered.

Following a meeting between SBW and PVDP in January 2024, SBW sent an e-Mail asking a number of follow up questions, many of which were not answered. Among these questions was; "Which local authorities (and individuals) were consulted to agree where the photographs for the photomontages would be taken? "

The answer received was:

"All locations for the viewpoints from which photomontages were (and will continue to be) generated, were discussed and agreed with relevant planning authority's" [sic]

However, SBW have **e-Mail confirmations from WODC, Vale and Cherwell that the Developer did not consult about which viewpoints should be chosen for photomontages. The small number and the selected locations (and quality) of those included by the Developer has been widely criticised by experts and local residents.**

2. **Gardens Trust (GT), a Statutory Consultee,** made this comment about the selected viewpoints. "Staff at public [consultation] event centres including Cassington were **unable to provide adequate information on assessment of views and settings impacted, referring to the sample of viewpoints in the PEIR, which are woefully inadequate**, from one view only, not to, from, in and around assets and not assessed according to the NPPF 2023 in terms of significance and substantial or less than substantial levels of harm".

3. **Campaign for the Protection of Rural England (CPRE)** comment

"We also note that despite providing many thousands of pages of material, much of it inconsequential, there are a significant number of key areas where information is yet to be provided."

"Just as examples: Failure to set out the Applicant's grounds for establishing the 'very special circumstances' required to justify building on the Green Belt! failure to provide a Biodiversity Net Gain Assessment, an Environmental Management Plan, a Construction Traffic Management Plan or an impact assessment on the Blenheim World Heritage Site. A very limited and inadequate selection of photomontages, including omission of many of the most significant view-points."

"Although much of this information is promised at a later stage, CPRE Oxfordshire **does not believe that the public currently has enough detail to engage properly** in this Phase 2 consultation. We therefore request that the consultation is re-run when the appropriate information is available and that submission of the proposal to the Planning Inspectorate is delayed until after this has taken place".

4. **Oxford County Council (OCC).**

"More generally, our previous comments on the Phase 2 consultation made in February 2024 (attached) **remain to be addressed**. We would emphasise again that significant work will be required between now and the Autumn and **that focussed engagement with OCC and the other host** authorities will be essential.

5. **Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust.**

"We raised [a number of] comments in our previous response **and are disappointed to see that in the intervening months they have not been addressed.**"

6. London Oxford Airport

“London Oxford Airport based at Kidlington is one of England’s on 29 ‘safeguarded’ airports, which imposes a number of statutory restrictions and obligations on the airport. In the last two years **we haven’t had PVDP’s assessment(s) and documentation relating to the safeguarding of an officially safeguarded airport which we asked for right at the beginning, when they first came on the scene.**”

7. Oxfordshire branch of the Ramblers Association (OxRA).

OxRA submitted a detailed response to the Targeted Consultation relating to changes involving Public Rights of Way (PRoW), the poor quality maps and descriptions and the contradictions between the PEIR and the information Change Document.

“We note that in the Phase 2 Community Consultation Leaflet, on p.17 it is states that there will be “no removal of hedgerows, woodland, waterbodies, or watercourses”. And on p.18: “Regarding Public rights of Way, our primary aim is to preserve them without disruption ... Throughout operation, all existing routes will remain unaltered.”

“In the documentation for the current consultation, PVDP is proposing digging up and moving 10 established hedges: it would seem that the company is not aware of how long it takes to establish hedges sufficiently for them to become a haven for wildlife. Also, the original proposal would have had a detrimental effect on the positive experiences and health-giving properties arising from approximately 60 Public Rights of Way”

OxRA expressed **disappointment that the Developer had not already engaged** with the Ramblers. They later reported to SBW that they had received only a standard automated acknowledgement of receipt of their response and **no further communication or engagement with the Developer.**



Planning
Inspectorate

Number: 11

Name: Oxfordshire Estates Ltd. (1)

Date Received: 22 November 2024

From: [Dustin Dryden](#)
To: [Botley West Solar Farm](#); [White, Chris](#); [REDACTED]; [NI Enquiries](#); andy.graham@westoxon.gov.uk; Andrew.thompson@westoxon.gov.uk
Subject: Botley West Solar
Date: 22 November 2024 12:52:48
Attachments: [image001.jpg](#)
[22.11.24 - Botley West Solar.pdf](#)
[Annex A : DD and OxEs questions asked of PVDP 07.02.2024.pdf](#)
[Annex B - Developer PVDP response to DD & OxEs question 09.04.24.pdf](#)
[Annex C: summary of outstanding information from Developers at 12.11.2024.pdf](#)

Some people who received this message don't often get email from [REDACTED]

Dear Sirs,

Please find attached important correspondence for your urgent attention.

Our concerns relate to the developers' failure to consult adequately with the affected community regarding the proposed Botley West Solar project, prior to submitting the DCO (which they did on 15.11.24).

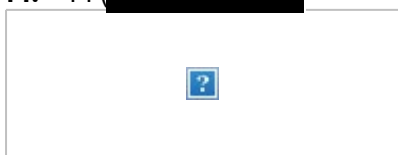
The matters raised within the correspondence relate directly to this phase of the process, the 'Acceptance' phase. The issues cannot therefore be deferred to after the 28 period has elapsed.

We appreciate your assistance and ask that you kindly confirm receipt of this email and attachments.

Kind Regards,

Dustin Dryden

M: +44 ([REDACTED])



This email and any attachments are confidential and may also be privileged. Oxford Estates Ltd may monitor and record all emails. The views expressed in this email are those of the sender and not Oxford Estates Ltd. If you have received this message in error, please notify the sender immediately, destroy this email and any attachments, and do not use, copy, store and/or disclose to any person this email and any attachments.

Company Number: 08730143

Registered Office: England and Company



22nd November 2024

Dear Sirs,

Re: Botley West Solar Farm

PINS Reference: EN01047

Applicant: PVDP on behalf of SolarFive Limited

Author of this letter: Oxfordshire Estates Ltd and Dustin Dryden – Statutory Consultee

We write regarding the above DCO application made 15.11.2024, to further register our significant concerns and objections to the deficient public consultations carried out by the developer, PVDP, acting on behalf of SolarFive Limited.

In particular, we consider that the statutory consultation carried out between December 2023 and February 2024 was substantially inadequate, in that (a) it failed to provide sufficient and accessible information to the public, and (b) it similarly has failed since that statutory phase to provide reasonable responses to queries which we have made.

Throughout the statutory consultation phase, it was abundantly clear that those people who attended as representatives of the developer, PVDP, and the applicant, SolarFive Limited, and who were supposedly present at each event to provide responses to those members of the public who attended each of the consultation events, were signally ill-equipped to provide meaningful answers. The developer / applicant seems to have taken the view that it was sufficient for them to have organised the events and turned up. That is not enough – the consultation itself must have substance and meaning and not merely be “tick box” exercise.

That view has now been reinforced by the limited, almost obfuscatory, responses to further enquiries which we made after the closure of the developer’s public consultation. The unhelpful responses have not properly addressed the legitimate planning concerns raised and have had no substance behind them.

To clarify, Dustin Dryden of Goose Eye Farm is a Statutory Consultee in the matter as he is both a resident at the centre of the proposed development whose home will be wholly and uniquely surrounded should the proposal go ahead, and the owner of Oxfordshire Estates Ltd, also located at Goose Eye Farm, in the centre of the proposals.

This letter is to ensure that the Planning Inspectorate is clearly sighted on specific relevant questions that have been asked of the developers, but which the developers have failed wholly, or in part, to answer. We understand that the DCO has now been made to your office and we therefore place you on clear notice of which questions have failed to be answered by the developer.

We consider the consultation has been inadequate and PINS should refuse to accept the DCO application until substantive answers to the questions properly asked of the developer / applicant, have been properly provided.



At Annex A to this letter, is the full list of questions asked by the author of this letter of PVDP during the public statutory consultation period (which closed on 08.02.24). Annex B sets out the answers provided to date. At Annex C is our re-iteration of the outstanding matters that require answers before the developers can claim to have complied with their duty to consult before making the DCO.

We therefore urge you to return the DCO in its present form, and to insist that the statutory consultation obligations are met and demonstrably complied with; of course, the DCO can then be re-submitted once the outstanding consultation matters set out in this letter have been fully satisfied.

Please note that both the general failure by the developer / applicant to complete a meaningful consultation, as well as the specific failure in relation to Mr Dryden's questions, continues to the present date. This leaves the case open to a judicial review.

It is simply not adequate or appropriate for the proposer of this extremely large ground-mounted solar PV project (one of the largest to be considered in the UK) to assert that further detail will be available in due course. The whole point of the statutory consultation exercise was – or should have been – that when the DCO submission is made to yourselves, adequate detail had already been made available to the public enabling them to understand what the proposed project will involve, and what measures are to be provided to mitigate impacts upon the landscape, and local communities, which will inevitably arise.

It is a significant failure of the developer that Mr Dryden has not been placed in that position to date, and that therefore the DCO should be rejected by your office at this stage, and re-submitted once all the proper questions have been provided with a clear and reliable response.

To give just one recent more general, but vital example; We understand that it is now being said by the developer / applicant that they **do not propose to include details of any construction traffic management plan in the DCO application** which has now been lodged with you. The reason given by the developer's spokesperson is claimed to be that any issues of traffic management, especially in the construction phase, is a matter for negotiation between the Highways Authority (Oxfordshire County Council) and the developer / applicant, and therefore does not need to be included in the DCO application itself.

Whilst that may be correct / appropriate for many local authority application (and even some NSIPs) that cannot be right in the circumstances of this project. The scale of Botley West is exceptionally large, amounting to some 3,200 acres of land, of which 2,000 plus acres will be covered in solar PV panels. The local road network is notoriously busy, especially in mornings and evenings when commuter traffic is at its highest. Apart from the obvious main trunk roads which pass through or very close to the overall site, most of the remaining road network is comprised of lower grade A-roads and connecting B-roads. All of these carry a significant amount of traffic, not least because they enable connections between the major trunk road network. The potential for traffic disruption on a major scale is inevitable. In particular, access and egress from Mr Dryden's home and Oxfordshire Estates Ltd. is a vital element of the consultation that should have been considered and resolved, clearly, within the DCO now submitted. It is not.

As such, in addition to Mr Dryden as a resident, and to his business, the disruption to local communities and to other road users cannot be left to consultations between the Highways Authority and the developer / applicant. It should – indeed must – form part of the overall examination of the impact which the Botley West project will have upon the 15+ local – and importantly, rural - communities spread throughout the proposed site.



To our knowledge, there is no other solar PV “farm” project in the world being proposed for construction so close to so many communities, important academic and scientific infrastructure and to human habitation. The proposed site, primarily in West Oxfordshire, is distinctly different from the semi-arid deserts of southern Europe or the western States of the USA and central Australia. West Oxfordshire is densely populated and exceptionally highly trafficked already.

Please see the attached Annexes A, B and C which clearly set out the questions raised by Mr Dryden and Oxfordshire Estates Ltd (in Annex A), the inadequacy of responses given by the developer / applicant (in Annex B) and the fundamental issues that remain to be consulted upon (in Annex C).

Your own guidance, The Planning Act 2008 (as amended) Pre-application procedure: Section 47 Community Consultation Frequently Asked Questions (FAQ) says “*The Pre-application consultation process is crucial to the effectiveness of the major infrastructure consenting regime. A thorough process can give the Secretary of State confidence that issues that may arise during the statutory six-month Examination stage have been identified, considered, and as far as possible/necessary, been addressed*”.

The consultation undertaken by the promoters for the solar farm has been underwhelming, leaving too many unanswered questions. We therefore ask you to reject this application at this stage and demand the applicants carry out a full and proper consultation with Mr Dryden and the wider community.

We look forward to hearing from you at your earliest convenience and remain available to provide further information at any time.

Yours faithfully,



Dustin Dryden

Oxfordshire Estates Ltd.



.....

Further, we formally notify you that we will, in due course, present our key concerns relating to both the United Kingdom’s investment screening regime under the National Security and Investment Act (NSI Act), and the National Protective Security Authority under their Critical National Infrastructure (CNI) concerns. As you will know, the energy sector is a core area for CNI.

We now re-iterate the important questions we previously asked, and the additional information we requested, to enable us to comment adequately on your plans. Once you have provided us the information below, we will be in a position to make our detailed observations and we request an extension of time of one month after you have provided the information requested below.

1. What alternative sites have you considered and why have they been discounted? Please provide full details of the alternatives, particularly brownfield sites, you have considered.

- Please note, many applicants use the excuse of proximity to existing sub stations which we consider is not a sustainable reason to justify large solar farms. Didcot power station is nearby and has direct access to the grid and is a brown field site.

2. Have you actually pre-consulted UNESCO, Historic England, ICOMOS-UK and DCMS on this matter? The Solar Panels will materially impact on the setting of the Blenheim Palace UNESCO World Heritage Site and its Outstanding Universal Value. Please provide full details of that consultation and their responses.

3. Now that you have presented a landscape and visual impact assessment (LVIA), please would you provide us with a copy of it?

4. What analysis have you given to the impact on the Eynsham Vale Area of Landscape Character, particularly and demonstrably taking account of the additional housing developments and the large Park and Ride facility currently under construction?

5. Are you proposing any batteries? If so, please provide specific details including locations, size, capacity, and fire suppressant and contamination details. We also note, that the Fire Service and other Emergency Service providers are in fact statutory consultees for a development of this scale. Please may you provide us their responses?

6. We understand that you have now carried out an assessment of the quality of the land for agriculture? Please provide details of the grade of soil for each field affected by your proposal and specifically an analysis of the central site.

7. What security fencing will be used? Please provide specific details, including locations and frequency of security lighting placements.
8. Please provide specific details of security cameras and the specific details of warning signage, accompanied by map references.
9. Where will the access points for the fields be located for installation and maintenance? Please provide actual details, accompanied by map references.
10. Where will the cable routes actually run? Please provide details of all cabling including any buried in the ground and to what depth. We also request mapping of proposed cable routes, along with clear details of proximity to existing gas pipes, water supply routes and any other existing underground cabling.
11. Please provide an instalment management plan showing how the panels will be installed including the types of vehicles to be used and precisely when, both date ranges, and time periods.
12. We consider the panels will be detrimental to the character of the area and will be highly visible. Please provide verified views from every public road and footway, particularly those around Goose Eye Farm. We will require both summer and winter views, again supported by specific map details.
13. Please provide the method of fixing the solar panels to the ground.
14. Please provide details of the use of each and every field over the last 20 years including temporary uses, leisure uses, farming activity and expert evidence of wildlife use and habitats, particularly any protected under the Wildlife and Countryside Act 1981. We respectfully ask that you do not resort to your PR company and spokesperson typical claims; to clarify, we are requesting substantive professional responses to these key questions.
15. Have you consulted Natural England and CPRE with respect to the ANOBs, loss of open countryside and ancient woodlands? Please provide the dates of those consultations and specify their responses?
16. What attempts have you made to consult those who use the public rights of way which are adjacent to and those within the proposed solar installation areas?
17. How many jobs will be created during the installation of the panels and afterwards once they have been installed. How many will be local? Please provide specific answers and the basis upon which you have calculated those numbers.
18. Please provide details of all proposed landscaping intended by you to mitigate the impact of the installation, the maintenance and the decommissioning phases –

please include locations and species of plants and explain the science underpinning your mitigation strategy.

19. Please provide details of the new woodland referred to on your website – location and types of trees proposed, as well as scientific support for selecting specific species in this soil type.

20. We note you are applying for the DCO to cover a period of at least 40 years. This is clearly not a temporary installation; given it is for such a long period, there is no guarantee the panels will be economically viable over that period - or that your organisation will even be in existence for that time – insolvency or administration is hardly unfamiliar territory in the solar panel industry.

- Do you have insurance to cover the removal if you were to go into insolvency or administration?
- Do you plan to place sufficient finances to cover the cost of decommissioning the BW solar installation in an escrow account to guarantee its removal?

21. We note you are not based in the UK. Please provide details of all installations you have carried out in the UK and how many employees are based in the UK and where they are based?

22. You have not provided a formal UK address for your consultation. Please provide a physical address.

23. Please provide details of the leases you have secured from the owners of all the fields in scope of your DCO. What guarantees are there that you will be able to implement any DCO if granted? Please provide (suitably redacted) copies of these agreements.

24. Solar panels, because of their weight/method of fixing to the ground and lorry movements associated with their installation, maintenance and removal, can damage the soil (particularly when the ground is wet or soft). Please provide details on how you intend to protect the soil.

25. Please provide full details and maps of the community gardens and allotments you are proposing; to include access details and hours of use and by whom?

26. You claim solar energy is key to decarbonising the UK's economy. Please provide full details of the scientific basis for this claim. The unpredictable, intermittent nature of solar PV generation and its seasonality means that other forms of flexible, 'dispatchable' energy generation are needed as back up capacity when the sun is not shining. In other words, solar PV generation imposes 'system balancing costs' on the network operator which has to ensure the stable operation

of the grid. These additional costs are often forgotten, or conveniently ignored, when solar generation is claimed to be ‘low-cost’ generation. Please ensure that you do not overlook responding in full to this important question.²⁷ You claim the solar farm will be designed so that the panels are set back to avoid areas close to road, nearby properties and other sensitive receptors. How are you going to achieve this?

28. Please provide specific details of all the new footpaths and landscape enhancements along with the actual dates the applicable work will take place, and of course the map references.

29. We do not see that your claim regarding flood risk assessment is at all accurate or sufficient. Please provide full details details of the source of your flood risk position.

30. So that we can reasonably assess the quality of surveys and assessments you claim to have carried out for the Preliminary Environmental Information Report, please provide us with a hard copy at your earliest opportunity.

From: info@botleywest.co.uk

Date: 9 April 2024 at 16:42:51 BST

To: Dustin Dryden [REDACTED]

Subject: RE: Botley West Solar Farm, Goose Eye Farm Remaining Questions

Dear Mr Dryden,

Thank you for your letter dated 8th February 2024 and for your patience as we have prepared a response to your enquiries.

Please be assured that your correspondence has been recorded as feedback to our statutory consultation. All feedback received is being considered by our project team to inform the refinement of proposals for Botley West. A description of the comments received, and how these have been considered by the team, will be presented in a Consultation Report. This report will be submitted for examination as part of the Development Consent Order application for the project.

Regarding previous correspondence, I note that as a project team we have contacted you a number of times regarding Botley West. Since the first phase of consultation in November 2022, our land referencing team, Ardent, has sent a number of letters to you at Goose Eye Farm as your property has been identified as a land interest as part of the project. This includes a land interest questionnaire between the first and second phases of consultation. You were also identified as a subsoil interest and were asked for feedback regarding your land in relation to Botley West Solar Farm for the second phase of consultation.

We do not have a record of previous outstanding enquiries received from you. However, our communication channels remain open should you wish to submit any further comments regarding the proposals for Botley West. We are preparing to submit a Development Consent Order application to the Planning Inspectorate later this year. If the project is then accepted for examination, you will have a further opportunity to register your interest to the Planning Inspectorate to provide your feedback directly to them, as well as provide us with any further comments.

We have looked to address the comments that you have provided below, based on information presently available. Please note that we cannot provide all the information at this stage, as details are yet to be finalised, and will either be finalised within the final DCO Application or will be decided if the project was to be granted consent by the Secretary of State.

An Alternative Site Assessment (ASA) will be included in the final DCO Application, which will demonstrate how we have looked at other land nearby. Land around Didcot was considered but it was not viable for the project. There are a number of factors that have informed the proposed site location of Botley West, including proximity to grid connection and demand, land availability and landscape features.

All relevant statutory and technical consultees have been consulted on both the EIA Scoping Report and the PEIR, in line with our second phase of consultation. This

includes Historic England and ICOMOS. All feedback from technical consultees will be considered and presented in our final Consultation Report.

Chapter 8 of the PEIR, Landscape and Visual Resources, is available to view on our [Document Library](#) of our website. This includes the chapter as well as the figures and appendices associated with the chapter.

Chapter 19 of the PEIR, Cumulative Effects and Inter-relationships, studies the effects of other development in proximity to our site. This includes the development around Eynsham. This will be further detailed in our Environment Statement, to be submitted with our final DCO Application.

While we recognise the importance of energy storage as key part of the UK's decarbonisation / journey to net zero, there are no batteries proposed for this project. We have assessed the quality of agricultural land across the site, which shows that 38% of the site is classed as Best and Most Versatile land. [The figures in Chapter 17 \(pages 5-7\)](#) of the PEIR show where this land is located across the site.

There is no security fencing proposed around the perimeter of the solar area. Instead, deer-proof fencing is being proposed. This can be seen on [page 3 of our visualisations](#). We do not have the exact location of security lighting at this stage.

We do not have full details of cameras to be used across the site. However, it is not proposed for there to be security cameras across the perimeter of the site, but instead for infrared sensors to be used. Some signage will be detailed in the final DCO application, but a lot of signage details will be confirmed following DCO consent. Exact access points are currently be worked on by the project team, however, the masterplan that is available on the website shows indicative locations for access points, shown by orange shading on the map.

Cable routes are indicatively shown on the masterplan in the [documents library](#) on the website, which is shown in the key on the right-hand side of each map. Furthermore, parts of the masterplan ([2.4A](#), [2.4B](#) and [2.4C](#)) focus on cable route options. The exact location of utilities is currently being consulted on with relevant landowners and stakeholders such as utilities companies, and this information is being used to inform the detailed design of the project.

Construction management plans are currently being produced by the project team, including the phasing of the construction within a two-year construction period, and outlines of these plans will be published within the final DCO application.

The locations for photomontages were informed by engaging with LPAs prior to the second phase of consultation, which can be found in in [Table 8.5 of chapter 8](#) of the PEIR. The final DCO application will include photomontages from all agreed viewpoints, including renderings from different years. The initial photomontages were taken in winter to present the site without screening present.

The panels will be installed using a screw piling technique to minimise the noise impact.

The majority use of this land has been agricultural. However, for exact details, this would need to be requested to the landowner for each field, rather than the project team who have lease agreements in place for the land.

Both Natural England and CPRE have been consulted as part of this second phase of consultation, as well as Cotswolds Natural Landscape. Their responses will be published within the Consultation Report to be submitted along with the final DCO Application.

We recognise that the impact to public rights of way were important for those who know the site, many of whom are residents. There are a variety of ways we have set out how people would be consulted in our [Statement of Community Consultation](#), through consultation with LPAs. This includes sending our Phase Two Community Consultation Leaflet to our Core Consultation Zone of over 22,000 addresses in proximity to the site. Public Rights of Way have been a key theme of feedback that has been brought up over both phases of consultation by members of the community as well as local groups. Details on the expected number of jobs has not yet been finalised, however, during construction, it is expected that there will be a maximum of 750 workers on site. (& Question 19) Our [Illustrative Masterplan](#) indicatively sets out the proposed planting locations across the site, including new trees and hedgerow, as well as new woodland areas.

The DCO Application will include documents such as a funding statement and decommissioning plan that address both the funding of decommissioning and how the site will be decommissioned. This does include an escrow account to guarantee its removal, setting out how funds are put aside in order to decommission the project if it was to be removed before the end of its operating license period. PVDP will buy an insurance policy to cover reinstatement at the end of the project.

PVDP do not currently have any installations in operation in the UK. Botley West is the first UK project of PVDP, and has four staff based in the UK, with around 20 staff based in Germany.

