The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Botley West Solar Farm

Case Reference: EN010145

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

24 July 2023

TABLE OF CONTENTS

1. INTRODUCTION

1.1.1 On 15 June 2023, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Photovolt Development Partners GmbH (PVDP) on behalf of SolarFive Ltd (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Botley West Solar Farm (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.1.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

http://infrastructure.planninginspectorate.gov.uk/document/EN010147-000009

1.1.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.1.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.1.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.1.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.1.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

1.1.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Sections 5 and 6)

ID	Ref	Description	Inspectorate's comments
2.1.1	Figure 1 and paragraph 2.1.2	Figures and land parcels	Scoping Report paragraph 2.1.2 states that the site is divided into three separate parts – the Northern Site, Central Site, and the Southern Site. These are stated to be identified on Scoping Report Figure 1 however, this only displays the red line boundary. The project description refers to each 'part' of the development when describing the baseline, but it is unclear which areas are being described. It is also unclear where the cable route is proposed. Where the ES provides any reference to sections of the Proposed Development, including cable routes, these should be clearly identified on relevant Figures.
2.1.2	Paragraphs 1.3.6, 6.2.16 and 6.2.26	Cable corridor	Paragraph 1.3.6 states that the solar arrays would be connected to the grid connection point via an underground electric cable. Paragraph 6.2.26 states that the project sites will be connected to a new National Grid substation via 220kV cables to be located close to the existing National Grid 400kV line that runs between Cowley and Walham. Discussions are ongoing as to its location. No maximum parameters are provided regarding the export cable route corridor other than the anticipated depth of cable laying. The width of cable trenches and proposed excavation methods are not provided. The ES should include a complete description of the Proposed Development including the cable route corridor, depth and width of the cable trench and proposed excavation methods.

ID	Ref	Description	Inspectorate's comments
2.1.3	Paragraphs 1.3.7, 1.3.8, 1.5.9, and 6.2.22	Substation location	The Scoping Report highlights that there is optionality regarding the location of the proposed new substation either within or outside of the redline boundary. It is stated that for the purposes of scoping it is assumed that the substation would be within the redline boundary, and therefore constitutes part of the Development Consent Order (DCO). However, should the substation be located outside of the red line boundary, this area would be substituted with solar panels and consent for the substation will be pursued via the Town and County Planning Act 1990 (TCPA) consenting regime. The ES should assess the cumulative effects between the Proposed Development and the substation should it be located outside of the Order Limits and not included in the DCO.
2.1.4	Paragraph 7.4.17 and section 6	Battery storage	Scoping Report paragraph 7.4.17 states that measures adopted as part of the project's mitigation include "*development of, and adherence to, battery storage units and electricity substations and handling procedures"*. However, battery storage units are not included in the project description. The ES must describe the project in full including any battery storage systems where they are proposed. These should be located on a Figure, the maximum parameters described, and any associated significant effects assessed within the ES chapters where relevant. The ES should describe relevant mitigation measures employed and explain how they are secured through the DCO to mitigate potential adverse effects e.g., from fire outbreak.
2.1.5	Paragraph 7.5.8 and section 6	Watercourse crossings	Scoping Report paragraph 7.5.8 states that a watercourse crossing will be required to cross the River Thames. No detail is provided on the location, number, and method of construction (e.g., Trenchless, horizontal directional drilling etc.) of watercourse crossings proposed.

ID	Ref	Description	Inspectorate's comments
			The ES should provide this information and assess any associated significant effects where they are likely to occur.
2.1.6	n/a	Utilities	National Grid identify assets within the zone of influence (ZOI) of the Proposed Development. Potential impacts to utilities are not addressed in the Scoping Report. The ES should take existing utilities into consideration when refining the design of the Proposed Development. The ES should provide an assessment of significant effects to utilities where they are likely to occur.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 4)

ID	Ref	Description	Inspectorate's comments
2.2.1	Paragraph 4.1.4	Scope of assessment	Paragraph 4.1.4 states that the scope of the assessment may be "*refined as appropriate throughout the EIA process*". The Applicant's attention is drawn to paragraph 1.04 of this Opinion which states that matters may be subsequently scoped out if further evidence has been provided to justify this approach. It is advised that any subsequent refinement of scope should be agreed with relevant consultation bodies in writing, with evidence and a clear justification submitted as part of the ES. The Inspectorate advises the use of a table to set out the key changes in parameters/options of the Proposed Development presented in the Scoping Report to that presented in the ES and how the scope of assessment has change (if this is the case). It is also advised that a table demonstrating how the matters raised in the Scoping Opinion have been addressed in the ES and/or associated documents provided.
2.2.2	Paragraph 4.2.6 and section 6.4	Assessment year and decommissioning	The ES identifies the construction years from 2025 to 2027 and the current planned year of opening as 2027. The ES should also set out what year grid connection is anticipated for, when decommissioning will be proposed (although it is acknowledged the proposal's lifetime is anticipated to be 42 years), and if/how decommissioning will be decided i.e. whether there will be a date for the end of lease of the land or whether there will be a decision at the end of project operation to determine whether operation can continue and if so, how this decision is to be made.

ID	Ref	Description	Inspectorate's comments
			Where there is potential for operation to continue beyond the 42 year lifetime, a reasonable worst-case scenario should account for this in relevant chapter assessments in the ES.
2.2.3	Paragraph 5.4.6	Location choice	Scoping Report paragraph 5.4.6 states that the land is considered to be a suitable location taking into account its location on low-productivity arable land of low ecological value. The Inspectorate considers that there is little evidence to support this statement as the results of ecological surveys are not presented in the Scoping Report and further surveys are required to determine what grade the agricultural land is, and subsequently, whether it is Best and Most Versatile (BMV) land. The ES should demonstrate how environmental baseline information such as ecological value and agricultural land classification has informed site selection, consideration of alternatives, and subsequently project refinement.
2.2.4	Paragraph 6.2.8	Solar panel height	Scoping Report paragraph 6.2.8 states that panels are likely to be between 1.8m and 2.5m above ground level in height but it is not clear whether this is to the top of the panel or the base of the panel (height of the panel from the ground) considering typical panels can often exceed 2.5m. The ES should ensure the project description is clear in terms of the maximum parameters of the Proposed Development and the maximum height of the panels. This should include a description of any optionality of the proposed panel types.
2.2.5	Table 6-1 and paragraph 6.2.9	Project description parameters	Scoping Report Table 6-1 does not identify concrete feet as a mounting structure however, these are identified as possible mitigation instead of piling in archaeologically sensitive areas. The ES should ensure that the parameters of the development align with the discussion in the text. Where concrete feet are proposed, this should

ID	Ref	Description	Inspectorate's comments
			be clearly set out in the ES and their use should be explained. Any associated impacts and effects should be assessed where significant effects are likely to occur.
2.2.6	n/a	Identification of receptors and potential impacts with reference to guidance	The ES should explain how sensitive receptors and potential impacts have been identified within an appropriate study area (based on the ZOI) with reference to guidance and baseline surveys; this is not always clear in the Scoping Report sections.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Historic Environment

(Scoping Report Section 7.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Paragraph 7.1.33	Effects on buried archaeology – Operation	The Scoping Report proposes to scope this matter out on the basis that impacts to buried archaeology would only occur as a result of ground disturbance from construction activities. The Inspectorate agrees that impacts to buried archaeology will not occur during operation and that this matter can be scoped out of the ES.
3.1.2	Paragraph 7.1.33	Effects on buried archaeology – Decommissioning	The Scoping Report proposes to scope this matter out on the basis that impacts to buried archaeology would only occur as a result of ground disturbance from construction activities. However, it is unknown what activities will occur during decommissioning and therefore, to the degree there is potential for disturbance to archaeology. In the absence of this information, the Inspectorate cannot agree to scope this matter out. The ES should describe anticipated decommissioning activities and assess potential impacts to archaeology where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.1.3	Paragraphs 7.1.24 and 7.2.6	Study area	A study area of 2km is proposed for heritage assets on the basis that this is likely to be the zone of theoretical visibility (ZTV) although some designated heritage assets may be removed or included depending on the potential for impact and its ZOI. The Inspectorate notes that a 5km study area is proposed for the Landscape and Visual assessment in Scoping Report paragraph 7.2.6 and it is not explained why these study areas are different when there is the potential for the same impacts e.g., visual and impacts to setting. The ZOI should also take into account potential impacts to the relationships between historic places – please refer to Historic England Guidance *The Setting of Heritage Assets* Historic Environment Good Practice Advice, Planning Note 3 (2017). The ES should ensure that the study area is based on the ZOI and where impacts to the historic environment are assessed in other relevant chapters such as the landscape and visual chapter, any differences in the applied study areas are explained and justified.
3.1.4	Paragraph 7.1.17	Geophysical surveys	The Scoping Report states that land that is not likely to be directly impacted will not be included in geophysical surveys. This includes areas that are set aside as 'buffers' around settlement areas or environmental mitigation areas. The Applicant should seek agreement on appropriate survey areas with the relevant consultees and ensure survey areas are adequate to accommodate the full design envelope so that the final iteration is fully assessed.
3.1.5	Table 7.1	Wider historic landscape	Impacts listed in Table 7.1 include changes to the wider historic landscape, but it is unclear how this has been defined/determined or whether this will be assessed in the proposed 2km study area. The ES should define what the wider historic landscape is and what study area is applied to this assessment.

ID	Ref	Description	Inspectorate's comments
3.1.6	Table 7.1	Indirect effects	Indirect effects are not considered in Table 7.1. The ES should identify and assess any potential indirect effects on the historic environment, for example, changes in drainage patterns or compression of the ground from infrastructure which could affect below ground heritage assets or lead to subsidence of above ground buildings and monuments.
3.1.7	Paragraphs 7.1.4 to 7.1.14	Baseline characterisation	The baseline characterisation presented in Scoping Report paragraphs 7.1.4 to 7.1.14 omits the identification of listed buildings located at Woodstock. Additionally, Scoping Report paragraph 7.1.9 states that no part of the Project within which development is proposed would be within a designated Conservation Area however, Figure 8 of the Scoping Report identifies that the red line boundary interacts with identified Conservation Areas. The ES should present a full and accurate characterisation of the baseline environment and all sensitive receptors located within an appropriate study area.

3.2 Landscape and Visual Resources

(Scoping Report Section 7.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 7.3	Visualisations during construction and decommissioning	No justification is provided for scoping out visualisations for the construction or decommissioning. It is unclear what is meant by the term "visualisations" in this context, although it is noted in the Historic Environment section of the Scoping Report (specifically paragraph 7.1.26) that visualisations include photomontages and wireframes. The Inspectorate is content that visualisations of the construction and decommissioning phases are not required. However, for the avoidance of doubt, the ES should assess visual effects at construction and decommissioning where there is the potential for significant effects to occur.
3.2.2	Table 7.3	Night-time assessment during all phases	A night-time assessment is proposed to be scoped out on the basis that no permanent lighting is proposed. However, it is unclear whether temporary lighting is proposed during construction and decommissioning and the nature and location of any temporary lighting. Lighting during operation is set out in Table 6.2 and includes manually operated lighting as well as motion sensor lighting for security and emergencies. It is unclear what the nature of the manually operated lighting would be. In the absence of such information the Inspectorate is not in a position to scope this matter out at this stage. The ES should describe the nature of the lighting strategy for all stages of the development and assess any significant effects where they are likely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.3	Table 7.3	Residential Visual Amenity Assessment during all phases	A Residential Visual Amenity Assessment (RVAA) is proposed to be scoped out as no significant effects are expected "*that would overwhelm existing properties nor render properties an unattractive place to live*". No further justification is provided for scoping this matter out. In line with guidance, the requirement for a RVAA is generally dependent on the outcome of a Landscape and Visual Impact Assessment (LVIA). Therefore, in the absence of LVIA conclusions, the Inspectorate does not agree to scope out a RVAA at this time. The need for an RVAA should be justified based on the conclusions of the LVIA presented in the ES and agreed with the relevant consultation bodies.
3.2.4	Table 7.3	5km study area	The Applicant proposes to scope out impacts beyond a 5km study area on the basis that significant effects are not expected to occur for the highest sensitivity receptors beyond 5km. However, Scoping Report paragraph 7.2.6 states that the extent of the study area will be determined by the findings of the ZTV and is likely to extend to a 5km buffer from the red line boundary. On the basis of the information provided, the Inspectorate does not agree to scope out impacts beyond 5km. The ES should define the study area based on the ZTV and consultation with the relevant bodies and explain any assumptions around the extent of visibility

ID	Ref	Description	Inspectorate's comments
3.2.5	Table 7.2	Photomontages	Table 7.2 of the Scoping Report states that photomontages will be used "*where appropriate*". No further detail is provided on the number of photomontages or locations proposed.

ID	Ref	Description	Inspectorate's comments
			The Applicant should justify the location and number of photomontages, ensuring these capture a worst-case scenario of impacts from the Proposed Development and are representative of visual receptors. The Applicant should seek agreement from relevant consultees regarding the appropriateness of selected photomontages and evidence of this agreement should be provided within the DCO application. The photomontages should show all components of the Proposed Development, including security fencing, CCTV poles, battery storage system, substations etc., and demonstrate the Proposed Development before and after mitigation in order to enable a worst-case scenario and the effectiveness of mitigation to be fully understood.
3.2.6	Table 7.3	Zone of Theoretical Visibility (ZTV)	Table 7.3 states that a ZTV is not required for the cable route. As noted in ID 2.1.2 above, limited information is provided on the export cable route corridor and therefore this element of the Proposed Development is unable to be fully understood. The ES should justify the exclusion of the cable route corridor from the ZTV giving consideration to the short-, medium- and long-term worst-case scenario of visual impacts of the cable corridor including, for example, any removal of vegetation. The cable route may be visible outside of the ZTV of the array considering its location south of the main site.
3.2.7	Paragraph 7.2.38	Viewpoints	The Scoping Report states that visual effects will be assessed based on publicly accessible viewpoints, although it is noted that "*not all public viewpoints from which the project would potentially be seen can necessarily be included in the assessment*". Figure 7 shows the location of the representative viewpoints. The ES should provide clear justification of the suitability of selected viewpoints. Paragraphs 7.2.15 and 7.2.16 of the Scoping Report state

ID	Ref	Description	Inspectorate's comments
			that the Local Planning Authorities and Cotswold Area of Outstanding Natural Beauty (AONB) Board will be consulted. Therefore, it is unclear whether the viewpoints provided in Figure 7 are subject to change. The ES should include evidence of any consultation and agreement of the methodology used, including selected viewpoints.
3.2.8	Paragraph 5.4.11	20m buffer zones	A 20m buffer zone is proposed for residential properties to provide a "setback distance". The ES should explain the use of buffer zones and why they are appropriate and the extent to which this reduces any potential adverse effects.
3.2.9	Paragraphs 6.2.20 and 7.2.23	Landscape masterplan	Scoping Report paragraph 7.2.23 states that either a Landscape Masterplan or a Landscape Strategy Plan would set out the design measures for landscape and visual mitigation. It is unclear how the management and monitoring of the mitigation would be secured. The ES should describe landscape and ecological mitigation and monitoring and explain how these are secured, cross-referencing to any relevant control documents where appropriate.
3.2.10	Paragraph 7.2.39	Year 1 and 10 summer and winter views	Scoping Report paragraph 7.2.39 states that a worst-case scenario will be assessed in winter at year 1 and again after mitigation has matured at year 10 during the summer. The ES should also include an assessment of impacts during winter in year 10 to understand the effectiveness of mitigation or explain why this is not necessary with reference to relevant guidance. The ES should also justify the year of maturation of vegetation.
3.2.11	Section 7.4 and 7.2	Raising of panels	It is unclear from Scoping Report Section 7.4 whether panels are intended to be raised to avoid potential flood risk. Where this is

ID	Ref	Description	Inspectorate's comments
			proposed, the ES should apply this parameter to the Landscape and Visual and Cultural Heritage assessments of significant effects.

