

Bladon Parish Council

Bladon Parish Council (BPC) welcomes the opportunity to provide comments on the Scoping Report (SR) for the Botley West Solar Farm (Project).

BPC would like to make the Inspector aware that Bladon Parish will be significantly affected by this Project.

Based on the information provided, approx. 53% of Bladon Parish¹ (176 hectares) has been earmarked for the project; 176 hectares is approx. 12.5% of the whole Project site.

It is hoped that due to the Parish being so greatly affected that BPC's comments will be given serious consideration when agreeing to the requirements of the EIA Environmental Statements for the Project.

After reviewing the Scoping Report, Bladon Parish Council (BPC) has the following comments for consideration.

General Comments Regarding the Scoping Out of Parameters

Due to the significant size of the Project, which covers over 1,400 hectares of agricultural land and will impact approximately 30,000 homes over multiple communities across the Project area as well as Blenheim Place, which welcomes around 750,000 visitors a year, it is important that the Environment Statements (ES) are as detailed as possible and, as such, no parameter should be scoped out.

However, should a parameter be scoped out, then a detailed justification should be given as to the rationale behind the decision. Several of the proposed scoped-out parameters in the SR are excluded based on assumptions that some will happen or are unlikely to happen or unlikely to have an effect. These assumptions should have to be proven.

Several parameters have been scoped out at construction stage but included at operational stage. Paragraph 6.3.1 states that construction is expected to last 24 months but no phasing has been provided for the buildout. It is also not known if the Project will be deemed 'operational' in stages or only after the last piece of infrastructure is in place.

Assuming that the Project is not considered operational until the last piece of infrastructure is in place, many areas of the Project will have solar panels or other items of infrastructure in place several years prior to the Project becoming operational, during the 24 months of estimated build time. In addition, some receptors will suffer impacts during the construction phase that are only being considered at the operational stage and these impacts will not have been assessed for mitigation.

Detailed Comments and Questions on the Scoping Report

For ease of reference, the following points are raised in the order they appear in the Scoping Report.

Section 2 Existing Baseline

2.1 Existing Development Site

¹Bladon Parish has an area of 326 hectares.

Northern Site (West Oxon and Cherwell)

- 1) Para 2.1.3 – This paragraph is incorrect in its description of the site and does not appear to take into account the additional land included to the South of the ‘Northern Site’ (East of Woodstock). The ‘Northern Site’ now also has the A4095 running along parts of its Southeast boundary. It should be noted that part of the original site boundary was only approx. 250m from the A4095 at the nearest points, yet this has not been mentioned in the Scoping Report (SR).
- 2) Para 2.1.6 – The paragraph states that the site is not near any statutory designations (e.g. Green Belt). It should be noted that even prior to the additional land being added at the East of Woodstock the Southern part of the ‘Northern Site’ was only approx. 250m from the Green Belt. The ‘Northern Site’ is now less than 50m from the Green Belt. This is because the Northeast edge of the Oxford Green Belt runs along the A4095 which bounds the Southeast boundary of the ‘Northern Site’.
- 3) Both comments above can be seen in Figure 2 of the SR.
- 4) Para 2.1.7 – The paragraph refers to several historical designations that are in close proximity to the ‘Northern Site’ but does not acknowledge Woodstock and its large concentration of Listed buildings. It also does not refer to the Scheduled Roman Villa which is located East of Woodstock, although para 7.1.11 of the report does acknowledge a Scheduled Roman Villa ‘located just to the east of the World Heritage Site (WHS) at Blenheim Palace’.
- 5) The Listed buildings and the location of the Scheduled Roman Villa can be seen in Figure 8, Heritage Designations of the SR.

Central Site (West Oxon and Cherwell)

- 6) Although Woodstock has been mentioned occasionally in the report under the ‘Northern Site’ and the WHS at Blenheim Palace appears to be considered under the ‘Northern Site,’ both locations could also be affected by the ‘Central Site.’ The nearest houses in Woodstock are only approx. 600m from the closest point on the Northern boundary of the ‘Central Site’ and the edge of Blenheim Palace grounds are less than 200m from the ‘Central Site.’ The Environment Statements (ES) should ensure that Woodstock and the WHS of Blenheim Palace are also considered when carrying out assessments for the ‘Central Site’.
- 7) Para 2.1.11 – Due to their proximities, the hamlet of Worton and the Town of Woodstock should also be considered as encircling the ‘Central Site’.
- 8) Para 2.1.11 – This paragraph does not acknowledge that the A4095 runs along the northern edge of the ‘Central Site’ and that the A44 is to the East of the ‘Central Site.’ The ES should ensure that the A4095 and A44 are also considered when carrying out the required assessments.
- 9) The A4095 is not mentioned anywhere apart from in para’s 7.7.7 and 7.79 (Acoustic Environment) and in Figure 1 within the Scoping Report, yet it is a significant road on the Highway Network.