The address for consultation is a Freepost address (FREEPOST BWSF) that directs post to our communications consultants who are responsible for handling the feedback for the project. However, SolarFive Ltd, the Applicant for the project, has an address of 2 West Street, Henley on Thames, Oxfordshire, England, RG9 2DU.

At this stage, we will not be providing lease agreements. Lease agreements have been agreed with all landowners across the site.

The easement is not registered at the Land Registry. The project has obtained a copy from the current landowner and is aware of the route of the water pipe.

The intention is for temporary haul roads to be used across the site during construction to mitigate the impact to the soil. This will likely be in the form of rubber matting that will be rolled out for construction vehicles to use. Furthermore, construction compounds will be implemented across the site to ensure that no HGVs need to enter into the main solar installation areas.

The details for community food growing were consulted on during the second phase of consultation with both members of the community and local groups. Discussions are still ongoing to determine the exact details, but the locations for these sites will be shown in the final design in the DCO application.

The UK Government has stated that solar is a key part of the energy mix as the country moves towards a decarbonised electricity grid. This includes having an installed capacity of 70 GW of solar by 2035. Recognising that a mix of renewable energy sources, supported by energy storage, will be needed to sustainably move away from fossil fuels, the Government has also set targets to have 50 GW of offshore wind capacity and 24 GW of nuclear capacity by 2035. All of these sources are required to allow for a decarbonised mix to be able to power the country moving forward.

Furthermore, energy storage is being built across the UK to balance the grid and store

power for when it is needed, including storing solar power when it is being generated most.

A number of buffer zones have been created within the design to set the panels back from sensitive receptors. As stated within our [consultation leaflet](#) on page 17, this includes expanding the minimum buffer zone away between solar panels and any building to 25m. There are also buffer zones for hedgerows, trees, ponds and woodland (5m); watercourses (8m); and ancient woodland (15m).

Our [Illustrative Masterplan](#) indicatively sets out the proposed landscape and footpath enhancements from a visual point of view. The exact details of the methods will be set out within the Environmental Statement as part of the final DCO application.

The FRA has been produced in accordance with the National Policy Statements (NPS) EN-1, EN-3 and EN-5; produced in June 2011. A 2020 review of the NPS led to the publication of updated drafts in March 2023, which came into force on 17th January 2024: https://assets.publishing.service.gov.uk/media/64252f5f2fa848000cec0f52/NPS_EN-3.pdf-3.pdf

We are happy to provide you with a full copy of the PEIR – currently, there are copies available at Woodstock Library and West Oxfordshire Council offices in Witney, which we can arrange for you to pick them up.

Kind regards,

Mark Owen-Lloyd

Project Developer

We remain disappointed that so little information has been made available prior to submission of the Botley West DCO.

As the system is front loaded and issues are expected to be resolved before the application is submitted, we expected most of the information we have previously asked for to be available prior to the DCO submission, particularly as DD / OxEs are one of the most affected parties; DD's home will be wholly surrounded by the proposed solar panels.

For the avoidance of doubt, I wish to assert that I must be given ample time to analyse the following information which has yet to be shared with me or the wider public:

1. The Alternative Site Assessment (ASA) – I would expect to see this before the final DCO Application is submitted so the local community is given the chance to challenge any assumptions made.
2. The exact location of security lighting is needed because of the impact on my home.
3. Likewise, the locations of security cameras are important for my privacy.
4. I have had security issues at my home in the past, so the exact locations of the access points and how they are secured are needed.
5. Cable routes are extremely disruptive. It was important this information was made available well in advance of the DCO submission; in the event, only partial information has been provided – and certainly insufficient to see what is proposed around Goose Eye Farm.
6. The same applies for construction management plans; and most especially regarding the traffic management plan – there is none.
7. The photomontages will inform me and the wider community over the impact on our properties. Whatever you have agreed with the council, I am expecting photomontages to show the direct impact upon my property. If you need viewpoints from my home I am happy to provide them.
8. The planting locations for trees and hedgerows are important to understand how effective they will be – this element remains unknown.
9. The proposed temporary haul roads can also be an eyesore and impact on local traffic. This information must be clearly provided before the DCO can be considered by PINS.

10. The Goose Eye Farm water pipe runs under the field to the west of the farm all the way to Church Hanborough; the developers propose to install solar panels (with the attendant piles and underground disruption); DD has a right of Easement over this part in order to maintain it; the developer has been informed of this. How does the developer intend to mitigate this issue, as a reroute would probably increase the pipe length by nearly 1000metres and there is not sufficient pressure in the main for this?

Overall, it is clear that there is too much outstanding information yet to be shared with stakeholders – including statutory consultees for the developer / applicant to assert that statutory consultation has effectively been complied with. Therefore PINS should reject the current DCO with the direction that consultation is completed by providing the answers sought by Mr Dryden and OxEs.



Planning
Inspectorate

Number: 12

Name: North Leigh Parish Council

Date Received: 2 December 2024

From: [Robert Gunn](#)
To: [Botley West Solar Farm](#)
Subject: Adequacy of Consultation on the part of developer PVDP From North Leigh Parish Council
Date: 02 December 2024 07:36:39
Attachments: [Botley West Solar - ADEQUACY OF CONSULTATION Note to PINS 11.2024 -2.docx](#)

You don't often get email from [REDACTED]

The attached table shows North Leigh Parish Council's view of the Adequacy of Consultation efforts by the Botley West developer, PVDP. In summary, it was entirely a box ticking exercise, with no regard for the questions actually raised by the few people who actually managed to attend the consultation events which were held over the difficult Christmas period and at difficult times of the day for many potential attendees.

Yours,

Robert Gunn, North Leigh Parish Councillor

FROM: **North Leigh Parish Council**

<p>Question asked; <i>include approximate date and summary of information requested from developer, EG; what are the traffic management arrangements for construction period? Has a Health Impact Assessment been fully completed / scoped?</i></p>	<p>Response received; <i>specify whether response was received, date received, and if so, did response provide comprehensible answer?</i></p>
<p>1. Accessibility and Venues of Consultation</p> <p>Consultation period The consultation period took place either side of Christmas. Those consultations immediately prior to Christmas clashed with many other events.</p> <p>Timings Many consultation events were held during midweek and during the day when working people could not attend. What was driving this timetable</p> <p>Requested from PVDP reps at Bladon and Begbroke consultations</p>	<p>No response received</p>
<p>2. Population and Human Health.</p> <p>Scoping Report by PVDP noted reasons why the site is considered to be a suitable location. One of these reasons noted is “Its location away from main settlements”. This is not true. The 111kms of 2metre high fencing, the 306cctv cameras and the 156 power converters will pose many and damaging limitations on residents’ ability to enjoy the countryside and 111kms of fencing will render much of the area impassable for residents.</p> <p>Discussion with PVDP reps at Bladon consultation event</p>	<p>No response received</p>

FROM: **North Leigh Parish Council**

<p>3.Green Belt <i>Para 5.4.7 of the Scoping Report</i> notes that “Much of the project is in the Green belt” . It further states that “very special circumstances will be set out to explain.....location”. Some 75% of the project will be on greenbelt land. “This para goes on to say that “Very special circumstances will be set out to explain why the Applicant is siting the development in the Green Belt.....” What are these very special circumstances and why should a few companies and individuals have the right to obliterate green belt areas that are important for the well-being of the thousands of residents for the next 40+years? Requested at Bladon Consultation event</p>	<p>No Response. Also the issue of “Very Special Circumstances” required to justify building in the Green Belt has never been addressed in any of the developer’s documents to date.</p>
<p>4. Transport and Construction Traffic Management It is our contention that the A4095 road, which passes through North Leigh parish will be adversely impacted during the construction and decommissioning phases of this project and likely during the operational and maintenance phases too. It is already a heavily used road and quite dangerous for vehicles emerging from housing estates immediately alongside the road. It is likely that further heavy lorry use during the construction phases will render the road dangerous. The SR mentions Abnormal Indivisible Loads (AILs) in <i>para 7.6.24, Table 7.11.</i></p>	<p>No Response received</p>

FROM: ***North Leigh Parish Council***

<p>No routes are determined for AILs in the SR, therefore their impact on the Local Roads Networks (LRNs) or Strategic Roads Network (SRNs) cannot be determined.</p> <p>In summary, the Traffic section of the SR relies entirely on mitigation studies that the SR claims will be carried out at some point in the future and as such gives no opportunity for respondents to assess the impact of the project on traffic and road conditions and therefore safety.</p> <p>Requested at Consultation events and thereafter.</p>	
5.	



Planning
Inspectorate

Number: 13

Name: Cassington Parish Council

Date Received: 9 December 2024

From: [Alex David Rogers](#)
To: [Cassingtonclerk](#); [Botley West Solar Farm](#)
Subject: Botley West Solar Farm – Adequacy of Consultation Representation
Date: 09 December 2024 09:08:23
Attachments: [Letter to PINS.docx](#)
[Cassington Parish Council Response to Scoping Report.docx](#)
[Cassington Parish Council - Response to WODC Dev Con Mta 5-2-2024 Final Version 1-2-2024.docx](#)
[Cassington Response to Targeted Consultation.docx](#)

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Dear Sir/Madam,

I am writing as a member of Cassington Parish Council during the period of Acceptance of the Botley West Solar Farm Proposal. We believe that the submission of this application is premature as many of our questions and those of other local authorities with respect to this development remain unanswered or inadequately addressed by the developers, PVDP. As such, if adequacy of consultation is an exercise that really has any meaning this proposal should be rejected in its present form until matters that have been raised are addressed. Having had an opportunity to read parts of the application we note that many of these matters remain problematic in the application reinforcing that the consultation has not only been inadequate but the legitimate and serious concerns of the thousands of residents and local authorities have been ignored, downplayed or superficially dealt with by the applicants.

I attach a letter detailing the areas of inadequate response to our previous responses to various phases of the consultation. I also attach our previous communications to the applicants and to local authorities with respect to the consultations.

In the meantime apologies for not sending this correspondence from by Parish Council email address. Unfortunately this is currently suffering from a technical issue.

Yours Sincerely

Alex Rogers

The Planning Inspectorate,
Botley West Solar Farm Proposal,

Alex Rogers,
Parish Councillor for Cassington
Parish of Cassington
6th December, 2024

Dear Sir / Madam,

I am writing to you with respect to the Botley West Solar Farm proposal which I believe is at the acceptance stage at present. Whilst it is understood that Cassington Parish will be Registered automatically as an interested party I believe it is my duty as a Parish Councillor to draw your attention to the inadequacy of the consultation prior to the submission of the proposal by PVDP. Cassington Parish Council has responded to PVDP's consultations including:

The Pre-Planning Community Consultation Leaflet

The Scoping Report

The Main Public Consultation

The Targeted Consultation of June 2024

We have submitted our responses to these documents, including copying some of them to PINS and to WODC and local Councillors. We have also attended the community consultation events in person, most significantly the one held in Cassington in early 2024. Despite these numerous attempts to engage with the consultation process many of the points we have raised, in some cases, multiple times, have not been addressed by the developers in the consultation process, and now that we have had an opportunity to read the summary application many of these issues remain outstanding.

I will try and summarise the outstanding points below:

Questions Asked	Responses received
<p>Alternative options</p> <p>Cassington Parish Council have asked on multiple occasions why alternatives to the proposed scheme have not been considered?</p> <p>If this project was a public project undergoing submission under Greenbook Rules it would require the listing of alternative options including their costs and benefits (monetised and qualitative)</p>	<p>PVDP have consistently failed to examine options with respect to Botley West in terms of:</p> <ul style="list-style-type: none">• The geographic location of the current scheme, especially given that land further north which may be more suited for this development (i.e. is flatter) is present and is in the hands of the main land owner.

<p>and then selection of a preferred option based on careful analysis.</p>	<ul style="list-style-type: none"> • The mix of renewable energy which currently comprises only solar power when wind is available and also, potentially hydropower. • Whether a smaller scheme using more advanced and more efficient solar cells would achieve national, regional and local objectives with respect to renewable energy. <p>Indeed, at no stage have we seen a written justification of the proposed scheme, which has changed little since the project was first revealed to the public, compared to other options which are clearly available.</p>
<p>Flooding</p> <p>Pluvial flooding is a significant issue in the Parish of Cassington, affecting or potentially affecting the village of Cassington (Elms Road), Jericho Barns, and Worton Farm/village. Concerns about flooding were not addressed during the public consultation event at Cassington because PVDP’s consultants failed to send their hydrologist to the meeting. PVDP and their consultants dismissed Cassington Parish Council’s view that such a large number of sloped solar panels on the land above Cassington and Worton posed an increased flood risk. We believe this risk lies in three areas:</p> <ul style="list-style-type: none"> • Solar panels will likely form a drip line increase the rate of runoff from arrays, a view backed up by the latest peer-reviewed scientific papers on the subject. • Compaction of the ground during construction and maintenance. • Disruption of land drainage systems lying underground. <p>Flood risk has been emphasised by several homes in Elm’s Road Cassington being flooded in autumn of this year, a</p>	<p>PVDP and their consultants have failed to produce adequate written responses to the issue of pluvial flooding in the Parish of Cassington during the consultation. Some verbal reassurances that flood prevention measures would decrease flood risk to Cassington are not an appropriate response when people’s homes are at risk.</p> <p>Although not part of the consultation, the ES provided as part of the application still fails to acknowledge the role of solar panels in increasing runoff and increased risk of pluvial flooding, the complexity of the watershed around Cassington or other potential impacts on drainage from construction. Furthermore, the offered solution to flooding in Cassington is vague (a number of balancing ponds etc) and detailed plans will not be considered until later in the planning process. This provides little reassurance for the Parish Council or residents of Cassington.</p> <p>The solutions offered in the ES have not considered Jericho Barns or Worton and we note that information in Appendix 10.1 of the ES where it is stated there is no risk</p>

<p>repeat of flooding in 2007 and near-miss flooding events in the intervening years. Worton Farm and the Yarnton Road are also subject to flooding from runoff of the fields above the Cassington Sewage works which are also part of the proposed scheme. This has resulted in December 2024 of spillage of sewage as well as flood water into Worton Farm. Cassington, Jericho Farm and Worton are vulnerable to flooding because they lie to the south of hills and the land comprises clay which includes numerous springs.</p>	<p>from sewage in flooding events has been proved wrong by the events of this week.</p>
<p>Local heating of air temperatures</p> <p>Large solar power stations such as the one proposed here have the potential to increase local temperatures in a similar way to the urban heat island affect. This is because solar panels absorb and then re-radiate heat, a phenomenon known as the Photovoltaic Heat Island Effect. Given the close vicinity of Botley West Solar Farm to residential properties this could lead to elevated summer temperatures affecting residents during the summer including both in the day and at night. Measurements over a solar power station, nearby urban environments and surrounding wildlands have indicated a warming effect of up to 3-4°C depending on the season and time of day. Such heat retention could have significant impacts on residents in villages surrounding the proposed solar power station which is a particular concern given temperature rise resulting from climate change.</p>	<p>No response.</p>
<p>Loss of amenity, green space and greenbelt</p> <p>50% of the Parish of Cassington is taken up with the proposed Botley West Solar Farm. 71% of the solar farm is located on the city of Oxford’s Greenbelt which WODC have recently commented “is functioning well” around the village of</p>	<p>PVDP have offered some extensions to existing footpaths from Cassington, notably Footpath 1. However, Cassington Parish Council points out that the main amenity value of these footpaths is in exposure to open greenspace. This is evident from all three of the affected footpaths. Buffer Zones around the footpaths are too small. Responses to the</p>

Cassington. The proposed solar farm will severely impact on the landscape around Cassington Village, damaging its aesthetic and amenity values as well as damaging the Greenbelt.

Three out of five of the main footpaths from Cassington to surrounding areas identified in the Cassington Village Neighbourhood Plan are severely affected by the proposed scheme. This is because these footpaths for some or the majority of their length will be flanked on either side by solar arrays and other infrastructure. These footpaths go to Eynsham via Eynsham Mill (Footpath 4), to Purwell Farm (Footpath 1) and to Begbroke (Footpath 2).

loss of amenity of footpaths to the residents of the Parish of Cassington are wholly inadequate.

Likewise, the loss of Greenbelt has been justified by the national requirement for renewable energy. However, the reason that the impacts of this scheme are so severe on both the Greenbelt and landscape surrounding Cassington is the location of Botley West Solar Farm on several river valleys in the area (also why flooding is an issue). This landscape characterised by river valleys and surrounding hills mean that the solar farm will be seen from some viewpoints for miles.

We also point out that the NPPF with respect to Greenbelt still requires strong justification for its use/loss. We believe that if PVDP had examined different options for the configuration of the Solar Farm not including the sloping land of the middle section, then this loss of Greenbelt could have been avoided.

At no stage, as a result of the comments of both Cassington Parish Council or many other residents of the areas affected by this proposal has PVDP or the landowners offered to re-examine the spatial configuration of the Solar Farm. We further note that in the Consultation Report submitted as part of the application in November “no comment” is made to Cassington Parish Councils identification of this issue.

We further note that Oxford County Council have pointed out that the landscape impacts of this scheme have been underestimated. No response has been given to this in the application.

We also note that West Oxfordshire District Council proposed that the Solar

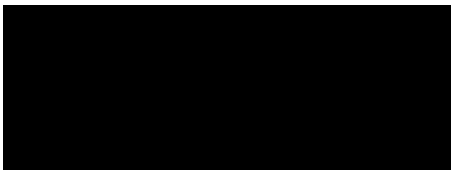
	<p>Farm be removed from the high ground to the north of Cassington. The response to this has been that the solar arrays will be screened by existing vegetation and new planting. This is an inadequate response and as it stands fails to mitigate from the visual impact of the scheme on the residents of Cassington and Jericho Farm.</p>
<p>Loss of Best and Most Versatile Land</p> <p>Cassington Parish Council has pointed out in several of its responses that a large area of Best and Most Versatile Land (BMV) will be lost to this development for more than 40 years and potentially permanently damaged through compression of the land by groundworks and construction and alteration of hydrology. The PEIR identified that 38% of the land take for Botley West was BMV land. However, these figures require clarification as does the relative amount of BMV land covered in the northern, central and southern sections of Botley West. We have been advised that the proportion of BMV land covered in the central section of the proposal is much higher than 40%.</p>	<p>PVDP have not provided any clarification on how they have calculated the amount of BMV land covered by the entire scheme or by the different sections of the development. We believe this has been deliberate in an attempt to conceal just how much productive farmland will be taken out of agriculture.</p>
<p>Buffer Zone</p> <p>A buffer zone of 25m (extended from 20m) to residential property is used in the scheme. This is wholly inadequate to protect the views and amenity of properties on the northern side of Cassington, and at Jericho Farm. It also poses a risk to properties from the effects of noise during construction and operation, Photovoltaic Heat Island Effect, accidental fire and the effects of destructive weather such as tornados (three experienced in the vicinity of Cassington and Eynsham in the last 10 years) which may damage or break solar panels and scatter pieces of glass and</p>	<p>During the course of the proposal development buffer zones were extended from 20 to 25m. This is wholly inadequate.</p>

<p>other infrastructure over a considerable distance.</p>	
<p>Targeted consultation (June 2024)</p> <p>The information provided includes comments on 57 boundary changes along with thumbnail maps showing where boundary changes are proposed. These maps and associated descriptions of the changes to the proposed scheme were wholly inadequate, in many cases lacking important detail or left so open as to leave the reader unable to assess what likely impacts were going to be (for example, making a substantial boundary change for a cable crossing point somewhere within the designated area). Examples of inadequate information included:</p> <ul style="list-style-type: none"> • Not showing the actual rights of way on thumbnail maps. • Not providing any information on the environment other than general habitat types that may be affected in some cases. This was of material consideration as it left the reader unable to assess neither the amount of habitat lost nor the quality of the habitat (i.e. whether or not a hedgerow is “ancient”). • Not showing local designations for nature recovery or habitats of national significance even though these are available on national databases and environment maps. • Not showing nearby heritage assets so that potential impacts on archaeological sites for example can be assessed (e.g. Sansom’s Platt). • In one case maps being so ambiguous that it is not possible to identify where the proposed change is (see 35 below). 	<p>No response.</p>

<p>This significantly lowers the value of the consultation as the nature of the proposed changes are not clear to the public as well as the environmental, amenity and heritage impacts. This suggests that as with the First Public Consultation, this second Targeted Consultation is inadequate, being deficient in the information it presents to the point where the public are unable to comment on many aspects.</p>	
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Cassington Parish Council believes that its concerns were not taken seriously during the consultation with respect to alternative options, flooding, impacts on landscape and amenity, loss of greenbelt, loss of farmland and for the Targeted Consultation. Examination of the submitted proposal indicate that many of our concerns have still not been addressed and many concerns simply ignored or downplayed. As a result, we contend that the proposal should be rejected for examination until the applicants have properly considered the legitimate concerns of the Parish Council and residents of the Parish of Cassington. Views on flooding are particularly concerning as they have been made under the flawed contention that solar panels do not increase runoff when all the recent scientific literature on the subject indicates that they do. We also note that many of the issues which we find have not been addressed have been raised by others and likewise have not been responded to at all, or where they have, responses are either superficial or downplay impacts.

Yours Sincerely



Alex Rogers

On behalf of Cassington Parish Council.

Cassington Parish Council: Response to Scoping Report for Botley West Solar Farm, June 2023

Alex D Rogers, Stewart Thompson, Graham Mills, Christopher Metcalf, Barbara King

Contact: cassingtonclerk@cassington-pc.gov.uk

Cassington Parish Council



View of the public right of way from Cassington to Purwell Farm known locally as “the track” or Purwell Lane. This right of way will be surrounded by solar arrays and fencing for much of its length should the Botley West Utility-Scale Solar Power Station be accepted for development in its current form.

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Introduction

This response to the Scoping Report for the Botley West Utility-Scale Solar Power Station was written by members of Cassington Parish Council with input from Parishioners where materially relevant. The response outlines some general concerns with respect to the Scoping Report and then addresses specific points related to individual Paragraphs and Sections. There is some repetition where points are relevant to multiple sections of the Scoping Report. Unfortunately time has not permitted a more refined document to be produced but we hope we have captured the majority of concerns that both the Parish Council and our Parishioners have with respect to the Scoping Report for this proposal.

General Points to be Addressed by the Impact Assessment

Consultation

Throughout the scoping report much is made of the consultative components of the plan-decision making process, in this case an EIA. We contend that despite the importance of consultation, the time frames involved are too restrictive. In the case of a development of this scale, large reports result from the process. This Scoping report is a good example. It is 169 pages long, yet the Parish Council had less than a month to both seek the views of the village residents and to formulate a report which reflects those views in a meaningful way. This we believe is unreasonable and we would urge that all future reports be made available as early as possible and not simply within the minimum guidelines indicated by defra. This observation we believe to be particularly pertinent when we consider the likely extent of the final ES for the proposal, which will amount to multiple volumes, with content contained in many hundreds (if not thousands) of pages.

Strategic Environmental Assessment (SEA)

This development proposal will fall under both the Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) Regulations. We note that “traditional” EIA, conducted at the individual project level, has proven unsatisfactory in dealing with the “bigger picture” impacts that developments of this scale generate. In particular, EIA has also failed to address cumulative impacts from multiple projects/developments and to protect the public interest. We therefore contend that the development should be considered at a more strategic higher-level, to guide policy-making and long-term planning by stakeholders in the renewable energy sector.

