

STOP BOTLEY WEST CAMPAIGN RESPONSE TO BOTLEY WEST PROPOSAL PHASE 2 PUBLIC CONSULTATION

7th February 2024

The Stop Botley West campaign recognises the urgent need for bold collective action to address the devastation of climate change. There is no doubt that an enormous increase in clean, renewable energy is needed to reduce greenhouse gas emissions. This requires a properly considered and planned response to ensure benefits outweigh harms. The climate crisis cannot be used to justify ill-considered, poorly planned projects.

The Stop Botley West campaign opposes the Botley West Solar Farm proposal on the following grounds.

Needs and alternatives

There is an urgent need for clean renewable energy including solar energy but the need for Botley West Solar Farm has not been demonstrated. According to the 'Pathways to a Zero Carbon Oxfordshire' report (Oxford University, 2021), the equivalent of 1% of Oxfordshire's land surface is required for solar energy to meet the county's targets. Domestic and commercial rooftops in Oxfordshire can provide three times that space. Together with locations such as brownfield sites and roofed carparks, there are viable alternatives for accommodating Oxfordshire's solar power that are not considered in the consultation documents.

The consultation documents do not give due consideration to alternative locations for a utility-scale solar farm like Botley West. The choice of location appears to have been led by land availability and proximity to a grid connection rather than by a comprehensive assessment of the environment to ensure the project is in an appropriate place. Moreover the availability of the connection to a new National Grid Electricity Transmission system via a new substation to be constructed by the National Grid west of Botley appears far from settled. Key information on the new substation and other new infrastructure on which Botley West Solar Farm would depend is not available and applications have not been made for the necessary planning permissions.

The consultation documents give no consideration to options for a network of smaller-scale solar farms that could be designed to fit into the landscape. These could be more community-based in their design, ownership and benefits. (An excellent example is Southill Solar near Charlbury.)

The proposal also gives no consideration to alternative sources of renewable energy. The World Bank points out the UK is poorly suited to solar energy generation compared to other countries (239th out of 240 countries assessed for the potential output of solar power).¹ For the UK, wind and nuclear energy are more productive and reliable, yet the PEIR downplays the importance of renewables other than solar.

The environmental statement should give due consideration to the various viable alternatives that are available.

Historic environment

The proposed project would have a dramatic impact on the setting of the UNESCO World Heritage Site of Blenheim Palace. A Heritage Impact Assessment for the WHS at Blenheim Palace is required by Historic England and UNESCO but none has so far been done. Pending that assessment, we can

¹ <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/466331592817725242/global-photovoltaic-power-potential-by-country>

refer to the Setting Study for the 'Blenheim Palace World Heritage Site Revised Management Plan 2017', in which Blenheim Palace says:

'The conversion of significant areas of agricultural land for other purposes, or the large-scale loss of woodland would detract from the distinctiveness of the setting'

'Tall developments on the skyline, or large-scale development (particularly those of a non-residential nature which tend to be bulkier and non-vernacular, for example industrial development; wind turbines; solar farms etc) could detrimentally influence the character of the adjoining rural areas'.

Blenheim Palace goes on to say:

'One of the key characteristics of the surroundings of Blenheim Park is that much of the setting lies within the wider extent of the Blenheim estate. ... As a traditional landed estate, much of the land is retained in open agricultural and enclosed forestry use - another attribute which contributes to OUV [Outstanding Universal Value]. The grazed pastoral landscapes around the river valleys, along with the fields and woodlands are particularly significant as these reflect the land-use and character of the landscape that would have been appreciated during the 18th century. Contrasts between these features is muted and gentle, representing the historic character of the farmed landscape of middle England. The appropriate management and enhancement of these landscape features is therefore an important objective.'

The proposed project would have a detrimental impact on numerous other important heritage assets such as the Historic England Protected Monument site of Sansom's Platt, the burial place of Sir Winston Churchill in Bladon, and many historic and listed buildings in the 15 villages and towns bordering the proposed sites. Immediately adjacent to the proposed sites there are also four Conservation Areas which are intended to maintain the historic character and setting of these rural communities.

Historic sites of national and international importance and their settings should be removed from the proposed project site.

Landscape and visual

The proposed project would dramatically transform the landscape of a substantial area of rural Oxfordshire adjacent to the Cotswolds Area of Outstanding Natural Beauty (AONB). It would significantly change several Oxfordshire Wildlife and Landscape Study (OWLS) district landscape types. The landscape does not have the capacity to accommodate a solar farm of this scale. The proposed project would result in unacceptable long term, severe landscape and visual impacts that would be incapable of effective mitigation.

The proposed site is an open landscape of gentle hills and river valleys with extended views of the surrounding countryside. The project would turn this into a semi-industrialised landscape of solar arrays on a scale that is unprecedented in the UK. The 'Zone of Theoretical Visibility' (ZTV) map in the PEIR shows the project would be visible over a very large area. It would be visible from the Cotswolds AONB. The mitigation types proposed would not effectively screen the solar arrays and other infrastructure of the solar farm.