3.3 Ecology and Nature Conservation

(Scoping Report Section 7.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Paragraphs 7.3.14, 7.3.19, and 7.3.26	Badgers	Badger surveys are not included within the list of surveys currently being undertaken on site (paragraph 7.3.19). Furthermore, badgers are not listed as fauna considered Important Ecological Features (IEFs) requiring detailed assessment, as listed in paragraph 7.3.26. It is not clear why badgers have been scoped out of further assessment, particularly considering paragraph 7.3.14 states that signs of badgers and badger setts have been identified across the site. The ES should assess significant effects on badgers where they are likely to occur. The ES should ensure the ecological baseline is robust and justify the extent and scale of surveys undertaken. The Applicant should seek agreement from relevant stakeholders on the scale and extent of any surveys undertaken, evidence of which should be provided within the DCO application.
3.3.2	Paragraph 7.3.38	Direct habitat loss of designated sites	The Applicant proposes to scope out effects from direct habitat loss as no habitat loss would occur within any of the identified designated sites. It is noted that Figures 4b and 5 identify that the red line boundary is adjacent to Wytham Woods Site of Special Scientific Interest (SSSI) and Blenheim Park SSSI. On this basis Natural England consider there is potential for direct habitat loss to these sites. The ES should assess significant effects from direct impacts to designated sites or explain how these effects, including habitat loss, are avoided and/or mitigated. The ES should explain how appropriate mitigation is secured through the application and how this has been informed by appropriate consultation.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.3	Table 7.3 and Paragraph 7.3.38	Impacts to designated sites from use of construction compounds and creation of mitigation areas – Construction and Decommissioning	Impacts to designated sites from use of construction compounds and creation of mitigation areas are not included in Table 7.3 and paragraph 7.3.38. However, impacts from construction activities on designated sites are proposed. The Inspectorate considers that insufficient evidence has been provided to demonstrate that there would be no impacts during operation or from use of construction compounds and creation of mitigation areas on designated sites. This matter should be assessed in the ES where significant effects are likely to occur.
3.3.4	Table 7.3	Impacts from invasive non-native species (INNS)	The list of impacts to habitats and designated sites during operation in Table 7.3 of the Scoping Report omits potential impacts from the introduction or spread of INNS, although this is included for impacts to species without explanation. The ES should assess impacts to habitats and designated sites from the potential introduction/spread of INNS.

ID	Ref	Description	Inspectorate's comments
3.3.5	Section 2, Figure 5, and paragraph 7.3.23	Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsars	Section 2 of the Scoping Report, which describes the existing baseline, does not identify Oxford Meadows SAC which is located to the east and southeast of the Proposed Development site. Although this site is shown on Figure 5 of the Scoping Report it is not clear whether impacts to this site will be assessed; paragraph 7.3.23 states that designated sites are "likely" to require detailed assessment but impacts to this site are not further discussed. Scoping Report paragraph 7.3.20 states that the search area for statutory sites is 5km and that the only identified sites are SSSIs and National Nature

ID	Ref	Description	Inspectorate's comments
			Reserves. SACs, Special Protected Areas and Ramsars are not identified. For the avoidance of doubt, the ES should list all nationally, internationally, and locally designated sites located within the study area, identify them on a Figure, and assess significant effects where they are likely to occur.
3.3.6	Paragraphs 7.3.14, 7.3.19 and 7.3.24	Important Ecological Features (IEFs) to be assessed	Scoping Report paragraph 7.3.19 sets out the ecological surveys currently being undertaken with paragraph 7.3.14 listing the species identified to date. Proposed surveys exclude other notable species such as dormice and wintering birds without explanation. Paragraph 7.3.26 lists the fauna to be assessed in the ES but this does not align with the proposed/current survey efforts; for example, non-breeding birds, fish etc. are omitted. The ES should justify the survey efforts and assess significant effects on IEFs identified within the ZOI where they are likely to occur.
3.3.7	Paragraphs 7.3.34 7.3.37	Buffer zones	Scoping Report paragraphs 7.3.34 to 7.3.37 identify mitigation likely to be required but it is unclear whether this accounts for buffer zones for watercourses, ancient woodland, or ancient and veteran trees. Buffer zones are indicated to be used to avoid development near ancient woodland in Scoping Report paragraph 5.4.11 however no distances have been defined nor how they will be implemented in accordance with the relevant guidance and secured through the DCO. The ES should describe and secure appropriate buffer zones for sensitive habitat types.
3.3.8	n/a	Veteran trees	There is no information on ancient and veteran trees in the Scoping Report. The ES should identify any ancient and veteran trees and assess any significant effects on these receptors where they are likely to occur and propose adequate mitigation where identified.

ID	Ref	Description	Inspectorate's comments
3.3.9	n/a	Floodplain grazing marsh – priority habitat	Natural England have identified areas of floodplain grazing marsh as a priority habitat that could be impacted by the Proposed Development, but these are not identified in the Scoping Report. The ES should identify areas of floodplain grazing marsh and assess significant effects to these habitats where they are likely to occur.
3.3.10	n/a	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.4 Hydrology and Flood Risk

(Scoping Report Section 7.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	n/a	n/a	No matters are proposed to be scoped out.

ID	Ref	Description	Inspectorate's comments
3.4.2	Paragraph 7.4.3	Study area	The study area is applied on the basis that 1km is the extent of potential impacts to/from flooding and 250m represents the ZOI, but no further evidence to support these areas is provided. The Scoping Report does not consider potential hydrological connectivity to the Proposed Development site. The ES should justify the study area applied based on hydrological connectivity of the site to water receptors and the extent of potential flood risk.
3.4.3	Paragraph 7.4.17	Elements in Flood Zones 2 and 3	The Scoping Report states that where practicable, built elements will be located outside of flood zones 2 and 3, implying that some elements may have to be situated in these areas. The ES should distinguish between flood zones 3a and 3b and specify what infrastructure will be located in which flood risk zones. The ES should explain what mitigation is in place to ensure that the Proposed Development is flood resilient and does not increase flood risk elsewhere.
3.4.4	Paragraphs 7.4.6 to	Groundwater and standing water receptors	Scoping Report paragraphs 7.4.6 to 7.4.14 provide a high-level description of the hydrological baseline environment but do not mention groundwater or standing water receptors or the potential for their presence. Neither receptor is included in potential impacts in

ID	Ref	Description	Inspectorate's comments
	7.4.14 and Table 7.6		Table 7.6. It is noted that Scoping Report paragraph 7.3.25 indicates ponds may be present on site. The Environment Agency note in their consultation response that aquifers are present in the study area and have potential to be impacted by the Proposed Development. The ES should describe any groundwater or standing water receptors identified in the study area and assess significant effects where they are likely to occur. Where groundwater receptors are assessed in other relevant chapters in the ES, this should be clearly cross-referenced.
3.4.5	Table 7.6	Deterioration of surface water quality	Deterioration of surface water quality is anticipated due to direct impacts from construction work in close proximity to watercourses and due to temporary access road crossings. For clarity, impacts should also consider mobilisation of contaminants and sediment from ground disturbance/earthworks. The ES should also assess indirect effects i.e., potential pollution from any stored/spilled materials.
3.4.6	Table 7.6	Deterioration of ground water quality	Deterioration of ground water quality is not included in potential impacts in Table 7.6 although construction works may interact with groundwater receptors e.g., through piling and excavation. The Environment Agency identify in their consultation response that a historic landfill is located beneath the cable route corridor highlighting potential for contamination. The ES should assess effects to ground water quality where a pathway for impact exists and significant effects are likely.
3.4.7	Table 7.6	Damage to field drainage at decommissioning	Impacts identified at decommissioning do not include damage to field drainage although this is identified as an impact at construction. The Scoping Report does not explain why this would not be an impact at decommissioning. The ES should justify why any potential impacts assessed differ between construction and decommissioning or else assess significant

ID	Ref	Description	Inspectorate's comments
			effects where they are likely to occur at decommissioning from damage to field drainage.

3.5 Ground Conditions

(Scoping Report Section 7.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 7.7	Impacts from land contamination – land parcels 1 and 10 – All phases	The Scoping Report proposes to scope this matter out on the basis that historic contamination information and other background information has ruled out contamination issues within these land parcels. However, this information has not been provided within the Scoping Report. No further explanation is provided in the Scoping Report. In the absence of this information the Inspectorate is not in a position to scope this matter.
3.5.2	Table 7.7	Impacts from ground instability – land parcels 1-5 and 10 – All phases	Scoping Report paragraph 7.5.14 states that ground instability may occur as a result of construction disturbance promoting landslips and landslides through slope destabilisation. Impacts from ground instability have been scoped out without any further explanation or justification. In the absence of information, the Inspectorate is therefore not in a position to scope this matter out.
3.5.3	Table 7.7	Impacts on mineral resources – land parcels 1-6, 11, 14 and 15 – All phases	On the basis that these land parcels are not located in any Mineral Safeguarding Areas, the Inspectorate is content to scope them out from further assessment in relation to mineral resources.

ID	Ref	Description	Inspectorate's comments
3.5.4	Paragraph 7.5.1	Groundwater receptors	The Scoping Report mentions groundwater contamination but does not identify groundwater receptors with potential to be impacted by the Proposed Development. Please see ID 3.4.4 above in relation to this matter.
3.5.5	Paragraph 7.5.5	Study Area	Scoping Report paragraph 7.5.5 states that a data search buffer of up to 100m will be applied to this assessment but this study area is not justified. The ES should fully justify the study area and explain how it has been applied based on the ZOI.
3.5.6	Paragraph 7.5.15	Minerals Safeguarding	The Scoping Report states that six land parcels (7, 8, 9, 10, 12, and 13) and part of the cable route area (16) fall within Mineral Safeguarding Areas. The ES should demonstrate that the Mineral Planning Authority has been consulted and that the proposed development does not impact on future ambitions for mineral extraction within the region.
3.5.7	Table 7.10	Definition of significant effects	Scoping Report Table 7.10 provides the combination of receptor sensitivity and magnitude of impact but does not explain which effects will be considered significant or how it will be determined whether an effect is significant if the outcome has potential to be either minor or moderate or either moderate or major etc. The ES should clearly set out how significant effects are defined and describe how any decisions are made where there is potential for an effect to either be significant or not.

3.6 Traffic and Transport

(Scoping Report Section 7.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Table 7.12	Operational phase	The Applicant proposes to scope out the impact of additional vehicle movements on the Local Road Network (LRN) and Strategic Road Network (SRN) during operation and maintenance of the Proposed Development on the basis that a limited number of additional vehicle movements, associated with infrequent maintenance activities, are likely to be generated. The number of vehicle movements likely to be required during operation and maintenance are not provided in the Scoping Report. The Inspectorate has considered the characteristics of the Proposed Development. The Inspectorate agrees to scope this matter out subject to confirmation of the type of operational/maintenance visits and vehicles and confirmation that these would not exceed relevant thresholds of effect (e.g. as set out in Environmental Assessment of Traffic and Movement , July 2023), taking account of any potential cumulative traffic effects.
3.6.2	Table 7.12	Decommissioning phase	The Applicant proposes to scope out the impact of additional vehicle movements on the LRN and SRN during decommissioning, on the basis that the number of vehicle movements generated would be less than the construction phase. The Scoping Report also states that a Construction Traffic Management Plan, updated as necessary, will be employed during the decommissioning phase. Indicative traffic numbers for either the construction or decommissioning phases are not provided within the Scoping Report. Therefore, no evidence is provided to support the claim that traffic numbers during decommissioning would be lower than during

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			construction. As such, the Inspectorate is not in a position to scope this matter out at this stage. The ES should identify the likely traffic generated during construction and operation, along with the basis for estimating traffic movements and any measures to manage the impact of traffic on the road network. Where the potential for a significant effect is identified, then this should be fully assed within the ES.

ID	Ref	Description	Inspectorate's comments
3.6.3	Paragraphs 7.6.5, 7.6.20, and 7.6.23 and Table 7.11	Access and highway works	The Scoping Report notes that access routes and arrangements are not yet known at this stage. It is not clear whether highway improvement works are proposed as part of the Proposed Development. Paragraph 7.6.23 states that there may be a requirement for a new junction to access the construction work areas and Table 7.11 states that highway works may be required to facilitate the movement of Abnormal Indivisible Loads (AILs) during construction. Paragraph 7.6.20 states that the Proposed Development could result in "*improved connectivity*" however it is not clear what this refers to. The ES should provide a description of the proposed access routes along with any associated highways works and identify works/accesses on a Figure. The ES should assess any associated significant effects that may arise as a result of any highways works where they are likely to occur.
3.6.4	Table 7.11	Abnormal Indivisible Loads (AILs)	The Scoping Report states that impacts on safety from the use of AILs will be assessed within the ES. Appropriate measures to ensure safe transportation of hazardous loads should be included within the outline CEMP.

ID	Ref	Description	Inspectorate's comments
3.6.5	Paragraphs 7.6.9 to 7.6.15	Strategic Road Network (SRN) – A4095	Scoping Report paragraphs 7.6.9 to 7.6.15 characterise the SRN, identifying A roads that link to the Proposed Development. It is noted that all A roads are described aside from the A4095 and it is unclear whether this is an omission or whether this is not considered part of the SRN. The ES should explain which roads form the SRN and why, and describe the baseline in full.

3.7 Noise and Vibration

(Scoping Report Section 7.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Paragraph 7.7.20	Baseline vibration surveys	The Applicant proposes to scope out baseline vibration surveys on the basis that the initial desk-based review of the site locations and surrounding areas indicate that no significant existing sources of vibration exist in the vicinity of the site. Whilst no baseline has been provided for this section in the Scoping Report, considering the baseline presented in other sections of the Scoping Report and in the description of the existing site (Section 2 of the Scoping Report) the Inspectorate is content that there are no existing sources of vibration that require surveys. Therefore, the Inspectorate is content to scope out baseline vibration surveys of the existing site.
3.7.2	Paragraph 7.7.21	Vibration impacts – Operation	The Applicant proposes to scope out an assessment of vibration impacts during the operational phase on the basis that vibration isolation measures will be included as part of the plant design. Based on the characteristics of the Proposed Development the Inspectorate agrees that operational vibration effects may be scoped out from further assessment. However, the ES should describe the potential sources of vibration arising from the operation of the Proposed Development and any measures proposed to control emissions.
3.7.3	Paragraph 7.7.22	Noise and vibration impacts – Decommissioning	The Applicant proposes to scope out an assessment of decommissioning phase impacts as these are likely to be similar or less significant than impacts during construction.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Limited information is provided regarding the activities proposed for the decommissioning phase. As noted in ID 3.6.2 above, indicative traffic numbers are not provided for either the construction or decommissioning phases and so there is little evidence to support the claim that the decommissioning phase impacts would be less significant than during construction. On the basis of the information provided, the Inspectorate does not agree to scope this matter out at this stage.
3.7.4	Paragraph 7.7.23	Noise and vibration impacts on ecological features	Impacts on ecological features are proposed to be assessed within the ecology aspect chapter of the ES. The Inspectorate is content with this approach. However, the noise and vibration aspect chapter should provide cross-references to the relevant sections of the ecology chapter where appropriate e.g., alignment of the ZOI.

ID	Ref	Description	Inspectorate's comments
3.7.5	Paragraph 7.7.4	Study areas	The study area for noise is defined in Scoping Report paragraph 7.7.4, using arbitrary distances of 1km, 300m and 100m from the Proposed Development depending on the noise source. This does not include potential impacts from increased traffic noise and the distances are not justified. The ES should explain how the study area(s) and sensitive receptors have been selected with reference to extent of the likely impacts and relevant supporting evidence such as modelling and/or relevant guidance.