SEA is a tool for assessing the environmental and social risks and impacts of policies, plans and programmes (PPPs) and ensuring the integration of the implications of such impacts into the formulation and implementation of PPPs. The scope of application of SEA collectively encompasses PPPs and development-related strategies across a range of sectors (in this case energy provision), geographical areas (national, regional, or local) or issues (such as climate change or biodiversity). It is our understanding that the UK Government has policies and programmes relating to energy provision. As such these policies and programmes fall under the requirement for a SEA to be devised for the component parts of the energy sector (wind, solar, nuclear etc.) - for example see the “Offshore Energy Strategic Environmental Guidelines”.

We note that there is no reference to SEA within the scoping document. We contend that elements of the proposed development should be considered in relation to the requirements/criteria of a SEA for the sector. SEA is now a well-established procedure that supports such plan-decision making, by ensuring that relevant alternatives are assessed that all environmental and social effects are evaluated and that stakeholder interests are balanced. With that in mind, we ask that the development proposal engages fully with the guidance available surrounding SEA and that, more

importantly, it involves all relevant stakeholders (of which Parish Councils are one) in the consultation process as soon as it commences, rather than their views being “bolted-on” after key debates and the decisions that emanate from them have taken place.

We note that the scoping report makes some references to cumulative impact assessment (CEA). The EIA Regulations require a description of the likely significant effects of the Project on the environment, which should cover cumulative effects. The inter relationship of likely significant effects of the Project therefore needs to be assessed. The Overarching National Policy Statement for Energy states the following in relation to requirements for the assessment of cumulative effects:

“When considering cumulative effects, the Environmental Statement (ES) should provide information on how the effects of the applicant’s proposal would combine and interact with the effects of other developments (including projects for which consent has been sought or granted, as well as those already in existence).”

As a consequence, the Planning Inspectorate guidance indicates that *“The inter-relationship between aspects of the proposed development should be assessed and careful consideration should be given by the developer to explain how inter-relationships have been assessed in order to address the environmental impacts of the proposal as a whole.”*

Acknowledging the above and both the Institute of Environmental Management and Assessment (IEMA) and Planning Inspectorate advice surrounding CEA, we would have expected to see more detailed reference to how the scoping study intends to address both inter and intra project cumulative effects of the proposed development. We would ask that these potential effects be considered in tandem with a SEA (see above).

Objectivity of the Scoping Report

The purpose of the *Scoping Report* is set out in paragraphs 1.8.1–1.8.4. Its job is to:

- describe “the scope and methodology of the technical studies being undertaken to provide a comprehensive assessment of any likely significant effects”;
- determine “suitable mitigation measures for the construction and operational phases of the Project” (and decommissioning as well?); and
- “inform and facilitate the request to PINS . . . to issue a Scoping Opinion”.

These outline the need for an objective report that informs PINS so that it can issue an appropriate Scoping Opinion. We find in general terms that the scoping report is biased, misleading or manipulative in many areas. This includes the use of incorrect or unsubstantiated statements / language, omissions of materially significant information (e.g. why 76% of the proposed scheme is sited on Greenbelt land) and the scoping out of areas of impact assessment likely to be unfavourable to the proposed scheme (e.g. socioeconomic impacts on residents). We urge that a very clear requirement is made on the applicants to produce an objective impact assessment on which the Secretary of State can make an evidence-based decision on the application.

Specific Points to be Addressed by the Impact Assessment

Executive Summary

The Executive Summary states that an 840MWe solar power station will deliver clean power to the equivalent of 330,000 homes. As stated in the Cassington Parish Council Response to the informal

consultation (Rogers et al., 2022) we believe this is an overstatement of the benefits of the project because:

- 840 MW will generate sufficient electricity for 250,000 homes (based on an average annual consumption of 3,300 kWh of electricity per household according to Government Figures)
- Solar energy is the least efficient form of renewable energy widely deployed particularly in mid-latitudes where solar irradiance varies substantially across the seasons. Power demand in the UK is highest in winter as a result of use of electricity for heating. This is the period when solar irradiance is at its lowest and least energy will be generated by the Botley West site.

As a result of the discrepancy in figures we request that a detailed independent assessment is made of the likely energy production by the Botley West Solar Power Station, including the advantages and disadvantages of this form of renewable energy generation compared to other potential forms (e.g. wind or mixed energy sources such as a combination of wind, solar, hydro). We note in this respect that the Energy NPS, Draft EN-3 Paragraph 3.10.2 sets out that government is supportive of solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use.

1 Introduction

1.3.1

The document states that:

“BWSF’s generation output will be vitally important if the Government’s commitments are to succeed, significantly helping to deliver the transition to net zero.”

This statement is made with no justification. It is very clear that an energy transition is required to prevent CO₂ emissions leading to damaging climate disruption. However, of the renewable energy sources available to the UK it is unclear what proportion of renewable energy should be provided by solar or whether it is appropriate to site solar power stations in rural areas traditionally used for food production with a high population as in West Oxfordshire.

We would expect an impact assessment of such as large-scale project to provide an evidence-based assessment of:

- The appropriate mix of renewable energy for the UK
- The most appropriate way to deliver the portion of that energy mix required by solar
- The most suitable locations in the UK to place such sites on the basis of least impact to both the environment and people not simply the willingness of landowners to rent their land for this purpose largely on the basis of financial gain. As stated in the NPS EN3 Paragraph 3.10.14 “applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land”.
- The need to develop open rural land, including substantial areas of green belt as a solar farm. As stated in the NPS EN3 Paragraph 3.10.14 “Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land”

1.3.5

The term “revert” implies that a detailed baseline understanding of the abiotic and biotic condition of the proposed development site is known, as this sets the parameters which any reversion

“package” must employ. We are not aware of any such baseline condition assessments having been undertaken and none are indicated in the scoping document and so we challenge the efficacy of any reversion which has no prior understanding of site condition pre-development. We would therefore expect that such an assessment(s) would take place in advance of the construction phase of the proposed development, should it be given planning permission.

The current agricultural land use is a consequence of the land being worked in such ways as to both elevate crop yield or to maximise the quality/quantity of grazing land available to livestock. These are achieved via a blended mix of agricultural practices including, crop rotation, leaving land fallow and managed grazing regimes. Given that the development will negate these happening for a period of 42 years, we fail to see how the land will be able to revert back to its previous use (and here we assume productivity) without a significant period of sympathetic agricultural management. For this latter point, we question as to whether the land will ever be put back to agriculture or whether it will more likely be given over to some other aspect of land-use management?

1.4 The Applicant

Following articles in the British Press (Private Eye, 2023a,b,c) we find the details of PVDP and Solar Five provided in the Scoping Report to be wholly inadequate. The US solar market had significant issues related to speculators developing projects and then selling them on with the result that many projects failed (Mulvaney, 2019). This appears to be the mode of operation of PVDP and the related company Solar Five. Both are allegedly linked to the wife of Dmitry Glukhov, Yulia Lezhen (aka Lejeune), both of whom have been implicated in financial malpractice. We would therefore like full disclosure on the structure, links and beneficial owners of both PVDP and Solar Five and clear details of their previous solar development projects as would be reasonably expected under due diligence.

1.4.2 Preservation of Amenity

As detailed in the Cassington Parish Council Response to the informal consultation (Rogers et al., 2022) the proposed Botley West Utility-Scale Solar Power Station will have a substantial and significant impact on amenity to the village of Cassington and surrounding villages. Exposure to green space and the opportunity to exercise on locally available land have been demonstrated multiple times to have both physical and mental health benefits (e.g. Bowler et al., 2010; Shanahan et al., 2016; Cox et al., 2017). The main public rights of way used by the residents of Cassington village will be severely degraded in terms of their visual aspect, from one of open farmland to one of a largely artificial landscape dominated by solar panels. As such we expect the Impact Assessment to thoroughly examine the impacts on amenity to local villages including the likely impacts on health and wellbeing of residents.

1.5.7

The Scoping Report States:

“The revisions proposed to draft EN-3 Renewable energy infrastructure emphasise the central role that solar will play in decarbonising the energy sector.”

We disagree with this statement. EN-3 states that solar forms “a key part of the government’s strategy for low-cost decarbonisation of the energy sector” (as stated in 5.3.9). A key part is not the central role, and indeed EN-3 covers a wide range of important renewable energy sources.

1.8.2

It is important that not only are the methods for technical studies towards the Environmental Impact Assessment are detailed but also the conditions on the ground when technical studies are being

undertaken. We have already heard of surveys of flora, for example, being undertaken on the proposed land to be subsumed by the Botley West Utility-Scale Solar Power Station, which has been mowed. Obviously, undertaking such a study following mowing will result in an underestimate of biodiversity. Such details should include:

- Qualifications and experience of the personnel undertaking technical studies
- Dates / times of year when technical studies are being undertaken
- Weather
- Factors which may influence results (such as mowing or other disturbance of the area, seasonal effects)
- Frequency of studies
- Representativeness of the areas being studied compared to both common and rare habitats in the entire study region

2.0 Existing Baseline

Northern Site (West Oxon and Cherwell)

2.1.3

The Scoping Report describes the land as: “The land is arable but low-grade agricultural land (see Figure 4) with multiple farm holdings scattered around the boundary edges.”

As far as we can see from Figure 4 much of the land appears to be unassessed with respect to land quality. However, given the land immediately adjacent to the proposed northern site is Grade 3A or 3B it is reasonable to assume it is similar in nature (as suggested in 2.1.4). The statement that the land is “low-grade” is therefore incorrect as according to Government classifications such land is Good (3A) or Moderate (3B) with moderate to high yields of certain crops (a narrower range of crops and more moderate yield is expected from 3B compared to 3A). We estimate that 1,400 ha of land produces approximately 7,000t of food each year adding up to a loss of nearly 300,000t over the 42 years. We have seen representatives of Blenheim Estates at public information meetings and Parish Council meetings also refer to the land as “poor” (Rogers et al., 2022). Local farmers in the area have also reported that the land in question (referring now to all three sites) can give high yields of crops irrespective of land classification.

Given the misrepresentation of the land by both the landowners and PVDP we believe the scoping report should include an independent assessment of land grade including information on actual crop yields from farmers who have cultivated this land over the last decade. This includes both the northern, central (2.1.13), and southern sections (2.1.22) of the Botley West proposal.

2.1.14

Although much of the land is in Flood Zone 1 the villages of Cassington and Yarnton have a history of flooding as a result of rapid movement of surface water running off the hills to the north (Cassington) and northeast (Yarnton). In Cassington flooding of properties on Elm’s Road occurred in 2007 (WODC, 2008). Foxwell Court, St Peter’s Close, Horsemere Lane, Foxwell End and Reynold’s Farm are also at risk of flooding from extreme surface water events (WODC, 2008). As recently as winter 2022/2023 properties on Elm’s Road came close to flooding likely because of a failure of the owners of adjacent land (Blenheim Estates) to maintain drainage ditches.

Studies of how utility-scale solar power stations impact hydrology are relatively few at present. However, the studies that do exist show changes in soil moisture content associated with solar panel arrays and also increases in surface water runoff (e.g. Pisinaras et al., 2014; Yavari et al., 2022).

Alterations in hydrology also have the potential to increase soil erosion in some circumstances (e.g. Yavari et al., 2022). One aspect of solar array design which influences runoff of rainwater is the tilt angle and orientation of the solar panels at a given site (Yavari et al., 2022).

We would therefore expect an impact assessment to thoroughly investigate the specific impacts on hydrology local to Cassington and Yarnton taking into account the design of the proposed solar arrays on the land to the north and northeast respectively of these villages. Surface water flooding does not seem to have been accounted for at all in the scoping report.

2.1.15

76% of the proposed solar farm would be on Oxford's green belt, taking up a larger percentage of land within 2kms of urban areas (6.9%) than all the green belt housing being built under current Local Plans (5.5%). Loss of greenbelt land in the central and southern sections of the proposed solar power station will mean the loss of a significant and substantial portion of Oxford's greenbelt lying to the west of the city. Greenbelt land is specifically designated to prevent urban sprawl and to safeguard the countryside from encroachment. According to the National Planning Policy Framework the Government attaches great importance to this designation and greenbelt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. We also note that the entire village of Cassington is covered by greenbelt designation, the reason for which is to restrict development around it to maintain the openness of the greenbelt. We would therefore expect the impact assessment for this development to include a specific assessment of the loss of a large section of Oxfordshire's greenbelt land both on local communities but also on Oxford and its surrounding area which is already under significant development pressure for housing, industry, transport infrastructure and solar farms.

2.1.16

Although there are no statutory ecological designations within the central site both within and surrounding Cassington there are several zones within the Natural England Habitat Network. These include areas of habitat restoration (e.g. Worton gravel pits), Network Enhancement Zone 1 (fields to the east of Cassington), Network Enhancement Zone 2 (south of A40) and a Network Expansion Zone (areas surrounding Cassington village especially to the north west and south). These are detailed in the Green Infrastructure Plan which is part of the Cassington Neighbourhood Plan which was accepted by Referendum in June 2023. These areas are included in the Cassington Neighbourhood Plan, Policy CAS1 Cassington Nature Recovery Network. We note that CAS1 Provision C states that "Proposals that will lead to the loss of land lying within the Network and that will undermine its integrity will be resisted." We note that the Scoping Report has failed to include any reference to the Cassington Neighbourhood Plan or Green Infrastructure Plan which applies to the entire Parish of Cassington. We expect the impact assessment to include a specific assessment of the impacts of the West Botley Utility Scale Solar Power Station on the Cassington Nature Recovery Network and wider Nature Recovery Network in West Oxfordshire since it clearly is likely to undermine the integrity of the land referred to in the Neighbourhood Plan.

2.1.17

We note that St Peter's Church in Cassington is Grade 1 listed as are likely other historic churches in the surrounding villages.

2.1.19

As indicated in the Cassington Neighbourhood Plan and accompanying Green Infrastructure Plan the most heavily used public rights of way from the village will be entirely surrounded in large parts by solar arrays or these will be visible from footpaths. There will be similar impacts to Public Rights of

Way in both the northern and southern sections of the Botley West proposal, including the Oxford Greenbelt Way. CPRE Oxfordshire have pointed out that 800MW of solar capacity are in place or planned for the county. Solar farms in the area already developed have impacted on public rights of way and the rural landscape (e.g. around Eynsham). We therefore suggest strongly that an assessment of Botley West Solar Farm includes an assessment of the cumulative effects of this development and others already in place or planned for the area. Omission of consideration of the cumulative impact on the total area of countryside and public rights of way being affected by such developments (as well as effects on the Oxford greenbelt) is inappropriate given the massive scale of the three sections of the Botley West Development. It should be noted that many of these public rights of way are not only enjoyed by people within the affected villages but also by citizens of the city of Oxford and visitors to the area.

2.2 Legislative Context

2.2.2

This section outlines that the Secretary of State must consider the following exceptions when considering whether to accept an application for development:

1. “that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations”
2. “that deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment”

We urge the Secretary of State to assess whether this proposal undermines the status of the World Heritage Site of Blenheim Palace in respect of (1.) and in respect of (2.) the large and significant impact on Greenbelt to the west of Oxford which is contradictory to the National Planning Policy Framework. At the very least the impact assessment should specifically address these specific matters in relation to Section 104 (3) of the Planning Act.

3. Consenting and Consultation Process

Feedback So Far

3.2.6

Given that the applicants cannot be expected to deliver independent and fair assessment of community feedback we ask the Secretary of State to require that raw data in respect of completed feedback forms are provided for the public, and especially to Parish Councils and District Councils to examine. These feedback forms may be anonymised to protect personal data. Summary assessments of feedback by PVDP are insufficient for councillors to understand what their residents think of this proposal or indeed what suggestions they may have to improve it. Publicly there has been an overwhelming negative response to this proposal amongst local communities directly affected by it who have initiated vigorous and well-supported grassroots action protesting against the proposal (e.g. the Stop Botley West Campaign). This is reflected in the fact that 80% of respondents were opposed to the development according to PVDP’s own data (PVDP, 2023).

4. Approach to EIA

4.1.2

We note that West Oxfordshire includes within its population a number of people with considerable expertise and local knowledge on the natural history of the area including both professional scientists (employed and retired) and citizen scientists. These people are likely to have extensive knowledge of local environmental baselines and could provide valuable input to the Environmental Impact Assessment (EIA). There appears to be no provision for their input into the EIA process which

claims to be iterative. We believe the EIA process would be greatly improved through input by these local experts and provision should be made to develop workshops or contact groups to ensure this happens.

Baseline Conditions (Sections 4.2.4 to 4.2.8)

As noted above (1.8.2) it is important that not only are the methods for technical studies towards the Environmental Impact Assessment detailed but also the conditions on the ground when technical studies are being undertaken is recorded and accounted for in the EIA.

4.2.17 and 4.2.18

We note that the Scoping Report identifies the following levels of impact:

Substantial;

- Major;
- Moderate;
- Minor;
- Neutral.

There is no category for “unknown impact” or “uncertain impact”. Many aspects of the impacts of utility scale solar power stations are poorly studied, especially outside of the USA and specifically in the U.K.

The EIA should for all these categories give a measure or estimate of confidence in the reported conclusions on impact given the methodologies employed and also specific information on the impacts of conditions during technical studies (see 1.8.2 above). Otherwise it is impossible to assess the weight that should be given for the conclusions related to the level of impact. Following the precautionary principal conclusions on levels of impact should be conservative (i.e. assume a worse case on impacts of the proposed scheme).

Mitigation and Monitoring (4.2.19 – 4.2.23)

As with assessment of levels of environmental impact we would expect proposed mitigation measures to be evidence based and to include levels of confidence that the proposed measures will be effective. There is ample evidence within the UK that often-used mitigation measures, such as species translocations, are frequently ineffective and result in subsequent losses of the translocated populations (e.g. for reptiles). We would also expect monitoring of all significant mitigation measures to be included in the EIA plan including during both the construction and operational phases of the proposed project.

5. Need and Alternatives Considered

5.2 Need

5.2.2

As stated in response to 1.3.1 above the applicant makes a claim that expansion of solar capacity in the U.K. is not achievable through the use of rooftop and brownfield sites alone (a claim repeated but not substantiated in 5.2.4). No evidence is provided that this is the case nor is there any specific evidence that there is an overwhelming case for development of a utility-scale solar power station on greenbelt land in a rural and highly populated part of West Oxfordshire. There are 250,000 hectares of south-facing commercial roof space in the UK. If just a quarter of this was used for solar panels, it could generate 25 GW of electricity annually. That’s the equivalent of 30 solar farms the

size of the proposed Botley West Solar Farm and hence why the independent review of the UK's net zero prospects called for a 'solar rooftop revolution' and for the reform of planning rules to enable it. In fact, other than large landowners willing to lease large areas of land, there is no case for the development of a utility-scale solar power station in this area. Rather than high level, statements of need we would expect specific, evidence-based assessment of why a utility-scale solar power station should be developed on land around Oxfordshire especially given the huge impacts on greenbelt, local communities and the environment.

5.2.3

The claim is made that the Botley West Utility-Scale Solar Power Station will deliver renewable energy to Oxfordshire and power 300,000 homes. The former is clearly not correct as the power will be delivered to the National Grid and the latter is disputed (see Executive Summary above). Again, we expect the impact assessment to provide clear evidence of these claims and furthermore to present evidence of why alternative schemes are not viable (e.g. a mix of wind and solar) or whether the land to be subsumed under solar panels could not contribute to climate change mitigation in other ways.

5.3 National and International Legislation and Policy Context

This section outlines international and national policy aimed at promoting the development of renewable energy sources globally and within the UK. However, what is not mentioned here are the United Nations Sustainable Development Goals (SDGs). The SDGs specifically address the need for development, including for energy, that balances climate, nature and people. It is very clear that whilst Botley West is proposed as a scheme which addresses the need for renewable energy the area of land it covers, including greenbelt, the number of communities it effects do not meet the requirements for sustainable development. This is an important area of international policy that should be included in the impact assessment.

5.4 Alternatives

Two alternatives are presented in the scoping report, develop the West Botley Utility-Scale Solar Power Station (5.4.2.) or "Do nothing" (5.2.3). We do not believe that the scoping report has assessed a range of different renewable options for the West Oxfordshire and Cherwell districts including wind and hydro (e.g. on the River Thames) or a combination of solar, wind and/or hydro. NPS Draft EN-3 Paragraph 3.10.17 states that: "Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, or storage) to maximise the efficiency of land use." The applicants have not given any consideration to co-location of other functions, and these must, in our opinion, form a part of the scoping report. Furthermore, as pointed out in Rogers et al. (2022) alternative uses (e.g. forest or grassland managed for carbon sequestration) of the land earmarked for this development could also be regarded as climate mitigation (around 35,000t of CO₂ sequestered by the land if managed for carbon sequestration) whilst having much greater benefits for people and biodiversity. These alternatives should also be investigated in the scoping report.

5.4.6

Solar irradiance, a main factor in selection of sites for solar power stations is not even referred to in the considerations for location of this scheme. This needs to be included in the impact assessment.

The statement that the scheme is located on "low-productivity arable land" is materially and demonstrably incorrect. The land identified for the Botley West Solar Power Station is generally Grade 3A or 3B, of good or moderate productivity (see response to 2.1.3 above).

The scheme is outside environmental designations but does lie very close to such sites and also covers substantial areas within the Nature Recovery Network in West Oxfordshire.

The statement that the West Botley Utility Scale Solar Power Station is away from main settlements is clearly false. 11,000 households lie within 1.5km of the proposed power station. It covers land adjoining a large number of villages and also impacts land enjoyed for amenity by people in the city of Oxford as well as visitors to the area. For people's homes, a buffer zone of only 20m is proposed for properties adjacent to this proposed scheme. Indeed, in comparison to Utility Scale Power Stations globally in the top 20 by size (of which this proposal is one) at least 18 of the others are located in desert or arid environments where impacts on population are small to negligible. We expect the impact assessment to ascertain the impact of this development on local communities and the wider communities in the area who use the land for leisure especially during summer months.

Flood risk is only assessed in respect of flood plains from the local rivers not in terms of surface runoff (see response to 2.1.14 above).

The statement that the land proposed for development is of low ecological value needs to be substantiated, particularly that there is strong evidence that those habitats and species strongly associated with lowland agricultural production are in serious decline (see [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]).

We also note that although its location is directly outside of any environmental designations, many of the designations are in place to conserve and enhance components which do not observe "hard" boundaries. SSSIs are a good example of this, particularly when some of the species contained within them are highly mobile, birds and bats for example.

5.4.8

This section indicates that "at an early stage of the feasibility of the development of the Project, the Applicant produced a "high-level constraints" plan to understand site sensitivities in planning and environmental terms. This provided a framework within which the Applicant could start to consider ways in which the site could be designed and laid out. It would seem reasonable that there be a consultative aspect to the production of a high-level constraints plan rather than be presented with the Applicants view as to what this should look like. This would potentially remove some of the concerns we identify in the constraints plan (see below).

5.4.9

Text indicates that the constraints plan has identified "areas for habitat enhancement, including planting of native species and opportunity to enhance existing habitat". Given that the vast majority of the proposal will be located on agricultural land which has an extensive network of hedgerows and watercourses, many of which will be removed to accommodate the development, it is difficult to see how this can actually be achieved? In tandem with this we note that this proposal will be subject to the Biodiversity Net Gain requirement which becomes mandatory in November of this year. It would be useful to see how this requirement aligns with the constraints plan (above) or perhaps NSIP's are exempt from this obligation?