Section 5 Need and Alternatives Considered

5.2 Need

- 10) Para 5.2.4 – This paragraph states that due to cost of submitting a project larger than 50MWe that ‘power stations must be utility scale – in excess of 250MWe’. The ES should explain why, if only around 250MWe is required to be viable, it is proposed to build a scheme that is nearly 3.5 times the capacity needed to be viable. The ES should consider reduced size as one of several alternative options available.
- 11) Para 5.2.4 – This paragraph also states ‘The UK’s electricity needs will not be met by small, patchwork solar installations on roofs and wasteland. The UK needs large power installations to replace its retiring coal and nuclear fleet, and to meet the huge growth in electricity demand which we will see between now and 2035.’ The ES should provide evidence that justifies these statements as these are alternative options that should be considered as part of the process.

5.4 Alternatives

- 12) Para 5.4.3 – This paragraph incorrectly considers the only alternative option as ‘do nothing’. It states that net zero by 2030 may not be met without the Project and the ‘do-nothing scenario’ would materially undermine the Government’s strategy.
- 13) Nationally, many solar farm and other solar installations have been given planning permission over recent years and the ES should show the cumulative GW value of all permissions granted but not yet operating (the Government provides regular updates on the GW currently operating). The ES should show how, after allowing for these developments, the ‘do-nothing scenario’ would materially undermine the Government’s strategy. An additional exercise which considers the expected GW of known pre-app projects should also be carried out to see if the ‘do-nothing scenario’ would materially undermine the Government’s strategy.
- 14) As mentioned in points 10 and 11 above there are other options that should be considered as possible alternatives.
- 15) Para 5.4.6 – This paragraph states that the Site location is considered to be suitable due to its ‘location on low-productivity arable land of low ecological value’. The ES should provide details on how the developer has concluded that the arable land is of low productivity and of low ecological value. Under the Agricultural Land Classification (ALC) Grade 3(b) is identified as moderate quality agricultural land that is capable of producing moderate yields of crops (mainly cereals and grass). The Site is classified as 3(b) or better. Can the developer show that the yields produced on the land are lower than expected yields for the types of crops grown?
- 16) Any arable production baseline regarding the impact on local food and ecology should represent the uses/production as it stood at the start of the Pre-app process. Some tenant farmers may have left their tenancy already and any negative effects caused by their leaving, such as the change in farming practices or the possible loss of arable product as the land is converted to pasture early, for example, will be overlooked if the baseline is only established now. BPC is concerned that some negative effect to the ecology may have already occurred and will not be acknowledged in the ES.
- 17) Para 5.4.6 – This paragraph also states that the Site is located away from ‘main settlements’. The ES should confirm what qualifies as a main settlement. It is clear to see in Figure 1 of the SR there are numerous villages and a town in close proximity to the Site, some of which are large in size.
- 18) Para 5.4.7 – This paragraph acknowledges that much of the Project is within the Green Belt and that part of the ‘Very Special Circumstances’ justification for the Project rests upon the availability of Grid connection. The report states under para 5.2.3 that the UK Grid is constrained and that the 400 kV overhead line (OHL) is being reinforced all over the country, but that new electric generation cannot be connected until 2032; the advantage of this Project is that it should be able to connect to the Grid sooner.
- 19) The date of 2032 is the worst-case scenario for grid connection. Some of these improvement projects have been granted, or are currently seeking, planning permission and are due to be available for connection several years prior to 2032. Therefore, other areas will have viable connections to the Grid before 2032. The ES should include the details of these projects, including their timelines, and these new connections should be assessed as part of the ES as they may offer other viable alternatives in more suitable locations.
- 20) Para 5.4.11 – The developer has chosen to set a minimum buffer of only 20m from residential properties. The ES should explain why it has set the residential buffer minimum as only 20m and why it hasn’t designed the site layout to increase this minimum distance.

Section 6 Project Description

6.1 Introduction

21) Para 6.1.2 – This paragraph confirms that the Project will be confined to the Project boundary as shown in Figure 1 of the Scoping Report. Due to the way the Red Line Order Limits have been drawn, it is unclear in some areas of the Site which pieces of land are included or not. For example, the land included East of Woodstock shows Red Lines within Red Lines. In addition, Bladon Heath, surrounded by a Red Line, could be interpreted as included in the application Site but is acknowledged in paragraph 2.1.12 as not forming part of the Site. The ES should devise a map that shows more clearly the various areas covered by the application. This map could be colour coded to make it easier to understand, for example by identifying differently the land designated for panels areas, other infrastructure, buffers, and the cable route.