ID	Ref	Description	Inspectorate's comments
3.7.6	Paragraphs 7.7.11 to 7.7.19	Assessment methodology	Whilst the Inspectorate acknowledges that the methodology is proposed to follow relevant British Standards and guidance as listed in Scoping Report paragraph 7.7.14, the Scoping Report does not explain how these methodologies will be applied and how significant effects will be determined. No sensitive receptors, degree of sensitivity, impact magnitude or significance is defined in the Scoping Report relating to noise therefore it is unclear what will be assessed and how. The baseline only provides a very high-level description of land use and roads and it is unknown what surveys are proposed to inform the assessment. The ES should clearly set out the specific methodology employed to assess significant effects from noise and vibration with reference to guidance; the ES should not only rely on reference to guidance without explaining the methodology and its applicability in full. This should include explanation of how the baseline environment has been established with full survey details provided where they have been undertaken. The need for surveys and survey locations should be informed by consultation where appropriate.

3.8 Climate Change

(Scoping Report Section 7.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paragraphs 7.8.29 to 7.8.34	Risks from climate change including impacts from increase in ambient temperatures and extreme weather events (excluding flooding) – All phases	Risks from climate change are proposed to be scoped out on the basis that impacts are not likely to be considered significant during the Proposed Development's lifetime of 42 years. Mitigation will be embedded in the design and technology of the solar array to account for extreme weather events such as storms, high winds, and increased ambient temperatures. On the premise that the ES explains how and to what degree the design and technology accounts for these events, the Inspectorate agrees to scope this matter out.
3.8.2	Paragraph 7.8.33	Impacts from Greenhouse Gas (GHG) emissions from land use change – All phases	The Inspectorate agrees that this can be scoped out as the Proposed Development is unlikely to cause significant release of GHG emissions from land use change during all phases. This is due to the minimal disturbance proposed to the land (piling and cable route excavation only) and considering the nature of the land use change from agricultural to either mowing or sheep grazing and wildflower planting.
3.8.3	Paragraph 7.8.32	Impacts from flood risk as a result of climate change – All phases	Scoping Report paragraph 7.8.32 proposes that impacts from flooding as a result of climate change will be assessed in the Flood Risk Assessment which will incorporate the latest climate change projections. The Inspectorate agrees that on this basis, An additional assessment of impacts from flooding as a result of climate change is not required.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.4	Paragraph 7.8.37	GHG emissions – Decommissioning	Scoping Report paragraph 7.8.37 states that GHG emissions during decommissioning will be minimised through the recycling of PV modules and components where possible. The Inspectorate would expect to see a Decommissioning Plan, agreed with the Local Authority, secured through the inclusion of an Outline Decommissioning Plan or similar with the Application. The ES should clearly set out if and how impacts from GHG emissions will be assessed for the decommissioning phase.

ID	Ref	Description	Inspectorate's comments
3.8.5	n/a	n/a	n/a

3.9 Socio-Economics

(Scoping Report Section 7.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 7-18	Impacts on temporary workers accommodation – Construction and Decommissioning	Construction workers are not anticipated to require accommodation as the site has good road linkages and accessibility at a local and regional level. Workers are anticipated to be based in the regional area. Any temporary accommodation required would be provided on site or via regional hotels/bed and breakfasts. The Inspectorate agrees to scope this matter out on the basis that the ES confirms the number of construction workers both alone and cumulatively with other development would not be likely to result in significant effects in this regard.
3.9.2	Table 7-18	Impacts to recreational activities – All phases	The Scoping Report proposes that this matter is scoped into the human health chapter and therefore does not need to be scoped into the socio-economics chapter. The Inspectorate agrees with this approach.
3.9.3	Table 7-18	Impacts to land use – Construction and Decommissioning	Impacts are not proposed to be considered during the construction or decommissioning phases and only at the operational phase. The Inspectorate considers the impact to land use is not limited to one phase of the development and should be assessed holistically across all phases.
3.9.4	Table 7-18	Impacts to tourism – Construction and Decommissioning	Impacts to the tourism industry are anticipated to be outweighed by the spending of construction workers and any impacts would be short-term. Impacts to visual amenity and its effects on tourism are proposed to be scoped in for the operational phase. The Inspectorate does not agree to scope out impacts to tourism during the construction and decommissioning stages on the premise that

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			impacts such as noise, traffic etc. has potential to impact nearby receptors e.g., Blenheim Palace. The ES should assess effects to tourist receptors where an impact pathway exists for potential significant effects.
3.9.5	Table 7-18	Impacts to health and social care – Construction and Decommissioning	The Scoping Report proposes that this matter is scoped into the human health chapter and therefore does not need to be scoped into the socio-economics chapter. The Inspectorate agrees with this approach.
3.9.6	Table 7-18	Impacts to open space/Public Rights of Way (PRoWs) – All phases	The Scoping Report proposes that this matter is scoped into the human health chapter and therefore does not need to be scoped into the socio-economics chapter. The Inspectorate agrees with this approach.
3.9.7	Table 7-18	Impacts to crime and safety – All phases	Security is proposed during construction and operation through installation of security fencing, CCTV, and lighting. The Inspectorate agrees that significant effects are not likely in relation to crime and safety.
3.9.8	Table 7-18	Impacts to housing – Operation	The Scoping Report anticipates that the Proposed Development infrastructure would have minimal adverse effect on housing values or affordability. Whilst the Inspectorate broadly agrees considering the nature of the Proposed Development during operation, the ES should explain why the Proposed Development would have a minimal effect on housing value and affordability during operation.
3.9.9	Table 7-18	Impacts to transport and commuting patterns – Operation	The Scoping Report proposes that this matter is scoped into the transport chapter and therefore does not need to be scoped into the socio-economics chapter. The Inspectorate agrees with this approach.

ID	Ref	Description	Inspectorate's comments
3.9.10	n/a	n/a	n/a

3.10 Human Health

(Scoping Report Section 7.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 7-19	Impacts on physical activity – All phases	This is proposed to be assessed under impacts to open space, leisure, and play (including PRoW) which is scoped into assessment. The Inspectorate agrees with this approach.
3.10.2	Table 7-19	Risk taking behaviour – Construction and Operation	Healthy workforce behaviour is proposed to be encouraged through a workforce management plan. The number of workforce professionals are not anticipated to be of a number to affect local markets e.g., drinking alcohol during any phase of the Proposed Development. The Inspectorate agrees that this matter can be scoped out on the basis that the ES confirms the number of construction workers would not be likely to lead to significant effects in this regard.
3.10.3	Table 7-19	Impacts on housing – Construction and Operation	Construction workers are not anticipated to require accommodation as the site has good road linkages and accessibility at a local and regional level. Workers are anticipated to be based in the regional area. Any temporary accommodation required would be provided on site or via hotels/bed and breakfasts. The Inspectorate agrees to scope this matter out on the basis that the ES confirms the number of construction workers would not be likely to lead significant effects in this regard.
3.10.4	Table 7-19	Impacts from relocation – Construction and Operation	The Inspectorate agrees to scope this matter out on the basis that the Proposed Development is not stated to require compulsory land purchases of homes or community facilities.
3.10.5	Table 7-19	Impacts on community safety – All phases	Best practice is proposed to be employed via management plans for construction. The Inspectorate notes that Section 9.5 of the Scoping

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Report states that any potential risks that could impact the project will be reported in the ES and mitigation will be proposed where appropriate. Please refer to ID 3.15.5 below. On the basis that potential risks are identified, as well as mitigation proposed to reduce such risks, the Inspectorate is content to scope this matter out.
3.10.6	Table 7-19	Impacts on social participation – All phases	The Inspectorate agrees that indirect impacts can be considered under impacts to access, transport mode, and connection and that direct impacts may be scoped out on the basis that the Proposed Development would not directly affect land for community interactions such as meeting places which support social participation.
3.10.7	Table 7-19	Impacts to water quality or availability – Construction and Decommissioning	Best practice measures are proposed to be secured through management plans to reduce/avoid risks of pollution to waterbodies and responses to accidental spills and the Scoping Report states that construction and decommissioning activities are unlikely to affect bathing waters. It is proposed that where significant effects are identified in the Hydrology and Ground Conditions Chapter of the ES, an assessment of significant effects to human health from water quality/availability changes will be included. The Inspectorate agrees with this approach on the basis that the ES cross-references where appropriate.
3.10.8	Table 7-19	Impacts to water quality or availability – Operation	Best practice measures are proposed to be secured through management plans to reduce/avoid risks of pollution to waterbodies and responses to accidental spills. Operational effects on water quality and availability are not anticipated on a scale that would lead to likely significant effects. Where significant adverse effects are identified in the Hydrology and Ground Conditions Chapters this impact will be included in the Human Health Chapter, otherwise it is proposed to be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that where potential significant adverse effects are identified to water quality/availability in the Hydrology/Ground Conditions Chapters, impacts to Human Health should be assessed and where no significant adverse effects are identified to water quality/availability in the Hydrology/Ground Conditions Chapters, this can be scoped out of the Human Health Chapter. Appropriate cross-reference should be made in the ES.
3.10.9	Table 7-19	Impacts to land quality – Construction and Decommissioning	Scoping Report paragraph 6.2.21 states that limited excavations will be associated with the Proposed Development (e.g., cable routes) and that material will be reused in reinstatement and landscaping and restoration of the site. Best practice measures are proposed to be secured through relevant management plans to manage impacts from contamination (existing historic, dust etc.). It is proposed that where significant effects are identified in the Agricultural Land and Soil Chapter of the ES, an assessment of significant effects to human health from potential land contamination will be included. The Inspectorate agrees with this approach and Appropriate cross reference should be made in the ES.
3.10.10	Table 7-19	Impacts to land quality – Operation	Excavations are not anticipated to be required during operation. Best practice measures are proposed to be secured through management plans to reduce/avoid risks of contamination. Operational effects on land quality are not anticipated on a scale that would lead to likely significant effects. The Inspectorate agrees to scope this matter out.
3.10.11	Table 7-19	Impacts to health and social care services – All phases	A high proportion of the project workforce is anticipated to be those that are resident in the regional area and therefore no changes to the health and social services are anticipated from in-migrating workers. The Inspectorate agrees to scope this matter out on the basis that

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			the ES confirms the number of construction workers would not be likely to lead significant effects in this regard.
3.10.12	Table 7-19	Impacts to the built environment – All phases	The Inspectorate agrees that based on the location and nature of the Proposed Development, it would be unlikely to significantly affect the built environment and that any introduced infrastructure to the landscape would be assessed under the 'community identity' health determinant.

ID	Ref	Description	Inspectorate's comments
3.10.13	Section 7.10	Relevant standards and guidance	All sources used in the Scoping Report for the Human Health Chapter have errors in their reference. The ES should ensure that any references are properly sourced and listed without error to verify supporting information and evidence.
3.10.14	Section 7.10	Methodology	Scoping Report Section 7.10 does not explain how significance will be determined or what constitutes a significant effect. The ES should set out an appropriate methodology to identify significant effects supported by consultation where appropriate and in line with relevant guidance.
3.10.15	Paragraph 7.10.2	Vulnerable populations	The Scoping Report identifies that vulnerable populations will be assessed in the ES however, the term vulnerable populations is not defined and it is unclear how sensitivity will be applied to these receptors. The ES should define what receptors fall within the scope of the vulnerable population definition assessed.

3.11 Agricultural Land and Soils

(Scoping Report Section 7.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Paragraph 7.11.39	Decommissioning effects	The Scoping Report proposes to scope this matter out on the basis that effects from the decommissioning phase will be similar to, or of a lower magnitude than, the construction phase. No evidence has been provided to support this and the extent of impacts during construction are currently unknown. Due to the lack of information provided, the Inspectorate does not agree to scope this matter out. The Inspectorate would expect to see a Decommissioning Plan, agreed with the Local Authority, secured through the inclusion of an Outline Decommissioning Plan or similar with the Application. This should include consideration of how the land will be reinstated and to what standard and how/where infrastructure will be removed. The ES should clearly set out if and how impacts to agricultural land are to be assessed for the decommissioning phase.

ID	Ref	Description	Inspectorate's comments
3.11.2	Paragraph 7.11.31	Agricultural Land Classification (ALC) Survey	The Applicant has stated that they will conduct a 'semi-detailed' ALC survey at the site based on 1 auger boring every 2ha and the excavation of soil pits. The Applicant should ensure that any approach is justified, aligns with relevant guidance and/or standards (e.g., Natural England Technical Information Note TIN049, 2012), and/or is agreed with the relevant consultees.

ID	Ref	Description	Inspectorate's comments
3.11.3	Paragraph 7.11.38	Soil Management Strategy	The Scoping Report states that an outline Soil Management Strategy (SMS) will be produced, detailing measures to reduce or avoid damage to soils. For clarity, this should be provided with the application and detail how this is secured through the DCO.
3.11.4	Paragraph 7.12.4	Cumulative loss of BMV at a regional level	The ES should provide a regional assessment of the loss of BMV land and assess any significant effects where they are likely to occur.

3.12 Cumulative Effects and Inter-relationships

(Scoping Report Section 7.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.12.2	Section 7.12	Methodology – Cumulative	The ES should explain the methodology for defining both the short list of developments identified and justify the omission/inclusion of developments for each cumulative assessment. This should be informed by appropriate consultation with the relevant bodies.
3.12.3	Section 7.12	Methodology – Inter-relationships	The ES should explain how the inter-relationships assessed have been identified and explain the methodology for assessment.
3.12.4	n/a	Thames Valley Flood Scheme	The Applicant's attention is drawn to the consultation response from the Environment Agency (Appendix 2 of this Opinion) regarding the overlap of the Proposed Development with the Thames Valley Flood Scheme. The ES should provide clarity on this overlap, should it remain, and any interactions/impacts between the two developments.

3.13 Air Quality

(Scoping Report Section 8.2)

ID	Ref	Applicant's proposed matters to be scoped out	Inspectorate's comments
3.13.1	Section 8.2	Air Quality associated with traffic movements	The Scoping Report proposes that a desk-based study using the Department for Environment, Food and Rural Affairs (DEFRA) mapped estimates and results of local air quality monitoring will be undertaken to determine the existing air quality baseline of the site and surrounding area. No study area is determined, and surveys or modelling are not proposed. Construction and operational traffic movements will be considered against threshold criteria contained within EPUK/IAQM (2017) 'Land-Use Planning & Development Control: Planning for Air Quality' guidance. The Scoping Report anticipates that movements will not exceed the threshold and a detailed assessment will not be required. The Scoping Report does not provide an indication of vehicle movements required during any phase of the development. The ES must provide a defined study area (based on the affected road network) and confirm the number of traffic movements during each phase of the Proposed Development, both alone and cumulatively with other proposals, to confirm that the relevant IAQM-EPUK thresholds are not exceeded. Subject to this confirmation, the Inspectorate agrees to scope out impacts to air quality from traffic movements.

ID	Ref	Description	Inspectorate's comments
3.13.2	n/a	n/a	n/a

3.14 Glint and Glare

(Scoping Report Section 8.3)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.14.1	Section 8.3	Glint and glare	The Applicant proposes to provide a technical assessment rather than a standalone assessment in the ES. The technical assessment will assess impacts to ground and aviation receptors within a 1km and 10km ZOI respectively without full explanation as to why these ZOIs have been applied. The Scoping Report anticipates that any potential adverse effects can be mitigated through design which would be demonstrated in the technical assessment. The Inspectorate agrees that glint and glare may be assessed in a separate technical assessment provided that the ZOI of the assessment is appropriately justified, and that the assessment demonstrates that there would be no potential for significant effects to occur in line with relevant guidance. In the event that potential remains for significant effects from glint and glare, a full assessment should be undertaken, and this should be used to inform the relevant chapters in the ES, in particular for the Landscape and Visual Resources aspect chapter. Attention is drawn to comments from stakeholders including West Oxfordshire Council and Oxfordshire County Council who identify receptors with potential to be impacted outside of the proposed ZOI.