5.4.10 and 5.4.11

5.4.10 states that constraining factors that affected the evolution of the Project layout and design included areas of ancient woodland, whilst 5.4.11 indicates that “buffer zones were then imposed on land adjacent to ancient woodland, within which it was decided that land would remain free from development” and that “further buffers were imposed to provide set back distances of a minimum 20m from residential properties”. Here we raise two points of concern – (i) if the applicants are able to identify a buffer width for residential properties, why have you not included the buffer distance for ancient woodland? and (ii) we contend that the presence of the development 20m away from residential properties in no way constitutes an appropriate buffer zone width and is therefore wholly inadequate. How was this arrived at? Certainly not via consultation. The question arises as to whether the buffer zone set around Ancient Woodland has taken any account of the foraging distances for wildlife resident in such areas and which use surrounding land to find food (e.g. owls or other birds of prey, mammals such as bats, badgers, foxes or deer). Such detail should be included in the impact assessment.

6. Project Description

6.2.17

We note here that the use of sheep grazing or manual cutting back of plants will be used to control the vegetation under the solar arrays. Given the massive scale of the proposed development we question the practicality of such arrangements to manage the land. 1,400 ha would require about 17,000 sheep for grazing. If these sheep are not moved seasonally, they will consume wildflowers and reduce the biodiversity of the proposed sites. We therefore request that the full details of such arrangements are presented in the impact assessment including the numbers of sheep, their management, and/or the manpower requirements for manual control of such growth. The use of herbicides should be detailed if it is anticipated that they will be required.

Table 6.1 and 6.2

Table 6.1 details the infrastructure that will be put in place on what is currently mainly arable land for the proposed scheme. This includes a very large number of solar arrays placed up to 2m above the ground as well as Converters and Substations adding to visual impact. Some of this infrastructure also produces noise. In addition, the entire scheme will be surrounded by fencing up to 2m high with security cameras placed on average every 365m and lighting (including PIR activated lighting) in some areas. It is important that the impact of this urban / industrial infrastructure on the surrounding landscape, public rights of way and settlements in the area are considered in the impact assessment as well as impacts on wildlife.

6.2.20

The applicant states that “landscape mitigation will be embedded in the overall project design and would be formulated to minimise potential landscape and visual impacts and maximise enhancement of landscape features, landscape character and biodiversity of the site”. Whilst this is a laudable claim, we look forward to consultation on a draft landscape master plan tasked with delivering these aims to a satisfactory standard for a solar farm comprising close on 2.7 million solar panels and associated infrastructure.

6.4.1

This states that “when the operational phase ends, the Project will be decommissioned. The anticipated period of operation and decommissioning is 42 years. All solar PV array infrastructure including solar PV modules, mounting structures, cabling, inverters and transformers will be removed from the site and recycled or disposed of in accordance with good practice and market

conditions at that time. This raises several areas of concern. (i) It is our understanding that solar panels have an expected lifespan of between 25 – 30 years. Does this mean that somewhere in the operational cycle of the development that all the panels will in effect have to be replaced? (ii) recent articles ([REDACTED]) indicate that the expertise for the scrapping and recycling of solar panels in the UK does not exist. (iii) if panels need to be replaced during the operational cycle of the development (see (i) above,) then we calculate roughly 5.3 million panels will eventually require recycling. If, as recent articles indicate the UK has no capacity to recycle, then these will end up in landfill sites with a very significant local/regional impact as a consequence? Stating that disposal of infrastructure will partially depend on “market conditions at the time” is not good enough for a development of this size. In particular, the carbon impacts of construction, materials, machinery, operation and decommissioning should be evaluated against the benefits of the scheme in renewable energy production.

7. Proposed Scope Of Assessment: ES Chapters

Legislative and Policy Context

7.1.2

We note that the Cassington Neighbourhood Plan and Green Infrastructure Plan are not included in the list of policy documents on planning for consideration in the impact assessment. They should be included along with any other relevant Neighbourhood Plans as they comprise information on the history, environment, and communities located within or adjacent to the proposed area of development. They also include local policies of relevance to the impacts of the proposed development.

7.1.5

Although the Blenheim Palace World Heritage Site is just outside the utility-scale solar power station, both the site and its setting within rural Oxfordshire, including nearby greenbelt should be assessed with respect to impact on World Heritage Status. Landscape is an important aspect of granting of World Heritage Status and this proposal has a major impact on the surrounding landscape which is the setting of the site.

7.1.9

We note that whilst the West Botley Utility-Scale Solar Power Station has been set outside of the Conservation Area of Cassington Significant Views from the Conservation Area, mainly pointing to the northwest will be strongly adversely affected by the development (WODC, 2007). Views from all the mentioned designated Conservation Areas should be assessed for visual impact from the West Botley proposal. We note in 7.1.24 that the Zone of Theoretical Visibility set at 2km from the boundary of heritage assets.

7.1.12

We also note the presence of Frogwelldown Lane on the western edge of Yarnton which has been in use at least since the Middle Ages. This lane was part of the old Oxford to Witney road and is notable as the historic route of retreat of the army of Charles I from Oxford during the English Civil War. The lane currently runs from the edge of Yarnton to the Burleigh Road.

7.2 Landscape and Visual Resources

Legislative and Policy Context

7.2.3

The Cassington Local Neighbourhood Plan and Green Infrastructure Plans are now accepted by Referendum and should be considered as local planning policy documents for the Impact Assessment.

7.2.14

We note that the West Botley Utility-Scale Solar Power Station would be unique globally in the number of houses within a 1.5 kms radius of it, a total of almost 11,000. This includes in settlements such as Wootton, Shipton-on-Cherwell, Woodstock, Bladon, Freeland, the Hanboroughs, Begbroke, Yarnton, Kidlington, Worton, Cassington, Eynsham, Farmoor, Cumnor and Botley. The comparable average number for the USA's largest solar farms is fewer than 10 ($n=27$). Even equally populous Netherlands has only a thirtieth of the number of houses within the same distance of its largest solar farms. It is inconceivable that a portion of these households will not suffer substantial adverse or worse impacts in terms of their views of the surrounding landscape as well as the landscapes of some of these villages in their entirety. In the case of Cassington, houses along the northern edge of the village as well as in the settlement of Jericho Farm will have current views of farmland replaced by solar arrays and additional infrastructure. This transformation of the landscape will be visible from the central areas of the village and also from public rights of way running to the north and northeast of the village. In our view it is essential that the impacts on landscape and visual resources of all of these villages and their residents are carefully assessed by independent experts.

We also note that the proposed change in land use has already had significant impacts on landscape in the area. An example is the establishment of a dog walking facility in fields along the Cassington – Yarnton Road, west of Yarnton. The farmer leasing this and other land has had his holdings reduced as a result of the West Botley proposal by the landowners. This rendered it unprofitable to continue to farm the land remaining meaning that other alternative uses for the land have had to be developed. The facility is surrounded by high metal fences which we believe detracts from the surrounding landscape including public rights of way. It is therefore important to assess not only how the West Botley Solar Power Station itself will influence landscape and visual resources but also how the scheme itself may influence the use of the land around it (see Potential Cumulative Impacts, 7.2.34).

Table 7.3

We note that "Residential Visual Amenity Assessment" is to be scope out of the project assessment for landscape and visual resources. The grounds given for this are that:

"No significant effects expected that would overwhelm existing properties nor render properties an unattractive place to live."

We wholly reject this scoping out of impacts on residential visual amenity as:

(i) The proposed solar power station includes more households within 1.5km than any other we have been able to find.

(ii) Residents of the Parish of Cassington (and no doubt other villages / parishes) will suffer major impacts on their enjoyment of visual resources including views from their homes, common areas in their villages and views from public rights of way. In some cases, solar arrays will dominate views

from properties. By any measure these are visual receptors (people) who will be affected by the visual impacts of the proposed development (see also 7.2.27, 7.2.28)

(iii) We already have had reports of house sales falling through in Cassington because of the perceived threat of the West Botley Solar Power Station to quality of life in the village for which visual impact is a major consideration. This materially contradicts the reasoning for scoping out of residential visual amenity impacts.

(iv) An increasing number of studies show impacts of solar farms on house values. The nearer you are to one, and the bigger the solar farm is, the greater the impact. These impacts appear to be particularly marked where solar farms are built on rural land (Gaur and Lang, 2023).

We add that not only do we fully expect Residential Visual Amenity Assessment to be included in the impact assessment of the proposed solar power station on landscape and visual resources but that this assessment should include the views of residents of households who will be affected by the visual impacts of the scheme both in their homes and through use of nearby public rights of way. This is clearly an area which requires interviews and direct assessment of impacts on residents.

We also reject that there is no need for a night-time assessment when there may be substantial numbers of PIR-activated security and other lighting within the development.

Potential Cumulative Impacts

7.2.34

The countryside west of Oxford is subject to increasing development of solar farms on agricultural land including areas to the east / southeast of Yarnton and to the west of Eynsham. Along with the significant urban industrial and residential development along the Yarnton – Woodstock corridor and around Eynsham, including on Greenbelt land, it is essential to consider the accumulated impact of these and the West Botley Solar Power station proposal.

We also note, as above (7.2.14) that this proposed development is already having an impact on use of agricultural land in the area.

7.3 Ecology and Nature Conservation

Relevant Policy, Legislation and Guidance

7.3.2

Relevant local policy documents should include the Cassington Local Neighbourhood Plan and Green Infrastructure Plan. The former includes Policy CAS1 on the Cassington Nature Recovery Network and the latter much information on local nature assets.

7.3.9

As noted for 2.1.16 although there are no statutory ecological designations within the central site both within and surrounding Cassington there are several zones within the Natural England Habitat Network. These include areas of habitat restoration (e.g. Worton gravel pits), Network Enhancement Zone 1 (fields to the east of Cassington), Network Enhancement Zone 2 (south of A40) and a Network Expansion Zone (areas surrounding Cassington village especially to the north west and south). These are detailed in the Green Infrastructure Plan which is part of the Cassington Neighbourhood Plan which was accepted by Referendum in June 2023. These areas are included in the Cassington Neighbourhood Plan, Policy CAS1 Cassington Nature Recovery Network. We note that CAS1 Provision C states that “Proposals that will lead to the loss of land lying within the Network and that will undermine its integrity will be resisted.”

We also note that the latest version of maps released by the Developer reveal plans to dig a trench through Long Mead meadow to enable their cables to cross the Thames near Eynsham. Long Mead is part of only 4 square miles of original floodplain hay meadow left in the UK and must be protected. 97% of this type of habitat was lost between 1930 and 1984 (Wildlife Trusts, 2012) so it is nationally scarce community of plants and animals. It featured in a film produced for Cop26 and it would be a huge embarrassment for the government if part of this important floodplain was disrupted on their watch.

7.3.12

A major component of the landscape appeal of the proposed development site is the patchwork of lowland agricultural land, bounded by a hedgerow matrix, interspersed with copses and woodlands, some of which are classified as ancient semi-natural woodlands (ASNW). Given the nature of the proposal we envisage large-scale removal of the hedgerow matrix (whether temporarily or permanently) and either the removal of the woodland component or their isolation as a consequence of their connectivity with the hedgerow matrix being removed and fencing erected. We take this opportunity to indicate that the UK has lost over 50% of its hedgerow matrix post world-war II and that of the remaining hedgerows, 60% are classified as being in a poor condition. As a consequence, the Hedgerow Regulations (1997) were introduced to halt the removal/ degradation of what remains of the resource. Here we also note the recommendation of the UK Climate Change Committee who indicate that hedgerow cover will need to be increased by 40% by 2050 to help deliver our net zero target – in essence this requires the planting of 200,000 km of new hedgerows. We therefore contest any development which proposes to remove hedges, even temporarily, because of the high negative landscape impacts of this activity and the counter-intuitive nature of their removal in line with net zero aspirations.

In tandem with the loss of hedgerows we note the large-scale loss of ancient woodland in the UK, with current estimates suggesting we have c. 2% of its former distribution remaining. ASNWs are renowned for their high amenity and landscape, along with their importance as biodiversity hotspots. We expect that the scoping report will look to leave the majority of ASNWs intact, but question their landscape and amenity appeal as a consequence of being surrounded by a sea of solar panels.

Construction of solar farms and their associated infrastructure requires large-scale removal of vegetation and surface grading. This results in habitat loss, degradation and fragmentation, leading to a reduction in species richness and density. These impacts are exacerbated as the solar farm proposed will be situated on agricultural land which provides the landscape and habitat for an ever-dwindling group of plants and animals. Today in the UK the loss of “agri-wildlife” is well documented, with the majority of species and habitats associated with low-intensity agriculture showing catastrophic declines post World War 2. As a result, many of those species associated with agricultural habitats are afforded protection at the very highest levels.

A very large amount of fencing (over 100km) is indicated as required in this report. This will mean that access to a very large amount suitable foraging and breeding territory will be lost. Many agri-bird and mammal species require large, uninterrupted tracts of suitable breeding and feeding habitat with which to complete their life cycle. Solar farms result in large-scale losses of these vital components and as a consequence, species already demonstrated to be in significant decline (brown hare, harvest mice and several species of passerine birds including linnet, yellowhammer, corn bunting and tree sparrow for example) will be further negatively impacted. It is also useful to note that if the land between the solar arrays is to be sheep-grazed, then the surrounding field perimeter

will require stock-proof fencing in order to contain the grazing livestock. This fencing will function as a barrier to movement (resulting in an inability to access/maintain breeding and feeding territory) for several mammal species, notably badger and those species of deer typically found in agricultural settings.

An examination of records on i-Naturalist may also be appropriate for the area to detect presence of species.

7.3.14 and 7.3.15

We note that there is no mention of aquatic birds which we view as a significant omission for several reasons. First of all, the presence of reservoirs and rivers within and around the Botley West Utility-Scale Solar Power Station proposal means that aquatic birds are a feature of the area. Solar panels present a significant strike risk to bird species, especially if the surfaces are vertically oriented and/or reflecting light (e.g. Visser et al 2019; Smallwood, 2020). Water birds have been demonstrated to collide with the panels as they mistake them for waterbodies and effectively try to land on them (Jenkins et al., 2015; Mulvaney, 2019). We also note that some aquatic birds such as mute swans and geese also feed in fields proposed to be covered in solar arrays around the village of Cassington particularly in winter. Bird mortality at solar arrays in the US caused a mortality of 11.61 birds per MW/year (Smallwood, 2020). Translating such a figure to the West Botley utility-scale solar power station would cause a mortality of more than 390,000 birds over a 40-year operating time. Obviously impacts on US bird fauna are likely to be different to those in Oxfordshire but this gives an idea of the potential scale of impact of an 840 MW power station on birds in the area.

We also note that solar panels present a significant strike risk to insectivorous bird and bat species, especially if the surfaces are vertically oriented and/or reflecting light. Birds and bats are attracted to the panels for a variety of reasons. The panels themselves attract the principal prey items of insectivorous animals, which the birds/bats seek to consume, thus colliding with the structures in doing so. Aquatic insects are also attracted to the polarised light reflected by solar panels, again displaying maladaptive behaviour, mistaking the panels for water surfaces.

We note with concern the use of the term “survey season” in 7.3.15. As pointed out above behaviour of animals such as birds varies seasonally so surveys of fauna should take place throughout the year.

7.3.21 and 7.3.22

The scoping report indicates that the majority of ecological surveys will be conducted within the site boundary, with the exception of those mobile species, great crested newts (GCNs) and bats specifically, for whom buffer zones of 500m and 10km will be in place for these respectively.

We raise three issues which we consider of concern. (i) great crested newts have been documented as travelling as far as 1.3km [REDACTED] so why is only a 500m buffer proposed ?, (ii) the report specifically indicates that surveys will take place in waterbodies i.e GCN *breeding* habitat – no mention is made of terrestrial surveys in those habitats which they need for dispersal, feeding and hibernation (of which hedgerows are key) after they leave the breeding ponds and (iii) no mention is made of bird surveys – most farmland bird species are highly mobile and will access of a matrix of habitat types as part of their life cycle. In particular, we stress the importance of agricultural land for migratory species which rely heavily upon large tracts of agricultural land and their associate hedgerows, particularly in the late autumn/winter period. Species of note here are winter thrushes (redwing and fieldfare), starling, and several species of geese and swans. In addition, passerine birds

such as wheatear, yellow wagtails and redstart, “stop-off” on agricultural land in order to re-fuel on passage to their nesting grounds. As such, loss of these sites, accompanied by a reduction/removal of their ability to provide food sources, constitutes a significant concern to the overall impact to bird diversity. We therefore contend that a much wider survey area, spanning the breeding, migration and over-wintering seasons should be in place.

7.3.35 – 7.3.37

7.3.35 notes that “Replacement habitat for that lost where such habitat is either of conservation significance in its own right or supports a protected or otherwise notable species”. Whilst much is made of reinstating elements of the habitat lost post solar farm construction, most notably hedgerow systems, emphasis must be placed upon the fact that we are losing a long-established, biodiverse habitat in exchange for a brand new one. This new creation will take many decades to come anywhere close to the biodiversity of its predecessor, this at a time when agri-biodiversity continues to be lost apace.

Further to the point above, 7.3.36 states that the provision of new commuting routes for bats might form part of an ecological mitigation package. Bats use woodland edges, hedgerows, and other linear features to echolocate their way between their various feeding, breeding and roosting sites. Removal of these, even if temporary, will have a significant detrimental effect upon their survival, noting here that all species of bat in the UK are protected under the Wildlife & Countryside Act. Given that these planted features will take several years to reach a size against which the bats can successfully navigate, then we draw into question their efficacy as mitigation for these protected species.

7.3.37 indicates that the biodiversity net gain metric will be used to calculate the before and after biodiversity value of the site, the calculation subsequently used to deliver Biodiversity Net Gain (BNG). Given the large scale of the proposal, which will significantly impact a matrix of lowland agricultural land interspersed with habitats known to be of high biodiversity value, we look forward to being consulted over the proposals contained in the BNG strategy, in particular the scale, site selection and “like for like” elements which need to be made evident.

7.4 Hydrology and Flood Risk (59)

7.4.2

Relevant local policy documents should include the Cassington Local Neighbourhood Plan and Green Infrastructure Plan. The Green Infrastructure Plan contains details of past flooding and current flood risk to the village of Cassington.

7.4.3

This indicates, in keeping with previous sections, a likely zone of influence for hydrological impacts, specifically 250m for hydrology and 1km for flood risk. Again, we observe that there is no justification presented for the arrival of these figures, noting (again) that there has been no stakeholder consultation as part of the process.

Baseline Environment

Hydrological Setting

7.4.6 – 7.4.21

The scoping document focuses largely on flood risk associated with the water courses in the area of the proposed solar power station. However, for Cassington, Jericho Farm, Worton and Yarnton surface water flooding is the significant issue which needs to be considered in the impact

assessment. Elm's Road in the village of Cassington appears to be particularly vulnerable to surface water flooding events which result from surface water draining off the high ground of the fields to the north of Cassington. This is consistent with flooding of properties on Elm's Road in 2007 (WODC, 2008). Foxwell Court, St Peter's Close, Horsemere Lane, Foxwell End and Reynold's Farm are also at risk of flooding from extreme surface water events (WODC, 2008). Outside the village Jericho Farm and Worten are also vulnerable to flooding and the road junction to Worten Farm was flooded over the winter of 2020/2021. Following the 2007 flood events action was taken to mitigate future surface-water flooding including the clearing of previously blocked drains and the building of a drainage pond behind the southwest corner of the playing fields. Since this time there have been no further property flooding events in Cassington village although the threat remains as demonstrated by near flooding in the winter of 2022-2023.

Studies of how utility-scale solar power stations impact hydrology are relatively few at present. However, the studies that do exist show changes in soil moisture content associated with solar panel arrays and also increases in surface water runoff (e.g. Pisinaras et al., 2014; Yavari et al., 2022). Alterations in hydrology also have the potential to increase soil erosion in some circumstances (e.g. Yavari et al., 2022). One aspect of solar array design which influences runoff of rainwater is the tilt angle and orientation of the solar panels at a given site (Yavari et al., 2022).

Given the flooding issues already experienced at Cassington, Worton and Jericho Farm resulting from surface water runoff alteration of hydrology on the hills to the north of Cassington which will be near completely covered by solar arrays is a significant concern for residents of the Parish. Any increase in surface water runoff would increase flood risks to properties particularly in Elm's Road, but also in Foxwell Court, St Peter's Close, Horsemere Lane, Foxwell End, Reynold's Farm, Jericho Farm and Worton. We are not reassured by the statement by PVDP in their Phase 1 Consultation Summary Report (PVDP, 2023) that "Well designed solar farms do not cause an increase in the risk of flooding." In a situation where there is a continued risk to our villages from surface water flooding framed by an apparent increase in extreme rainfall events resulting from climate change (see UKCP18 statements on frequency and severity of surface water flooding in summer and autumn) this is a major concern to our residents.

Table 7.6 indicates a variety of potential hydrological and flood risk impacts which might arise as a consequence of the proposed development, with the vast majority to be subjected to a modelling approach to inform the assessment. A concern here is that many of the models will assume optimum condition infrastructure is in place (field drainage ditches, storm drains etc.), which they are not. We are therefore enquiring how these sub-standard infrastructures will be captured in the models (if at all)?

7.4.19 indicates that cumulative impacts from hydrology and flood risk will likely occur, whilst 7.4.20 suggests that these impacts will be contained within the footprint of each of the 3 sites. This, given the nature of the risks identified i.e. all linked to water movement, we challenge, particularly given our observation above that sections of the water movement mechanisms across the landscape are in poor repair and the history of surface water flooding.

We expect these concerns to be reflected in a thorough assessment of flood risk to the villages including modelling, taking account of conditions on the ground of drainage infrastructure of the effects of the Central Section of the Botley West Scheme on local hydrology and if necessary trials undertaken with solar arrays of different design undertaken over an appropriate time period to understand impacts on soil hydrology and runoff.

We also note that a high-pressure water supply pipe runs underground across the fields to the north of Cassington and this also must be considered during construction and operation of the solar power station.

7.5 Ground Conditions

7.5 addresses those elements relating specifically with ground conditions, notably in terms of potential impacts arising from the construction, operation and maintenance, and decommissioning phases of the Project.

7.5.5

This section indicates that the study area proposed for an assessment of ground conditions is the footprint of the development and a data search buffer of *up to* 100m. Again, we question the parsimonious nature of the buffer zones proposed, noting that in this instance there will only be a data (desktop) search within the buffer area.

7.5.12

This section suggests that the Project *may* impact on ground conditions during, construction, operation and/or decommissioning phases. We contend that all these phases *will* impact ground conditions and we would urge that all future communications dispense with the incorporation of this speculative narrative because of its inaccuracy.

Table 7.7

As is indicated the majority of the land parcels have the potential to have impacts relating to land contamination, ground instability or mineral resources, with the need for further assessment indicated as necessary. However, the nature of that assessment is not indicated i.e. will it be primary surveys or will it be a reliance upon historical data? If it is the latter, then we consider this to be particular cause for concern as we draw into question the reliability of historic data collection and reporting mechanisms, especially as they will be used to both predict the magnitude of the impacts likely encountered and guide the sensitivity categories of the receptor sites.