6.2 Operational Development

22) Para 6.2.2 – Within this paragraph, the developer states that ‘discussions are advanced in respect of allowing land to be given over to community groups for small scale food production.’ BPC would like to know who has taken part in these discussions as BPC has not been approached directly at any stage during the process to take part in any discussions regarding the Project.

Section 7 Proposed Scope of Assessment: ES Chapters

7.1 Historic Environment

23) Para 7.1.5 – This paragraph does not acknowledge that the WHS of Blenheim Palace is also located approx. 1 km South of the ‘Northern Site’. This information is referred to in paragraph 2.1.8.

24) Para 7.1.6 and 7.1.7 – These paragraphs provide a list of villages that are close to the Site perimeter and have concentrations of Listed buildings as well as other Listed buildings close to the perimeter but outside these villages. It does not mention Woodstock, which has a large concentration of Listed buildings. The ES should include Woodstock in its assessments or explain why Woodstock is not included in the list of villages close to the perimeter of the Site when it falls within the 2km Study Area, as stated in paragraph 7.1.24.

25) As mentioned in point 6 above, the locations of both Woodstock and the WHS at Blenheim Palace should be considered when assessing the impact of the ‘Central Site’.

7.2 Landscape and Visual Resources

26) Table 7.3 – Residential Visual Amenity Assessment has been scoped out of the assessment for Landscape and Visual for all stages of the Project. BPC strongly believes that it should be included within the ES. In addition to the large number of residential properties in the area whose visual amenity will be affected by the Project, there are also recreation areas, such as Bladon’s Recreation Ground, which border the Site and will also have its visual amenity affected. The Residential Visual Amenity Assessments should be carried out as these assessments may show that the impact on visual amenity is so great that the proposed development is against the public interest.

27) Due to numerous other proposed developments in the area, the ES should also consider the cumulative visual impact of these additional developments when assessing the visual impact of the Project. Currently, it may appear that there will still be areas of open countryside around the Project but taking into consideration the proposed developments identified under 7.12 Cumulative Effects and Inter-relationships will show that this is not the case. BPC have also commented on this issue under point 42 of this document.

7.3 Ecology and Nature Conservation

28) Para’s 7.3.8, 7.3.14 and 7.3.19 – These paragraphs provide lists of surveys that have commenced and identify populations of fauna of conservation interest. These lists do not include other important mammals in the area such as deer and foxes. It may be that these types of mammals are not classed as of ‘conservation interest’ but due to the size of the area covered by the Project and the fencing in of multiple areas, the habitats of these and other mammals, including their travel corridors and their ability

to move around the Site, will be affected by the Project. The impact on other mammals should be included in any ES assessments.

- 29) The report does not include details on how the Project will affect the habitats within the enclosed areas of interest. An example of these areas are the ancient woodlands of Burleigh Wood and Bladon Heath, which are acknowledged under paragraph 2.1.12 as being enclosed but not forming part of the Site. Although these areas are excluded from the Project, fencing off the areas around the perimeter of these ancient woodlands and other areas of interest will affect the various species within those enclosed areas. The ES should assess the impact of enclosing these areas on the fauna and their habitats.
- 30) It should be noted that neither deer nor foxes are mentioned anywhere within the Scoping Report.

7.6 Traffic and Transport

- 31) Paras 7.6.9 to 7.6.15 – These paragraphs refer to the Local Road Network (LRN) and that there are several ‘A’ classification roads in the proximity of all parts of the Site. The ‘A’ roads identified are A34, A40, A44, A4260 and A420. Para 7.6.15 states that other roads surrounding the Site are of a lower classification. As mentioned in point 9 above the SR does not acknowledge the existence of A4095 which is a major ‘A’ road that runs from Bicester to Witney via Bladon, touching on both the Northern and Central parts of the site. The ES and Transport Assessment should include the A4095 when carrying out any assessments.
- 32) Para 7.6.15 – This states that other roads surrounding the Site are of a lower classification and provide access to the local areas. Although not officially a ‘A’ or ‘B’ road Lower Road, which connects the A4095 Bladon/Long Hanborough to the A40 at Eynsham, is a significant road that is used for more than providing access to the local area, it is a highly used road both by cars and HGV’s and can be adversely affected when traffic problems occur on other parts of the network such as the A34, A40 and A44. The ES needs to acknowledge the importance of this road when considering any transport assessments.
- 33) Table 7.12 – The effect of additional vehicle movements at decommissioning stage on the LRN and SRN has been scoped out. Although the report proposes that decommissioning will generate a lower rate of additional movements than the at the construction phase, there will still be an impact in the future. The ES and Transport Assessments should include this impact in their assessments.