ID	Ref	Description	Inspectorate's comments
3.14.2	n/a	n/a	n/a

3.15 Topics proposed to be scoped out

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Section 9.1	Materials assets	Material assets are defined in paragraph 9.1.1 in line with the Infrastructure Planning (EIA) Regulations 2017. As this term is stated to have a broad scope, the Scoping Report proposes that these potential receptors are assessed in other relevant chapters including the socio-economic and historic environment aspect chapters. The Inspectorate agrees with the approach and is content to scope out a separate assessment of material assets.
3.15.2	Section 9.2	Daylight, Sunlight and Microclimate	Scoping Report paragraph 9.2.1 states that a glint and glare assessment would be included as part of the Preliminary Environment Information Report (PIER) and ES and that due to the location and nature of the proposed works and receiving environment, impacts to daylight, sunlight, and microclimate are not anticipated. Based on the location and the parameters set out in the Scoping Report, the Inspectorate agrees that this matter can be scoped out as significant effects are unlikely to occur.
3.15.3	Section 9.3	Waste	Scoping Report paragraph 9.3.1 acknowledges that the project is likely to generate waste during construction and decommissioning and that waste generation during operation will be minimal; Scoping Report paragraph 6.2.1 states that failed infrastructure will require replacement during operation. Whilst an outline code of construction practice is proposed to set out how waste will be managed during construction, the management of waste during operation and decommissioning is unknown.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate does not agree to scope out impacts from waste. The ES should quantify waste anticipated to be generated during construction, operation, and decommissioning and explain how waste will be managed at each phase. This should include consideration of any potential cumulative waste generation and associated significant effects.
3.15.4	Section 9.4	Electromagnetic fields (EMF)	Scoping Report paragraph 9.4.3 references use of public exposure guidelines published by the International Commission on Non – Ionizing Radiation Protection (ICNIRP) in 1998 which sets a threshold for potential human health effects for lines at 132kV or more. The export cable is the only cable anticipated to exceed this threshold running between the solar array and the National Grid substation. Scoping Report paragraph 1.3.7 identifies the potential locations of the substation within and outside of the Order Limits. These would be located to the south of the site near Farmoor Reservoir in both scenarios. The Scoping is undertaken on the assumption that the substation is located within the Order Limits. This means that the cable is located 120m from the nearest residential receptor. It is proposed that the ES will detail any design measures taken to avoid potential adverse effects from EMF on receptors and therefore a separate chapter is not required. The Scoping Report does not identify whether receptors would be impacted if the substation is located at the alternative location outside of the red line boundary. Should this remain an option in the ES, or become the chosen option, the ES should provide evidence to demonstrate that there would be no effect pathway to sensitive receptors, including airports. The Applicant is directed to consultation responses from the UK Health and Safety Executive and Cherwell District Council (Appendix 2 of this Opinion). Where an impact

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			pathway exists, the ES should assess significant effects where they are likely to occur.
3.15.5	Section 9.5	Major Accidents and Disasters	Major accidents and disasters are scoped out on the basis that the Proposed Development would not introduce any procedures that would lead to a risk of major accidents and disasters. The ES is proposed to report any potential risks that could impact the project and propose mitigation where appropriate. It is unclear from the Scoping Report whether battery storage is proposed as part of the Proposed Development (please see ID 2.1.4 above). This has potential to introduce hazards from fire and release of chemicals, therefore, the Inspectorate does not agree to scope this matter out. The ES should describe any battery storage in full where it is proposed and assess significant effects from battery storage where they are likely to occur. The ES should include a fire safety management plan or similar to explain how the risk of fire and chemical leaks will be managed. The ES should take the location and operation of London Oxford Airport into account for any mitigation proposed to ensure that their operation and emergency procedures are not compromised.
3.15.6	Section 9.6	Transboundary Effects	The Scoping Report refers to Advice Note Twelve and the screening proforma. The Applicant considers that there are no anticipated effects of the project on other EEA states and so a transboundary assessment is not proposed in the ES. The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[1]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Integrated Care Board	NHS Buckinghamshire, Oxfordshire and Berkshire Intergrated Care Board
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Oxfordshire Fire and Rescue Services
The relevant police and crime commissioner	Thames Valley Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Cumnor Parish Council
	Yarnton Parish Council
	Kidlington Parish Council
	Shipton-on-Cherwell and Thrupp Parish Council
	Begbroke Parish Council
	Eynsham Parish Council
	Hanborough Parish Council
	Cassington Parish Council
	Bladon Parish Council
	Wootton Parish Council

[1] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Tackley Parish Council
	Freeland Parish Council
	Woodstock Town Council
The Environment Agency	The Environment Agency
[The relevant] AONB Conservation Boards	Chilterns Conservation Board
	Cotswolds Conservation Board
The Relevant Highways Authority	Oxfordshire County Council
The relevant strategic highways company	National Highways
The Canal and River Trust	The Canal and River Trust
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	South East and London Forestry Commission

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[2]

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board
The National Health Service Commissioning Board	NHS England
The relevant NHS Foundation Trust	South Central Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd

[2] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
Railways	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	Canal and River Trust
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Thames Water
	Thames Water Commercial Services
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Quadrant Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity distributor with CPO Powers	Squire Energy Limited
	National Gas Transmission plc
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
The relevant electricity transmitter with CPO Powers	Utility Assets Limited
	Vattenfall Networks Limited
	Southern Electric Power Distribution Plc
	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))[3]

LOCAL AUTHORITY[4]
Buckinghamshire Council
Bladon Parish Council
Canal and River Trust
Cherwell District Council
Cotswold District Council
Gloucestershire County Council
Oxford City Council
Oxfordshire County Council
Reading Borough Council
South Oxfordshire District Council
Stratford-on-Avon District Council
Swindon Borough Council
Vale of White Horse District Council
Warwickshire County Council
West Berkshire Council
West Northamptonshire Council
West Oxfordshire District Council
Wiltshire Council
Wokingham Borough Council

[3] Sections 43 and 42(B) of the PA2008

[4] As defined in Section 43(3) of the PA2008

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Begbroke Parish Council
Bladon Parish Council
Canal and River Trust
Cassington Parish Council
Cherwell District Council
Cotswold District Council
Cumnor Parish Council
Environment Agency
Freeland Parish Council
Hanborough Parish Council
Historic England
Kidlington Parish Council
National Gas Transmission plc
National Grid
National Highways
Natural England
Oxfordshire County Council
Royal Mail Group
Shipton-on-Cherwell and Thrupp Parish Council
Tackley Parish Council
Thames Water
United Kingdom Health Security Agency

Vale of White Horse District Council
West Oxfordshire District Council
Wokingham Borough Council
Woodstock Town Council
Wootton Parish Council
Yarnton Parish Council

Begbroke Parish Council

To: The Planning Inspector

Jeffrey Wright – Clerk
[redacted]
E mail: clerk@begbrokepc.org.uk
Website: https://www.begbrokepc.org.uk/

Your ref:

11/07/2023

Dear Sir/Madam,

Re: Botley West Solar Farm – Official Objection from Begbroke parish council.

I am writing on behalf of Begbroke parish council regarding the above proposals. At our parish council meeting on July 3rd, 2023, they were again discussed. The committee were unanimous in objection against these plans.

This site is green belt with beautiful views from a high viewpoint at Spring Hill and will destroy the local environment. There is absolutely no need to carry out projects such as this when we accept that whilst solar energy is a future alternative to fossil fuels, buildings and other such locations could be used for this inefficient method of generation. However, wind turbines both on land and offshore are the preferred option and legislation requires changing.

I list below bullet point details, with some elaboration, of our objections and comments.

- Green belt
- There are supposed to be exceptional circumstances to build in a green belt – this is not one.
- Ruins a beautiful rural landscape that has views from Spring Hill towards neighbouring villages and beyond.
- Public rights of way are affected.
- The proposal would have a significantly harmful effect on the rural character and appearance of the area through adversely eroding the agricultural landscape and the intrinsic beauty of the countryside.
- Agricultural land – even Merton's tenant farmer has signs saying, "These fields produce your food."
- Undemocratic – avoiding local planning by promoting as a Nationally Significant Infrastructure Project (NSIP) and removed from direct control by the three affected District Councils (West Oxfordshire, Cherwell, and Vale of White Horse).
- None of the responses during any community consultation is likely to be made publicly available, so that we will not be able to judge the strength of feeling for or against Botley West Solar Farm.
- Planning Inspectors may be chosen who have little or no knowledge of the local situation because their job is only to decide if due legal process has been followed.
- If the developers have ticked all the relevant NSIP legal boxes, the Inspector is obliged to approve the application whether it is a good idea, and whether it is appropriate in the landscape where it will be built.
- Claims of increasing biodiversity are rubbish.
- On flight paths for Airplanes
- Does not account for housing developments already agreed on green belt surrounding Begbroke.
- None on Blenheim Estate – why?
- None on recent new housing built by Blenheim and Pye
- Insist panels are put on new developments to reduce needs elsewhere.
- Water runoff will increase – leading to increased flooding and overflowing ditches.
- Promoted for financial gain as more £/acre than food production.

Begbroke Parish Council

- Residents are against.
- Why this area when there are other more suitable locations in the country?
- Electricity Input to National Grid is not limited to a location such as Botley.
- Not evaluated compared other generation means.
- Why not other means of generation such as Biofuels?
- Encourages weed growth – not pasture.
- The size is overwhelming.
- Already others in the area.
- Has the efficiency of the existing solar farms been investigated.
- We need to reduce energy consumption by more insulation and reduction in waste such as air curtains in shops.
- The PM has stated several times that solar panels should not be sited on agricultural fields.
- Some of the fields are used for Biofuels so that will be lost along with the flexibility to grow food for human consumption one of the things the government said we need to increase food production and reduce our reliance on imported food.
- Some productive farmland is in Cat. 3b and some of it around us 3a
- Green belt - further loss of 14000 hectares which at first sight seems to be a greater land area in the county as all the proposed housing.
- This proposal will turn productive agricultural landscape into a barren one which will not support the current eco systems.
- Food production requires increasing – impossible with land being given over to other uses.
- These proposals will require a change of use to be approved - what guarantees are given that it will be withdrawn / revert after a given time?
- What is the design of the solar panel support frames? (There are multiple designs available to allow continued partial agricultural use)
- Sheep - do not need them - being encouraged to eat less meat / vegan / vegetarian unprofitable especially at shearing time.
- Increased bio-diversity - is not proven and very unlikely - no consideration given to larger animals such as deer who run free - animals naturally avoid tracks and pathways used by humans and dogs.
- No consideration appears to have been given to the existing eco systems supporting other species such as Red Kite, Owls, birds of prey, hares and the many insects found on the land.
- Groundnesting species such as Skylark will be especially affected by the loss of the arable farmland and its conversion to pastoral land for sheep-grazing and solar farming.
- Insects are showing a 64% reduction in numbers since 2004 (Kent Wildlife Trust and Buglife)
- Other means of generation - Wind farms – must be considered instead and government policy changes.
- Solar panels are inefficient compared with other means of generation and have a high environmental impact if the process of mining / processing raw materials and manufacture are included.
- Other locations - use of railway embankments, use of decommissioned coal fired generation sites for other means of generation. For example, Wind farms. Hydro-electric on the Thames/other local rivers/Blenheim Lake/Central reservations on dual carriageways
- Aircraft flight path - in the event of accident, high risk of fatality - Electricity and aviation fuel do not mix - also rigid structures on the ground rather than grass and crops.
- The panels are environmentally damaging in that they are extremely difficult to recycle.
- How will the hedges proposed be maintained tor are they just going to be left to grow wild - the latter method does not work as paths become overgrown and damp/boggy/unusable.
- Given that the there is still major conflict between Ukraine and Russia which is likely to escalate further, the loss of productive agricultural land does not appear to be in the national interest. you cannot eat electricity.
- Construction of this facility is unlikely to create local employment.
- The de facto ban on solar farms will be continued by the government, the environment secretary has signalled.
- Thérèse Coffey, fresh from her visit to Cop27, suggested to parliament that she would be continuing with policy plans initiated under the former prime minister Liz Truss, which would block solar power from most farmland.
- However, with a government that has continual “U” turns, there is no certainty on anything.
- Under Truss, Defra officials were looking at how to redefine “best and most versatile” land (BMV), which is earmarked for farming, to include the middling-to-low category 3b. Land is graded from 1 to

Begbroke Parish Council

5, and currently BMV includes grades 1 to 3a. Planning guidance says that development on BMV land should be avoided, although planning authorities may take other considerations into account. This would mean 60% of all agricultural land would be off-limits to solar farms.

- The 2,151,366 piles are unlikely to ever be removed.
- The project would cause chaos on narrow local roads – especially with proposed developments on existing green belt.
- 1100 properties are within 1.5km
- Rare meadows are included in the site.
- 111km of 2m high fencing is proposed.
- Say how much the house prices will go down.
- We need food as we cannot eat electricity.
- The world bank say the U.K. is the worse place in the world to put a solar farm due to our lack of sunshine, which makes panels very inefficient compared to an equivalent six offshore wind turbines which would work in the dark.
- All the other large solar farms are in deserts away from population.
- It is possible that Russian money is behind it which we understood the government was outlawing.
- It is not temporary the plant and machinery will remain after 42 years.
- The parish council has received from many concerned residents, well considered objections to these plans.
- The noise emitted is projected to be 69dB. This will be intolerable – especially to wildlife.
- Planning decisions should ensure that new development is appropriate for its location considering the effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or wider area to impacts that could arise from the development.
- Avoid noise giving rise to significant adverse impacts on health and the quality of life and identify and protect tranquil areas which have remained undisturbed by noise and are prized for their recreational and amenity value for this reason.
- The proposal conflicts with Policies of the LP which, amongst other aims seek to not permit developments where noise generated would cause material disturbance or nuisance to occupiers of surrounding properties.
- The Applicant refers to the temporary nature of the proposal, 42 years is a considerable length of time for the solar arrays, DNO substation, fencing, CCTV towers and other associated structures to be present on site. Given this duration the proposed development would be seen as permanent features rather than as temporary.
- We have seen the objections from our neighbour Yarnton parish council, an concur with their objections.

We look forward to you rejecting this misguided project.

Yours faithfully

Jeffrey Wright - Clerk.

Bladon Parish Council

[redacted]
clerk@bladon-pc.gov.uk – [redacted]

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 Parish[1] (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.

[1]Bladon Parish has an area of 326 hectares.

Section 2 Existing Baseline

2.1 Existing Development Site

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 the 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 justify 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 Governments 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 Governments 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 cable 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 is 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 withing 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 then 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.

Canal & River Trust
Making life better by water

By email
BotleyWestSolar@planninginspectorate.gov.uk

Your Ref

Our Ref IPP - 198

Wednesday 11/06/23

NSIP: Botley West Solar Farm

Waterway:

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Nationally Significant Infrastructure Projects (NSIPs) process.

The Trust has reviewed your proposals and on the basis that they appear unlikely to have any impact on our waterway we have **no** comment to make at this time.

If your proposals become significantly altered, we ask that you re-consult us in order that we can re-consider this position.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Jane Hennell MRTPI

[redacted]canalrivertrust.org.uk

[redacted]

https://canalrivertrust.org.uk/specialist-teams/planning-and-design

Cassington Parish Council: Response to Scoping Report for Botley West Solar Farm, June 2023

Alex D Rogers, Stewart Thompson, Graham Mills, Christopher Metcalf, Barbara King

Contact: cassingtonclerk@cassington-pc.gov.uk

Cassington Parish Council

View of the public right of way from Cassington to Purwell Farm known locally as “the track” or Purwell Lane. This right of way will be surrounded by solar arrays and fencing for much of its length should the Botley West Utility-Scale Solar Power Station be accepted for development in its current form.