7.6 Traffic and Transport

7.6.18

We note that there are 11,000 households within 1.5km of the West Botley Utility-Scale Solar Power Station. Settlements such as Cassington with a narrow through road, residential properties, a school and a church are highly vulnerable to disturbance from construction traffic. Also, because of the dense population of the area in general operations such as trenching or cable laying which disrupt road routes (Table 7.11) have the potential to significantly redirect traffic also causing disturbance and disruption to surrounding villages. We therefore expect each settlement along / within routes for traffic associated with construction and operation to be specifically assessed for impacts, not a overall general analysis.

7.7 Noise and Vibration

Baseline Acoustic Environment

7.7.5 and 7.7.7

The village of Cassington and Jericho Farm also lie on the southern edge of the Central Section of the West Botley Utility-Scale Solar Power Station.

7.8 Climate Change

7.8.1, 7.8.19, 7.8.29, 7.8.31

The impact assessment states that it will only consider changes in cloud cover in respect of climate change. We point to two other factors that should be included in the impact assessment:

(i) Extreme rainfall events. Predicted changes in patterns of rainfall resulting from climate change must be assessed with respect to hydrology and flood risk especially to villages located at the bottom of hills or slopes to be covered in solar arrays (such as Cassington).

(ii) Extreme wind / storm events. Land around Cassington and Eynsham has been subject to two extreme wind events in the last 11 years (May, 2012 and October, 2021). The latest event, which occurred on the 31st October, 2021 was associated with a small low pressure system (mesolow). This caused a tornado of estimated strength T3 (Strong Tornado) to move through Cassington Village causing substantial damage to buildings, walls and trees (Horton, 2021). An even stronger tornado (T4 – Severe Tornado) tore through Burleigh Wood on the same day felling over 100 trees (a location enclosed by the Central Section of the solar power station). An assessment needs to be made of the likelihood of such events occurring, whether the frequency will change with climate change and the potential for damage to the solar power station (especially the Central Section). This is both a matter of operational risk for the solar power station and public safety. We view the statement in 7.8.31 that “extreme weather events are not considered to cause significant environmental effects to the Project” as evidently incorrect.

7.8.15, 7.8.16, 7.8.34

We expect any life-cycle assessment of the Botley West Utility-Scale Solar Power Station to not just include manufacturing-stage emissions but also emissions associated with mining and production of materials for solar arrays and other infrastructure, construction, including transport and traffic, operations and also, importantly, decommissioning and recycling of materials used for solar arrays and associated infrastructure (proposed to be scoped out). Infrastructure should be built with principles of the circular economy which means that the very large number of solar arrays and associated infrastructure should be recycled following decommissioning.

7.9 Socioeconomics

We note the Cassington Local Neighbourhood Plan is not included within the documents related to the socioeconomic assessment. This document includes much information which is relevant to the assessment related to the parish of Cassington.

Table 7.18

Employment

Significant impact on employment will be mainly associated with construction and will be temporary.

Need for temporary accommodation for workers

Temporary accommodation for workers not required because of good road linkages in the region. We point out that many of the roads in the area are already severely congested, hence current work to improve provision of Park and Ride facilities and road improvements. This, therefore, requires assessment at the EIA stage.

Economic output

Improvements will be temporary (i.e. during construction).

Recreation activities and Land Use

Rapid development of rural centres and villages in the West Oxfordshire area is putting great pressure both on land, infrastructure and residents of the area. Without doubt this is already eroding the quality of life of residents through increased disturbance from traffic, pollution, access to amenities, availability of public transport and opportunity for exercise and experiencing the outdoors.

Exposure to green space and the opportunity to exercise on locally available land have been demonstrated multiple times to have both physical and mental health benefits (e.g. Bowler et al., 2010; Shanahan et al., 2016; Cox et al., 2017). The main public rights of way used by the residents of Cassington village will be severely degraded in terms of their visual aspect, from one of open farmland to one of a largely artificial landscape dominated by solar panels. Schemes to enhance use of land through provision of a footpath along the Evenlode River (as suggested during the public consultation) will not compensate for these losses and have issues in and of themselves.

The aspect of open countryside currently enjoyed by residents of Cassington living on the north side of the village as well as residents of Jericho Farm will also be dominated by solar arrays, likely harming wellbeing in terms of mental and physical health. Jericho Farm, in particular, will be almost completely surrounded by solar arrays running up closely to the boundaries of the properties there.

The setting of Cassington, one of the few small villages in West Oxfordshire close to Oxford will turn from a largely rural aspect to one of being surrounded by industrialised land to the north (Mulvaney, 2019). This will have negative impacts on well-being for the majority of village residents.

We also note that in its pursuit of change in land use Blenheim Estates have, where they have been able, terminated the tenure of farmers on the land subject to the current proposal. This has caused great stress to some of the families involved and in one case has been suggested to have contributed to the death of one of the Parish's farmers (Cassington Parish Council Meeting, 1st December, 2022).

We therefore view an assessment of the socioeconomic impacts of the proposed scheme on recreational activities and land use to be essential.

Housing

11,000 households lie within 1.5km of the Botley West Utility-Scale Solar Power Station. Already we have had reports that house sales have fallen through in the village of Cassington because of the perceived threat of the impact posed by the solar power station. An increasing number of studies show impacts of solar farms on house values. The nearer you are to one, and the bigger the solar farm is, the greater the impact. We therefore challenge leaving this out of the EIA Assessment. Evidence material indicates that there will be a significant financial impact on households through both affecting the value and saleability of properties. Furthermore, we challenge the contention that this development is "temporary" for many people in our village and others this development will be in place for the rest of their lives. Temporary is therefore a relevant term, for many residents it will be to all practical purposes permanent. We note that one of the grounds for rejection of another large-scale solar power station was that a 40-year lifespan for practical purposes may be regarded as permanent (Planning Inspectorate Application Reference s62A/2022/0011 Land East of Pelham Substation, Maggots End, Manuden).

Crime and Safety

We do not believe that the assumption that “a workforce management plan”, including the operation of “modern slavery policies”, is going to ensure that the behaviour of both the highly skilled and less skilled workers is sound. Even if most workers, as claimed, will [arguably] be reasonably local, they may not feel a particular kinship with the immediate locality, which may be reflected in their driving and other behaviour as well as their spending preferences.

With respect to crime there are two aspects to this: (1) crime centred on the proposed site itself; and (2) crime committed in the surrounding area. The first has been scoped out and the second is not even considered for scoping in or out. Site-related crime has been scoped out for the construction phase on the (“assumed”) grounds that the site security arrangements will be adequate. This rather overconfidently passes over the attraction that large construction sites have for both opportunistic crime and, more seriously, for organised crime groups, who might have the wherewithal to circumvent security measures. For the operation phase, crime is again scoped out because the “proposed scheme is unlikely to affect the crime profile of the area . . . No impacts considered likely.” Table 7.19 goes even further: “widespread actual and *perceived* crime that could affect population health” is scoped out; likewise “changes in crime or fear of crime”. The latter assertion is based on “the rural context of the Project”.

Crime does not have to be particularly widespread to be perceived as such, and to induce fear of crime. The arrival of a population of, say, 1,200 workers probably changing in personnel from time to time, is bound to have an impact on the crime profile of the area *outside* the site. One or two burglaries from homes or businesses, thefts of farm equipment, driving offences, petty vandalism, accumulations of litter – no doubt the responsibility of a small minority of workers – will swiftly alter the local atmosphere and begin to affect local residents’ wellbeing. Opportunistic strangers or organised groups, some turning up in high viz jackets and hard hats, will almost certainly target the area. And as for the “rural context”, RPS seems to have no idea about current concerns about levels of rural crime. Scoping out crime is in our view inappropriate.

7.11 Agricultural Lands and Soils

We note the Cassington Local Neighbourhood Plan and Green Infrastructure Plan are not included within the documents related to the Agricultural Lands and Soils. These documents are relevant as they include policies on nature recovery and also use of the land surrounding the village for recreational purposes.

As part of the assessment, we would like to see an estimation in the loss of agricultural productivity for the land subsumed by the solar power station over its lifetime.

8.3 Glint and Glare

8.3.14

We note that RAF Brize Norton is not included in the likely receptors for glint and glare. However, some of the approaches to the airport, for example, over the village of Cassington, may be affected by glare from the solar arrays located north of the village and therefore should be considered as potential receptors for the purposes of the Glint and Glare analyses.

9 Topics Proposed To Be Scoped Out Of The EIA Process

9.2 Daylight, Sunlight and Microclimate

Soil microbial biodiversity is vital to the well-being of the above ground vegetation and all that depends upon it. Solar panels result in a large proportion of the overall footprint of the solar farm effectively being put in the shade with reduced exposure to rain, severely diminishing soil microbial

activity as a consequence of alteration to the immediate microclimate. This will result in an inert growth medium for plant life with a cascading effect upon the wildlife that directly or indirectly depends upon it. Solar panels also alter the temperature and evapotranspiration of soils, tending to keep them warmer during winter and cooler during the summer (e.g. Armstrong et al., 2016).

Large solar power stations such as the one proposed here have the potential to increase local temperatures in a similar way to the urban heat island affect. Measurements over a solar power station, nearby urban environments and surrounding wildlands have indicated a warming effect of up to 3-4°C depending on the season and time of day (Barron-Gafford et al., 2016). Such heat retention could have significant impacts on residents in villages surrounding the proposed solar power station which is a particular concern given temperature rise resulting from climate change.

We conclude that both from the point of views of impacts on biodiversity and on people effects of this proposed very large-scale power station on microclimate should be within the scope of the EIA.

9.4 Electromagnetic Fields (EMF)

The scoping report restricts consideration of this issue to cables that exceed 132kV, and to human health only. However, the effect on non-humans should be scoped in, not least because power converter stations and transformers, of which there will be 156 + 6 + 2, are generators of EMFs. According to the US National Library of Medicine's National Center for Biotechnology Information:

“Numerous studies across all frequencies and taxa indicate that current low-level anthropogenic EMF can have myriad and synergistic effects, including on orientation and migration, food finding, reproduction, mating, nest and den building, territorial maintenance and defense, and on vitality, longevity and survivorship itself. Effects have been observed in mammals such as bats, cervids, cetaceans and pinnipeds among others, and on birds, insects, amphibians, reptiles, microbes and many species of flora.”

Not surprisingly, the paper goes on to say, “It is time to recognize ambient EMF as a novel form of pollution and develop rules at regulatory agencies that designate air as 'habitat' so EMF can be regulated like other pollutants. Long-term chronic low-level EMF exposure standards, which do not now exist, should be set accordingly for wildlife, and environmental laws should be strictly enforced”.

References

- Armstrong, A., Ostle, N.J., Whitaker, J. (2016) Solar park microclimate and vegetation management effects on grassland carbon cycling. *Environmental Research Letters* 11: 074016.
- Barron-Gafford, G.A., Minor, R.L., Allen, N.A., Cronin, A.D., Brooks, A.E., Pavao-Zuckerman, M.A. (2016) The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures. *Scientific Reports* 6: 35070.
- Bowler, D.E., Buyung-Ali, L.M., Knight, T.M., Pullin, A.S. (2010) A systematic review of evidence for the added benefits to health of exposure to natural environments. *BMC Public Health* 10: 456.
- Cox, D.T.C., Shanahan, D.F., Hudson, H.L., Fuller, R.A., Anderson, K., Hancock, S., Gaston, K.J. (2017) Doses of nearby nature simultaneously associated with multiple health benefits. *International Journal of Environmental Research and Public Health* 14: 172.
- Gaur, V., Lang, C. (2023) House of the rising sun: The effect of utility-scale solar arrays on housing prices. *Energy Economics* 122: 106699.
- Horton, S. (2021) Cassington Tornado 2021: Report by the Tornado and Storm Research Organisation (TORRO). 15pp.
- Jenkins, A.R., Ralston, S., Smit-Robinson, H.A. (2015) *Best Practice Guidelines for assessing and monitoring the impact of solar energy facilities on birds in southern Africa*. Birdlife South Africa, 62pp.
- Mulvaney, D. (2019) *Solar Power: Innovation, Sustainability and Environmental Justice*. University of California Press, 329pp.
- Pisinaras, V., Wei, Y., Barring, L., Gemitzi, A. (2014) Conceptualizing and assessing the effects of installation and operation of photovoltaic power plants on major hydrologic budget constituents. *Science of the Total Environment* 493: 239–250.
- Private Eye (2023a) Marlborough Light. Private Eye 1597.
- Private Eye (2023b) Botley Contested. Private Eye 1599.
- Private Eye (2023c) Light and Shady. *Private Eye* 1601.
- PVDP (2023) Botley West Solar Farm: Phase One Consultation Summary Report July, 2023. Photovolt Development Partners on behalf of SolarFive Ltd. 15pp.
- Rogers, A., Thompson, S., Mills, G., Metcalf, C., King, B. (2022) Cassington Parish Council Response to the Botley West Utility Scale Solar Power Station: Response to the Photovolt Development Partners Pre-Planning Community Consultation Leaflet. Cassington Parish Council, 14pp.
- Shanahan, D.F., Bush, R., Gaston, K.J., Lin, B.B., Dean, J., Barber, E., Fuller, R.A. (2016) Health benefits from nature experiences depend on dose. *Scientific Reports* 6: 28551.
- Smallwood, K.S. (2020) Utility - scale solar impacts to volant wildlife. *Journal of Wildlife Management*. 86: e22216.
- Visser, E., Perold, V., Ralston-Paton, S., Cardenal, A.C., Ryan, P.G. (2019) Assessing the impacts of a utility-scale photovoltaic solar energy facility on birds in the Northern Cape, South Africa. *Renewable Energy* 133: 1285-1294.

Wildlife Trusts (2012) *Where To Go For Wildlife in Berkshire, Buckinghamshire and Oxfordshire*, Fifth Edition. Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, Littlemore, Oxfordshire. Pisces Publications, an imprint of NatureBureau, Newbury, Berkshire, 184pp.

WODC (2007) Conservation Area Character Appraisal Cassington. West Oxfordshire District Council Planning Service, Witney, Oxfordshire, UK, 7pp.

WODC (2008) Parish Flood Report Cassington November 2008. West Oxfordshire District Council, 20pp.

Yavari, R., Zaliwciw, D., Cibir, R., McPhillips, L. (2022) Minimizing environmental impacts of solar farms: a review of current science on landscape hydrology and guidance on stormwater management. *Environmental Research Infrastructure and Sustainability 2*: 032002.

Cassington Parish Council Response to the Botley West Proposal Phase Two Public Consultation to West Oxfordshire District Council Development Control Meeting 5th February 2024; PVDP and the Planning Inspectorate

Written and approved by Parish Councillors: Alex David Rogers, Barbara King, Christopher Metcalfe, Graham Mills, Stewart Thompson on the 1st February, 2024.

Introduction

This document follows a request by West Oxfordshire District Council for responses from Parish Councils to the Botley West Utility-Scale Solar Power Station proposal. Cassington Parish Council will reserve detailed comment on the Preliminary Environmental Information Report (PEIR) and the Botley West proposal until the full submission of the proposal to the Planning Inspectorate which is expected sometime in the summer of 2024. Therefore, what follows are areas of initial concern which have not been addressed or have been inadequately addressed since our submission of our response to the Scoping submitted by the developers, PVDP.

Adequacy of Consultation

The developers have engaged in two rounds of public consultation, an informal consultation which took place in December 2022 and the Phase Two Consultation which has taken place in December and January 2023/2024. Cassington Parish Council notes very little change of material consequence to its Parishioners in the proposed scheme since the Phase One Community Consultation which is a concern as the scheme will cover approximately 50% of the land of the Parish. The proposed Utility-Scale Solar Power Station, possibly the largest in Europe and amongst the largest in the world still entirely dominates the land to the north and northeast of the village, it comes to within 15m of our resident's property and many questions regarding mitigation of impacts to flood risk and to the natural environment remain unanswered or answered in vague terms.

We question the utility of a consultation process that results in little perceivable change to the proposed project. We also note that according to the Gunning Principle (Local Government Association, 2019), No. 1 states that for proper consultation to take place proposals should still be at a formative stage. Specifically: "*A final decision has not yet been made, or predetermined, by the decision makers*". Furthermore Principle No. 4 states that "*conscientious consideration must be given to the consultation responses before a decision is made*". Specifically: "*Decision-makers should be able to provide evidence that they took consultation responses into account*".

The Phase Two Consultation straddled the Christmas and New Year Period despite requests from Stop Botley West, CPRE Oxfordshire and others to move the period of the consultation to after the holidays to enable residents the best opportunity to engage and feed into the process. These requests were ignored and given the huge size of the material provided by PVDP (i.e. the PEIR being over 7,000 pages long), and despite an additional time allocation

over and above the legal requirement for consultation we believe that this gave Parishioners insufficient time to fully comprehend and assess the proposed scheme. It is therefore the case that Parishioners are unlikely to have been fully informed when engaging with the public events scheduled by PVDP, including the one in Cassington on the 12th of January. Coming back to the Gunning principles, No. 3. States that *“there is adequate time for consideration and response”*. Specifically:

“There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation, despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of the impact of the consultation”.

The Phase Two Community Consultation Leaflet was only distributed just before Christmas 2023 and therefore it may have been lost or discarded by householders in the busy period before Christmas. Notwithstanding this issue this is the document which most Residents are likely to have read. The contents of this document were superficial and largely highly biased towards the proposal. Many details of aspects of the proposal referred to in the Phase Two Consultation Leaflet are not even addressed in the PEIR (e.g. the Traffic Management Plan).

Members of the Parish Council attended the Cassington Consultation Event and both of the online consultation events. At the Cassington event specialist consultants were not available on Hydrology or Ecology. Both of these areas are of significant importance to the residents of Cassington. The village is currently at high risk of surface-water flooding from the fields to the north of the village which slope down from north to south. Flooding events have in the past particularly affected Elms Road. Many of our residents enjoy walking on the footpath that reaches a high point just before Purwell Farm which not only gives open views of green countryside to the east, southeast and south all the way to Oxford and Wytham Wood, but also the opportunity to view wildlife such as farmland birds.

At times during consultations our residents were dealt with in a brusque manner by the representatives of PVDP and RPS. This left our residents frustrated and in some cases in tears.

The online consultation events were highly unsatisfactory. At the event for Parish Councils attendees could only propose questions via the chat box (no audio available) which provided no opportunity for rebuttal or clarification of any of the replies provided by the panel. To compound the frustration, once the question had been “answered” by the panel, the chat box indicated that “this question was answered online”. This was not the case, and the panel were challenged (via the chat box!) to this effect. None of the questions put forward by Cassington Parish Council were addressed. The event on the 23rd of January was chaired by a member of Counter Context, the communications company employed by PVDP. The format was the same as the Parish Council Event. The questions selected for answering by the panellists Marc Owen Lloyd and consultants from RPS were in favour the scheme and generally allowed the panel to cast the proposal in a positive light. None of the questions submitted by Cassington Parish Councillors were answered. At one stage the online consultation comprised of extolling a series of positive aspects of the proposed scheme, in other words pure propaganda. If the developers were serious about the online consultation being useful to the public, then it should have been chaired by a neutral party.

The PEIR submitted by RPS on behalf of PVDP was an inadequate basis on which to allow members of the public to understand the proposal, its risks and proposed mitigations. Despite its enormous length, at more than 7,000 pages, vital documents and data were missing from the PEIR. Examples included the Traffic Management Report, the Biodiversity

Net Gain Report and the Environmental Management Plan. Despite PINS advising PVDP during the Scoping Report and during a meeting of September 2023 no justification was provided in the PEIR of the enormous take of Greenbelt Land by this proposal. We ask how the public are supposed to adequately engage with the consultation process if such critical information is not supplied to inform opinion, questions and suggestions as to how the scheme could be improved or whether it should be rejected.

A further issue with the PEIR is that it has not been provided with an adequate index. This makes navigating such an enormous document impossible. Given the limited time to examine such a document this omission is a serious one as readers cannot focus on specific areas of the PEIR to lift information relevant to their questions.

Space devoted to the hard copy of the PEIR in Eynsham Library was inadequate for examination of the multiple folders making up the report.

Overall, for such a large and significant proposal for our Parishioners, insufficient information has been provided for intelligent consideration. This is in direct contravention of Gunning Principle No. 2: *“there is sufficient information to give ‘intelligent consideration’”*. Specifically:

“The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response”.

The Main Concerns of Cassington Parish Council with Respect to the Scheme

Cassington Parish Council's main concerns with the proposed Utility-Scale Solar Power Station fall into several categories:

- The massive scale of the proposed solar power station, particularly its central section which covers 50% of the land of the parish and is largely (75%) on greenbelt land in contradiction to the National Policy Planning Framework (NPPF). This should be considered in the light of the numerous other developments in the immediate area for housing, industrial use and other solar power stations which are further impacting on greenbelt land and other rural locations.
- The proposed scheme will utterly transform the landscape to the north, northwest and northeast of Cassington, converting gently sloping hills and the Evenlode Vale, with extended views of the surrounding countryside to a semi-industrialised landscape.
- The loss of Best and Most Versatile Land which includes the farms of our parish for the duration of the scheme (beyond the life expectancy of many of our residents) and potential longer-term damage to the productivity of this farmland.
- Increased risk of surface water flooding.
- Significant and long-term damage to wildlife.
- Loss of amenity and green space for healthy living.
- Disturbance to the community of the Parish of Cassington during the construction of the solar power station and during its operation.
- The opportunity costs for nature restoration and amenity that this scheme will incur.

Scale of the Proposed Development and Use of Greenbelt Land

The Botley West Utility-Scale Solar Power Station represents a development the size of Heathrow Airport being dropped into the rural landscape of West Oxfordshire, Cherwell and the Vale of the Whitehorse. The entire area represents a mosaic of habitats which is

interconnected by the valleys of the Rivers Dorn, Glyme, Evenlode, Windrush and Thames. These form a coherent north-south river valley landscape of consistently high quality and sensitivity which is straddled by the Blenheim Park WHS at its heart, between the proposed Northern and Central development sites. The Parish of Cassington will have 50% of its area covered by the proposed solar power station. 75% of the scheme is on greenbelt land.

The proposed scheme is directly in contradiction to the NPPF Chapter 13 (Protecting Greenbelt Land) Paragraphs 152, 153 and 156. The development is clearly very harmful to the greenbelt of the City of Oxford and its purposes; “very special circumstances” to locate Botley West Utility-Scale Solar Power Station on the greenbelt have not been demonstrated and alternatives to this scheme have not been considered likely because these do not result in large financial benefits to the landowners and developers.

To the people of Cassington this development will be utterly transformative. The rural views to the north of the village enjoyed by some of our households and the many of the rights of way currently enjoyed by many of our residents, for exercise, leisure and watching wildlife will be converted to an industrial landscape of solar arrays, power converter stations and high voltage transformers as well as fencing and other infrastructure such as security cameras.

Proposed mitigations to these losses of visual landscape, amenity and wellbeing are wholly inadequate. Some of our residents are so traumatised by this proposal that they have left the consultations in tears, and many are suffering stress as a result of the prospect of the change in our lives that this proposal will bring.

