

Botley West Solar Farm: Comments on the Applicant's responses to

(1) Written Representations Submitted at Deadline 1, and

(2) The Examining Authority's First Written Questions (ExQ1)

From Nigel Pearce, 12 July 2025

Introduction

The following comments refer to the Applicant's responses relating to Best and Most Versatile (BMV) agricultural land. Their response to my Written Representation and the ExA's Written Questions on this subject constitutes what might have been a masterwork of evasiveness, if it wasn't so transparent.

(1) 12.4 Applicant's Responses to Written Representations Submitted at Deadline 1

REP1-162

As someone new to NSIP Public Examinations, I was surprised to see that my Written Representation, 14 pages (over 5,000 words) of detailed text backed up by evidence, could elicit no more than "The Applicant notes" it, and an "Acknowledgement". Will there be no further response to the many points made?

REP1-163

The Applicant makes no attempt to respond to what are serious allegations on my part about the "misleading, inaccurate, and structurally biased approach that PVDP and its consultants have taken on this issue" *throughout the process*. Instead, they needlessly describe the ALC system (we all know about this) and introduce a distraction about grading not necessarily reflecting current economic value of yield, which is not what is being questioned. (In any case, current economic value of yield could be higher, rather than lower as the Applicant wishes to imply.)

(2) 12.2 Applicant's Responses to the Examining Authority's First Written Questions

Q1.11.1

The Applicant makes no attempt to address the operational lifetime of the project – at least 35 years, maybe more – or explain in what way, and to what extent, they sought to avoid BMV land in their choice of location for this lengthy period of time. (Presumably because they have made no effort to avoid it.) Instead, they restrict their

response to the permanent infrastructure only, and the short-term construction phase. However, as PVDP said in their *Scoping Report* in paragraph 5.2.4, “the need to generate cheap, subsidy-free power means these power stations must be utility scale – in excess of 250MWe.” In other words, the Applicant could easily have avoided BMV land, and restricted the panel coverage to areas of “moderate” agricultural land, while ensuring the economic viability of the project.

Q1.11.7

I am sure that the ExA has noticed that the Applicant has ignored the question at the end of the second bullet point completely.

Likewise, the Applicant has failed to answer, directly, the request in the first bullet point about the operational lifespan. Instead, they confirm the 100% loss of current agricultural operations “at the commencement of construction”, and confirm that the operational effects have been scoped out of the assessment in Table 17.7. But it is precisely these operational effects that the ExA is questioning, because they have been arbitrarily scoped out. Too uncomfortable for the Applicant to answer?

Q1.11.8

No doubt the ExA has also noticed that the Applicant has responded to the first part of the request (the easy part – the data are readily available), but completely ignored the second, about “specific justification for the use of land *by grade*”. This omission is a particularly stark one . . .

Q1.11.11

. . . but not as stark as the total failure to respond at all or in any way (as yet) to the ExA’s question about degraded soil on the Blenheim Estate. Were Mr Hare’s extravagant claims too difficult for the Applicant to substantiate?

Q1.1.20

The admission that “the matter of agricultural land use is not relevant” was *an error* is revealing in two senses. First, it sums up their cavalier and careless approach to agriculture generally (see for example, their dismissive response to Q1.16.12); and, second, I would suggest that it was not an error at all, but another manifestation of the poor soil narrative that pervades the Applicant’s written material and oral exchanges. The mistake was being found out.

Q1.9.2

The response to this question is evasiveness at its most evasive. The challenge is to the choice of matrix (and matrices generally). The Applicant does not address this challenge. Instead, they simply regurgitate a description of the methodology they have used, as if repeating it is sufficient to brush off any criticism. It does not answer why they chose the matrix they did, rather than other, more objective, options available. The methodology itself may otherwise be sound; the point is, the choice of matrix is where the methodology is tainted and “expert” judgement is undermined.

The Applicant says that the author has taken this approach for many years. I am sure the author is very experienced, and will therefore know exactly how to manipulate the methodology, and especially the choice of matrix, to favour the client.

I note also that, in spite of having my surname in front of them when responding, they got it wrong in their response. Rather symbolic of their lack of seriousness.

Q1.16.7

The Applicant’s unsatisfactory response to this question skates over the operational phase of the project, which will bring long-term visual change to the “traditional English countryside”, and ignores the “agricultural productivity” part of the question. It also raises the “temporary” problem. Solar farms may be “time-limited and fully reversible”, but energy companies are increasingly seeking to extend their lifetime, and it is fair to assume that Botley West is likely do so too (before or after PVDP sell it on to someone else). At what point is “temporary” no longer temporary? With a Freudian slip, the Applicant goes on to say that the direct benefits to Blenheim will be *long-term* revenue. Precisely. Never-ending, perhaps.

Addendum: 12.5 Applicant’s Responses to Submissions Submitted at Deadline 1

REP1-100

No doubt CPRE will respond to this separately, but it is ironic that the Applicant suddenly acquires an interest in accuracy by saying that there is no reference to “low productivity” in Volume 1, Chapter 17. This is correct as far as the two words themselves are concerned. However, the Applicant’s whole approach to BMV land has been to minimise its importance and to imply that the “poor quality” of the soil throughout the project area means that its productivity is correspondingly low.