Contents

Introduction

This response to the Scoping Report for the Botley West Utility-Scale Solar Power Station was written by members of Cassington Parish Council with input from Parishioners where materially relevant. The response outlines some general concerns with respect to the Scoping Report and then addresses specific points related to individual Paragraphs and Sections. There is some repetition where points are relevant to multiple sections of the Scoping Report. Unfortunately time has not permitted a more refined document to be produced but we hope we have captured the majority of concerns that both the Parish Council and our Parishioners have with respect to the Scoping Report for this proposal.

General Points to be Addressed by the Impact Assessment

Consultation

Throughout the scoping report much is made of the consultative components of the plan-decision making process, in this case an EIA. We contend that despite the importance of consultation, the time frames involved are too restrictive. In the case of a development of this scale, large reports result from the process. This Scoping report is a good example. It is 169 pages long, yet the Parish Council had less than a month to both seek the views of the village residents and to formulate a report which reflects those views in a meaningful way. This we believe is unreasonable and we would urge that all future reports be made available as early as possible and not simply within the minimum guidelines indicated by defra. This observation we believe to be particularly pertinent when we consider the likely extent of the final ES for the proposal, which will amount to multiple volumes, with content contained in many hundreds (if not thousands) of pages.

Strategic Environmental Assessment (SEA)

This development proposal will fall under both the Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) Regulations. We note that "traditional" EIA, conducted at the individual project level, has proven unsatisfactory in dealing with the "bigger picture" impacts that developments of this scale generate. In particular, EIA has also failed to address cumulative impacts from multiple projects/developments and to protect the public interest. We therefore contend that the development should be considered at a more strategic higher-level, to guide policy-making and long-term planning by stakeholders in the renewable energy sector.

SEA is a tool for assessing the environmental and social risks and impacts of policies, plans and programmes (PPPs) and ensuring the integration of the implications of such impacts into the formulation and implementation of PPPs. The scope of application of SEA collectively encompasses PPPs and development-related strategies across a range of sectors (in this case energy provision), geographical areas (national, regional, or local) or issues (such as climate change or biodiversity). It is our understanding that the UK Government has policies and programmes relating to energy provision. As such these policies and programmes fall under the requirement for a SEA to be devised for the component parts of the energy sector (wind, solar, nuclear etc.) - for example see the "Offshore Energy Strategic Environmental Guidelines".

We note that there is no reference to SEA within the scoping document. We contend that elements of the proposed development should be considered in relation to the requirements/criteria of a SEA for the sector. SEA is now a well-established procedure that supports such plan-decision making, by ensuring that relevant alternatives are assessed that all environmental and social effects are evaluated and that stakeholder interests are balanced. With that in mind, we ask that the development proposal engages fully with the guidance available surrounding SEA and that, more

importantly, it involves all relevant stakeholders (of which Parish Councils are one) in the consultation process as soon as it commences, rather than their views being "bolted-on" after key debates and the decisions that emanate from them have taken place.

We note that the scoping report makes some references to cumulative impact assessment (CEA). The EIA Regulations require a description of the likely significant effects of the Project on the environment, which should cover cumulative effects. The inter relationship of likely significant effects of the Project therefore needs to be assessed. The Overarching National Policy Statement for Energy states the following in relation to requirements for the assessment of cumulative effects:

"When considering cumulative effects, the Environmental Statement (ES) should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other developments (including projects for which consent has been sought or granted, as well as those already inexistence).'

As a consequence, the Planning Inspectorate guidance indicates *that "'The inter-relationship between aspects of the proposed development should be assessed and careful consideration should be given by the developer to explain how inter-relationships have been assessed in order to address the environmental impacts of the proposal as a whole.'*

Acknowledging the above and both the Institute of Environmental Management and Assessment (IEMA) and Planning Inspectorate advice surrounding CEA, we would have expected to see more detailed reference to how the scoping study intends to address both inter and intra project cumulative effects of the proposed development. We would ask that these potential effects be considered in tandem with a SEA (see above).

Objectivity of the Scoping Report

The purpose of the *Scoping Report* is set out in paragraphs 1.8.1–1.8.4. Its job is to:

- describe "the scope and methodology of the technical studies being undertaken to provide a comprehensive assessment of any likely significant effects";
- determine "suitable mitigation measures for the construction and operational phases of the Project" (and decommissioning as well?); and
- "inform and facilitate the request to PINS . . . to issue a Scoping Opinion".

These outline the need for an objective report that informs PINS so that it can issue an appropriate Scoping Opinion. We find in general terms that the scoping report is biased, misleading or manipulative in many areas. This includes the use of incorrect or unsubstantiated statements / language, omissions of materially significant information (e.g. why 76% of the proposed scheme is sited on Greenbelt land) and the scoping out of areas of impact assessment likely to be unfavourable to the proposed scheme (e.g. socioeconomic impacts on residents). We urge that a very clear requirement is made on the applicants to produce an objective impact assessment on which the Secretary of State can make an evidence-based decision on the application.

Specific Points to be Addressed by the Impact Assessment

Executive Summary

The Executive Summary states that an 840MWe solar power station will deliver clean power to the equivalent of 330,000 homes. As stated in the Cassington Parish Council Response to the informal

consultation (Rogers et al., 2022) we believe this is an overstatement of the benefits of the project because:

- 840 MW will generate sufficient electricity for 250,000 homes (based on an average annual consumption of 3,300 kWh of electricity per household according to Government Figures)
- Solar energy is the least efficient form of renewable energy widely deployed particularly in mid-latitudes where solar irradiance varies substantially across the seasons. Power demand in the UK is highest in winter as a result of use of electricity for heating. This is the period when solar irradiance is at its lowest and least energy will be generated by the Botley West site.

As a result of the discrepancy in figures we request that a detailed independent assessment is made of the likely energy production by the Botley West Solar Power Station, including the advantages and disadvantages of this form of renewable energy generation compared to other potential forms (e.g. wind or mixed energy sources such as a combination of wind, solar, hydro). We note in this respect that the Energy NPS, Draft EN-3 Paragraph 3.10.2 sets out that government is supportive of solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use.

1 Introduction

1.3.1

The document states that:

"BWSF's generation output will be vitally important if the Government's commitments are to succeed, significantly helping to deliver the transition to net zero."

This statement is made with no justification. It is very clear that an energy transition is required to prevent CO_2 emissions leading to damaging climate disruption. However, of the renewable energy sources available to the UK it is unclear what proportion of renewable energy should be provided by solar or whether it is appropriate to site solar power stations in rural areas traditionally used for food production with a high population as in West Oxfordshire.

We would expect an impact assessment of such as large-scale project to provide an evidence-based assessment of:

- The appropriate mix of renewable energy for the UK
- The most appropriate way to deliver the portion of that energy mix required by solar
- The most suitable locations in the UK to place such sites on the basis of least impact to both the environment and people not simply the willingness of landowners to rent their land for this purpose largely on the basis of financial gain. As stated in the NPS EN3 Paragraph 3.10.14 "applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land".
- The need to develop open rural land, including substantial areas of green belt as a solar farm. As stated in the NPS EN3 Paragraph 3.10.14 "Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land"

1.3.5

The term "revert" implies that a detailed baseline understanding of the abiotic and biotic condition of the proposed development site is known, as this sets the parameters which any reversion

"package" must employ. We are not aware of any such baseline condition assessments having been undertaken and none are indicated in the scoping document and so we challenge the efficacy of any reversion which has no prior understanding of site condition pre-development. We would therefore expect that such an assessment(s) would take place in advance of the construction phase of the proposed development, should it be given planning permission.

The current agricultural land use is a consequence of the land being worked in such ways as to both elevate crop yield or to maximise the quality/quantity of grazing land available to livestock. These are achieved via a blended mix of agricultural practices including, crop rotation, leaving land fallow and managed grazing regimes. Given that the development will negate these happening for a period of 42 years, we fail to see how the land will be able to revert back to its previous use (and here we assume productivity) without a significant period of sympathetic agricultural management. For this latter point, we question as to whether the land will ever be put back to agriculture or whether it will more likely be given over to some other aspect of land-use management?

1.4 The Applicant

Following articles in the British Press (Private Eye, 2023a,b,c) we find the details of PVDP and Solar Five provided in the Scoping Report to be wholly inadequate. The US solar market had significant issues related to speculators developing projects and then selling them on with the result that many projects failed (Mulvaney, 2019). This appears to be the mode of operation of PVDP and the related company Solar Five. Both are allegedly linked to the wife of Dmitry Glukhov, Yulia Lezhen (aka Lejeune), both of whom have been implicated in financial malpractice. We would therefore like full disclosure on the structure, links and beneficial owners of both PVDP and Solar Five and clear details of their previous solar development projects as would be reasonably expected under due diligence.

1.4.2 Preservation of Amenity

As detailed in the Cassington Parish Council Response to the informal consultation (Rogers et al., 2022) the proposed Botley West Utility-Scale Solar Power Station will have a substantial and significant impact on amenity to the village of Cassington and surrounding villages. Exposure to green space and the opportunity to exercise on locally available land have been demonstrated multiple times to have both physical and mental health benefits (e.g. Bowler et al., 2010; Shanahan et al., 2016; Cox et al., 2017). The main public rights of way used by the residents of Cassington village will be severely degraded in terms of their visual aspect, from one of open farmland to one of a largely artificial landscape dominated by solar panels. As such we expect the Impact Assessment to thoroughly examine the impacts on amenity to local villages including the likely impacts on health and wellbeing of residents.

1.5.7

The Scoping Report States:

"The revisions proposed to draft EN-3 Renewable energy infrastructure emphasise the central role that solar will play in decarbonising the energy sector."

We disagree with this statement. EN-3 states that solar forms "a key part of the government's strategy for low-cost decarbonisation of the energy sector" (as stated in 5.3.9). A key part is not the central role, and indeed EN-3 covers a wide range of important renewable energy sources.

1.8.2

It is important that not only are the methods for technical studies towards the Environmental Impact Assessment are detailed but also the conditions on the ground when technical studies are being

undertaken. We have already heard of surveys of flora, for example, being undertaken on the proposed land to be subsumed by the Botley West Utility-Scale Solar Power Station, which has been mowed. Obviously, undertaking such a study following mowing will result in an underestimate of biodiversity. Such details should include:

- Qualifications and experience of the personnel undertaking technical studies
- Dates / times of year when technical studies are being undertaken
- Weather
- Factors which may influence results (such as mowing or other disturbance of the area, seasonal effects)
- Frequency of studies
- Representativeness of the areas being studied compared to both common and rare habitats in the entire study region

2.0 Existing Baseline

Northern Site (West Oxon and Cherwell

2.1.3

The Scoping Report describes the land as: "The land is arable but low-grade agricultural land (see Figure 4) with multiple farm holdings scattered around the boundary edges."

As far as we can see from Figure 4 much of the land appears to be unassessed with respect to land quality. However, given the land immediately adjacent to the proposed northern site is Grade 3A or 3B it is reasonable to assume it is similar in nature (as suggested in 2.1.4). The statement that the land is "low-grade" is therefore incorrect as according to Government classifications such land is Good (3A) or Moderate (3B) with moderate to high yields of certain crops (a narrower range of crops and more moderate yield is expected from 3B compared to 3A). We estimate that 1,400 ha of land produces approximately 7,000t of food each year adding up to a loss of nearly 300,000t over the 42 years. We have seen representatives of Blenheim Estates at public information meetings and Parish Council meetings also refer to the land as "poor" (Rogers et al., 2022). Local farmers in the area have also reported that the land in question (referring now to all three sites) can give high yields of crops irrespective of land classification.

Given the misrepresentation of the land by both the landowners and PVDP we believe the scoping report should include an independent assessment of land grade including information on actual crop yields from farmers who have cultivated this land over the last decade. This includes both the northern, central (2.1.13), and southern sections (2.1.22) of the Botley West proposal.

2.1.14

Although much of the land is in Flood Zone 1 the villages of Cassington and Yarnton have a history of flooding as a result of rapid movement of surface water running off the hills to the north (Cassington) and northeast (Yarnton). In Cassington flooding of properties on Elm's Road occurred in 2007 (WODC, 2008). Foxwell Court, St Peter's Close, Horsemere Lane, Foxwell End and Reynold's Farm are also at risk of flooding from extreme surface water events (WODC, 2008). As recently as winter 2022/2023 properties on Elm's Road came close to flooding likely because of a failure of the owners of adjacent land (Blenheim Estates) to maintain drainage ditches.

Studies of how utility-scale solar power stations impact hydrology are relatively few at present. However, the studies that do exist show changes in soil moisture content associated with solar panel arrays and also increases in surface water runoff (e.g. Pisinaras et al., 2014; Yavari et al., 2022).

Alterations in hydrology also have the potential to increase soil erosion in some circumstances (e.g. Yavari et al., 2022). One aspect of solar array design which influences runoff of rainwater is the tilt angle and orientation of the solar panels at a given site (Yavari et al., 2022).

We would therefore expect an impact assessment to thoroughly investigate the specific impacts on hydrology local to Cassington and Yarnton taking into account the design of the proposed solar arrays on the land to the north and northeast respectively of these villages. Surface water flooding does not seem to have been accounted for at all in the scoping report.

2.1.15

76% of the proposed solar farm would be on Oxford's green belt, taking up a larger percentage of land within 2kms of urban areas (6.9%) than all the green belt housing being built under current Local Plans (5.5%). Loss of greenbelt land in the central and southern sections of the proposed solar power station will mean the loss of a significant and substantial portion of Oxford's greenbelt lying to the west of the city. Greenbelt land is specifically designated to prevent urban sprawl and to safeguard the countryside from encroachment. According to the National Planning Policy Framework the Government attaches great importance to this designation and greenbelt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. We also note that the entire village of Cassington is covered by greenbelt designation, the reason for which is to restrict development around it to maintain the openness of the greenbelt. We would therefore expect the impact assessment for this development to include a specific assessment of the loss of a large section of Oxfordshire's greenbelt land both on local communities but also on Oxford and its surrounding area which is already under significant development pressure for housing, industry, transport infrastructure and solar farms.

2.1.16

Although there are no statutory ecological designations within the central site both within and surrounding Cassington there are several zones within the Natural England Habitat Network. These include areas of habitat restoration (e.g. Worton gravel pits), Network Enhancement Zone 1 (fields to the east of Cassington), Network Enhancement Zone 2 (south of A40) and a Network Expansion Zone (areas surrounding Cassington village especially to the north west and south). These are detailed in the Green Infrastructure Plan which is part of the Cassington Neighbourhood Plan which was accepted by Referendum in June 2023. These areas are included in the Cassington Neighbourhood Plan, Policy CAS1 Cassington Nature Recovery Network. We note that CAS1 Provision C states that "Proposals that will lead to the loss of land lying within the Network and that will undermine its integrity will be resisted." We note that the Scoping Report has failed to include any reference to the Cassington Neighbourhood Plan or Green Infrastructure Plan which applies to the entire Parish of Cassington. We expect the impact assessment to include a specific assessment of the impacts of the West Botley Utility Scale Solar Power Station on the Cassington Nature Recovery Network and wider Nature Recovery Network in West Oxfordshire since it clearly is likely to undermine the integrity of the land referred to in the Neighbourhood Plan.

2.1.17

We note that St Peter's Church in Cassington is Grade 1 listed as are likely other historic churches in the surrounding villages.