Loss of Best and Most Versatile Land

Despite the claims of Dominic Hare, the CEO of Blenheim Estates that the Botley West Utility-Scale Solar Power Station will be located on “poor” agricultural land (e.g. Cassington Parish Council Meeting, 1st December, 2022 referring to Grade 3B land) it is now clear that much of the proposed site is Grades 1, 2 and 3A, in other words Best and Most Versatile (BMV) land. PVDPs own estimates indicate that 38% of the land covered by the Utility-Scale Solar Power Station is on BMV land. According to estimates provided to Stop Botley West based on GIS studies solar panels in the central site will be positioned on land which is 80% BMV. The NPPF guidelines direct that planning decisions should:

“enhance the local environment” by “recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”

Chapter 15 Paragraph 180.

The NPPF further specifies that:

“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.”

Chapter 15 Para 181 ⁶².

The Botley West Utility-Scale Solar Power Station does not conform to the guidance by the NPPF and neither are alternatives that might site the proposal on less high-quality farmland considered by the applicants.

Loss of viable farms in the Parish of Cassington also detracts from the landscape as well as depriving the U.K. of productive farmland. This has been the cause of considerable stress to our farmers (as revealed by interventions of one of farmers at the Parish Council meeting of the 1st December 2022).

Increased Risk of Flooding

As detailed in the document Cassington Parish Council: Response to Scoping Report for Botley West Solar Farm, June 2023 we believe that for Cassington, Jericho Farm and Worton surface water flooding is a significant issue associated with this development. Elm's Road in the village of Cassington is particularly vulnerable to surface water flooding events which result from surface water draining off the high ground of the fields to the north of Cassington. This is consistent with flooding of properties on Elm's Road in 2007. Foxwell Court, St Peter's Close, Horsemere Lane, Foxwell End and Reynold's Farm are also at risk of flooding from extreme surface water events. Outside the village Jericho Farm and Worton are also vulnerable to flooding and the road junction to Worton Farm was flooded over the winter of 2020/2021. Following the 2007 flood events action was taken to mitigate future surface-water flooding including the clearing of previously blocked drains and the building of a drainage pond behind the southwest corner of the playing fields. Since this time there have been no further property flooding events in Cassington village although the threat remains as demonstrated by near flooding in the winter of 2022-2023 and 2023-2024.

Studies of how utility-scale solar power stations impact hydrology are relatively few at present. However, the studies that do exist show changes in soil moisture content associated with solar panel arrays and also increases in surface water runoff (e.g. Pisinaras et al., 2014; Yavari et al., 2022). Alterations in hydrology also have the potential to increase soil erosion in some circumstances (e.g. Yavari et al., 2022). One aspect of solar array design which influences runoff of rainwater is the tilt angle and orientation of the solar panels at a given site (Yavari et al., 2022).

RPS dismiss the scientific literature cited in the Cassington response to the Scoping report by stating that the studies are mostly based on situations not relevant to the UK (i.e. lands which are typically drier than the UK and subject to sporadic heavy rainfall). However, periods of drought interspersed by extremely heavy rain are exactly the type of weather pattern we are seeing in the UK as a result of climate change. The PEIR offers three main mitigations for flood risk, the slope of the panels aimed at reducing speed of runoff, vegetated spaces between the solar arrays and the use of swales (vegetated drainage channels) at the downhill sides of the solar arrays. We note that compression of the soil will result from vehicle movements, earthworks and the extensive driving of foundations for solar arrays into the land on which the solar power station will be constructed. This has been identified as a major contributor to flood risk in the UK (ADAS, 2023). This is also likely to damage existing field underdrainage. Unlike many other solar power stations which are located on flat land this scheme is proposed for sloping land forming the vales around the Evenlode, Glyme and Thames. Layers of clay are a feature of these soils, and it is notable that the land to the east of Cassington earmarked for this scheme (to the north of the sewage works) is permanently wet usually with standing water across the entire slope during the winter (hence the name Springhill for the nearby farm). During periods of heavy rainfall water will simply runoff the vegetated topsoil so this measure, one of the three mentioned in the PEIR will not function at the point when most needed. Flood mitigation for Cassington has therefore not been considered in detail in the PEIR and many factors remain unaccounted for or not based on a solid grounding of scientific evidence. We therefore

remain unconvinced that the measures proposed will be sufficient to prevent flooding of households in the parish.

Significant and Long-Term Damage to Wildlife

The land of the Parish of Cassington comprises a mosaic of habitats including farmland, hedgerows, tree lines bordering fields and tracks, woodland and river valleys and associated flood meadows. This mosaic of habitats leads to a rich and diverse fauna and flora significant elements of which will be severely degraded or even lost as a result of this scheme. This is because many elements of the wildlife, especially birds require farmland in rotational cropping, along with hedgerows and other landscape features to thrive. As demonstrated by the PEIR the land in questions hosts healthy populations of Red Listed birds (e.g. yellowhammers, linnets and corn bunting), bats, badgers, hares and other wildlife. The mitigation measures laid out by the PEIR are inadequate to compensate for the massive loss of habitat for these animals where they are sensitive to the presence of solar arrays and other infrastructure. Furthermore, important elements of the environmental mitigation plans are missing from the PEIR, including the Biodiversity Net Gain Report and the Environmental Management Plan. The latter is particularly important in understanding the management of mitigation measures throughout the lifetime of the scheme. Cassington Parish Council therefore regards this scheme as having significant impacts on wildlife over a large area of the Parish and wider area of the proposed solar power station.

Loss of Amenity and Green Space for Healthy Living

As stated in the NPPF Chapter 15 Paragraph 180:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”

Loss of the currently beautiful and open landscape to the north of Cassington will have a serious impact on ecosystem services provided by the land to the residents of the Parish. This will mainly be in the form of cultural services in terms of amenity gained from exercise, walking and viewing wildlife in the open countryside of the current landscape and greenbelt. Such amenity is important to the health and well being of our Parishioners. Furthermore, some of our residents will be within 15m of the proposed scheme and thus will suffer an immediate and long-lasting impact to the quality of their lives.

Disturbance to the community of the Parish of Cassington

Currently detailed traffic and construction management plans are not available for evaluation. However, given the construction of the proposed solar power station will take two years, involve numerous traffic movements, pile driving foundation modules for solar arrays to a depth of 2.5m, earthworks and other infrastructure we suspect that disturbance to the communities in the Parish of Cassington will be high given its proximity to the central area. Following construction there will also be disturbance from maintenance of the solar power station (7 days a week) as well as general noise associated with operation. Heat island effects will also be likely to be relevant with such a large acreage of solar arrays in such close proximity to residential areas. This may lead to higher than ambient temperatures during the summer leading to health effects and disturbance of residents.

Opportunity Costs for Nature Restoration and Amenity

The region around the Thames, Evenlode and wider area has the potential for considerable restoration activity and further national-level designation at the highest level for nature conservation and landscape preservation. The countryside around Cassington is included in the current Nature Recovery Network for Oxfordshire. We believe that the development of the Botley West Utility-Scale Solar Power Station, despite ideas being put forward of a nature corridor along the Evenlode by the developers, will actually prevent such nature recovery activities from reaching their full potential and will damage wildlife dependent on a mosaic of habitats including farmland. This opportunity cost is not considered by PVDP or their consultants. Such nature restoration plans could also be coupled with a wider network of footpaths and cycleways, community solar and other forms of sustainable living in a much more effective and inclusive manner than is offered by the current proposal. As such, if adopted, Botley West would represent opportunity loss rather than gain for the people of our Parish and Oxford City and Oxfordshire as a whole.

References

ADAS (2023) The impact of solar photovoltaic (PV) sites on agricultural soils and land. Work Package Three: Review of Impacts. Report for the Welsh Government, ADAS, Rosemaund, Preston Wynne, Herefordshire, HR1 3PG, 79pp.

Local Government Association (2019)

<https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

Accessed 1/2/2024.

Pisinaras, V., Wei, Y., Barring, L., Gemitzi, A. (2014) Conceptualizing and assessing the effects of installation and operation of photovoltaic power plants on major hydrologic budget constituents. *Science of the Total Environment* 493: 239–250.

Yavari, R., Zaliwciw, D., Cibin, R., McPhillips, L. (2022) Minimizing environmental impacts of solar farms: a review of current science on landscape hydrology and guidance on stormwater management. *Environmental Research Infrastructure and Sustainability* 2: 032002.

Cassington Parish Council Response to the Botley West Solar Farm: Information Change Note on Targeted Consultation, June 2024

Rogers, A.D., King, B., Metcalfe, C., Mills, G., Thompson S. (Cassington Parish Council).

Introduction

A Targeted Consultation was launched by PVDP on the 14th June, 2024 with little or no prior warning to the public. Many of the public received notification via post during the week following the start of the consultation (in one case on the 19th June) reducing the time to respond. This is a material consideration given that the deadline for response to this Targeted Consultation was just 6 weeks (July 28th).

The Targeted Consultation was stated to be required because:

The original proposal has been adjusted to:

- Reflect better boundaries reflecting OS maps as well as land ownership.
- To present refined routes for cabling.
- To adjust the scheme for more access points for both construction and maintenance of Botley West Solar Power Station. These access points may have been modified to improve safety (e.g. modification of splays to improve visibility for vehicles entering / leaving the proposed sites.
- Removal of land from the proposal that is no longer required.

General Comments

Adequacy of the Public Consultation

It is surprising that this Targeted Consultation is needed following the consultation in December 2023 / January 2024. This first official Public Consultation presented a vast quantity of (unindexed) information begging the question of why a second Targeted Consultation presenting 57 changes, is needed. Cassington Parish Council can only conclude that the first official Public Consultation was rushed, meaning that the information presented now was missing, unrefined or inaccurate. This suggests that the First Consultation was indeed inadequate.

Inadequate Information

The information provided provides comments on 57 boundary changes along with thumbnail maps showing where boundary changes are proposed. These maps and associated descriptions of the changes to the proposed scheme were wholly inadequate, in many cases lacking important detail or left so open as to leave the reader unable to assess what likely impacts were going to be (for example, making a substantial boundary change for a cable crossing point somewhere within the designated area). Examples of inadequate information included:

- Not showing the actual rights of way on thumbnail maps.

- Not providing any information on the environment other than general habitat types that may be affected in some cases. This was of material consideration as it left the reader unable to assess neither the amount of habitat lost nor the quality of the habitat (i.e. whether or not a hedgerow is “ancient”).
- Not showing local designations for nature recovery or habitats of national significance even though these are available on national databases and environment maps.
- Not showing nearby heritage assets so that potential impacts on archaeological sites for example can be assessed (e.g. Sansom’s Platt).
- In one case maps being so ambiguous that it is not possible to identify where the proposed change is (see 35 below).

This significantly lowers the value of the consultation as the nature of the proposed changes are not clear to the public as well as the environmental, amenity and heritage impacts. This suggests that as with the First Public Consultation, this second Targeted Consultation is inadequate, being deficient in the information it presents to the point where the public are unable to comment on many aspects.

Specific Comments

Impacts of Changes

1. Dornford Lane, an ancient drover’s track will be included in the scheme to be used for maintenance vehicle traffic. This is currently a public right of way. At the northern end the lane forms a track. However, as it nears the southern end, and junctions with other footpaths such as Akeman Street it narrows to one or two feet wide, with wide swathes of vegetation, bushes, hedging and trees, etc. It would be impossible to drive vehicles down this path without causing massive damage so it is assumed the developer will therefore have to remove these hedges. It is likely they are older than 1845 making them “ancient hedgerows”. The most ancient parts of the hedgerow along this track include ash and oak trees and can be 15 to 20 feet across. The small Roman town of Sansom’s Platt is also in the immediate vicinity of Dornford Lane.
2. Access between field, impacts unclear from information presented.
3. Dornford Lane included in the scheme for access. Also, a 33Kv cable to be placed across the roadway in a place as yet undetermined.
4. Access through a hedge along the A4260 for construction site and substation. Loss of hedgerow; no information provided on status or likely age of hedgerow.
5. Hedgerow removed along the B4027 to allow construction and maintenance of solar arrays and delivery of power converters. The applicant states (as in 4) that any protected species will be safeguarded. It is difficult to imagine how you can safeguard a protected species within a hedge that is due to be removed especially if the species is dependent on the environment provided by the hedge.
6. Inclusion of B4027 and Stratfield Lane in the development to connect fields and enable cable laying. This includes a public right of way.
7. Widening of the boundary along Stratford Lane which may lead to loss of hedgerows.
8. Correction of project boundary to align with OS maps.
9. Change in the project boundary to allow cable to be placed underground. Will potentially impact the Glyme Valley way and National Cycle Route 5.
10. Boundary change along the B4027 to ensure access for construction.
11. Change of boundary to align with OS maps.

12. Change of boundary to align with OS maps.
13. Change of boundary to allow access from the Banbury Road for construction and maintenance traffic. Will result in loss of hedgerows of indeterminate age.
14. Change of boundary related to land ownership.
15. Potential widening of the boundary along Banbury Road to the north of Hensington. This may result in the loss of hedgerows but there is insufficient information here to evaluate ecological impact.
16. Use of a track for a 33kV cable connecting arrays. This may result in the loss of a public right of way or impact its use during construction.
17. Adjustment of boundary to reflect land ownership.
18. A site boundary change that may impact on several major Oxfordshire footpaths including the Greenbelt Way, the Eynsham and Thames Path Promoted Routes. Disruption to the use of these footpaths may occur during construction. There is no further information on likely impacts to ecology.
19. Boundary change to reflect OS map.
20. Boundary change to reflect OS map.
21. A boundary change to reduce potential impacts on archaeology. This would appear to be a beneficial change in terms of heritage.
22. Boundary change to align with the OS map.
23. Access to construction site to the east of Langford Lane. This will result in the loss of mature hedgerow. See comments to (5) above.
24. Disruption to the cycle and footpath running along the A44 for cable laying during construction. It is noted that this is the main foot and cyclepath connecting Woodstock / Bladon to Begbroke, Yarnton and Oxford. This route is in daily use by cycling commuters into Oxford, the villages between Woodstock and Oxford and to the Begbroke Science Park.
25. Boundary change to allow for a 30m wide "path". This is to allow for commercial development associated with the growing industrial parks to the east of Oxford Airport.
26. Boundary change to align with OS maps.
27. Change in boundary to allow for cable laying across the Cassington (Burleigh) Road. This road is now a busy route taking a lot of local rush hour traffic moving between Oxford / Yarnton and from the A40 through Cassington to the Bladon / Long Hanborough Road (A4095). Any disruption to this route will cause considerable inconvenience to local road users and also will likely result in heavier traffic in the surrounding area (e.g. traffic from Yarnton going instead through Cassington or up the A44 and through Bladon, a route already heavily congested. The mature hedges along this road are also not mentioned here and presumably they will also be damaged or a part removed for this work.
28. This is a rather non-specific boundary change, the impacts of which are not possible to determine because the precise cabling route for which the change is made is yet to be determined. It is another example of where the information provided in the Targeted Consultation is insufficient to allow assessment of impacts, in this case on Heath Lane, Bladon and on a Bridleway.
29. Boundary change potentially causing loss of trees and hedgerow along Cassington Road to allow for cabling. We note that this may affect the edge of Burleigh Wood, an area of ancient woodland (see PEIR, Chapter 9, P17). This wood was already damaged by a tornado on the 31st October, 2021. As with (27) we note the disruption to traffic this may incur along the Cassington Road.
30. Installation of a bridge over and cabling under the River Evenlode south of Mill Farm

It is noted that in the PEIR rivers are described as being protected with a buffer corridor from the proposed scheme. The Evenlode specifically, is identified as an important landscape-scale corridor running from north to south (PEIR Chapter 9, P42). Clearly there will be at the very least temporary disturbance and habitat destruction during construction along the Evenlode at or close to the very area that is identified as where a floodplain meadow could be established (PEIR Chapter 9, P18, P19, P28, P57) and where the corridor along the Evenlode could add to the Cassington Nature Recovery Network. The Lower Evenlode is also identified as a Conservation Target Area (CTA; PEIR Chapter 9, P40) and as good territory for foraging bats and otters (PEIR Chapter 9, P46, P47). Presumably the bridge would be used for maintenance traffic for the Solar power station causing disturbance during the operation of the facility (see (32)).

31. Boundary change to match OS map.
32. Widening of the access to Mill Farm from the B4449 to allow access for placement of Power Converters and for maintenance traffic. Again, removal of hedges with no detail of how mature these are or of details of removal (see 5).
33. Change of project boundary to reflect OS maps.
34. The proposal here is for a footbridge over the river Evenlode. The positioning of this footbridge would seem to connect land to the west of the Evenlode to land surrounded by the river as it splits in two to the north and reconnects to the south. A priority identified in the Cassington Neighbourhood Plan is connecting the footpath from Cassington via Purwell Farm which ends at the River Evenlode just north of Goose Eye Farm, potentially opening a pedestrian and cycling commuting and amenity route between Cassington and Long Hanborough (see Cassington Neighbourhood Plan). This footbridge does not seem to achieve this goal although it may if the additional footbridge (35) is positioned on eastern loop of the River Evenlode in this location. Unfortunately, the maps provided with the Targeted Consultation are not clear on this matter (see 35 below). Although impacts to the River Evenlode and surrounding meadows would be less than the bridge described in (30) nonetheless care would need to be taken in design and construction of the footbridge given the sensitive nature of the habitats in this area (see 30 above).
35. It is completely unclear where this footbridge is located as no arrow points from the (35) box on P9 of the Targeted Consultation document to the river crossing point. A location at the end of the footpath from Cassington, crossing the River Evenlode north of Goose Eye Farm, before the River splits in two would make most sense. It is also likely that this was the historic crossing point of the river and the footpath probably continued to the west. If this is the location of the proposed footbridge it would be compatible with the proposal in the Cassington Neighbourhood Plan and the footbridge described in (34) unnecessary. This will only be a useful ProW if the additional footpaths are put in place to the west of the River Evenlode connecting Cassington to Church Hanborough or (preferably) Long Hanborough. Although here we point out that amenity of such a footpath and benefits in terms of exposure to green countryside will be considerable detracted from given the covering of much of the land around the route by solar arrays. Again, although impacts to the River Evenlode and surrounding meadows would be less than the bridge described in (30) nonetheless care would need to be taken in design and construction of the footbridge given the sensitive nature of the habitats in this area (see 30 above).
36. As with the Cassington (Burleigh) Road, Lower Road takes a significant load of local rush hour traffic from the A40 and the southern stretch of the B4449 (linking to Oxford via the

Swinford Bridge) to Long Hanborough. Any disruption of this route will lead to significant congestion in the area and likely traffic overspill into Cassington. The mature hedges along this road are also not mentioned here and presumably they will also be damaged or a part removed for this work.

37. The boundary change here includes an existing rural (farm) track. It is assumed no hedge removal or other activities will be required here as these are not mentioned.
38. The Boundary is changed to remove New Barn Farm from the scheme.
39. The project site boundary is made here to allow connection of 33KV cabling between solar arrays. It is noted that this cabling would need to cross the River Evenlode with all the potential impacts on an important environmental corridor as described above (30). This crossing is just north of Eynsham Mill.
40. The note identifies boundary changes to reflect land ownership and to give the project more “engineering flexibility”. We note that the area including both the boundary to Cassington Sewage Farm, the access track to it and the boundaries of the railway line comprise a lot of mature hedgerow and semi-wooded habitat. Many birds use these areas for nesting or foraging opportunities. Any loss of these habitats will entail an impact on plant, insect, bird and other diversity.
41. Boundary adjusted to match with OS maps.
42. The boundary of the scheme has been modified to include the private access road to Purwell Farm. It is assumed that there will be no need to alter the boundaries of this track which comprise mature hedgerows to allow access for the power converter units. What is a significant concern is the route by which the Power Converter units will be delivered to this site. Coming from Yarnton the route includes a narrow bridge which is likely to be unsuitable for HGVs. This leaves access either from the A40 via Cassington, which has a weight limit through the village, reflecting the proximity of buildings (included listed buildings) to the roadway and its narrowness. Another route would be via the A4095 but again through Bladon the road is extremely narrow.
43. The boundary has been altered to allow cabling to be routed between solar arrays. There is no identification of impacts in the Targeted Consultation documents, but it is noted that an area of woodland borders this change which is an environmentally sensitive habitat.
44. Access to the fields west of the Cassington (Burleigh) Road will be widened to take delivery of Power Converter Substations. This is likely to involve loss of mature hedgerows (see 5, above and notes below). Again, this raises concerns about the transport via HGVs along roads which are likely to be suitable for such large vehicles.
45. Boundary of the scheme is adjusted to reflect the OS map.
46. The boundary of the scheme will be adjusted to include the maintenance track to the Sewage Works. This track is also part of a public footpath which is used by walkers (including dog walkers), joggers and for commuting from Cassington to Begbroke Science Park. Disruption to this footpath during construction along the highlighted area, as well as the footpath beyond the concrete track will be a major inconvenience to walkers who often use this route. It is noted that additional traffic during construction and for maintenance will be on top of the relatively light use of the current track for traffic to / from Cassington Sewage farm and fields connecting to this track. It is assumed that there will not need to be removal of hedges from either side of this track which are rich in wildlife (see 40).
47. The boundary changes incorporate land around the railway line and the boundaries of Cassington Sewage Farm. As above (40), we note that the area including both the

boundary to Cassington Sewage Farm, the access track to it and the boundaries of the railway line comprise a lot of mature hedgerow and semi-wooded habitat. Many birds use these areas for nesting or foraging opportunities. Any loss of these habitats will entail an impact on plant, insect, bird and other diversity. It is also not understood why this change refers to highway when it lies around the railway line running from Oxford.

48. The boundary change is to improve the visibility line to the north to enable safe access of vehicles presumably along the track to Cassington Sewage Farm. This access already comprises a considerable splay of concrete to enable vehicles to enter or leave this track. The Cassington – Yarnton road in this area is lined by mature hedgerows which would be impacted if changes are made to increase visibility from the track to the road.
49. Alteration of the boundary to align with land ownership.
50. Land classified as species-rich grassland is removed from this scheme which is positive. However, the boundary is increased elsewhere to the south of the Cassington Road and to the west of Cassington Canal. This land is in the existing core nature recovery network and is also identified as Priority Habitat Inventory Coastal and Floodplain Grazing Marsh (see Magic maps and Cassington Neighbourhood Plan's Green Infrastructure Plan). 97% of this type of habitat was lost between 1930 and 1984 (Wildlife Trusts, 2012) so it is nationally scarce community of plants and animals. It is also concerning that land adjacent to Eynsham Allotments is also included in the boundary as this includes a complex of hedgerows and wooded habitat. Overall, the land identified for entrenching the cable is entirely unsuitable given its ecological sensitivity. This is unsurprising as there is a complex of such habitat running along the north bank of the Thames in this area (see Cassington Green Infrastructure Plan).
51. This is a minor adjustment of the scheme boundary of little consequence.
52. This is a minor adjustment of the scheme boundary of little consequence.
53. An adjustment of the boundary to reflect legal ownership of the land.
54. An adjustment of the boundary to align with the OS map.
55. An adjustment of the boundary to avoid loss of trees or hedgerow.
56. An adjustment of the boundary to avoid loss of trees or hedgerow.
57. Denman's Lane is a significant public footpath connecting Cumnor with Eynsham Road and also including a circular walk from Cumnor which also connects to the Oxford Greenbelt Way. Entrenching a cable along this footpath will lead to significant public inconvenience, even if temporary. There are no details of likely environmental impacts of this part of the scheme

Hedgerows

Some loss of hedgerows will be incurred as a result of new access areas and other activities proposed as part of the targeted consultation. Mitigation for this is proposed as the replanting of 25.5km of new hedgerow as part of the scheme. It is noted that this is significantly less (~12%) than proposed in the PEIR, Chapter 9 (29km of new hedgerow with a further 28km of hedgerow reinforced). Cassington Parish Council asks why there has been a 12% decrease in the planting of hedgerows between the First Public Consultation and this Targeted Consultation? Is it because information was incorrect in the materials presented in the First Public Consultation or have the applicants deliberately reduced hedge planting and if so why?