7.7 Noise and Vibration

- 34) Para 7.7.5 – The paragraph only lists a few of the villages surrounding the Site locations and does not include Bladon, Church Hanborough, Cassington, Begbroke or Wootton.
- 35) Para 7.7.7 – Although this paragraph refers to Long Hanborough and Eynsham bordering the ‘Central Site’, it does not include Bladon as also bordering the ‘Central Site’. The ES should include Bladon when assessing the Acoustic Environment.

7.9 Socio-Economics

- 36) Table 7.18 – This table identifies that the impact on some receptors will be covered within other chapters of the ES such as Human Health. BPC would like to know if different criteria is applied during their assessments under different chapters of the ES.
- 37) Table 7.18 – This table shows that Land Use and Tourism receptors are out of scope at the construction and decommissioning stages but included at operation stage. Due to the size of the Project, the buildout time may be 1 to 3 years depending on the phasing of the buildout. Some areas may be completed a long time prior to the operational stage and as such, Land Use and Tourism may experience impacts similar to those at the operational stage at the construction and decommissioning stages. The ES should include the assessment of impacts on Land Use and Tourism at all stages.
- 38) Table 7.18 – The table only includes the Housing receptor under the operational stage and not under the commissioning or decommissioning stages. As mentioned in point 31 above, although not operational,

parts of the built site may be completed for some time prior to or after the operational stage and therefore during construction and decommissioning, Housing may experience impacts similar to those at the operational stage.

- 39) Table 7.18 - It also states that Housing is out of scope at the operational stage due to the solar farm being only temporary in nature and this limits the potential for any widespread adverse effect on housing value and unlikely to have any significant impact. The term 'temporary' is misleading as 42 years comprises two generations and as such should not be considered temporary. Due to the size of the Site, any impact on the many residential properties within proximity of the site would be widespread across the area. Without including Housing in the ES, how is it possible to know that there is no widespread or significant impact on housing? The ES should assess the impact on Housing at all stages of the Project.

7.10 Human Health

- 40) Table 7.19 – This table includes 'Housing' as a subject area, which is also the same name for the receptor under Socio-Economics. The areas/subjects identified under each entry are not consistent with each other. This could cause confusion as the application progresses.
- 41) Table 7.19 – This table states that Housing is out of scope at all stages of the Project. As explained in point 33 above the ES should include an assessment of the impact on Housing at all stages of the project.

7.12 Cumulative Effects and Inter-relationships

- 42) To be able to visualise the cumulative impact of developments in the area, BPC would like to request that the ES include a plan that shows the Project in relation to not only all the approved and proposed residential developments in the area, but also to the approved and proposed solar farms and other non-residential developments in the area, such as, for example, the proposed Park and Ride on the A44 near the Bladon Roundabout. In addition to these proposed developments, the plan should also include developments built/being built but not yet showing on the OS base map being used. They should also show the built solar farms already in the area as, unlike residential developments, the OS base map does not show these types of developments and it could be assumed that these areas are undeveloped and still open countryside.

Section 9 Topics Proposed to be Scoped Out of the EIA Process

9.2 Daylight, Sunlight and Microclimate

- 43) Para 9.2.1 – The paragraph states that the nature of the project is not likely to result in microclimate changes and is therefore scoped out. There are multiple studies which discuss the Heat Island Effect and have shown that temperatures around the panels increases by 3 to 4 degrees. Microclimate should not be scoped out and the ES should include assessments to show the effect this increase in temperature will have on the fauna and flora in the area.

9.4 Electromagnetic Fields (EMF)

- 44) The report does not acknowledge that ambient EMF can affect the local wildlife. There are studies that show that EMF can have numerous effects on wildlife including, for example, orientation and migration, food finding and reproduction. This has been observed affecting mammals such as bats and deer and also birds, insects, amphibians, reptiles and also many species of flora. The ES should scope in EMF and include an assessment of impact on both Humans and Non-Humans.

Summary Table

- 45) Table 9.1 – This table is a summary of the issues/topics covered in the individual section within the Scoping Opinion therefore any comments raised in the points above are also relevant to the corresponding sections in this table.