



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Botley West Solar Farm Scoping Report – response from CPRE Oxfordshire, July 2023

We are aware that Councils will already have been working on their response to this Scoping Report but hope that we are in time to feed in the following comments.

Overall, we consider that the Scoping Report appropriately identifies many of the issues that will require assessment. However, we would like to raise a number of concerns, including some critically important issues that are currently omitted but should be scoped in.

'Temporary' consent (para 1.3.5)

The definition of 'temporary' is in our experience being continually pushed by solar farm promoters, from 25 years to 40 years and here to 42 years.

We do not consider that the word 'temporary' should apply to a project that will have a transformational impact on a wide area of Oxfordshire for a period of time covering several generations of children and over half the average UK life expectancy.

The Environmental Impact Assessment should be adjusted to consider what will in effect be permanent impacts.

5.4 Alternatives

We consider this section to be deeply flawed.

For example, it **fails to consider alternative approaches** such as:

- The **capacity of rooftop renewables to address need**. The Pathways to Zero Carbon Oxfordshire Report, produced by the University of Oxford and endorsed by all Oxfordshire local authorities, states that 1% of Oxfordshire's land is needed to meet its future solar energy requirements, a figure that could be accommodated 3x over on existing rooftops and brownfield sites.
- **Alternative locations outside the Oxford Green Belt** – the proposed cabling clearly indicates the possibility of siting the development some distance from any sub-station and therefore removes any justification of very special circumstances resting on Grid connection.

It also makes highly questionable assertions such as that the arable land is 'low productivity', the location is 'away from main settlements' and that it is 'outside any environmental designations'. (Strangely, it neglects to mention that it is within the setting of a World Heritage Site!)



7.2 Landscape & Visual Resources

Night-time assessment – impact of LIGHTING should be SCOPED IN during construction, operational and decommissioning phase (Table 7.3)

We welcome the indication that no lighting will be permanently operated and that infrared will be used for CCTV lighting outside daylight hours. However, some wildlife may be sensitive to infrared and it is not clear what the cumulative impact of the lighting for CCTV, the solar PV Array transformers and the electrical compounds will be. For example, how frequently are the motion sensors likely to be triggered and over what distance. For these reasons, we believe this issue should be scoped in for all phases.

Residential Visual Amenity Assessment – impact on VISUAL AMENITY of existing properties should be SCOPED IN during construction, operational and decommissioning phase (Table 7.3)

It is simply not credible to suggest that an industrialising development of this size and scope (eg 156 Power Converter Stations '12m x 3m and 306 x 4m high CCTV columns) will not have a significant impact on the attractiveness of existing residential properties as a place to live. We note (para 7.2.14) that the ES will consider residents as receptors if there is a potential for substantial adverse effects. We would argue that the ES is the appropriate mechanism by which to assess these effects and therefore the impact on visual amenity should be scoped in for all phases.

This is also relevant to 7.9 Socio-Economics – Table 7.18 – where Impact on Amenity of residents is also currently scoped out.

7.3 Ecology & Nature Conservation

Direct habitat loss effects within the boundary of designated sites should be scoped in as there is at least one such site – the Long Mead Local Wildlife Site – which is at risk of direct impact (due to the proposed cabling route). This is a 10ha rare wildflower hay meadow, of which only 4 square miles remain in the UK.

7.8 Climate change

GREEN HOUSE GAS EMISSIONS should be SCOPED IN for decommissioning.

PVDP asserts (para 7.8.34) that emissions from decommissioning will be 'minimal in comparison' to construction. However, 'minimal by comparison' does not equate to 'inconsequential' and the GHG emissions from decommissioning may still be considered to be significant. The impacts should therefore be scoped in.

8.3 Glint & glare

Para 8.3.11

CPRE does not consider that a 1km assessment area is sufficient for identifying ground-based receptors as the impacts of solar reflection may be experienced negatively over a considerably further distance depending on the lay of the land. We would **recommend a minimum 5km assessment area**.

The **list of receptors should be extended to include users of Public Rights of Way and open access areas**.

We ask that the comments above are reflected in the Council's own response to PINS.



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Yours sincerely

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