2.1.19

As indicated in the Cassington Neighbourhood Plan and accompanying Green Infrastructure Plan the most heavily used public rights of way from the village will be entirely surrounded in large parts by solar arrays or these will be visible from footpaths. There will be similar impacts to Public Rights of

Way in both the northern and southern sections of the Botley West proposal, including the Oxford Greenbelt Way. CPRE Oxfordshire have pointed out that 800MW of solar capacity are in place or planned for the county. Solar farms in the area already developed have impacted on public rights of way and the rural landscape (e.g. around Eynsham). We therefore suggest strongly that an assessment of Botley West Solar Farm includes an assessment of the cumulative effects of this development and others already in place or planned for the area. Omission of consideration of the cumulative impact on the total area of countryside and public rights of way being affected by such developments (as well as effects on the Oxford greenbelt) is inappropriate given the massive scale of the three sections of the Botley West Development. It should be noted that many of these public rights of way are not only enjoyed by people within the affected villages but also by citizens of the city of Oxford and visitors to the area.

2.2 Legislative Context

2.2.2

This section outlines that the Secretary of State must consider the following exceptions when considering whether to accept an application for development:

1. "that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations"
2. "that deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment"

We urge the Secretary of State to assess whether this proposal undermines the status of the World Heritage Site of Blenheim Palace in respect of (1.) and in respect of (2.) the large and significant impact on Greenbelt to the west of Oxford which is contradictory to the National Planning Policy Framework. At the very least the impact assessment should specifically address these specific matters in relation to Section 104 (3) of the Planning Act.

3. Consenting and Consultation Process

Feedback So Far

3.2.6

Given that the applicants cannot be expected to deliver independent and fair assessment of community feedback we ask the Secretary of State to require that raw data in respect of completed feedback forms are provided for the public, and especially to Parish Councils and District Councils to examine. These feedback forms may be anonymised to protect personal data. Summary assessments of feedback by PVDP are insufficient for councillors to understand what their residents think of this proposal or indeed what suggestions they may have to improve it. Publicly there has been an overwhelming negative response to this proposal amongst local communities directly affected by it who have initiated vigorous and well-supported grassroots action protesting against the proposal (e.g. the Stop Botley West Campaign). This is reflected in the fact that 80% of respondents were opposed to the development according to PVDP's own data (PVDP, 2023).

4. Approach to EIA

4.1.2

We note that West Oxfordshire includes within its population a number of people with considerable expertise and local knowledge on the natural history of the area including both professional scientists (employed and retired) and citizen scientists. These people are likely to have extensive knowledge of local environmental baselines and could provide valuable input to the Environmental Impact Assessment (EIA). There appears to be no provision for their input into the EIA process which

claims to be iterative. We believe the EIA process would be greatly improved through input by these local experts and provision should be made to develop workshops or contact groups to ensure this happens.

Baseline Conditions (Sections 4.2.4 to 4.2.8)

As noted above (1.8.2) it is important that not only are the methods for technical studies towards the Environmental Impact Assessment detailed but also the conditions on the ground when technical studies are being undertaken is recorded and accounted for in the EIA.

4.2.17 and 4.2.18

We note that the Scoping Report identifies the following levels of impact:

Substantial;

• Major;

• Moderate;

• Minor;

• Neutral.

There is no category for “unknown impact” or “uncertain impact”. Many aspects of the impacts of utility scale solar power stations are poorly studied, especially outside of the USA and specifically in the U.K.

The EIA should for all these categories give a measure or estimate of confidence in the reported conclusions on impact given the methodologies employed and also specific information on the impacts of conditions during technical studies (see 1.8.2 above). Otherwise it is impossible to assess the weight that should be given for the conclusions related to the level of impact. Following the precautionary principal conclusions on levels of impact should be conservative (i.e. assume a worse case on impacts of the proposed scheme).

Mitigation and Monitoring (4.2.19 – 4.2.23)

As with assessment of levels of environmental impact we would expect proposed mitigation measures to be evidence based and to include levels of confidence that the proposed measures will be effective. There is ample evidence within the UK that often-used mitigation measures, such as species translocations, are frequently ineffective and result in subsequent losses of the translocated populations (e.g. for reptiles). We would also expect monitoring of all significant mitigation measures to be included in the EIA plan including during both the construction and operational phases of the proposed project.

5. Need and Alternatives Considered

5.2 Need

5.2.2

As stated in response to 1.3.1 above the applicant makes a claim that expansion of solar capacity in the U.K. is not achievable through the use of rooftop and brownfield sites alone (a claim repeated but not substantiated in 5.2.4). No evidence is provided that this is the case nor is there any specific evidence that there is an overwhelming case for development of a utility-scale solar power station on greenbelt land in a rural and highly populated part of West Oxfordshire. There are 250,000 hectares of south-facing commercial roof space in the UK. If just a quarter of this was used for solar panels, it could generate 25 GW of electricity annually. That’s the equivalent of 30 solar farms the

size of the proposed Botley West Solar Farm and hence why the independent review of the UK's net zero prospects called for a 'solar rooftop revolution' and for the reform of planning rules to enable it. In fact, other than large landowners willing to lease large areas of land, there is no case for the development of a utility-scale solar power station in this area. Rather than high level, statements of need we would expect specific, evidence-based assessment of why a utility-scale solar power station should be developed on land around Oxfordshire especially given the huge impacts on greenbelt, local communities and the environment.

5.2.3

The claim is made that the Botley West Utility-Scale Solar Power Station will deliver renewable energy to Oxfordshire and power 300,000 homes. The former is clearly not correct as the power will be delivered to the National Grid and the latter is disputed (see Executive Summary above). Again, we expect the impact assessment to provide clear evidence of these claims and furthermore to present evidence of why alternative schemes are not viable (e.g. a mix of wind and solar) or whether the land to be subsumed under solar panels could not contribute to climate change mitigation in other ways.

5.3 National and International Legislation and Policy Context

This section outlines international and national policy aimed at promoting the development of renewable energy sources globally and within the UK. However, what is not mentioned here are the United Nations Sustainable Development Goals (SDGs). The SDGs specifically address the need for development, including for energy, that balances climate, nature and people. It is very clear that whilst Botley West is proposed as a scheme which addresses the need for renewable energy the area of land it covers, including greenbelt, the number of communities it effects do not meet the requirements for sustainable development. This is an important area of international policy that should be included in the impact assessment.

5.4 Alternatives

Two alternatives are presented in the scoping report, develop the West Botley Utility-Scale Solar Power Station (5.4.2.) or "Do nothing" (5.2.3). We do not believe that the scoping report has assessed a range of different renewable options for the West Oxfordshire and Cherwell districts including wind and hydro (e.g. on the River Thames) or a combination of solar, wind and/or hydro. NPS Draft EN-3 Paragraph 3.10.17 states that: "Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, or storage) to maximise the efficiency of land use." The applicants have not given any consideration to co-location of other functions, and these must, in our opinion, form a part of the scoping report. Furthermore, as pointed out in Rogers et al. (2022) alternative uses (e.g. forest or grassland managed for carbon sequestration) of the land earmarked for this development could also be regarded as climate mitigation (around 35,000t of CO_2 sequestered by the land if managed for carbon sequestration) whilst having much greater benefits for people and biodiversity. These alternatives should also be investigated in the scoping report.

5.4.6

Solar irradiance, a main factor in selection of sites for solar power stations is not even referred to in the considerations for location of this scheme. This needs to be included in the impact assessment.

The statement that the scheme is located on "low-productivity arable land" is materially and demonstrably incorrect. The land identified for the Botley West Solar Power Station is generally Grade 3A or 3B, of good or moderate productivity (see response to 2.1.3 above).

The scheme is outside environmental designations but does lie very close to such sites and also covers substantial areas within the Nature Recovery Network in West Oxfordshire.

The statement that the West Botley Utility Scale Solar Power Station is away from main settlements is clearly false. 11,000 households lie within 1.5km of the proposed power station. It covers land adjoining a large number of villages and also impacts land enjoyed for amenity by people in the city of Oxford as well as visitors to the area. For people's homes, a buffer zone of only 20m is proposed for properties adjacent to this proposed scheme. Indeed, in comparison to Utility Scale Power Stations globally in the top 20 by size (of which this proposal is one) at least 18 of the others are located in desert or arid environments where impacts on population are small to negligible. We expect the impact assessment to ascertain the impact of this development on local communities and the wider communities in the area who use the land for leisure especially during summer months.

Flood risk is only assessed in respect of flood plains from the local rivers not in terms of surface runoff (see response to 2.1.14 above).

The statement that the land proposed for development is of low ecological value needs to be substantiated, particularly that there is strong evidence that those habitats and species strongly associated with lowland agricultural production are in serious decline (see https://www.bto.org/our-science/publications/developing-bird-indicators https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/habitats/hedgerows/#:~:text=Around%20118%2C000%20miles%20of%20hedgerows,largely%20to%20intensification%20of%20agriculture https://www.frontiersin.org/articles/10.3389/fsufs.2019.00118/full https://hedgelink.org.uk/guidance/hedgerow-biodiversity/).

We also note that although its location is directly outside of any environmental designations, many of the designations are in place to conserve and enhance components which do not observe "hard" boundaries. SSSIs are a good example of this, particularly when some of the species contained within them are highly mobile, birds and bats for example.

5.4.8

This section indicates that "at an early stage of the feasibility of the development of the Project, the Applicant produced a "high-level constraints" plan to understand site sensitivities in planning and environmental terms. This provided a framework within which the Applicant could start to consider ways in which the site could be designed and laid out. It would seem reasonable that there be a consultative aspect to the production of a high-level constraints plan rather than be presented with the Applicants view as to what this should look like. This would potentially remove some of the concerns we identify in the constraints plan (see below).

5.4.9

Text indicates that the constraints plan has identified "areas for habitat enhancement, including planting of native species and opportunity to enhance existing habitat". Given that the vast majority of the proposal will be located on agricultural land which has an extensive network of hedgerows and watercourses, many of which will be removed to accommodate the development, it is difficult to see how this can actually be achieved? In tandem with this we note that this proposal will be subject to the Biodiversity Net Gain requirement which becomes mandatory in November of this year. It would be useful to see how this requirement aligns with the constraints plan (above) or perhaps NSIP's are exempt from this obligation?

5.4.10 and 5.4.11

5.4.10 states that constraining factors that affected the evolution of the Project layout and design included areas of ancient woodland, whilst 5.4.11 indicates that "buffer zones were then imposed on land adjacent to ancient woodland, within which it was decided that land would remain free from development" and that "further buffers were imposed to provide set back distances of a minimum 20m from residential properties". Here we raise two points of concern – (i) if the applicants are able to identify a buffer width for residential properties, why have you not included the buffer distance for ancient woodland? and (ii) we contend that the presence of the development 20m away from residential properties in no way constitutes an appropriate buffer zone width and is therefore wholly inadequate. How was this arrived at? Certainly not via consultation. The question arises as to whether the buffer zone set around Ancient Woodland has taken any account of the foraging distances for wildlife resident in such areas and which use surrounding land to find food (e.g. owls or other birds of prey, mammals such as bats, badgers, foxes or deer). Such detail should be included in the impact assessment.

6. Project Description

6.2.17

We note here that the use of sheep grazing or manual cutting back of plants will be used to control the vegetation under the solar arrays. Given the massive scale of the proposed development we question the practicality of such arrangements to manage the land. 1,400 ha would require about 17,000 sheep for grazing. If these sheep are not moved seasonally, they will consume wildflowers and reduce the biodiversity of the proposed sites. We therefore request that the full details of such arrangements are presented in the impact assessment including the numbers of sheep, their management, and/or the manpower requirements for manual control of such growth. The use of herbicides should be detailed if it is anticipated that they will be required.

Table 6.1 and 6.2

Table 6.1 details the infrastructure that will be put in place on what is currently mainly arable land for the proposed scheme. This includes a very large number of solar arrays placed up to 2m above the ground as well as Converters and Substations adding to visual impact. Some of this infrastructure also produces noise. In addition, the entire scheme will be surrounded by fencing up to 2m high with security cameras placed on average every 365m and lighting (including PIR activated lighting) in some areas. It is important that the impact of this urban / industrial infrastructure on the surrounding landscape, public rights of way and settlements in the area are considered in the impact assessment as well as impacts on wildlife.

6.2.20

The applicant states that "landscape mitigation will be embedded in the overall project design and would be formulated to minimise potential landscape and visual impacts and maximise enhancement of landscape features, landscape character and biodiversity of the site". Whilst this is a laudable claim, we look forward to consultation on a draft landscape master plan tasked with delivering these aims to a satisfactory standard for a solar farm comprising close on 2.7 million solar panels and associated infrastructure.

6.4.1

This states that "when the operational phase ends, the Project will be decommissioned. The anticipated period of operation and decommissioning is 42 years. All solar PV array infrastructure including solar PV modules, mounting structures, cabling, inverters and transformers will be removed from the site and recycled or disposed of in accordance with good practice and market

conditions at that time. This raises several areas of concern. (i) It is our understanding that solar panels have an expected lifespan of between 25 – 30 years. Does this mean that somewhere in the operational cycle of the development that all the panels will in effect have to be replaced? (ii) recent articles (https://www.bbc.com/news/science-environment-65602519) indicate that the expertise for the scrapping and recycling of solar panels in the UK does not exist. (iii) if panels need to be replaced during the operational cycle of the development (see (i) above,) then we calculate roughly 5.3 million panels will eventually require recycling. If, as recent articles indicate the UK has no capacity to recycle, then these will end up in landfill sites with a very significant local/regional impact as a consequence? Stating that disposal of infrastructure will partially depend on "market conditions at the time" is not good enough for a development of this size. In particular, the carbon impacts of construction, materials, machinery, operation and decommissioning should be evaluated against the benefits of the scheme in renewable energy production.

7. Proposed Scope Of Assessment: ES Chapters

Legislative and Policy Context

7.1.2

We note that the Cassington Neighbourhood Plan and Green Infrastructure Plan are not included in the list of policy documents on planning for consideration in the impact assessment. They should be included along with any other relevant Neighbourhood Plans as they comprise information on the history, environment, and communities located within or adjacent to the proposed area of development. They also include local policies of relevance to the impacts of the proposed development.

7.1.5

Although the Blenheim Palace World Heritage Site is just outside the utility-scale solar power station, both the site and its setting within rural Oxfordshire, including nearby greenbelt should be assessed with respect to impact on World Heritage Status. Landscape is an important aspect of granting of World Heritage Status and this proposal has a major impact on the surrounding landscape which is the setting of the site.

7.1.9

We note that whilst the West Botley Utility-Scale Solar Power Station has been set outside of the Conservation Area of Cassington Significant Views from the Conservation Area, mainly pointing to the northwest will be strongly adversely affected by the development (WODC, 2007). Views from all the mentioned designated Conservation Areas should be assessed for visual impact from the West Botley proposal. We note in 7.1.24 that the Zone of Theoretical Visibility set at 2km from the boundary of heritage assets.

7.1.12

We also note the presence of Frogwelldown Lane on the western edge of Yarnton which has been in use at least since the Middle Ages. This lane was part of the old Oxford to Witney road and is notable as the historic route of retreat of the army of Charles I from Oxford during the English Civil War. The lane currently runs from the edge of Yarnton to the Burleigh Road.

7.2 Landscape and Visual Resources

Legislative and Policy Context

7.2.3

The Cassington Local Neighbourhood Plan and Green Infrastructure Plans are now accepted by Referendum and should be considered as local planning policy documents for the Impact Assessment.

7.2.14

We note that the West Botley Utility-Scale Solar Power Station would be unique globally in the number of houses within a 1.5 kms radius of it, a total of almost 11,000. This includes in settlements such as Wootton, Shipton-on-Cherwell, Woodstock, Bladon, Freeland, the Hanboroughs, Begbroke, Yarnton, Kidlington, Worton, Cassington, Eynsham, Farmoor, Cumnor and Botley. The comparable average number for the USA's largest solar farms is fewer than 10 (*n*=27). Even equally populous Netherlands has only a thirtieth of the number of houses within the same distance of its largest solar farms. It is inconceivable that a portion of these households will not suffer substantial adverse or worse impacts in terms of their views of the surrounding landscape as well as the landscapes of some of these villages in their entirety. In the case of Cassington, houses along the northern edge of the village as well as in the settlement of Jericho Farm will have current views of farmland replaced by solar arrays and additional infrastructure. This transformation of the landscape will be visible from the central areas of the village and also from public rights of way running to the north and northeast of the village. In our view it is essential that the impacts on landscape and visual resources of all of these villages and their residents are carefully assessed by independent experts.

