

STOP BOTLEY WEST RESPONSE TO BOTLEY WEST SOLAR FARM TARGETED CONSULTATION (14TH JUNE - 28TH JULY 2024)

21st July 2024



INTRODUCTION

Stop Botley West (SBW) is a community campaign group that began in November 2022 when local residents were first informed about the proposal to construct Botley West Solar Farm (BWSF).

SBW recognises the urgent need for bold collective action to address the devastation of climate change. An enormous increase in clean, renewable energy is needed to reduce carbon 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 that cause more harms than benefits.

Stop Botley West believes the harms that would be caused by the proposed project would substantially outweigh the benefits it would create for reasons that are outlined in our response to the statutory public consultation.¹

We have the following comments on the proposals in the Targeted Consultation.

1. PUBLIC RIGHTS OF WAY

We believe the proposed changes would have many harmful impacts on local Public Rights of Way (PRoW). PRoW – footpaths and bridleways – are rigorously protected. Any proposed changes will need to be examined by local planning authorities and opinions sought from non-statutory consultees such as the Ramblers Association as well as statutory consultees.

1. Local impacts

Change 1 would impact Dornford Lane and the Sustrans national cycle route NCR5 (Claude Duval Way).

Dornford Lane is not suitable for the use proposed by the Developer. It is an ancient drovers' road of historical importance associated with the history of the Blenheim Estate and the old Woodstock Manor which preceded Blenheim. In its leaflets on the Oxfordshire Way, Oxfordshire County Council refers to it as being of special interest: *'Dornford Lane is an ancient green lane, coming into existence around the year 1100 for the purpose of carrying supplies from the royal demesne farm at Steeple Barton to the royal manor of Woodstock.'*

The Victoria County History for the Parish of Wootton confirms the historical interest of this track: *'Dornford Lane is a wide green lane flanked by ancient hedgerows... The lane's course, roughly duplicating that of the ancient Banbury-Oxford road and avoiding the centres of villages, suggests that it was a drove road for either local or long distance use.'*

Dornford Lane also shows clearly on the 1793-1794 Richard Davis Map of the County of Oxford, as are the early field and hedge patterns adjacent to the Lane.

¹ <https://img1.wsimg.com/blobby/go/b88fe279-b547-48aa-9134-87b8b5b735a6/downloads/0334%20SBW%20consultation%20response.pdf?ver=1720853489763>

The historic use of Dornford Lane for moving goods and livestock between towns and villages has resulted in a footpath and bridleway surrounded on either side by ancient hedgerows with an extraordinarily rich mix of trees, shrubs and other planting. The footpaths which meet with Dornford Lane also have ancient hedgerows with similarly wide and rich tree and shrub growth. Bruce Smith's website localdroveroads.co.uk describes it as '*a smashing length of drovers' road.... The hedgerow on either side of the path is 15 or 20 foot deep – hawthorn & elder run amok – but that depth was once part of the road, which was 75 foot wide 200 years ago.*' Ordnance Survey ordinary mapping also show the extent of trees and shrubs either side.

It should also be noted that a large part of the protected Roman town archeological site of Sansom's Platt lies alongside Dornford Lane.

Dornford Lane is a designated footpath and bridleway; as such, vehicles are not permitted. The Developer proposes to use the lane for access during the construction stage and for maintenance using light goods vehicles and other vehicles during the operational stage, i.e. the lifetime of the solar farm. It appears the Developer is unaware that while the northern end of the lane is a track, towards the southern end, and at junctions with other footpaths such as the Oxfordshire Way, the lane narrows to just one to two feet wide. It would be impossible to drive vehicles down the path without causing extensive damage to the rich mix of trees, shrubs and other hedgerow vegetation on either side of the lane which is as much as 15 or 20 feet deep.

The proposed use of Dornford Lane is described in vague and non-committal language, stating an 'intention' not to use Dornford Lane for access during construction and to use it 'infrequently' for maintenance. It is not clear what this would mean in practice.

The description of Change 1 is further confusing as it refers to both Dornford Lane and Claude Duval Way. It would be less confusing if it was made clear that Dornford Way and Claude Duval Way are the same route (Claude Duval Way is a Promoted Path that follows Dornford Lane PRoW).

Change 3 would impact not only Dornford Lane but also the east-west bridleway linking Wootton to Dornford Lane (Wootton BR21). Change 3 proposes that this bridleway is used for maintenance during the operation of the solar farm but later it says it would be used for temporary cabling work. These contradictory claims are confusing and need to be clarified.

Like Dornford Lane, this right of way is a very old path that is lined on either side by dense trees, bushes and other vegetation. It would not be possible for maintenance vehicles to use it without causing extensive damage.

Change 9 would impact Sustrans NCR5 as well as the Glyme Valley Way.

Change 16 refers to a PRoW for which the official designation is 342/6/10. The Definitive Map describes this route as a footpath, not a track as claimed. This means it may not be wide enough to lay a 33kV cable.

Change 18: references in the description to Eynsham and the Thames Path are an error. While they are indeed located on the Green Belt Way, they are a long way from the site of the proposed change. It appears that confusion has arisen because the Developer does not realise the Green Belt Way referred to is a long, circular Promoted Path.

