

To: BotleyWestSolar@planninginspectorate.gov.uk

Date: 10/07/2023

Subject: Botley West Scoping Report - Cumnor Parish Council response to Planning Inspectorate Consultation

Cumnor Parish Council wishes to make the following points regarding the applicant's Scoping Report.

1. Three Power Stations or one?

As the applicants states in their Executive Summary that:

'BWSF is formed of three separate but related solar farm areas, with interconnecting cables'

Council believes that this application should be withdrawn and re-submitted to the respective District Councils as three separate applications, so bringing the so-called 'southern' section located in this parish within the planning purview of both Vale of White Horse District Council and Cumnor Parish Council, including the planning policies of its made [Neighbourhood Plan](#).

2. Green Belt

Council notes with regret that the applicant pays scant regard to the fact that all the proposed site within this Parish is designated Green Belt. This must be included in all relevant assessments, including those set out below.

3. Cumulative Effects

Council draws PINS attention to the fact that the proposed southern site lies immediately adjacent to, and south of, another proposed solar power station (Red House Farm – see Figure 1 below) where the Vale of White Horse District Council (VWHDC) has required an extensive set of Environmental Impact Assessments be carried out ([P22/V2581/SCO](#)).

These are to include:

- Landscape and Visual Effects;
- Biodiversity;
- Archaeology and Cultural Heritage;
- Land Use and Agricultural Land Classification;
- Residential Amenity;
- Socio-economics;
- Glint and Glare; and
- Cumulative impacts as appropriate including landscape and visual and construction impacts in particular HGV movements and noise.

In addition, in respect of transport and highways, VWHDC advised the applicant that providing a Construction Traffic Method Statement is *'not considered to be sufficient'*, with the planning application to be accompanied by a *'transport Statement, as well as a comprehensive Construction Traffic Management Plan (including Decommissioning), with a Delivery and Servicing Management Plan'*

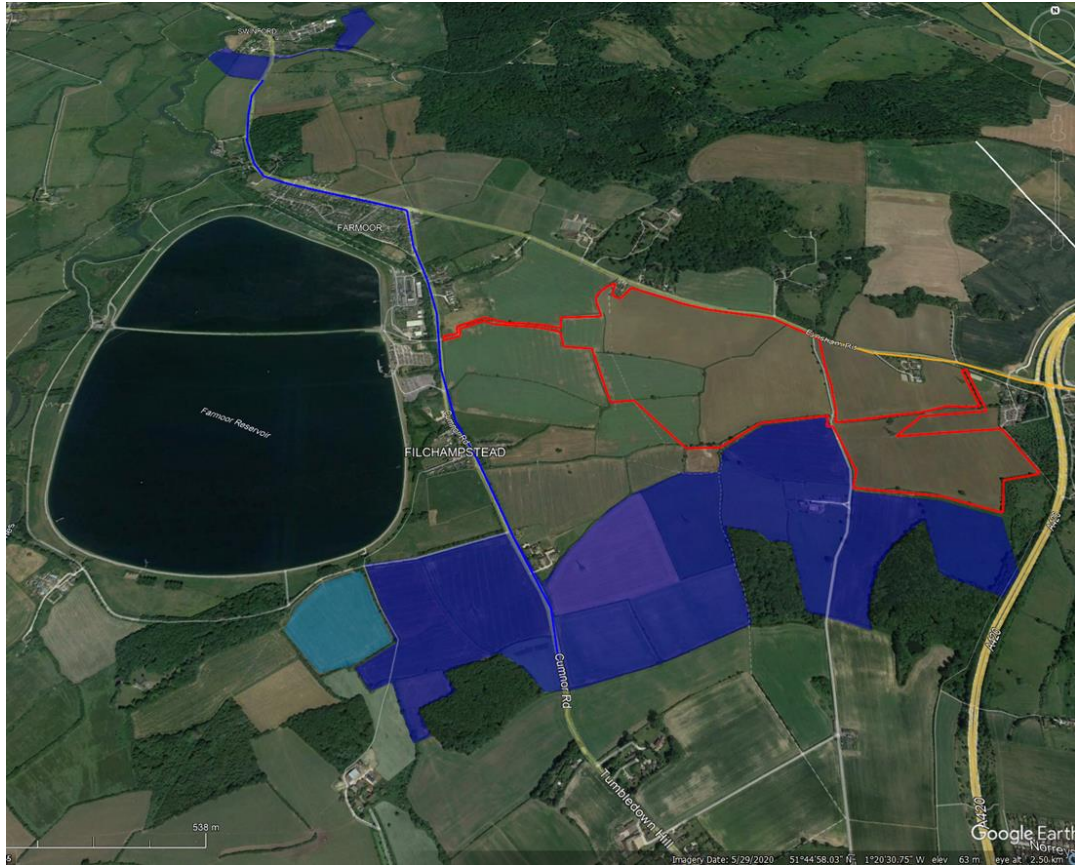


Figure 1
 showing 'Botley West' in dark blue, the most likely alternate location of the 440kV National Grid substation in light blue, and the perimeter of the proposed Red House Farm solar power station in red

4. Historic Environment:

Council notes that the Grade II Upper Whitley Farm sits on high ground 300m to the SE of the proposed site boundary.