We also note that the proposed change in land use has already had significant impacts on landscape in the area. An example is the establishment of a dog walking facility in fields along the Cassington – Yarnton Road, west of Yarnton. The farmer leasing this and other land has had his holdings reduced as a result of the West Botley proposal by the landowners. This rendered it unprofitable to continue to farm the land remaining meaning that other alternative uses for the land have had to be developed. The facility is surrounded by high metal fences which we believe detracts from the surrounding landscape including public rights of way. It is therefore important to assess not only how the West Botley Solar Power Station itself will influence landscape and visual resources but also how the scheme itself may influence the use of the land around it (see Potential Cumulative Impacts, 7.2.34).

Table 7.3

We note that "Residential Visual Amenity Assessment" is to be scope out of the project assessment for landscape and visual resources. The grounds given for this are that:

"No significant effects expected that would overwhelm existing properties nor render properties an unattractive place to live."

We wholly reject this scoping out of impacts on residential visual amenity as:

(i) The proposed solar power station includes more households within 1.5km than any other we have been able to find.

(ii) Residents of the Parish of Cassington (and no doubt other villages / parishes) will suffer major impacts on their enjoyment of visual resources including views from their homes, common areas in their villages and views from public rights of way. In some cases, solar arrays will dominate views

from properties. By any measure these are visual receptors (people) who will be affected by the visual impacts of the proposed development (see also 7.2.27, 7.2.28)

(iii) We already have had reports of house sales falling through in Cassington because of the perceived threat of the West Botley Solar Power Station to quality of life in the village for which visual impact is a major consideration. This materially contradicts the reasoning for scoping out of residential visual amenity impacts.

(iv) An increasing number of studies show impacts of solar farms on house values. The nearer you are to one, and the bigger the solar farm is, the greater the impact. These impacts appear to be particularly marked where solar farms are built on rural land (Gaur and Lang, 2023).

We add that not only do we fully expect Residential Visual Amenity Assessment to be included in the impact assessment of the proposed solar power station on landscape and visual resources but that this assessment should include the views of residents of households who will be affected by the visual impacts of the scheme both in their homes and through use of nearby public rights of way. This is clearly an area which requires interviews and direct assessment of impacts on residents.

We also reject that there is no need for a night-time assessment when there may be substantial numbers of PIR-activated security and other lighting within the development.

Potential Cumulative Impacts

7.2.34

The countryside west of Oxford is subject to increasing development of solar farms on agricultural land including areas to the east / southeast of Yarnton and to the west of Eynsham. Along with the significant urban industrial and residential development along the Yarnton – Woodstock corridor and around Eynsham, including on Greenbelt land, it is essential to consider the accumulated impact of these and the West Botley Solar Power station proposal.

We also note, as above (7.2.14) that this proposed development is already having an impact on use of agricultural land in the area.

7.3 Ecology and Nature Conservation

Relevant Policy, Legislation and Guidance

7.3.2

Relevant local policy documents should include the Cassington Local Neighbourhood Plan and Green Infrastructure Plan. The former includes Policy CAS1 on the Cassington Nature Recovery Network and the latter much information on local nature assets.

7.3.9

As noted for 2.1.16 although there are no statutory ecological designations within the central site both within and surrounding Cassington there are several zones within the Natural England Habitat Network. These include areas of habitat restoration (e.g. Worton gravel pits), Network Enhancement Zone 1 (fields to the east of Cassington), Network Enhancement Zone 2 (south of A40) and a Network Expansion Zone (areas surrounding Cassington village especially to the north west and south). These are detailed in the Green Infrastructure Plan which is part of the Cassington Neighbourhood Plan which was accepted by Referendum in June 2023. These areas are included in the Cassington Neighbourhood Plan, Policy CAS1 Cassington Nature Recovery Network. We note that CAS1 Provision C states that “Proposals that will lead to the loss of land lying within the Network and that will undermine its integrity will be resisted.”

We also note that the latest version of maps released by the Developer reveal plans to dig a trench through Long Mead meadow to enable their cables to cross the Thames near Eynsham. Long Mead is part of only 4 square miles of original floodplain hay meadow left in the UK and must be protected. 97% of this type of habitat was lost between 1930 and 1984 (Wildlife Trusts, 2012) so it is nationally scarce community of plants and animals. It featured in a film produced for Cop26 and it would be a huge embarrassment for the government if part of this important floodplain was disrupted on their watch.

7.3.12

A major component of the landscape appeal of the proposed development site is the patchwork of lowland agricultural land, bounded by a hedgerow matrix, interspersed with copses and woodlands, some of which are classified as ancient. semi-natural woodlands (ASNW). Given the nature of the proposal we envisage large-scale removal of the hedgerow matrix (whether temporarily or permanently) and either the removal of the woodland component or their isolation as a consequence of their connectivity with the hedgerow matrix being removed and fencing erected. We take this opportunity to indicate that the UK has lost over 50% of its hedgerow matrix post world-war II and that of the remaining hedgerows, 60% are classified as being in a poor condition. As a consequence, the Hedgerow Regulations (1997) were introduced to halt the removal/ degradation of what remains of the resource. Here we also note the recommendation of the UK Climate Change Committee who indicate that hedgerow cover will need to be increased by 40% by 2050 to help deliver our net zero target – in essence this requires the planting of 200,000 km of new hedgerows. We therefore contest any development which proposes to remove hedges, even temporarily, because of the high negative landscape impacts of this activity and the counter-intuitive nature of their removal in line with net zero aspirations.

In tandem with the loss of hedgerows we note the large-scale loss of ancient woodland in the UK, with current estimates suggesting we have c, 2% of its former distribution remaining. ASNWs are renowned for their high amenity and landscape, along with their importance as biodiversity hotspots. We expect that the scoping report will look to leave the majority of ASNWs intact, but question their landscape and amenity appeal as a consequence of being surrounded by a sea of solar panels.

Construction of solar farms and their associated infrastructure requires large-scale removal of vegetation and surface grading. This results in habitat loss, degradation and fragmentation, leading to a reduction in species richness and density. These impacts are exacerbated as the solar farm proposed will be situated on agricultural land which provides the landscape and habitat for an ever-dwindling group of plants and animals. Today in the UK the loss of “agri-wildlife” is well documented, with the majority of species and habitats associated with low-intensity agriculture showing catastrophic declines post World War 2. As a result, many of those species associated with agricultural habitats are afforded protection at the very highest levels.

A very large amount of fencing (over 100km) is indicated as required in this report. This will mean that access to a very large amount suitable foraging and breeding territory will be lost. Many agri-bird and mammal species require large, uninterrupted tracts of suitable breeding and feeding habitat with which to complete their life cycle. Solar farms result in large-scale losses of these vital components and as a consequence, species already demonstrated to be in significant decline (brown hare, harvest mice and several species of passerine birds including linnet, yellowhammer, corn bunting and tree sparrow for example) will be further negatively impacted. It is also useful to note that if the land between the solar arrays is to be sheep-grazed, then the surrounding field perimeter

will require stock-proof fencing in order to contain the grazing livestock. This fencing will function as a barrier to movement (resulting in an inability to access/maintain breeding and feeding territory) for several mammal species, notably badger and those species of deer typically found in agricultural settings.

An examination of records on i-Naturalist may also be appropriate for the area to detect presence of species.

7.3.14 and 7.3.15

We note that there is no mention of aquatic birds which we view as a significant omission for several reasons. First of all, the presence of reservoirs and rivers within and around the Botley West Utility-Scale Solar Power Station proposal means that aquatic birds are a feature of the area. Solar panels present a significant strike risk to bird species, especially if the surfaces are vertically oriented and/or reflecting light (e.g. Visser et al 2019; Smallwood, 2020). Water birds have been demonstrated to collide with the panels as they mistake them for waterbodies and effectively try to land on them (Jenkins et al., 2015; Mulvaney, 2019). We also note that some aquatic birds such as mute swans and geese also feed in fields proposed to be covered in solar arrays around the village of Cassington particularly in winter. Bird mortality at solar arrays in the US caused a mortality of 11.61 birds per MW/year (Smallwood, 2020). Translating such a figure to the West Botley utility-scale solar power station would cause a mortality of more than 390,000 birds over a 40-year operating time. Obviously impacts on US bird fauna are likely to be different to those in Oxfordshire but this gives an idea of the potential scale of impact of an 840 MW power station on birds in the area.

We also note that solar panels present a significant strike risk to insectivorous bird and bat species, especially if the surfaces are vertically oriented and/or reflecting light. Birds and bats are attracted to the panels for a variety of reasons. The panels themselves attract the principal prey items of insectivorous animals, which the birds/bats seek to consume, thus colliding with the structures in doing so. Aquatic insects are also attracted to the polarised light reflected by solar panels, again displaying maladaptive behaviour, mistaking the panels for water surfaces.

We note with concern the use of the term “survey season” in 7.3.15. As pointed out above behaviour of animals such as birds varies seasonally so surveys of fauna should take place throughout the year.

7.3.21 and 7.3.22

The scoping report indicates that the majority of ecological surveys will be conducted within the site boundary, with the exception of those mobile species, great crested newts (GCNs) and bats specifically, for whom buffer zones of 500m and 10km will be in place for these respectively.

We raise three issues which we consider of concern. (i) great crested newts have been documented as travelling as far as 1.3km (https://www.keyenv.co.uk/wp-content/uploads/2011/06/GNGCNV2.pdf) so why is only a 500m buffer proposed ?, (ii) the report specifically indicates that surveys will take place in waterbodies i.e GCN *breeding* habitat – no mention is made of terrestrial surveys in those habitats which they need for dispersal, feeding and hibernation (of which hedgerows are key) after they leave the breeding ponds and (iii) no mention is made of bird surveys – most farmland bird species are highly mobile and will access of a matrix of habitat types as part of their life cycle. In particular, we stress the importance of agricultural land for migratory species which rely heavily upon large tracts of agricultural land and their associate hedgerows, particularly in the late autumn/winter period. Species of note here are winter thrushes (redwing and fieldfare), starling, and several species of geese and swans. In addition, passerine birds

such as wheatear, yellow wagtails and redstart, “stop-off” on agricultural land in order to re-fuel on passage to their nesting grounds. As such, loss of these sites, accompanied by a reduction/removal of their ability to provide food sources, constitutes a significant concern to the overall impact to bird diversity. We therefore contend that a much wider survey area, spanning the breeding, migration and over-wintering seasons should be in place.

7.3.35 – 7.3.37

7.3.35 notes that “Replacement habitat for that lost where such habitat is either of conservation significance in its own right or supports a protected or otherwise notable species”. Whilst much is made of reinstating elements of the habitat lost post solar farm construction, most notably hedgerow systems, emphasis must be placed upon the fact that we are losing a long-established, biodiverse habitat in exchange for a brand new one. This new creation will take many decades to come anywhere close to the biodiversity of its predecessor, this at a time when agri-biodiversity continues to be lost apace.

Further to the point above, 7.3.36 states that the provision of new commuting routes for bats might form part of an ecological mitigation package. Bats use woodland edges, hedgerows, and other linear features to echolocate their way between their various feeding, breeding and roosting sites. Removal of these, even if temporary, will have a significant detrimental effect upon their survival, noting here that all species of bat in the UK are protected under the Wildlife & Countryside Act. Given that these planted features will take several years to reach a size against which the bats can successfully navigate, then we draw into question their efficacy as mitigation for these protected species.

7.3.37 indicates that the biodiversity net gain metric will be used to calculate the before and after biodiversity value of the site, the calculation subsequently used to deliver Biodiversity Net Gain (BNG). Given the large scale of the proposal, which will significantly impact a matrix of lowland agricultural land interspersed with habitats known to be of high biodiversity value, we look forward to being consulted over the proposals contained in the BNG strategy, in particular the scale, site selection and “like for like” elements which need to be made evident.

7.4 Hydrology and Flood Risk (59)

7.4.2

Relevant local policy documents should include the Cassington Local Neighbourhood Plan and Green Infrastructure Plan. The Green Infrastructure Plan contains details of past flooding and current flood risk to the village of Cassington.

7.4.3

This indicates, in keeping with previous sections, a likely zone of influence for hydrological impacts, specifically 250m for hydrology and 1km for flood risk. Again, we observe that there is no justification presented for the arrival of these figures, noting (again) that there has been no stakeholder consultation as part of the process.

Baseline Environment

Hydrological Setting

7.4.6 – 7.4.21

The scoping document focuses largely on flood risk associated with the water courses in the area of the proposed solar power station. However, for Cassington, Jericho Farm, Worten and Yarnton surface water flooding is the significant issue which needs to be considered in the impact

assessment. Elm's Road in the village of Cassington appears to be particularly vulnerable to surface water flooding events which result from surface water draining off the high ground of the fields to the north of Cassington. This is consistent with flooding of properties on Elm's Road in 2007 (WODC, 2008). Foxwell Court, St Peter's Close, Horsemere Lane, Foxwell End and Reynold's Farm are also at risk of flooding from extreme surface water events (WODC, 2008). Outside the village Jericho Farm and Worten are also vulnerable to flooding and the road junction to Worten Farm was flooded over the winter of 2020/2021. Following the 2007 flood events action was taken to mitigate future surface-water flooding including the clearing of previously blocked drains and the building of a drainage pond behind the southwest corner of the playing fields. Since this time there have been no further property flooding events in Cassington village although the threat remains as demonstrated by near flooding in the winter of 2022-2023.

Studies of how utility-scale solar power stations impact hydrology are relatively few at present. However, the studies that do exist show changes in soil moisture content associated with solar panel arrays and also increases in surface water runoff (e.g. Pisinaras et al., 2014; Yavari et al., 2022). Alterations in hydrology also have the potential to increase soil erosion in some circumstances (e.g. Yavari et al., 2022). One aspect of solar array design which influences runoff of rainwater is the tilt angle and orientation of the solar panels at a given site (Yavari et al., 2022).

Given the flooding issues already experienced at Cassington, Worton and Jericho Farm resulting from surface water runoff alteration of hydrology on the hills to the north of Cassington which will be near completely covered by solar arrays is a significant concern for residents of the Parish. Any increase in surface water runoff would increase flood risks to properties particularly in Elm's Road, but also in Foxwell Court, St Peter's Close, Horsemere Lane, Foxwell End, Reynold's Farm, Jericho Farm and Worton. We are not reassured by the statement by PVDP in their Phase 1 Consultation Summary Report (PVDP, 2023) that "Well designed solar farms do not cause an increase in the risk of flooding." In a situation where there is a continued risk to our villages from surface water flooding framed by an apparent increase in extreme rainfall events resulting from climate change (see UKCP18 statements on frequency and severity of surface water flooding in summer and autumn) this is a major concern to our residents.

Table 7.6 indicates a variety of potential hydrological and flood risk impacts which might arise as a consequence of the proposed development, with the vast majority to be subjected to a modelling approach to inform the assessment. A concern here is that many of the models will assume optimum condition infrastructure is in place (field drainage ditches, storm drains etc.), which they are not. We are therefore enquiring how these sub-standard infrastructures will be captured in the models (if at all)?

7.4.19 indicates that cumulative impacts from hydrology and flood risk will likely occur, whilst 7.4.20 suggests that these impacts will be contained within the footprint of each of the 3 sites. This, given the nature of the risks identified i.e. all linked to water movement, we challenge, particularly given our observation above that sections of the water movement mechanisms across the landscape are in poor repair and the history of surface water flooding.