As previously identified by Cassington Parish Council the UK has lost over 50% of its hedgerow matrix post world-war II and that of the remaining hedgerows, 60% are classified as being in a poor condition. Consequently, the Hedgerow Regulations (1997) were introduced to halt the

removal/ degradation of what remains of the resource. In particular, Ancient Hedgerows are of concern for nature conservation and as part of our heritage in terms of preserving the landscape of the English countryside. Ancient hedgerows, which tend to be those which support the greatest diversity of plants and animals, are generally defined as those which were in existence before the Enclosure Acts, passed mainly between 1720 and 1840 in Britain. These hedgerows are protected as Important Hedgerows under the Hedgerow Regulations (1997) and it is estimated that something like 70% of the U.K.s hedgerows are classified as “Important”. Such hedgerows need permission from the Local Planning Authority to be removed and although the Botley West proposal is submitted to the Planning Inspectorate, it is assumed the LPA will still need to be consulted over removal of Important Hedgerows.

Cassington Parish Council also notes the recommendation of the UK Climate Change Committee who indicate that hedgerow cover will need to be increased by 40% by 2050 to help deliver our net zero target – in essence this requires the planting of 200,000 km of new hedgerows. We therefore contest any development which proposes to remove hedges, even temporarily, because of the high negative landscape impacts of this activity and the counter-intuitive nature of their removal in line with net zero aspirations.

Whilst negative impacts of hedgerow loss are assumed to be mitigated because of the planting of new hedgerow (whether this is 25 or 29km is not clear and nor is the location), emphasis must be placed upon the fact that proposed changes are losing a long-established, biodiverse habitat in exchange for a brand new one. As with many aspects of the impacts of solar power stations on the environment and biodiversity, the effects of hedgerow age on species richness and abundance are poorly studied (Tresise et al., 2021). However, scientific peer-reviewed literature indicates that the biodiversity of hedgerows relates to their age, and the expected recolonisation time for biodiversity depends on the groups of species involved as well as other factors (e.g. location). Hedge biodiversity estimates (species richness or diversity measures) are often based on the plant species they host, and they can be especially important for woodland species in agricultural landscapes where much of ancient woodland has been lost (e.g. Litza & Dieckman, 2018; Montgomery et al., 2020). In southern Britain, the number of species in a 30m length of hedgerow is approximately one per hundred years of age (Pollard et al., 1974 in Montgomery et al., 2020). Newly established hedges can generate a high species richness in a relatively short time although species tend to be dominated by grasses and ruderal species (i.e. early colonisers of disturbed land or weedy species) whereas ancient hedgerows are dominated by stress-tolerant woodland species (Montgomery et al., 2020; see also Litza and Dieckman, 2018). At least one study in Oxfordshire has demonstrated that abundant and diverse spider and beetle populations can develop in well-managed and newly planted hedgerows in five years (Pywell et al., 2005).

Taking this together we assume that any replanted hedgerow may not necessarily replace habitat and associated biodiversity lost as a result of the changes outlined in the Targeted Consultation, especially if they are ancient hedgerows and possibly not if they are Important Hedgerows (older than 30 years or regarded as important for other reasons). Even where new hedges successfully establish it is unlikely their biodiversity will match that of Important hedges for many decades and for ancient hedges, perhaps centuries.

Summary

- The Targeted Consultation is clearly rushed with the result that information required for the residents of West Oxfordshire and other affected communities are not in a position

to judge the impacts of the proposed boundary and other changes and request changes to the proposed plans or ask questions.

- Given the supposed comprehensive nature of the First Public Consultation it is unclear why the developers missed or were forced to implement these 57 changes. This leads us to the conclusion that the First Consultation was also rushed and therefore inadequate for its stated purposes.
- In many cases insufficient information is presented in the Targeted Consultation to understand the changes proposed and their effects on nature, heritage and amenity. Given this, it is very difficult for the public to respond to this consultation (at short notice) with questions, requests to make changes or other points.
- Some of the proposed changes are at face value positive (e.g. proposal for footbridges across the River Evenlode and provision of a new Public Rights of Way – but note the impact of the presence of solar arrays on this new PRoW). Other changes are neutral (e.g. minor changes to reflect land ownership or OS maps).
- Many of the changes are concerning because of the potential impacts on nature, amenity, heritage and traffic. Given that many of these changes are to the Central Area of the scheme they have an impact on the residents of Cassington and Worton. We have noted these impacts pertaining to the Cassington (Burleigh) Road and the Lower Road. The fact that the scheme still requires a cable crossing sensitive ecosystems along the Thames is a significant concern.

References

Litza, K., Diekmann, M. (2018) Hedgerow age affects the species richness of herbaceous forest plants. *Journal of Vegetation Science* 30: 553–563.

Montgomery I., Caruso, T., Reid, N. (2020) Hedgerows as ecosystems: service delivery, management, and restoration. *Annual Review of Ecology, Evolution, and Systematics* 51: 81–102.

Pollard, E., Hooper, M.D., Moore, N.W. (1974) *Hedges*. Collins New Naturalist Library Book 58. London: Collins.

Pywell, R.F., James, K.L., Herbert, I., Meek, W.R., Carvell, C. et al. (2005) Determinants of overwintering habitat quality for beetles and spiders on arable farmland. *Biological Conservation* 123: 79–90.

Tresise, M.E., Reed, M.S., Chapman, P.J. (2021) Effects of hedgerow enhancement as a net zero strategy on farmland biodiversity: a rapid review [version 1; peer review: 2 approved]. *Emerald Open Research* 3: 23.



Planning
Inspectorate

Number: 14

Name: Oxfordshire Estates Ltd. (2)

Date Received: 10 December 2024

The Planning Inspectorate
Ms Caroline Hopewell

10th December 2024

Dear Ms Hopewell, Sirs,

Re: Botley West Solar Farm
PINS Reference: EN01047
Applicant: PVDP on behalf of SolarFive Limited

Author of this letter: Oxfordshire Estates Ltd and Dustin Dryden – Statutory Consultee

Further to our previous letter of 22.11.24 and your kind email response of 04.12.24, we note that the details of the DCO Application were subsequently published on your portal.

In scrutinising those documents we are concerned to see further evidence of the inadequacy of consultation. We are confident that the legislative requirements of adequate and appropriate consultation are not met by the developer simply asserting that they have met that standard; to do so would amount to ‘marking their own homework’!

We draw your attention to the specific failures to meet the standard of adequate consultation in the attached table, which we hope is of some assistance to your considerations, prior to making you decision regarding ‘acceptance’, due 13.12.24.

Bearing in mind that we are not planning experts, we are simply a member of the public with whom the consultation was obliged to engage. We trust you will recognise that we are not in an equal position to the Applicants. Therefore, we are unable to present you with a full technical argument; we can only assert – in the strongest possible terms – that relevant questions we have asked of the Developers, have simply been passed over.

In those circumstances we urge you to reject the application at this stage and that you require the Applicants re-apply once they have in fact meaningfully and substantively responded to questions asked by the affected community.

Yours sincerely,


Dustin Dryden, Oxfordshire Estates Ltd

FROM: ***Insert name of Parish, Town, Local Authority asking question here: Eg: 'Long Hanborough Parish Council'***

<p>Question asked; <i>include approximate date and summary of information requested from developer, EG; what are the traffic management arrangements for construction period? Has a Health Impact Assessment been fully completed / scoped?</i></p>	<p>Response received; <i>specify whether response was received, date received, and if so, did response provide comprehensible answer?</i></p>
<p>1. We submitted the following questions to the Targeted Consultation on 28.07.24 referred to in Sections 10 and 11 of the Consultation Report [EN01047/APP/5.1]:</p> <p><i>36: crosses the mains water pipe supply to Goose Eye Farm. What specific work has been undertaken to identify and protect this water supply from any effects of the proposed dynamic pipe ramming in this vicinity? Please specifically also address the data regarding the vibration effects of DPR. Please provide the applicable Water Board certified pipe location maps that support your answers.</i></p> <p><i>37: there is a long standing right of way / access from the nearby carriageway ('Lower Road') up to a gated rear entrance to Goose Eye Farm. This right of way is an essential safety route for access and egress to Goose Eye Farm in the event of emergency access / egress; a supporting Statutory Declaration can be provided in support of this RoW, upon request. As with all such rights, this RoW cannot be obstructed and proper consideration of any risks to human health and animal welfare must be demonstrable in your response. Please also note that any interference with this access / egress is likely to have a detrimental impact upon the socio-economics of the running of Goose Eye Farm.</i></p> <p><i>Please specifically clarify what alternatives are to be proposed to ensure the access / egress is preserved.</i></p>	<p>No response received.</p>
<p>2. We have asked for confirmation of the claims made in applying for the Ofgem License at the root of the BWSF proposal, regarding assertions made by PVDP to have completed a significant number of solar parks in the past. The absence of any</p>	<p>No response received.</p>

Botley West Solar Farm : DCO Application by Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd
INADEQUATE CONSULTATION RECORD – SUBMISSION TO BotleyWestSolar@planninginspectorate.gov.uk

FROM: ***Insert name of Parish, Town, Local Authority asking question here: Eg: 'Long Hanborough Parish Council'***

<p>confirmation or proof can amount to a “material misstatement’ which, if found, enables that license to be cancelled within 7 days of receiving such proof. This supporting information was requested from May 2023.</p>	
<p>3. Following media reports and other information, we have sought clarity and confirmation that the Developer (specifically, its’ Officers) does not have any connection with sources of finance that are likely to have a sufficient link to sanctioned sources, under UK law; the concern arises as one of the Directors of the PVDP (and its many affiliated companies associated with this Application) have clear business, assets and capital interests in Russia, according to clear publicly available information.</p>	<p>No formal response received; the questions have simply been dismissed.</p>



Planning
Inspectorate

Number: 15

Name: Helen Barr

Date Received: 12 December 2024

From: **Helen Barr**

Date: Tue, Dec 12, 2023 at 10:29 am

I live in West Oxfordshire where Europe's largest Solar Farm Proposal (Botley West Solar Farm 1,350 MWp) has just launched its statutory NSIP consultation.

I have read the booklet that was delivered to households in the area. And I have consulted the documents placed in local public libraries and materials on the Botley West Website. I see from the PINS website that you have rules that govern the accessibility of documents to the general public: their reading level, HTML formatting and navigational tools.

Do these guidelines apply also to developers when they produce materials for public consultation? Might you have a template for guidance to developers when they submit materials? Or are there existing models or modelling of NSIP consultation documents written in plain English to which you can direct me.

I have uploaded a file of a preliminary linguistic analysis of the consultation document produced by Botley West

IMPRECISION IN BOTLEY WEST SOLAR FARM CONSULTATION LEAFLET NOVEMBER 2023

Summary of findings

The consultation document is difficult to read for a number of reasons. Scores on The Gunning Fog Index or the Flesh Kincaid Reading Test are significantly high. Texts for a wide audience generally need a fog index less than 12. Texts requiring near-universal understanding generally need an index less than 8. The lowest score in The Community Consultation booklet is 15.28. The highest (the introduction) is 17.59.

The text is inaccessible to a wide audience not solely because it contains a high density of polysyllabic words. As the edited sections of the text show (pasted after the table), words of 3+ syllables are often clumped together. The text is heavy with compound noun phrases which do not have a clear referent (see table). Processes are represented with noun phrases which delete agency of performance and obscures exactly what is being done when, where, and by whom. There is a heavy use of plurals which obscures precise detail. There are very few finite verbs in the text. Instead, there is a heavy use of modal verbs (incomplete conditional actions), and verbs which are present continuous: i.e. no specific action has been completed or recorded. Clear time-specific syntax is conspicuous by its absence. Finite verbs are suppressed. This, alongside dense abstract polysyllabic vocabulary and a high degree of complex word formation results in a consultation document that is neither accessible nor proportionate in communicating the scope of the project to the communities that the booklet is designed to address.

(Interestingly, the Gunning Fog Index score is actually lower in the sections of the PEIR introduction I have scanned). There are comments to be made about the accessibility of these very lengthy reports in Public Libraries that are closed for a long period during the Christmas Holidays. Further, Eynsham Library, for instance, does not have the physical space (desks without computers and suitable height chairs) for readers to be able to study these huge files. The extended reading space in the library is in the children's section!

Page	Modal tense (<i>actions which may, or may not happen</i>)	Non-finite tense (action not completed, or guaranteed)	Use of comparative that is unspecified	Process and agency unclear	Vocabulary without a clear referent	Statement
2	could				Affordable (see also pp.4, <i>(no calibration of scale of affordability – or to whom)</i>)	could deliver 840 MW of clean...affordable power
3 8 10		Proposed Has been proposed Our proposed approach		Proposed environmental enhancement measures	Enhanced (<i>from what to what? – deletion of framework to make statement accountable</i>)	proposed environmental enhancement measures proposed mitigation measures proposed a new cycle route

14		New proposed footpaths		<i>(who is going to do what and where?)</i>		
15		Proposed approach				
16						
3	Potential			proposed	New recreational connectivity	Potential impacts on the environment and local communities
14	Potential			mitigation measures (14, 16, 17 x3, 20)	<i>(code for extending a footpath between Cassington and Church Hanborough along a route lined with solar panel fencing. What is being connected?)</i>	
16	Community benefit			mitigation and enhancement areas (11)		
	Potential environmental impacts			<i>(enhancement of what?)</i>		
10				mitigation	Boosting connectivity (10)	Boosting connectivity(10)
				OED	<i>Between what and/or whom?</i>	Increasing connectivity (14)
11				mitigation (n) 2a)	Increasing connectivity (14)	
				extenuation or palliation of an offence, fault, etc.;		
				abatement or minimization of the loss or damage resulting from a wrongful act.		
14				in mitigation (Law): by way of extenuation or palliation (esp. of an offence) in order to obtain a favourable modification (of judgment, a penalty, damages). <i>(the use of the word mitigation throughout suggests that some harm or damage will result from the project</i>		
				<i>(no agency and scale to calibrate what</i>		

				<i>is being mitigated. Measure(s) plural hides what exactly is to be done)</i> See also pp.6,16 x 2 and 17		
4	could				Home-grown electricity (re-wording of UK energy supply that implies that solar panels are a nutrient grown in people's back gardens)	Climate change could reduce the UK's stock of high-grade agricultural land Home-grown electricity
5			More efficient scale (sentence includes comparison to rooftop solar but no evidence is supplied for the comparison in efficiency between the rooftop and ground level solar energy)			Its ability to produce power on a more efficient scale
5				<i>When and who are the parties?</i>		Has secured
5, 10				<i>Where exactly?</i>		In close proximity to the site
5				<i>Of what?</i>		capacity
6				<i>Agreed by whom?</i>		Agreed local viewpoints
	may					The project may look
6					Mitigation measures (see comment for p.3)	
7				<i>(with whom and when)</i>		Has an agreement
7					<i>Omits quantity – actually only for 3 hours per day</i>	Enough electricity for the equivalent of 330,000 homes

7					<i>Unspecified claim – affordable (how), and to whom?</i>	Affordable power
7, 17 x3, 20					<i>Plural and nominalisation masks the precise distance</i>	Increased minimum buffer zone distances
7					<i>Plurals hide quantity of increase and no calibration of significant.</i>	Significant increases to the buffer zones See also p.16 significant environmental impacts
7		seeks to				
7					<i>How is increase measured? What is the baseline? What kind of recreational use?</i>	Increase recreational use and access across the site
7					<i>Plurals hide quantity and mask those already in existence, See comments on maps pp.8-12</i>	New footpaths and cycle paths
7 17					<i>What is the baseline and how has this figure been calculated. There is a reference to p,16 of the booklet but p.16 does not unpack the figures</i>	Minimum biodiversity net gain of at least 70% See also p.17
7					<i>Development not present in first booklet</i>	Removed solar development directly south
7 9		is exploring (7) we are exploring (9) (no firm commitment)			Dynamic (active? forceful? effective? Word sounds punchy but lacks any precise referent) and wide-ranging community benefits package. (ref to p.15 but all details prefaced by phrase 'is exploring'. No guarantees	
8					See comment p.3. <i>What are visual impacts?</i>	Mitigate against visual impacts
9		(sequence of tenses is unclear, and construction doesn't have time specificity. Text obscures the fact the theses routes will				All public rights of way... will remain open following the construction of Botley West

		<i>be closed for unspecified periods of time while BW is under construction)</i>				
9					<i>What does this mean – and which areas? IS this something the ‘community’ has asked for?</i>	Areas for community food growing
9					<i>Why these birds?</i>	skylarks
10					OED buffer <i>2.figurative; spec.used attributively to designate a state, zone, etc., lying between two others, usually owing allegiance to neither, and serving as a means of preventing hostilities between them.</i>	Buffer zones
10 16	Potential Potential of the following mitigations				<i>Impacts (on what- and what are these impacts?</i>	Potential and visual impacts
10		We are offering to assist <i>(No specific guarantee or timescale)</i>		We are offering to assist <i>(whom – and how)</i>		
10					<i>So far as I can see from the map the ‘new cycle path’ does not extend to the railway station</i>	Salt Cross... and Hanborough Railway Station
11 12		We are proposing x2 With new planting proposed underneath				Upgrade a footpath between Bladon and Begroke New circular walk near Cassington
11					<i>How much of 30% is approximately?</i>	Approximately 30% of the site
12		We are considering			A number of cabling options <i>(how many –</i>	

					<i>and what are the options)</i>	
12		It is intended			Features such as the river <i>Presumably River Thames? And what are the other features?</i>	It is intended to cross existing features
12		Is likely to <i>(no firm commitment)</i>			Within or directly next to <i>(which is it? – and what does directly next to mean?)</i>	National Grid is likely to locate their substation
13 14 17	Could look Could look like Could look (no guarantee that this is how they will look				<i>Photographs? Drawings – who has created these and from whose perspective? How binding are they?</i>	visualisations
14		We are seeking to take		Local initiatives <i>(who has initiated them?)</i> Committed to ensuring funding is available <i>(from where and how much?)</i>		
14	May have	We are actively exploring <i>(i.e. not inactively! – and no firm commitment to this</i>	Wider <i>(than what?)</i>		Helping to reduce energy bills UK electricity prices <i>This is extremely misleading and fails to account for the market-driven mechanisms for establishing electricity prices</i> The marginal producer of electricity in the UK is most often gas because it is one of the most expensive sources, so is chosen last in the ‘merit order’ on the spot market. But it serves a	In addition to the wider effect that increased solar capacity may have on UK electricity prices

					<p>vital role because gas-fired power stations can be easily switched on and off at short notice to make sure that supply balances to meet demand. Renewable energy sources, on the other hand, are unpredictable due to changes in weather, while nuclear energy provides a fairly constant source of power that is difficult to turn on and off. This means that, although generation methods that have low marginal cost (including renewables and nuclear) produce the majority of UK electricity, the price that is paid for it in both wholesale and retail markets is set much higher, at the marginal cost of generating electricity with gas</p> <p>https://www.instituteforgovernment.org.uk/article/explainer/electricity-market#:~:text=Electricity%20suppliers%20buy%20the%20electricity,-ahead)%20market</p>	
14	May struggle to live sustainably	<p>Allocating areas (<i>not delivered</i>)</p> <p>Looking to empower (<i>not achieved</i>)</p> <p>Seeking to provide food (<i>not done</i>)</p>		<p>We have engaged with (<i>doesn't guarantee agreement of specific proposals</i>)</p> <p>Understanding the opportunities (<i>doesn't commit to precise action</i>)</p> <p>Seeking to provide food to the</p>		<p>Seeking to provide food to the community at low or no cost to combat food poverty and reduce food waste</p>

				community at low or no cost to combat food poverty and reduce food waste (<i>how?</i>)		
15		We are exploring Will ensure the accountability Aiming to create		Findings....will ensure the accountability <i>(findings is vague, and findings have no agency in ensuring accountability. Accountability to whom?)</i>	Various onsite benefits Environmental benefits Reflects the same visions <i>(in reverse – what visions – green is a blanket term)</i>	Green projects
15	Fund could support	Exploring the creation of a retail		That will be similar in size to £50,000 (<i>imprecise</i>)	To sell part of the energy generated by Botley West <i>(how large or small a part)</i>	
16				Studies being undertaken That are identified <i>(by whom?)</i>		That are identified
17	Could include				<i>Refugia is undefined. There are only 2 attested examples in OED – hence not very accessible vocabulary to use – and misleading. I don't think log piles can be classed as refugia. Where do the logs come from?: An isolated area forming a natural refuge (refuge n. 4d) for plants and animals. In later use also: a managed, artificial, or legally protected habitat of this type</i>	Bee hives, log piles and other refugia bird and bat boxes
17					<i>Waterbodies is a coinage. It ought to be water bodies. The coinage occludes exactly what kind of topographical water is</i>	No removal of waterbodies

					<p><i>included in this designation.</i></p> <p>An area or mass of water, esp. as forming a topographical feature (lake, river, sea, etc.); a body of water (see body n. V.18a). <i>Aren't wetlands water bodies? If so, how does this statement account for drilling cables in Swinford Meadows?</i> wetland, n. An area of land that is usually saturated with water, often a marsh or swamp</p>	
17					<i>Is this only in the vicinity of Oxford airport or does this apply to the whole site?</i>	No permanent operation of security lighting
17					<i>To humans, perhaps, but what about bats – or even some species of birds?</i>	Infra-red sensors, which provide no visible light
18		Intends to implement				Outline Soil Management plan
18					<i>How is this possible for land classed as 3a)</i>	The land will return to its original use
18		Will be executed			<i>Why can there be no plan at the start at the operational life of the site? Two years before the end of the lease keeps everyone in the dark</i>	At the end of BW's operational life.... A comprehensive decommissioning plan
18					<i>dedicated to what? And what will it reserve?</i>	Dedicated reserve
18		Land will return			<i>How is this possible with grade 3a land.</i>	To its original use
18		Not become		Not become brownfield Negative results in non-specification of what it will become	<i>Why not say outright the land will be classed as greenfield?</i>	
18		We are developing	More opportunities		<i>Referent unclear</i>	New routes and upgrade current ones

			<i>(unspecified comparative)</i>			
18	May be necessary				<i>Diversions where? And for how long? Safety of whom?</i>	Temporary diversions.... safety
18		Our objective is to <i>Not identical to 'we will not'</i>			<i>What kind of inconvenience and who are the users? And what are they using?</i>	Minimise inconvenience to users
19		We are developing				Pollution Prevention Plans Infrastructure Drainage Strategy Code of Construction Practice
					<i>Surely a drainage strategy needs implemented before consultation especially given flooding in area. Merton has recently been denied permission to build 500 homes in Yarnton because of the village's history of flash flooding</i>	
19					In various project components <i>Which ones? And what are the components</i>	Drainage strategy
19		We have already put in place		Incorporating Establishing Planting Implementing Employing Maintaining <i>Present participles are incompatible with past tense of 'already put in place' – especially seeded vegetation</i>		
					<i>What on earth is this?</i>	Seeded vegetation
19		We'll include				Construction Traffic Management Plan
19					<i>A solar panel? What about the particular materials of the solar panels they</i>	Up to 90% of materials in a solar panel are recyclable

