

## **Combe Parish Council response to Botley West Solar Farm Scoping Report, July 2023.**

Combe Parish Council welcomes this opportunity to comment on the Scoping Report submitted by PVDP, but we would like to point out that we were not invited to participate in the first phase of public consultation by the developer in 2022. While the parish of Combe is not situated immediately adjacent to the proposed site, this development will significantly impact on the quality of the environment and landscape setting of Combe, which is highly prized by its residents (see Combe Village Design Statement, 2023). We also wish to address the broader implications of this large-scale project for West Oxfordshire residents and for UK food production.

Our first comments focus on questions of food security and the loss of agricultural land. Our second section of comments addresses various other concerns:

### **1. Food security and agricultural land use**

Comment: The potential loss of good quality agricultural land raises grave concerns for domestic food production and our food security. The war in Ukraine has recently highlighted the vulnerability of the UK's over-reliance on international food markets. Has the potential loss of food production, and its impact, been quantified?

The following paragraphs show inconsistencies in the argument about agricultural land quality on the project sites.

**2.1.3 The Northern Site shown on Figure 1 comprises approximately 316 ha. It is located north of the town of Woodstock, west of Tackley and east of Wootton. The A4260 Banbury Road runs to the east of the site for its entire length, as does the River Dorn to the west. This section is bisected by the B4027 towards the south. The land is arable but low-grade agricultural land (see Figure 4) with multiple farm holdings scattered around the boundary edges.**

Comment: It is not 'low grade' land, it is classified as good to moderate!

**2.1.13 The site is on undulating land with peaks at Purwell Farm and Begbroke Wood. The Natural England Regional Agricultural Land Classification Map (London and the South East, ALC007, 2010) confirms the area as likely to be Grade 3 agricultural land which would require further surveys to ascertain whether it is considered BMV agricultural land.**

and

**5.4.6 The Site is considered to be a suitable location, taking into account the following:**

- **land availability;**
- **its location on low-productivity arable land of low ecological value .....**

Comment: how can the claim be made that the land is on 'low-productivity arable land of low ecological value', when Para **2.1.13** maintains that the agricultural land is likely to be Grade 3? Figure 4 shows that nearly all the land is provisionally classified as Grade 3, although it needs further classification in order to categorise it as 3a (good quality) or 3b (moderate quality). According to Natural England's LPA classifications, this is not low quality.

**5.2.2 The Government's recently published 'British Energy Security Strategy'1 (April 2022) required a 500% increase in solar generation by 2035. This will need the construction of up to 50GW of solar**

**power stations. The challenges that developers face in land assembly, the consenting and permitting process, as well as Grid constraints mean this is a stretching target. It will not be achieved by rooftop solar panels and brownfield sites alone. It will require utility-scale solar power stations delivering large amounts of power to the National Grid, making best use of scarce Grid connections.**

Comment: The British Energy Security Strategy document indicates that greenfield sites should be avoided and that only lower quality land should be used. They say:

*'We will continue supporting the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites.'*

This statement seems to contradict the proposed use of moderate to good agricultural land.

**7.11.4 - 7.11.8** points out that solar farms are not prohibited on agricultural land, but Grade 3a and up should be avoided. All the land seems to be provisionally classified as Grade 3, without division, with the exception of a small area around Farmoor.

## **2. Other comments**

**1.3.5 The majority of the land proposed for the Project is currently used for arable crops or is otherwise down to pasture. The consent being sought by the Project is a temporary consent for 42 years from the date of any DCO consent granted for the Project. At the end of this period all above ground infrastructure (excluding the National Grid Electricity Transmission (NGET) substation) and equipment will be removed with the land reverting back to its previous use at the end of that period.**

Comment: This claim needs further verification. Solar panels are difficult to recycle and the fields will be contaminated with piles and footings (up to 2m deep from the solar arrays) and underground cabling (para.1 .3 6). What reassurances can be given that the developer, or any subsequent owner of these sites, will undertake the costly removal of the contaminants so that the land can revert to agricultural use?

**1.5.7 The revisions proposed to draft EN-3 Renewable energy infrastructure emphasise the central role that solar will play in decarbonising the energy sector. The scale of such proposals and their impacts are also recognised.**

Comment: Combe Parish Council is fully supportive of the need to find alternative, sustainable sources of energy production as we transition to net zero carbon emissions by 2050. However, there is no evidence that the Botley West Solar Farm proposal will deliver the claimed benefits. There are far better, environmentally sensitive, alternatives to large scale ground mounted solar panels available, including the use of modern solar panels on domestic and industrial roof tops, brownfield sites, carparks etc.

**1.6.4 Schedule 2 development requires EIA to be undertaken where it is likely to have significant effects on the environment by virtue of factors such as its nature, size or location. Taking into account the nature and scale of the development proposed, EIA will be undertaken for the Project.**

Comment: Surely the 'location' on Grade 3 agricultural land is also significant, as well as the 'nature' and 'scale'.

**2.1.9 There is an extensive public right of way (PROW) network running within and around this site, most prominently the Oxfordshire Way which crosses the section on an east-west bearing. The 416/11/20 bridleway also runs in a north-south bearing through the section for almost its entire length.**

and

**2.1.19 Although to a lesser extent than the Northern Site, the Central Site is crossed by a number of PROWs. The route that would be most impacted being the Shakespeare's Way, which runs through the centre of the site, northwest from Yarnton. The 132/5/10 bridleway and 132/4/10 footpath also cross through the northern part of the section for a relatively long distance**

Comment: what are the implications of this for walkers and users of bridlepaths, given the site will be fenced off? **Para. 6.2.28** indicates that 'The fencing will be for operational security purposes and may be up to 2m in height'.

**5.4.6. The Site is considered to be a suitable location, taking into account the following.....its location away from main settlements**

Comment: 11,000 properties are within 1.5km

**6.2.17 Planting and management of grassland, hedgerows, trees and areas of scrub is proposed across the site for landscape, visual and biodiversity mitigation and enhancement. .... In areas not affecting power generation vegetation growth will be facilitated to improve biodiversity.**

Comment: Where is the evidence for this? The massive change in biodiversity (including hydrologic, vegetative, and carbon dynamics) following the ploughing up of arable fields and will not only diminish the landscape's ability to support ecosystem services during the solar facility's lifespan, but these changes may leave legacy effects that persist long after the installation is removed. There is no evidence that facilitation of 'vegetation growth' will in any way compensate for the major loss of biodiversity.