

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



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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 (<https://goodcalculators.com/flesch-kincaid-calculator/>)

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 recommit 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

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 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 (who is going to do what and where?)	Enhanced (from what to what? – deletion of framework to make statement accountable)
8	proposed mitigation measures		Our proposed approach		
10			New proposed footpaths		
14			Proposed approach		
16	proposed a new cycle route				
3	Potential impacts on the environment and local communities	Potential Potential Community benefit		proposed mitigation measures (14, 16, 17 x3, 20)	New recreational connectivity (code for extending a footpath between Casington and Church Hambarough along a route lined with solar panel fencing. What is being connected?)
14		Potential Potential environmental impacts		mitigation and enhancement areas (11) (enhancement of what?) mitigation OED mitigation (n) 2a) extension or palliation of an offence, fault, etc., abatement or minimization of the loss or damage resulting from a wrongful act. 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). (the use of the word mitigation throughout suggests that some harm or damage will result from the project	Boosting connectivity (10) Between what and/or whom? Increasing connectivity (14)
16	Boosting connectivity(10) Increasing connectivity (14)			(no agency and scale to calibrate what is being mitigated. Measure(s) plural hides what exactly is to be done) 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			When and who are the parties?	
5, 10	In close proximity to the site			Where exactly?	
5	capacity			Of what?	
6	Agreed local viewpoints			Agreed by whom?	
	The project may look	may			
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 guaranteed)	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 x3, 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 17	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 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	Mitigate against visual impacts				See comment p.3. What are 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 theses 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-final issues (actions not completed, or guaranteed)	Process and agency unclear	Vocabulary without a clear referent
10	Buffer zones				OED buffer 2 (narrative; 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)
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 (when – 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 Baginbale ... New circular walk near Cassington		We are proposing x2 with new planting proposed underneath		
12	Approximately 30% of the site				How much of 20% is approximately?
12	It is intended to cross existing features		We are considering		A number of existing options (how many – and what are the options)
12	National Grid is likely to locate their substation		It is intended		Features such as the river Presumably River Thames? And what are the other features?
13, 14, 17	Visualisation	Could look into guarantee that this is how they will look	is likely to (no firm commitment)		Within or directly next to (when is it? – and what does directly next to mean?)
14			We are seeking to take	Local initiatives (who has initiated them?) Committed to ensuring funding is available (from where and how much?)	Photographs? Drawings – who has created these and from whose perspective? How binding are they?

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 <i>inactively!</i> – 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</p> <p>https://www.instituteforgovernment.org.uk/article/explainer/electricity-market#:~:text=Electricity%20suppliers%20buy%20the%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)	<p>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?)</p>	
15	Green projects		<p>We are exploring Will ensure the accountability Aiming to create</p>	<p>Findings....will ensure the accountability (findings is vague, and findings have no agency in ensuring accountability. Accountability to whom?)</p>	<p>Various onsite benefits Environmental benefits Reflects the same visions (in reverse – what visions – green is a blanket term</p>
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			<p>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</p>

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 n. V.183</i>). Aren't wetlands water bodies? If so, how does this statement account for drilling cables in Swinford Meadows? wetland. 1. 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 Yarraton 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				<i>What on earth is this?</i>
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?</i> <i>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 and integral part of the DCO application.

STOP BOTLEY WEST CAMPAIGN, OXFORDSHIRE, May 2024