Change 18 may however still affect another PROW, number 342/2/20, although it is not clear from the description whether it refers to the bridleway itself or a strip of land alongside it. An option the Developer could consider is to route construction traffic along the line of the dismantled railway immediately to the north of this bridleway.

Change 21 would impact on the large established hedgerow on the north-west side of the A4095. The entry and exit point of the proposed HDD compound would be on a busy A road, the A4095, and have traffic implications.

Change 26 would impact Woodstock FP6, part of a popular circular walk from Woodstock which goes through a beautiful tunnel of trees and well-established hedges.

Change 28 would impact Bladon BR5, part of Shakespeare's Way and an important route between Bladon village, the Bladon Heath woodland, Begbroke and Yarnton. There is also considerable concern amongst the residents of the numerous houses on either side of Heath Lane, Bladon about the unknown level of impact this proposal would have on them. Clarification is required.

Change 32 proposes to remove a hedgerow that is, like the adjacent fields, protected by a covenant.

Change 34: Whilst the new footbridge would improve the connectivity of the local path network, it would be at the cost of the destruction of the countryside that this path network serves.

Change 50 shows a revised cable route running very close to Wytham Woods university research centre and SSSI.

1.2 General impacts

1.2.1 The number of footpaths that would be affected over an extensive area by the proposed changes would have considerable cumulative impact. There are 13 modifications or 'temporary closures' of PRow. While impacts are described as temporary, multiple interventions across the area would put much of the local PRow network out of action at the same time. This would have a significant detrimental impact on the amenity for local residents and visitors.

1.2.2 Many of the footpaths that would be impacted by the proposed changes provide a link between other well-used PRow. If one footpath is impeded or blocked, access is effectively blocked across a much wider network of linked PRow.

1.2.3 The Information Change Note is vague about the duration of the disruption to local amenity. Changes are described as 'temporary in nature' and therefore 'unlikely to lead to adverse affects'. However the entire Botley West Solar Farm proposal is also described as 'temporary', meaning 42 years. Clarification is required.

1.2.4 Botley West Solar Farm would require the use of many miles of security fencing around the site and its perimeter. It is not clear from the documentation available what arrangements will be made to ensure the security fencing does not block any of the PRow that cross the sites.

1.2.5 The surface of the green lanes of the Oxfordshire Cotswolds tends to become very sticky and muddy in wet weather. They are serviceable for walkers at the moment because they have been compacted by decades or centuries of regular use. If the surfaces are excavated to lay cables, it would inevitably result in them becoming softer and more muddy, making them much less accessible and fit for purpose.

1.2.6 Last but not least, we wish to point out that it has been a time-consuming challenge for us to identify the exact locations of the changes represented in the small images in the Information Change Note. Just two of the 57 proposed changes are identified by their identifying number (changes 28 and 46) while the remaining 55 changes have no identifying numbers at all. The changes should have been identified in the Information Change Note using their Ordnance Survey map Grid Reference numbers. As it is, many consultees will be unable to identify the proposed changes and make an informed response to the targeted consultation.

2. ENVIRONMENTAL IMPACTS

2.1 Re change 50, we are pleased that the previously proposed cable routes across the Thames that would have directly impacted the Long Mead Wildlife Site have now been abandoned. Nevertheless the remaining routes would directly impact important restoration meadows. It would be very difficult to mitigate or compensate for this harm.

Putting cabling under the Thames and towpath would be harmful wherever it is located. It would be likely to destabilise the riverbank and increase the risk of erosion of the towpath. The banks are already under increased pressure because of the increase in flooding events, making erosion more likely. Cable-laying is likely to exacerbate the situation.

2.2 Established and ancient hedgerows are important and enjoy rigorous protection. The impact of the proposed changes on hedgerows will need to be examined by local planning authorities and opinions sought from relevant non-statutory as well as statutory consultees.

In nine of the proposed changes, the Information Change Note says that 25.5km of new hedgerow would be planted. However it does not say how much established existing hedgerow the Developer proposes to remove. The Developer should specify the total amount of hedgerow they propose to remove throughout the entire site.

The Developer should also provide an explanation of the impact of the removal of many kilometers of established and ancient hedgerow on the 70% biodiversity net gain it claims would be achieved by the proposed development. Newly-planted, limited species hedging cannot contribute to biodiversity to the same extent as long established - in some cases ancient - hedgerows.

3. SCOPE OF CONSULTATION

It is puzzling and disappointing that the Developer chose not to make use of the targeted consultation to address any of the deficiencies of the previous statutory public consultation. Those deficiencies are identified in SBW's Adequacy of Consultation report (May 2024).²

The number of the changes proposed in the subsequent targeted consultation (57) indicates that the statutory public consultation was premature. It appears to have been rushed through by the Developer in order to meet project development schedules rather than to facilitate an adequate public consultation.

² <https://img1.wsimg.com/blobby/go/b88fe279-b547-48aa-9134-87b8b5b735a6/downloads/AOC%20Main.pdf?ver=1718049112334>