The proposed solar farm would be unprecedented in terms of its proximity to human habitation. Consultation leaflets were sent to 22,000 households within 2km of the site, indicating the number of people who would be impacted. The solar arrays would be visible from hundreds, if not thousands, of properties as well as numerous roads and footpaths. Villages adjacent to the site would be engulfed - for instance Bladon and Cassington would each have about 50% of their parish's land taken over by the project and 30% of Hanborough Parish would be covered. Some residents' homes would be within 15m of the project site.

The environmental statement should include a full Residential Visual Amenity Assessment.

Over 76% of the proposed site is located within the City of Oxford Green Belt and would occupy over 3% of that Green Belt. This is contrary to National Planning Policy Framework (NPPF) guidance which makes clear that renewable energy projects, including solar farms are *'not appropriate development for Green Belt land.'*

Green Belt land and land in the immediate vicinity of towns and villages should be removed from the proposed project site.

Ecology and nature conservation

The proposed project would cause significant, long-term damage to wildlife and in addition it would prevent opportunities for nature restoration.

The proposed site comprises a mosaic of habitats including farmland, hedgerows, tree lines bordering fields and tracks, woodland including ancient woodland and river valleys and associated flood meadows. It is interconnected by the valleys of the Rivers Dorn, Glyme, Evenlode, Windrush and Thames that form a coherent north-south river valley landscape of consistently high quality and sensitivity.

The wide variety of habitats leads to a rich and diverse fauna and flora, significant elements of which would be severely degraded or even lost as a result of the proposed project because many elements of the wildlife, especially birds, require farmland in rotational cropping, along with hedgerows and other landscape features to thrive. The PEIR recognises that the land hosts healthy populations of red- and amber-listed birds, bats, badgers, hares and other wildlife but the mitigation measures described in the PEIR would be wholly inadequate to compensate for the massive loss of habitat for this wildlife caused by 900 hectares of solar panels, 100km of security fencing and other infrastructure.

The region around the Thames, Evenlode and wider has considerable potential for restoration and national-level designation at the highest level for nature conservation and landscape preservation. The proposed site includes land that is part of the current Nature Recovery Network for Oxfordshire. The proposed project would prevent such nature recovery activities from reaching their full potential as well as damaging wildlife dependent on a mosaic of habitats including farmland. This opportunity cost is not considered in the PEIR.

Key information for understanding the proposed environmental mitigation plans is missing from the PEIR and should be provided in the environmental statement. This includes the Biodiversity Net Gain (BNG) Report and the Environmental Management Plan. The former is essential to justify the entirely unsubstantiated claim in the PEIR that the project would result in a minimum 70% BNG. The latter is required to understand the management of mitigation measures throughout the lifetime of the scheme.

Hydrology and flood risk

There is increasing scientific evidence showing that solar arrays generate increased greenfield run off rates but the PIER takes no account of that evidence. The proposed project could increase the risk of surface water flooding, affecting hundreds if not thousands of homes. It could also affect the flood-prone city of Oxford a few miles downstream.

The consultation documents provide minimal and incomplete information on proposed mitigation measures, particularly for the soil compression that would result from vehicle movements, earthworks and the extensive driving of foundations for solar arrays into the land which is a major contributor to flood risk. These works are also likely to damage existing field underdrainage.

The environmental statement should include a comprehensive flood risk assessment and a comprehensive land and water management and monitoring plan for the operational phase.

Amenity and human health

The proposed project would cause a significant loss of amenity and green space for healthy living, impacting the physical and mental health and wellbeing of tens of thousands of people. There is much robust evidence now to demonstrate that open green space plays a significant part in people's physical and mental health. The loss of beautiful rural landscape would have a serious impact on amenity gained from exercise, walking and viewing wildlife in the open countryside.

Numerous Public Rights of Way (PRoW) within the proposed project area are used by the local communities as well as visitors for exercise and leisure. Figure 17.5 suggests that several dozen footpaths would change from traversing agricultural fields to traversing a solar farm. Panels would be mounted up to 2.5 metres high so footpath views could be of the underside of the solar panels. The consultation documents say PRoW would be retained or even increased but make the baffling assumption that a walk through a solar farm is equivalent to a walk through farmland. The PEIR assumes people would continue using the footpaths within the solar farm for exercise and recreation but it is more likely they would instead drive to real countryside (thus increasing traffic and emissions) or stop walking altogether.

The NPPF (Chapter 15) requires '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.'

Agricultural land and public rights of way

Agricultural land

The UK already relies on imports to provide almost half its food and climate change is expected to make it harder to ensure the resilience of the country's food supply. The proposed project would cause a substantial loss of productive agricultural land for at least 35-42 years as well as causing potential longer term damage to the productivity of the land.