Council would wish the geophysical survey to include the 'buffer areas' (para 7.1.17) as these too will be subject to disturbance by, for example, the erection of security fences, CCTV towers and associated cabling.

Given the applicant shows (Figure 8 page 169) two alternate underground high voltage cable routes crossing the River Thames either side (to the west and east) of the historic Swinford toll bridge (Grade II* listed), located on the B4044 at the NW extremity of the Parish where it meets Eynsham Parish, Council would wish the Historic Environment report to include an explicit assessment of the impact on Swinford toll bridge.

5. Landscape and Visual Resources:

Council requests that its 'Important Views' in its Neighbourhood Plan be considered in this section.

Council objects to the unevidenced statement in Table 7.3 that residential visual amenity assessment should be 'scoped out' and requests that it be placed in scope given the juxtaposition of the area shown in the applicant's Figure 8 (page 169) with residential property along the B4044, along Cumnor Road (B4017), the Grade II listed Upper Whitley Farm etc. etc.

This is especially so given the proposal for the 3.8 hectare and 15m high substation to be built in the Parish.

6. Ecology and Nature Conservation

Council has a very low degree of confidence in the statement (para 7.3.38) that

'no habitat loss would occur within any of the identified designated sites, at European, national or local level'

For example, in this Parish there are a number of 'ancient oaks' in the proposed development area. There are also many nesting protected species, such as skylarks and lapwings.

Council would wish the applicant's assertion to be tested by adequate independently conducted assessments.

Council would wish to see direct habitat loss effects included.

Council believes 'migratory birds' should be added to the list of species in para 7.3.8 given the international importance of Farmoor reservoir and its environs (including its 3x nature reserves) for migratory species.

Council would also wish RSPB and Thames Water to be consulted in this section given that the [latter describes Farmoor as 'a unique habitat for wildlife'](#) where *'January brings teal, water rail and little egret, who can often be seen enjoying the wetland, April sees ospreys wheeling across the water in search of fish, in the warm summer months swifts and swallows take to the skies - showing off their diving skills.'*

7. Hydrology and Flood Risk

Council notes that the proposed DCO site in this Parish spans an elevation difference of c. 40m.

Given the complex hydrology of the Parish (see the [Flood Risk Assessment](#) in our made Neighbourhood Plan) Council considers the proposed 250m boundary for assessment to be inadequate, the known zone of influence being well in excess of 1km in this Parish, due to its rapid changes in elevation (greater than 86m across the Parish) and complex geology.

Council believes para 7.4.6 should explicitly reference the river Thames itself, not as present 'River Thames tributary', since the site is proposed to both border and cross the river itself.

In para 7.4.12 the applicant ignores the fact that the proposed westerly crossing point of the Thames lies across the [Longmead wildlife site](#), part of the Thames Valley Wildflower Meadow Restoration Project. Council requests that this site be included in scope.

8. Ground Conditions

Council requests that the cumulative effects on ground contamination and ground water contamination of the use of cleaning products and other materials on the PV panels and other infrastructure over 42 years be assessed.

9. Traffic and Transport

Council notes that the only road access to the southern site (for construction, operation and decommissioning) is via a narrow rural road, the B4017, that links - and provides access to - residential and business properties, a children's nursery and an infant/primary school in Farmoor, Filchampstead and Cumnor Village, the latter being a designated Conservation Area (see Cumnor's made [Neighbourhood Plan](#)).

As such Council believes that operation and maintenance effects over 42 years should be scoped in, not out as proposed in Table 7.12 (pp77). Similarly, the theoretical decommissioning in 42 years-time should be scoped in.

Similarly, Council does not believe that the proposed 'Transport statement' (para 7.6.2) will be adequate and requests that PINS requires the more complete assessment required by Vale of White Horse District Council (see point 3. above) for the immediately adjacent proposed Red House Farm solar power station.

10. Socio Economic

Given that the Parish contains a number of businesses operating in the leisure/tourism industries, Council would wish the impacts on these sectors to be in scope for construction, operation and decommissioning.

Council wishes that 'crime and safety' be scoped in given the known prevalence of theft from solar power stations (see [Northumbria Police concerns over proposed solar power station west of Whittonstall](#)).

With a reported 93% increase in crime on solar farms from 2021 to 2022 and the role of "organised crime gangs... travelling the length of the country" this is a major concern for residents.

