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New Road
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Photovolt Development Partners

By email:
info@botleywest.co.uk

**Director of Economy and Place:
Robin Rogers**

9th August 2024

Dear Sir or Madam,

Oxfordshire County Council's Response to Botley West Solar Farm Targeted Consultation (14 June to 28 July 2024)

Thank you for consulting Oxfordshire County Council (OCC) on the formal targeted consultation for Botley West Solar Farm. As you are aware, OCC previously provided comments on the scoping consultation in July 2023 and Phase 2 consultation in February 2024.

In compiling this response, OCC has had regard to the Botley West Targeted Consultation Information Change Note and the Botley West Solar Farm Targeted Consultation Site Location and Order Limits Plan. We understand that the changes proposed to the redline area are primarily required as a result of mapping accuracy, refined cable routes, safe access from the highway, avoiding areas of archaeological importance, and minimising environmental effects.

With regards to the targeted consultation, OCC have concerns about impacts on Public Rights of Way, hedgerows, trees, and irreplaceable ancient woodland habitat. It does not appear that any of the changes proposed have been made to avoid landscape or visual impacts. More detail on the changes is required and the Environmental Assessment will need take account of them. Confirmation that cable routing through Long Mead Local Wildlife Site is no longer being proposed is supported. Officer responses are set out in Annex 1.

More generally, our previous comments on the Phase 2 consultation made in February 2024 (attached) remain to be addressed. We understand that prior to submission you intend to publish a document explaining the changes and refinements made in response to consultation feedback. As you are aware, OCC and the other host authorities want to work with you to shape the proposals into an acceptable form by minimising impacts and providing a suitable package of mitigation.

As stated previously, in principle OCC support proposals for green energy providing there are no significant adverse environmental impacts. OCC recognises there is a climate emergency and that the expansion of solar generating capacity in Oxfordshire is needed as part of the transition to net zero. Notwithstanding this, the council still has the following concerns with the proposals:

- Significant impact on local landscape character and views.
- Potentially inappropriate development in the Green Belt.
- Loss of best and most versatile agricultural land.
- Insufficient mitigation for a scheme of this scale.
- Insufficient benefit to the local communities.
- Potential sterilisation of mineral resources.
- The impact of cable routing on the highway network requires further assessment.
- The impact of the National Grid sub-station (dimensions - L165m x W135m x H14m) should be assessed as part of this application at the potential locations it could be sited on.
- Betterment for flood risk has not been demonstrated.
- No information on the consideration of alternative sites is provided.
- Inadequate assessment of cumulative impacts.
- Further environmental assessment is required to fully understand the impacts of the proposal before conclusions on impacts are reached.

We understand your intention is to submit the DCO application in the Autumn of this year. We would emphasise again that significant work will be required between now and the Autumn and that focussed engagement with OCC and the other host authorities will be essential.

Please see the detailed officer responses in Annex 1.

Yours faithfully,

Nicholas Perrins

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Head of Strategic Planning

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Annex 1: Detailed Officer Comments in Response to Botley West Solar Farm Targeted Consultation (14 June to 28 July 2024)

Landscape

It does not appear that any of the changes proposed have been made to avoid landscape or visual impacts. Without further detail it is difficult to assess any further impacts that the changes may have. Our previous comments still stand; a development of such exceptional scale and impact requires exceptional mitigation that goes beyond the planting of hedgerows and woodland belts to soften views from selected vantage points. A landscape-scale approach should be taken comprising a landscape and green infrastructure masterplan that matches the scale and ambitions of the project and leaves a legacy of a strengthened, more resilient, and more biodiverse landscape.

Ecology

All previous comments continue to apply, apart from those that raise concern about the potential cable route through Long Mead Local Wildlife Site. These comments should be read in conjunction with OCC's previous ecology comments.

Some of the changes result in loss of hedgerows, these hedgerows should be assessed in line with the Hedgerow Regulations and assessment of the impact of their loss be integrated into the Environmental Impact Assessment and calculations of biodiversity net gain for the application.