Until recently, PVDP and Blenheim Estate have consistently dismissed the proposed site as comprising only poor, low-grade agricultural land. This transpires not to be the case. The provisional data presented in the PEIR indicates 38% of the site is Grades 1, 2 and 3a and is therefore classified as best and most versatile (BMV) agricultural land. Stop Botley West and others asked Botley West for a breakdown of BMV land for the three sites but it was refused. However we have obtained independent estimates based on GIS studies that show:

- The Central Site (comprising 64% of the total land proposed for solar panels) is 45% BMV, i.e. very high and high value land. The remaining 55% is grade 3b, i.e. medium-value land.
- The Northern Site (comprising 30% of the total land proposed for solar panels) is 48% BMV, i.e. very high and high value land. The remaining land is 52% grade 3b, i.e. medium-value land.
- The Southern Site (comprising 6% of the total land proposed for solar panels) was not quantitatively determined but estimated to be about 25% BMV land.

Taking all three sites together, about 45% of the total land proposed for solar panels is BMV, i.e. very high and high value agricultural land.

A full ALC survey is pending but it is likely the proposed project conflicts with NPPF guidance that requires developers to *'consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land'*.

BMV agricultural land should be removed from the proposed project site.

The proposal suggests that not all the productive agricultural land of the project site would be lost because opportunities are being considered to maintain agricultural productivity in the project area including sheep grazing and community-based agricultural production. No detail is provided on these ideas. There has been no proper assessment of their viability and no discussion with communities.

Public Rights of Way

There are numerous Public Rights of Way (PRoW) within the proposed project area that are used by residents and visitors for exercise, leisure and wildlife observation. As a result of the proposed project, many footpaths would in effect become corridors through fenced-in solar arrays, power converter stations and high voltage transformers. Views from many more footpaths would be of solar panels instead of agricultural fields. The mitigations proposed in the PEIR are wholly inadequate to address the impacts.

In order to provide an adequate understanding of the project's impact on PRoW, the environmental statement should provide an overlay of the Zone of Theoretical Visibility (Fig. 8.3) and the map of Public Rights of Way (Fig. 17.5). It should provide an analysis of the length of existing PRoW that would be adjacent to or surrounded by the project, and the length of PRoW that would be within 100m of the project or where the project would be clearly visible.

Traffic, noise and vibration

The proposed project would cause considerable disturbance to the communities surrounding the sites during the construction, operational and maintenance and decommissioning phases.

Detailed traffic and construction management plans are not provided in the consultation documents which means it is impossible to assess the impact. However, given the construction would take two years, involving numerous traffic movements, pile driving of foundations for the solar arrays to depths of up to 2.5m, earthworks and other infrastructure, disturbance to tens of thousands of people in the local communities could be high.

In the operation phase there would be disturbance from continuous maintenance as well as noise associated with operation. Heat island effects are also likely with such a large area of solar arrays in close proximity to residential areas.

Cumulative effects

The cumulative effects of the proposed project are not properly considered in the PEIR and the consultation documents greatly underestimate the cumulative impacts.

The cumulative effects assessment fails to take account of major developments including 19,000 houses coming forward through Local Plan allocations and the ground-mounted solar farms already allocated in Oxfordshire, totalling over 1,000 hectares. The map in the PEIR of other developments is limited to the immediate surroundings of the proposed project (it does not consider major developments proposed around Didcot, Harwell, Abingdon or Bicester) but nevertheless it shows the cumulation of solar and other developments would create a swathe of urbanised countryside from Wootton in the north-east almost to Cumnor in the south-west.

The assessment of cumulative effects in the PEIR inexplicably does not consider the effects of 'within-project' cumulative impacts arising from the overwhelming scale and repetitive nature of the

proposed development. Twelve times larger than the biggest existing solar farm in the UK, it would cover an area of 1300 hectares with well over 2 million solar panels, 156 power converter stations each up to 12m long and 3m high, six high voltage transformers each 18m long and 6 m high, and over 100km of 2m high security fencing.

The environmental statement should provide much better consideration of the unprecedented scale of impacts of the project itself as well as the context of other changes in the area expected over the next 35-42 years. It should include a summary table showing:

- Amount and proportion of the Green Belt that would be taken by the project, and by other development already shown in Local Plans
- Number and length of PRowS affected
- Number of properties that would have a view over the project
- Hectares of (separately) grades 1, 2, 3a and 3b agricultural land that would be taken in each of the three sites
- Number of wildlife sites of different designations affected
- Number of heritage properties whose settings would be affected
- Number of properties that would be affected by more than 3dB and 10dB increase in noise.

Inadequate consultation

There is widespread dissatisfaction in the affected communities with the way the proposal has been presented for the Phase 2 Community Consultation. The consultation documents did not provide sufficient information to allow proper consideration. The information was not made available in an accessible way. It was not easily interpretable and insufficient time was allowed to consider the proposal and respond.

The consultation was inadequate and should be re-done.

Stop Botley West Campaign
7th February 2024