					<i>intend to use. What happens to the 'nearly' 10% of the other materials? What about the other materials used in construction such as cables, concrete etc?</i>	
19				<i>Established by whom and what are the processes? Where will they be carried out?</i>		Well-established industrial processed
19		Will be produced collaboratively				CTMP
19		We'll create				Travel plan for construction staff
20				<i>Have also been commenced When, and by whom?</i>		Heritage Impact Assessment
20					<i>What is antecedent of this?</i>	to achieve this
20	may					May employ a no-dig approach
20	could					Could utilise 'concrete shoes'
20					<i>How is this calibrated, and by whom?</i>	Significant Less significant
20				<i>Are considered reversible By whom? And what exactly does reversible mean</i>	<i>What kinds of effect?</i>	Effects on heritage assets
20				<i>How is significance measured? And by whom?</i>		Are deemed insignificant
20					<i>What does this mean?</i>	Environmental mitigation

Significant omissions

Soil Management Plan especially for Class 3a land (Check section 17.3 of PEIR)

Decommissioning Plan

Construction materials (especially cables, tunnels, substations, fencing)

Access points

Transport routes

Traffic Management Plan

Pollution Prevention Plans

Infrastructure Drainage Strategy

Code of Construction Practice

Size and materials of solar panels

Source of solar panels and materials

Details of Heritage Impact Assessment

From the Community Consultation Booklet

Fog Index Reading Level By Grade

17: College Graduate

16: College Senior

15 : College Junior

14: College Sophomore

13: College Freshman

-----D A N G E R L I N E-----

12: High School Senior

11: High School Junior

-----Easy Reading Below This Line-----

10: High School Sophomore

09: High School Freshman

08: 8th Grade

07: 7th Grade

06: 6th Grade

05: 5th Grade

Results

Flesh-Kincaid Grade Level: 7.8

Flesch Reading Ease Score: 49

Reading Level: College (Difficult to read)

Average Words per Sentence: 5.5

Average Syllables per Word: 1.8

Sentences: 134

Words: 739

<https://goodcalculators.com/flesch-kincaid-calculator/>

From the Community Consultation Booklet

THE GUNNING FOG INDEX IS 17.59

- The number of major punctuation marks, eg. [.,], was 30
- The number of words was 738

- The number of 3+ syllable words, highlighted in blue, was 150

EDITED TEXT

The need for Botley West We need to take action against climate change[.] We also need to improve the UK's energy security[.] Botley West can support this by providing affordable, renewable, and home-grown electricity[.] Phase Two Community Consultation Leaflet Botley West Solar Farm 2 Met Office, 'Record breaking 2022 indicative of future UK climate', July 2023 3 IEA, 'Net Zero Roadmap Update', September 2023 4 Solar Energy UK, 'Solar farms and food security[.] the facts', September 2022 5 UK Government, 'PM recommits UK to Net Zero by 2050', September 2023 6 UK Government, 'British Energy Security Strategy', April 2022 Local climate targets Oxfordshire has set ambitious climate targets for the county, which Botley West would contribute to[.] The Oxfordshire Energy Strategy, signed up to by all councils within Oxfordshire, agreed a target of a 50% reduction in carbon emissions by 2030, and 100% net zero carbon emissions by 2050[.] 9 The need for home-grown energy infrastructure As gas prices rise and energy bills increase, the UK is in need of a more reliable and secure supply of energy[.] This is essential in making us more resilient against potential blackouts, meet growing energy demands and improve our energy security[.] It can be achieved by increasing our own generating capacity and number of generating assets, through renewable energy projects such as Botley West[.] Building infrastructure where it is needed most Within Oxfordshire, there is a need to increase electricity generation to support demand[.] The county is committed to extensive growth and intends to lead on energy innovation[.] 9 These targets lead to a need to increase the capacity of electricity generation within Oxfordshire[.] This includes both the development of connecting infrastructure, through substations built by National Grid and other electricity suppliers, as well as new generating stations, such as Botley West[.] Botley West has secured a grid connection with National Grid in close proximity to the site, allowing for supporting both Oxfordshire's ambition to increase their solar generating capacity from 300 MW to 1900 MW by 2030, as well as supplying electricity to an area where the demand is growing and where there is capacity to accommodate it[.] Impacts of climate change The effects of climate change can be seen around us, both nationally and globally[.] Wildfires have broken out more frequently across Europe and our own weather has been more temperamental[.] 2022 was the first year in which a temperature above 40C was recorded in the UK[.] 2 To tackle climate change the International Energy Agency (IEA) has highlighted that renewable electricity, in particular solar, is key in reducing carbon emissions and achieving 2030 targets[.] 3 Climate change poses one of the most serious threats to food production in the UK[.] The Department for Environment, Food and Rural Affairs (DEFRA) has estimated that climate change could reduce the UK's stock of high-grade agricultural land by three quarters by 2050[.] 4 The need for ground-mounted solar The UK has set ambitious and legally binding targets to eliminate carbon emissions and achieve net zero carbon emissions by 2050[.] 5 Large-scale solar development is recognised as having an important role to play in helping achieve this target[.] The British Energy Security Strategy, published in April 2022, outlined the aim to increase the UK's solar capacity fivefold by 2035 – equivalent to around 70 gigawatts (GW) total generation capacity[.] 6 To achieve this, the UK must install an average of 4[.] 15 GW in solar capacity per year[.] Whilst rooftop solar is also part of this solution, projects such as Botley West are essential to be able to reach these targets, due to its ability to produce power on a much more efficient scale[.] The affordability of solar Solar is the most affordable form of electricity in the UK,7 which means that it can help to reduce household energy bills caused by the continued use of gas[.] Botley West could reduce our reliance on foreign gas imports, providing an equivalent amount of electricity for up to 330,000 homes[.] The Department of Energy Security and Net Zero (DESNZ) has identified solar as being central to the future of electricity generation in a recent report, with solar estimated to be roughly 35% cheaper than costs predicted for combined-cycle gas turbine power plant in 2025[.] 8 7 Solar Energy UK, 'Everything Under the Sun[.] The Facts About Solar Energy', March 2022

THE GUNNING FOG INDEX IS 15.28

- The number of major punctuation marks, eg. [.] , was 32
- The number of words was 562

- The number of 3+ syllable words, **highlighted in blue**, was 116

EDITED TEXT

Opportunities Beyond Solar Botley West Solar Farm is committed to **establishing** an **environmental** and longstanding **legacy** across the **area**[.] We are committed to working with the **community** to inform what a package of **community benefits** could look like[.] We are seeking to take a **considered** approach to **delivering community benefits** through Botley West[.] Our proposed approach is built upon three key forms of **potential community benefit**[:] 1[.] **Community** funding[:] we are committed to ensuring funding is **available** to support local **initiatives** for each year that the solar farm is **operational**[.] 2[.] On-site **benefits**[:] we are proposing to **deliver benefits** to local **communities** through the design the project, such as by increasing **connectivity** through new footpaths and providing areas for **community** food **production**[.] 3[.] Helping to reduce **energy** bills[:] in **addition** to the wider effect that increased solar **capacity** may have on UK **electricity** prices, we are **actively** exploring **potential mechanisms** through which the project could **directly** supply **electricity locally** at a discounted rate[.] During and since the last phase of **consultation**, the project team has been in **discussion** with a number of local groups to **understand** how best the project can **benefit** the local **community**[.] We have engaged with[:] We are exploring **various** on-site **benefits** that Botley West could **deliver** to local **communities**[.] As part of our approach to **deliver community benefits**, we are committed to supporting the local **community** by[:] Phase Two **Community Consultation** Leaflet Botley West Solar Farm **Establishing a Community Benefit Fund** - As part of Botley West's **objective** to **establish** a **legacy** across the **area** through working with the **community**, we are committed to exploring making a fund **available** that will be **similar** in size to Blenheim's **bursary** fund of £50,000[.] We are seeking feedback on the **potential** projects and **initiatives** that this fund could support[.] Local **Agricultural** Groups – **allocating** areas of the site for **community** arable farming and **community allotments**[.] Blenheim Estate – becoming the **environmental** steward for the site to maintain the **legacy** of the **area** and ensure that **environmental benefits** are **delivered**[.] The Estate has a **wellestablished** track record of **delivering** green projects and their own Green Report reflects the same visions as the project[.] The findings from the Estate's **monitoring** data will ensure the **accountability** of any **environmental commitments**[.] Local Farmers – **understanding** the **opportunities** for sheep to graze the land[.] Cherwell **Collective** – an **organisation** looking to **empower** those who may struggle to live **sustainably** by providing **locally** grown food to **communities**[.] **Cotteslowe Community** Larder – seeking to provide food to the **community** at low or no cost to combat food **poverty** and reduce food waste[.] **Biodiversity** Net Gain - aiming to create a **standard-setting environmental legacy** with a **minimum biodiversity** net gain of 70%[.] More details about our **biodiversity** plans can be found on page 17[.] Increasing **Recreational** Use – Botley West is exploring **improvements** to **connectivity** across the site through working with Blenheim and new proposed footpaths and cycle tracks[.] More details about our **recreational** plans can be found on page 18[.] Exploring **Community Energy Opportunities** - The team also **appreciate** that **energy** bills are becoming a real burden for many people[.] Botley West is exploring the creation of a retail **energy company** to sell part of the **energy generated** by Botley West to the local **community** at a discounted rate[.] 14 | **Opportunities** Beyond Solar **Opportunities** Beyond Solar |

THE GUNNING FOG INDEX IS 15.48

- The number of major punctuation marks, eg. [.] , was 36
- The number of words was 596
- The number of 3+ syllable words, **highlighted in blue**, was 132

EDITED TEXT

Environmental Impact Assessment (EIA) As part of our **Development** Consent Order (DCO) **application**, we are **undertaking** an **Environmental** Impact **Assessment** (EIA) to inform our **proposal** and the design[.] This is a

process that involves various studies being undertaken and mitigation measures proposed to reduce or remove any significant environmental impacts that are identified. The EIA process is helped by feedback received through consultation. The process is split into three main areas: the EIA scoping report, the Preliminary Environmental Impact Report (PEIR) and the Environmental Statement (ES). We submitted our EIA Scoping Report to the Planning Inspectorate (PINS) on 15th June 2023. PINS consulted with statutory consultees and published their Scoping Opinion on 24th July 2023, which will guide our EIA work. We are now consulting on a Preliminary Environmental Information Report (PEIR) which provides the initial findings of these assessments to help consultees develop an informed view of the potential environmental impacts of Botley West and our proposed approach to assessing and mitigating them. This has built upon the initial EIA scoping report, the Planning Inspectorate (PINS) Scoping Opinion and environmental assessments, in addition to the consultation feedback. Our DCO application will include an Environmental Statement, containing the full details of the environmental assessments undertaken for Botley West and the mitigation and enhancement measures proposed. Phase Two Community Consultation Leaflet Botley West Solar Farm 16 | Environmental Impact Assessment Environmental Impact Assessment | 17 Landscape and Visual As part of the ongoing EIA process, we have been assessing the potential visual impact of the site upon the local area. Therefore, we have developed a Landscape Masterplan which includes the landscape and ecological strategy for implementation, longterm maintenance, and management of the Project site. We have been exploring the potential of the following mitigations:

- Creation of woodland belts
- Planting of lengths of new hedgerows along lengths of PROWs and reinforcement of existing field boundary hedgerows
- Meadow grassland to perimeter of solar array areas and areas of enhancement
- Planting of individual trees where appropriate

We've taken several steps to mitigate visual impacts. This includes expanding the minimum buffer zone to 25 metres between the solar arrays and any building and increasing buffer zones near residential areas. An area of solar development has been removed to enhance safety for Oxford Airport. Furthermore, there will be no permanent operation of security lighting, instead there will be infrared sensors, which provide no visible light, and manually operated lighting will only be in the vicinity of transformers. Visualisations of how Botley West could look can be found on the project website (www.botleywest.co.uk). Local Ecology and Biodiversity In assessing the local ecology and biodiversity of the project site we have been undertaking site-specific surveys, investigated habitats, and studied the various species in the area. There are mitigation measures that the project incorporates to ensure the effects on ecology is minimised. These include:

- Establishing a minimum 5m buffer zone for hedgerows, trees, ponds and woodland, an 8m buffer for watercourses and 15m for ancient woodland
- No removal of hedgerows, woodland, waterbodies, or watercourses
- Establishing new skylark plots between the solar arrays
- Creating a new landscape-scale corridor along the River Evenlode

To deliver this, PVDP is working with Blenheim Estate to ensure there is long term environmental stewardship in place, with the primary goal of supporting the project to achieve a substantial biodiversity net gain within the area, of at least 70%. This could include:

- Establishing bee hives on the site
- Providing log piles and other refugia
- Putting bird and bat boxes on trees

THE GUNNING FOG INDEX IS 15.45

- The number of major punctuation marks, eg. [.] , was 34
- The number of words was 605
- The number of 3+ syllable words, highlighted in blue, was 126

EDITED TEXT

Recreation and Amenity In accessing the recreation and amenity of the site, the Botley West team have been exploring ways to increase the connectivity of the site through proposing new footpaths and cycle tracks. As a part of this, we will establish a new footpath to connect Cassington and Church Hanborough. Additionally, we are enhancing the existing footpath connecting Bladon to Campsfield, located near the airport north of Begbroke, to transform it into a dedicated cycle route. Furthermore, we are exploring more opportunities where we can facilitate new routes and upgrade current ones. Regarding the current Public Rights of Way,

our **primary** aim is to preserve them without **disruption**. While **temporary diversions** may be **necessary** for **safety** during **construction**, our **objective** is to **minimise inconvenience** to users. Throughout **operation**, all existing routes will remain **unaltered**. Land Use and **Agriculture** In assessing land use and **agriculture**, we have been conducting a number of **Agricultural Land Classification** (ALC) surveys. From our **initial assessments**, **approximately** 62% of the surveyed land falls under the **category** of **lower-quality** Subgrade 3b **agricultural** land, while 38% consists of Best and Most **Versatile** (BMV) **agricultural** land (ALC Grades 1-3a), with the **majority** of that land classed as 3a, which **represents** pockets of land across the site. The ALC Survey Map can be found in Figure 17.3 of the PEIR. Botley West intends to **implement** a **comprehensive** Outline Soil **Management Plan**. At the end of Botley West's **operational** life, a **comprehensive decommissioning** plan, commencing two years before the lease concludes, will be **executed**. Our **commitment** is to remove all **infrastructure** except public highway cables, keeping the **National Grid substation**. The land will return to its **original** use, and not become **brownfield** land, with a **dedicated** reserve to cover **decommissioning** costs. We will be working with **landowners** and **relevant stakeholders** to explore how **particular** features of our **proposals** – such as planting, landscaping, and **permissive** access – could provide **continued benefits** by remaining in place beyond the life of the solar farm. **Hydrology** and Flood Risk Solar farms provide the **opportunity** to reduce the flood risk of an **area**. Botley West is **actively** exploring ways to **mitigate** the **potential** impacts of the project on **hydrology** and flood risk during **construction** and **operation**. This includes conducting **hydrogeological** risk **assessments** for **sensitive** areas. The **mitigation** measures we have **already** put in place include:

- **Incorporating** a drainage **strategy** in **various** project **components** to **mitigate** surface water runoff and flood risk.
- **Establishing temporary** haul roads.
- Planting seeded **vegetation** between solar PV modules to manage surface water and **erosion**.
- **Implementing** shallow channels with seeded **vegetation** along the **perimeter** to capture excess water after heavy rainfall.
- Employing trenchless methods for crossing **watercourses** and flood defences.
- Maintaining a 10m buffer zone between **watercourses** and project **development**.

In **addition** to these **mitigation** measures, we are **developing Pollution Prevention Plans**, an **Infrastructure Drainage Strategy** and a Code of **Construction Practice** which follow **environmental guidelines**. Traffic, Access, and **Construction** Botley West is committed to reducing traffic and **construction** impacts. We've **actively** worked with **Oxfordshire** County Council Highways to address traffic concerns. To **minimise disruptions**, we'll include a detailed **Construction Traffic Management Plan** (CTMP) in our **Development Consent Order application**. This CTMP will be produced **collaboratively** with Highway **Authorities** and set out routeing and traffic controls. **Additionally**, we'll create a travel plan for our **construction** staff to **minimise** local road traffic. The **materials** used for the **construction** and the **lifetime** of the project will be as **recyclable** as **practically** possible. Up to 99% of **materials** in a solar panel are **recyclable**, and there are **well-established industrial** processes to do this.

From PEIR introduction

THE GUNNING FOG INDEX IS 13.61

- The number of major punctuation marks, eg. [.,], was 44
- The number of words was 535
- The number of 3+ syllable words, **highlighted in blue**, was 117

EDITED TEXT

1 **Introduction** 1.1 Purpose of this **Non-Technical Summary** 1.1.1 This **Non-Technical Summary** provides an **overview** of the **Preliminary Environmental Information** Report (PEIR) prepared for the Botley West Solar Farm. The PEIR has been prepared by RPS for **Photovolt Development Partners GmbH** (PVDP) on behalf of the **Applicant, SolarFive Ltd** (**SolarFive**). **SolarFive** is a licence holder under the **Electricity Act 1989** and also a **registered company** in England and Wales (**company no.** 12602740). 1.1.2 This **Non-Technical Summary** forms part of the **documents** submitted by the **Applicant** in support of the **application** for **development** consent for the Botley West Solar Farm (**hereafter** referred to as 'the Project') and has been written in a **non-technical language** and **summarises** the **information** contained within the PEIR. 1.1.3 The purpose of PEIR is to present the **preliminary** findings of the **Environmental Impact Assessment** (EIA) being **undertaken** for the Project, for the purposes

of [statutory consultation](#) in [accordance](#) with Sections 42 and 47 of the Planning Act 2008 (PA 08)[.] PA 08 was [introduced](#) to provide a new [development](#) consent regime for 'Nationally Significant Infrastructure Projects' (NSIP)[.] 1[.] 1[.] 4 The Project is classed as a NSIP for the purposes of PA 08 and [requires](#) an [application](#) for a [Development](#) Consent Order (DCO)[.] The [Applicant](#) therefore intends to submit an [application](#) for [development](#) consent to the [Secretary](#) of State via the [Planning Inspectorate](#) (PINS), as [required](#) under PA 08[.] 1[.] 1[.] 5 The PEIR has been published as part of the [consultation](#) process, which also includes a series of [community consultation](#) events in [accordance](#) with the process set out in the [Statement of Community Consultation](#) (SoCC)[.] 1[.] 1[.] 6 For access to the full PEIR, please refer to the [National Infrastructure Planning Website](#)[.] Botley West Solar Farm[.] Details of how to view the full PEIR and its volumes, or to obtain further copies of this NTS, are provided at the end of this [document](#)[.] 1[.] 2 [Overview](#) of the Project 1[.] 2[.] 1 The UK [Government](#) has [legislated](#) to commit the country to [achieving](#) net zero carbon [emissions](#) by 2050, and to [de-carbonising](#) electricity by 2035[.] The [Government's](#) 'British [Energy Security Strategy](#)' (April 2022) also expects a [five-fold](#) increase in solar power [generation](#), to 70GW, by 2035[.] These [commitments](#) mean that the UK [urgently](#) needs more [renewable](#) forms of [electricity](#) to be produced[.] The Project's [generation](#) output will be [vitaly important](#) if the [Government's](#) [commitments](#) are to succeed, [significantly](#) helping to [deliver](#) the [transition](#) to net zero[.] 1[.] 2[.] 2 The Project is formed of three [separate](#) but related solar farm areas with [interconnecting](#) cables, which [together](#) would [generate](#) [renewable](#) power through [photovoltaic](#) (PV) panels[.] The Project aims to [deliver](#) [approximately](#) 840MWe of power to the [National Electricity Transmission](#) System (NETS), Botley West Solar Farm [Preliminary Environmental Information](#) Report [.] [Non-Technical Summary](#) [.] [November](#) 2023 Page 2 providing secure and clean [energy](#) of an [equivalent](#) level to meet the needs of [approximately](#) 330,000 homes[.] 1[.] 2[.] 3 The Project's solar arrays (comprising all the mounting structures, frames and [foundations](#)) will be connected by [underground electrical](#) cables within each section of the site, and via [underground electric](#) cable to the [substation](#) at the grid [connection](#) point[.] The [interconnecting](#) cable route will [largely](#) follow the public highway, but some parts will cross land controlled by the [Applicant](#)[.]

THE GUNNING FOG INDEX IS 14.31

- The number of major punctuation marks, eg. [.] , was 28
- The number of words was 400
- The number of 3+ syllable words, [highlighted in blue](#), was 86

EDITED TEXT

[Operational Development](#) 5[.] 5[.] 1 During the [operational](#) phase, [activity](#) on the Site will be [minimal](#) and will be restricted [principally](#) to landscape and [ecology management](#), [equipment/infrastructure maintenance](#) and servicing including cleaning and [replacement](#) of any [components](#) that fail, and [monitoring](#) to ensure the [continued effective operation](#) of the [development](#)[.] [Operational](#) and [maintenance](#) staff may [require](#) access to the Site during daylight hours, seven days a week[.] 5[.] 5[.] 2 The [undeveloped](#) areas of the site will be designed and managed to enhance the landscape and [ecological](#) value of the [area](#)[.] The [Applicant](#) and the [landowners](#) are keen to secure these and any other [benefits](#) that the local [community](#) and other [stakeholders](#) may wish to promote[.] [Discussions](#) are advanced in respect of allowing land to be given over to [community](#) groups for small scale food [production](#), and for some parts of the site to be given over to sheep farming[.] Further details in respect to these [elements](#) will [continue](#) to be [developed](#) and refined, including the [relevant management](#) plans for these and other areas of the site[.] The [intention](#) is to report this [information](#) within the [Environmental Statement](#) that will [accompany](#) the [Applicants'](#) DCO submission[.] 5[.] 5[.] 2[.] 1 For [clarity](#), the Project does not [incorporate](#) any [battery](#) storage[.] [Energy generated](#) by the Project will be stored, as [required](#), by [Battery Energy](#) Storage Systems (BESS) that are connected to the Grid [elsewhere](#), including the EDF 50MW BESS located at Cowley [substation](#)[.] 5[.] 6 [Decommissioning](#) and [Enhancement](#) 5[.] 6[.] 1 The consent being sought by the Project is a [temporary](#) one[.] The Project will have a 35 year lease with the option to extend to 42 years[.] Within this [timeframe](#) the Project will be constructed, become [operational](#) and be [decommissioned](#)[.] [Decommissioning](#) is [anticipated](#) to start 2 years before the end of the lease and is expected to be completed in that time[.] All [infrastructure associated](#) with the [development](#) is [anticipated](#) to be

removed, and **exception** to this is assumed to be all cables in the public highway (as it could either remain in situ or removed as part of **decommissioning**).] The **National Grid substation** will **however** remain and the remaining land will revert back to its **previous use**.] 5[.] 6[.] 2 A **decommissioning** and **enhancement** plan, to include **timescales** and **transportation** methods, **ecological** and landscape **enhancements** and other **environmental improvements**, will be **developed** in **consultation** the local planning **authority**, local **community** and key **stakeholders** and form and **integral** part of the DCO **application**.]