Specific comments on each proposed change set out in 'Change Note' Appendix 2: Table of Changes to Order Limits

Change reference number	Comments
28.	Incorporates a section of ancient woodland, an irreplaceable habitat, with ecological connectivity to Bladon Heath Local Wildlife Site. Measures should be taken to avoid impact on the ancient woodland and trees (including tree root protection) and opportunities to expand, buffer and link woodland habitat should be taken into consideration. These measures should be informed by survey and the Local Wildlife Site citations.
29.	Has potential to impact ancient woodland, an irreplaceable habitat, found in Burleigh Wood Local Wildlife Site and Bladon Heath Local Wildlife Sites. Measures should be taken to avoid impact on the ancient woodland and trees (including tree root protection) and opportunities to expand, buffer and link woodland habitat should be taken into consideration. These measures should be informed by survey and the Local Wildlife Site citations.
30.	Rivers are habitats of principal importance under Section 40 of the NERC Act 2006, the impact of pipe laying beneath the River Evenlode and any impacts of the installation of bridges on the river habitats and associated species will need to be assessed through the EIA and

	taken into account in the biodiversity net gain calculations for the application.
34.	Rivers are habitats of principal importance under Section 40 of the NERC Act 2006, the impact of pipe laying beneath the River Evenlode and any impacts of the installation of bridges on the river habitats and associated species will need to be assessed through the EIA and taken into account in the biodiversity net gain calculations for the application.
35.	Rivers are habitats of principal importance under Section 40 of the NERC Act 2006, the impact of pipe laying beneath the River Evenlode and any impacts of the installation of bridges on the river habitats and associated species will need to be assessed through the EIA and taken into account in the biodiversity net gain calculations for the application.
37.	Rivers are habitats of principal importance under Section 40 of the NERC Act 2006, the impact of pipe laying beneath the River Evenlode and any impacts of the installation of bridges on the river habitats and associated species will need to be assessed through the EIA and taken into account in the biodiversity net gain calculations for the application.
39.	Rivers are habitats of principal importance under Section 40 of the NERC Act 2006, the impact of pipe laying beneath the River Evenlode and any impacts of the installation of bridges on the river habitats and associated species will need to be assessed through the EIA and taken into account in the biodiversity net gain calculations for the application.
50.	Avoidance of Long Mead Local Wildlife Site through removal of these sections for routing of cables is welcomed.

Arboricultural Comments

OCC's previous arboricultural comments continue to apply. In addition, the proposed changes have the potential to have further arboricultural impacts, including impacts to trees, hedgerows and to woodlands, including ancient woodlands which is an irreplaceable habitat. Without the detailed arboricultural information requested in our previous comments an accurate assessment cannot be made.

Transport

The changes are subject to previous highway comments provided by Oxfordshire County Council. Adequate visibility must be provided at all access and egress points with improvements expected to Public Rights of Way (PROW) and active travel routes. The county council would welcome further engagement around these improvements. Whilst no specific transport comments are made on the proposed changes, the county council will need to see further detail before we can comment on the acceptability of the proposal. We would a meeting to discuss the points raised previously.

Public Rights of Way (PRoW)

OCC's previous PRoW comments still stand and we continue to seek engagement with you about PRoW mitigation.

Regarding the focussed consultation, more detail is requested on the changes identified as affecting Public Rights of Way, in particular along Dornford Lane, before an assessment of the potential impact can be made.

The proposed directional pipe ramming for cables/pipes is of concern where it is located next to, across or near to bridleways that carry horses. We would expect assessments of noise and dust and an update to the Environmental Assessment to ensure there is no impact or that suitable mitigation is provided. We would also expect protection of the PRoW when it comes to the trench necessary to get the right depth for both ends of the drilling rig.

Archaeology

The amendments do not alter our original comments and they do highlight the need for the archaeological evaluation.

OCC Estates

OCC Estates have compared the focussed changes with our land ownership plans and none of the increased areas are owned by OCC. Therefore, Estates has no comment in respect of the potential of the changes including land not shown in the previous plans.

Our previous comments on the potential impact of the scheme on operational land in the locality of the scheme are unchanged and are yet to be addressed.