11. Agricultural Land and Soils

Council disagrees that (para 7.11.39) decommissioning effects should be scoped out on the grounds that, although details of decommissioning works are not known at this stage, they are likely to be of similar impact to construction.

If they are 'not known', how can they be assessed to be 'similar'?

12. Glint and Glare

Council requests that RAF Brize Norton (to the west of the central and southern sections, with the southern section being on the designated flightpath) should be included (para 8.3.14) – see also Figure 2 below.

13. Waste

Council is both astonished and concerned that the applicant proposes to scope waste 'out'.

The applicant's meagre five bullet point justification for this completely ignores the rate of replacement of inverters etc. required for a 42 year site operational life, let alone the decommissioning, of panels, inverters, cabling, buildings etc.

14. Electromagnetic fields

Council believes this needs to be scoped in given the proposed high voltage cable routings running past residential and childcare facilities in the parish (e.g. along the B4044 and B4017) and the proposed 3.8 hectare, 15m tall, 400,000V substation.

15. Major Accidents and Disasters

Council strongly believes this needs to be scoped in.

The proposed installation in this Parish alone of thousands of solar panels, dozens of voltage inverters and multiple substations, including the proposed 'Botley West' 440kV substation all pose both an accident and terrorism risk.

Recent, well publicised fires in solar power stations in the UK and overseas point to the necessity of applying the precautionary principle here, particularly as the site is just a km or so to the west of Oxford and will be within 60m of Thames Water's Farmoor reservoir (14 million litres, supplying Swindon etc.), and which lies directly under the RAF's flight path, and within the Control Zone, for RAF Brize Norton (see [Figure 2](#) below).

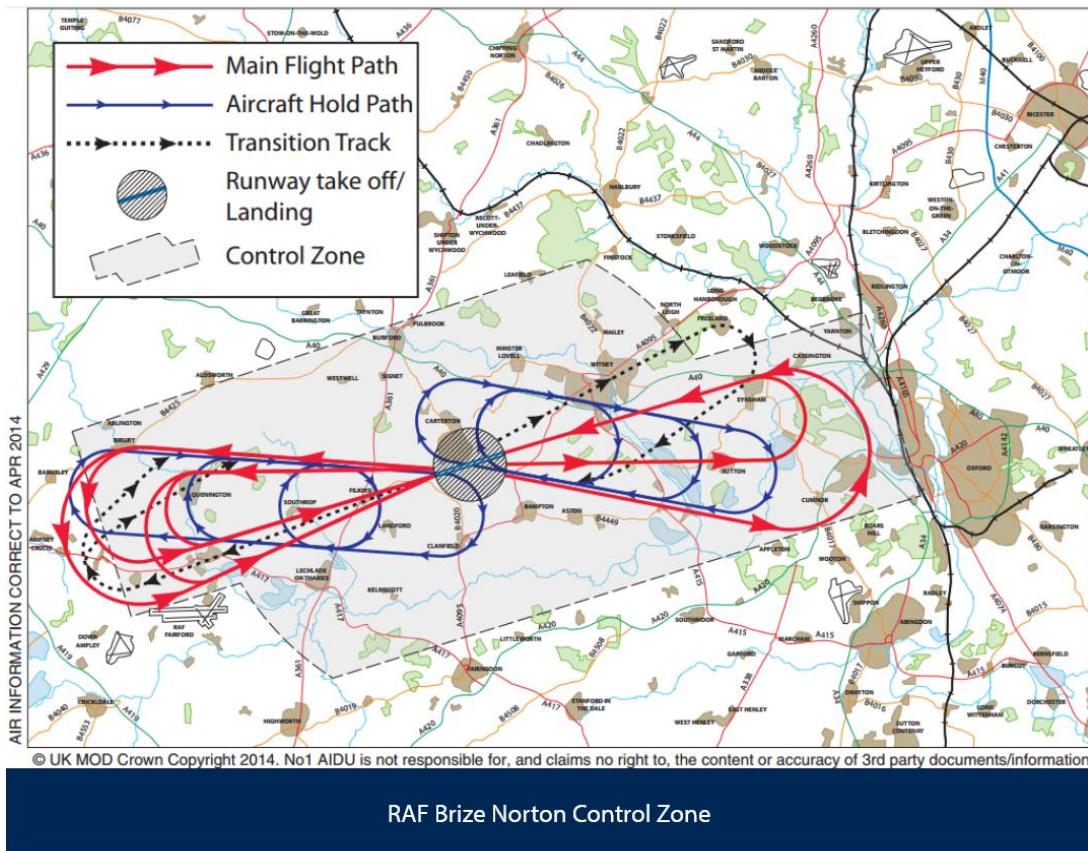


Figure 2