We expect these concerns to be reflected in a thorough assessment of flood risk to the villages including modelling, taking account of conditions on the ground of drainage infrastructure of the effects of the Central Section of the Botley West Scheme on local hydrology and if necessary trials undertaken with solar arrays of different design undertaken over an appropriate time period to understand impacts on soil hydrology and runoff.

We also note that a high-pressure water supply pipe runs underground across the fields to the north of Cassington and this also must be considered during construction and operation of the solar power station.

7.5 Ground Conditions

7.5 addresses those elements relating specifically with ground conditions, notably in terms of potential impacts arising from the construction, operation and maintenance, and decommissioning phases of the Project.

7.5.5

This section indicates that the study area proposed for an assessment of ground conditions is the footprint of the development and a data search buffer of *up to* 100m. Again, we question the parsimonious nature of the buffer zones proposed, noting that in this instance there will only be a data (desktop) search within the buffer area.

7.5.12

This section suggests that the Project *may* impact on ground conditions during, construction, operation and/or decommissioning phases. We contend that all these phases *will* impact ground conditions and we would urge that all future communications dispense with the incorporation of this speculative narrative because of its inaccuracy.

Table 7.7

As is indicated the majority of the land parcels have the potential to have impacts relating to land contamination, ground instability or mineral resources, with the need for further assessment indicated as necessary. However, the nature of that assessment is not indicated i.e. will it be primary surveys or will it be a reliance upon historical data? If it is the latter, then we consider this to be particular cause for concern as we draw into question the reliability of historic data collection and reporting mechanisms, especially as they will be used to both predict the magnitude of the impacts likely encountered and guide the sensitivity categories of the receptor sites.

7.6 Traffic and Transport

7.6.18

We note that there are 11,000 households within 1.5km of the West Botley Utility-Scale Solar Power Station. Settlements such as Cassington with a narrow through road, residential properties, a school and a church are highly vulnerable to disturbance from construction traffic. Also, because of the dense population of the area in general operations such as trenching or cable laying which disrupt road routes (Table 7.11) have the potential to significantly redirect traffic also causing disturbance and disruption to surrounding villages. We therefore expect each settlement along / within routes for traffic associated with construction and operation to be specifically assessed for impacts, not a coverall general analysis.

7.7 Noise and Vibration

Baseline Acoustic Environment

7.7.5 and 7.7.7

The village of Cassington and Jericho Farm also lie on the southern edge of the Central Section of the West Botley Utility-Scale Solar Power Station.

7.8 Climate Change

7.8.1, 7.8.19, 7.8.29, 7.8.31

The impact assessment states that it will only consider changes in cloud cover in respect of climate change. We point to two other factors that should be included in the impact assessment:

(i) Extreme rainfall events. Predicted changes in patterns of rainfall resulting from climate change must be assessed with respect to hydrology and flood risk especially to villages located at the bottom of hills or slopes to be covered in solar arrays (such as Cassington).

(ii) Extreme wind / storm events. Land around Cassington and Eynsham has been subject to two extreme wind events in the last 11 years (May, 2012 and October, 2021). The latest event, which occurred on the 31st October, 2021 was associated with a small low pressure system (mesolow). This caused a tornado of estimated strength T3 (Strong Tornado) to move through Cassington Village causing substantial damage to buildings, walls and trees (Horton, 2021). An even stronger tornado (T4 – Severe Tornado) tore through Burleigh Wood on the same day felling over 100 trees (a location enclosed by the Central Section of the solar power station). An assessment needs to be made of the likelihood of such events occurring, whether the frequency will change with climate change and the potential for damage to the solar power station (especially the Central Section). This is both a matter of operational risk for the solar power station and public safety. We view the statement in 7.8.31 that "extreme weather events are not considered to cause significant environmental effects to the Project" as evidently incorrect.

7.8.15, 7.8.16, 7.8.34

We expect any life-cycle assessment of the Botley West Utility-Scale Solar Power Station to not just include manufacturing-stage emissions but also emissions associated with mining and production of materials for solar arrays and other infrastructure, construction, including transport and traffic, operations and also, importantly, decommissioning and recycling of materials used for solar arrays and associated infrastructure (proposed to be scoped out). Infrastructure should be built with principles of the circular economy which means that the very large number of solar arrays and associated infrastructure should be recycled following decommissioning.

7.9 Socioeconomics

We note the Cassington Local Neighbourhood Plan is not included within the documents related to the socioeconomic assessment. This document includes much information which is relevant to the assessment related to the parish of Cassington.

Table 7.18

Employment

Significant impact on employment will be mainly associated with construction and will be temporary.

Need for temporary accommodation for workers

Temporary accommodation for workers not required because of good road linkages in the region. We point out that many of the roads in the area are already severely congested, hence current work to improve provision of Park and Ride facilities and road improvements. This, therefore, requires assessment at the EIA stage.

Economic output

Improvements will be temporary (i.e. during construction).

Recreation activities and Land Use

Rapid development of rural centres and villages in the West Oxfordshire area is putting great pressure both on land, infrastructure and residents of the area. Without doubt this is already eroding the quality of life of residents through increased disturbance from traffic, pollution, access to amenities, availability of public transport and opportunity for exercise and experiencing the outdoors.

Exposure to green space and the opportunity to exercise on locally available land have been demonstrated multiple times to have both physical and mental health benefits (e.g. Bowler et al., 2010; Shanahan et al., 2016; Cox et al., 2017). The main public rights of way used by the residents of Cassington village will be severely degraded in terms of their visual aspect, from one of open farmland to one of a largely artificial landscape dominated by solar panels. Schemes to enhance use of land through provision of a footpath along the Evenlode River (as suggested during the public consultation) will not compensate for these losses and have issues in and of themselves.

The aspect of open countryside currently enjoyed by residents of Cassington living on the north side of the village as well as residents of Jericho Farm will also be dominated by solar arrays, likely harming wellbeing in terms of mental and physical health. Jericho Farm, in particular, will be almost completely surrounded by solar arrays running up closely to the boundaries of the properties there.

The setting of Cassington, one of the few small villages in West Oxfordshire close to Oxford will turn from a largely rural aspect to one of being surrounded by industrialised land to the north (Mulvaney, 2019). This will have negative impacts on well-being for the majority of village residents.

We also note that in its pursuit of change in land use Blenheim Estates have, where they have been able, terminated the tenure of farmers on the land subject to the current proposal. This has caused great stress to some of the families involved and in one case has been suggested to have contributed to the death of one of the Parish's farmers (Cassington Parish Council Meeting, 1st December, 2022).

We therefore view an assessment of the socioeconomic impacts of the proposed scheme on recreational activities and land use to be essential.

Housing

11,000 households lie within 1.5km of the Botley West Utility-Scale Solar Power Station. Already we have had reports that house sales have fallen through in the village of Cassington because of the perceived threat of the impact posed by the solar power station. An increasing number of studies show impacts of solar farms on house values. The nearer you are to one, and the bigger the solar farm is, the greater the impact. We therefore challenge leaving this out of the EIA Assessment. Evidence material indicates that there will be a significant financial impact on households through both affecting the value and saleability of properties. Furthermore, we challenge the contention that this development is "temporary" for many people in our village and others this development will be in place for the rest of their lives. Temporary is therefore a relevant term, for many residents it will be to all practical purposes permanent. We note that one of the grounds for rejection of another large-scale solar power station was that a 40-year lifespan for practical purposes may be regarded as permanent (Planning Inspectorate Application Reference s62A/2022/0011 Land East of Pelham Substation, Maggots End, Manuden).

Crime and Safety

We do not believe that the assumption that “a workforce management plan”, including the operation of “modern slavery policies”, is going to ensure that the behaviour of both the highly skilled and less skilled workers is sound. Even if most workers, as claimed, will [arguably] be reasonably local, they may not feel a particular kinship with the immediate locality, which may be reflected in their driving and other behaviour as well as their spending preferences.

With respect to crime there are two aspects to this: (1) crime centred on the proposed site itself; and (2) crime committed in the surrounding area. The first has been scoped out and the second is not even considered for scoping in or out. Site-related crime has been scoped out for the construction phase on the (“assumed”) grounds that the site security arrangements will be adequate. This rather overconfidently passes over the attraction that large construction sites have for both opportunistic crime and, more seriously, for organised crime groups, who might have the wherewithal to circumvent security measures. For the operation phase, crime is again scoped out because the “proposed scheme is unlikely to affect the crime profile of the area . . . No impacts considered likely.” Table 7.19 goes even further: “widespread actual and *perceived* crime that could affect population health” is scoped out; likewise “changes in crime or fear of crime”. The latter assertion is based on “the rural context of the Project”.

Crime does not have to be particularly widespread to be perceived as such, and to induce fear of crime. The arrival of a population of, say, 1,200 workers probably changing in personnel from time to time, is bound to have an impact on the crime profile of the area *outside* the site. One or two burglaries from homes or businesses, thefts of farm equipment, driving offences, petty vandalism, accumulations of litter – no doubt the responsibility of a small minority of workers – will swiftly alter the local atmosphere and begin to affect local residents’ wellbeing. Opportunistic strangers or organised groups, some turning up in high viz jackets and hard hats, will almost certainly target the area. And as for the “rural context”, RPS seems to have no idea about current concerns about levels of rural crime. Scoping out crime is in our view inappropriate.

7.11 Agricultural Lands and Soils

We note the Cassington Local Neighbourhood Plan and Green Infrastructure Plan are not included within the documents related to the Agricultural Lands and Soils. These documents are relevant as they include policies on nature recovery and also use of the land surrounding the village for recreational purposes.

As part of the assessment, we would like to see an estimation in the loss of agricultural productivity for the land subsumed by the solar power station over its lifetime.

8.3 Glint and Glare

8.3.14

We note that RAF Brize Norton is not included in the likely receptors for glint and glare. However, some of the approaches to the airport, for example, over the village of Cassington, may be affected by glare from the solar arrays located north of the village and therefore should be considered as potential receptors for the purposes of the Glint and Glare analyses.

9 Topics Proposed To Be Scoped Out Of The EIA Process

9.2 Daylight, Sunlight and Microclimate

Soil microbial biodiversity is vital to the well-being of the above ground vegetation and all that depends upon it. Solar panels result in a large proportion of the overall footprint of the solar farm effectively being put in the shade with reduced exposure to rain, severely diminishing soil microbial

activity as a consequence of alteration to the immediate microclimate. This will result in an inert growth medium for plant life with a cascading effect upon the wildlife that directly or indirectly depends upon it. Solar panels also alter the temperature and evapotranspiration of soils, tending to keep them warmer during winter and cooler during the summer (e.g. Armstrong et al., 2016).

Large solar power stations such as the one proposed here have the potential to increase local temperatures in a similar way to the urban heat island affect. Measurements over a solar power station, nearby urban environments and surrounding wildlands have indicated a warming effect of up to 3-4^{o}C depending on the season and time of day (Barron-Gafford et al., 2016). Such heat retention could have significant impacts on residents in villages surrounding the proposed solar power station which is a particular concern given temperature rise resulting from climate change.

We conclude that both from the point of views of impacts on biodiversity and on people effects of this proposed very large-scale power station on microclimate should be within the scope of the EIA.

9.4 Electromagnetic Fields (EMF)

The scoping report restricts consideration of this issue to cables that exceed 132kV, and to human health only. However, the effect on non-humans should be scoped in, not least because power converter stations and transformers, of which there will be 156 + 6 + 2, are generators of EMFs. According to the US National Library of Medicine's National Center for Biotechnology Information:

"Numerous studies across all frequencies and taxa indicate that current low-level anthropogenic EMF can have myriad and synergistic effects, including on orientation and migration, food finding, reproduction, mating, nest and den building, territorial maintenance and defense, and on vitality, longevity and survivorship itself. Effects have been observed in mammals such as bats, cervids, cetaceans and pinnipeds among others, and on birds, insects, amphibians, reptiles, microbes and many species of flora."

Not surprisingly, the paper goes on to say, "It is time to recognize ambient EMF as a novel form of pollution and develop rules at regulatory agencies that designate air as 'habitat' so EMF can be regulated like other pollutants. Long-term chronic low-level EMF exposure standards, which do not now exist, should be set accordingly for wildlife, and environmental laws should be strictly enforced".

References

Armstrong, A., Ostle, N.J., Whitaker, J. (2016) Solar park microclimate and vegetation management effects on grassland carbon cycling. *Environmental Research Letters* 11: 074016.

Barron-Gafford, G.A., Minor, R.L., Allen, N.A., Cronin, A.D., Brooks, A.E., Pavao-Zuckerman, M.A. (2016) The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures. *Scientific Reports* 6: 35070.

Bowler, D.E., Buyung-Ali, L.M., Knight, T.M., Pullin, A.S. (2010) A systematic review of evidence for the added benefits to health of exposure to natural environments. *BMC Public Health* 10: 456.

Cox, D.T.C., Shanahan, D.F., Hudson, H.L., Fuller, R.A., Anderson, K., Hancock, S., Gaston, K.J. (2017) Doses of nearby nature simultaneously associated with multiple health benefits. *International Journal of Environmental Research and Public Health* 14: 172.

Gaur, V., Lang, C. (2023) House of the rising sun: The effect of utility-scale solar arrays on housing prices. *Energy Economics* 122: 106699.

Horton, S. (2021) Cassington Tornado 2021: Report by the Tornado and Storm Research Organisation (TORRO). 15pp.

Jenkins, A.R., Ralston, S., Smit-Robinson, H.A. (2015) *Best Practice Guidelines for assessing and monitoring the impact of solar energy facilities on birds in southern Africa.* Birdlife South Africa, 62pp.

Mulvaney, D. (2019) *Solar Power: Innovation, Sustainability and Environmental Justice.* University of California Press, 329pp.

Pisinaras, V., Wei, Y., Bärring, L., Gemitzi, A. (2014) Conceptualizing and assessing the effects of installation and operation of photovoltaic power plants on major hydrologic budget constituents. *Science of the Total Environment* 493: 239–250.

Private Eye (2023a) Marlborough Light. Private Eye 1597.

Private Eye (2023b) Botley Contested. Private Eye 1599.

Private Eye (2023c) Light and Shady. *Private Eye* 1601.

PVDP (2023) Botley West Solar Farm: Phase One Consultation Summary Report July, 2023. Photovolt Development Partners on behalf of SolarFive Ltd. 15pp.

Rogers, A., Thompson, S., Mills, G., Metcalf, C., King, B. (2022) Cassington Parish Council Response to the Botley West Utility Scale Solar Power Station: Response to the Photovolt Development Partners Pre-Planning Community Consultation Leaflet. Cassington Parish Council, 14pp.

Shanahan, D.F., Bush, R., Gaston, K.J., Lin, B.B., Dean, J., Barber, E., Fuller, R.A. (2016) Health benefits from nature experiences depend on dose. *Scientific Reports* 6: 28551.

Smallwood, K.S. (2020) Utility‐scale solar impacts to volant wildlife. *Journal of Wildlife Management*. 86: e22216.

Visser, E., Perold, V., Ralston-Paton, S., Cardenal, A.C., Ryan, P.G. (2019) Assessing the impacts of a utility-scale photovoltaic solar energy facility on birds in the Northern Cape, South Africa. *Renewable Energy* 133: 1285-1294.

Wildlife Trusts (2012) *Where To Go For Wildlife in Berkshire, Buckinghamshire and Oxfordshire*, Fifth Edition. Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, Littlemore, Oxfordshire. Pisces Publications, an imprint of NatureBureau, Newbury, Berkshire, 184pp.

WODC (2007) Conservation Area Character Appraisal Cassington. West Oxfordshire District Council Planning Service, Witney, Oxfordshire, UK, 7pp.

WODC (2008) Parish Flood Report Cassington November 2008. West Oxfordshire District Council, 20pp.

Yavari, R., Zaliwciw, D., Cibin, R., McPhillips, L. (2022) Minimizing environmental impacts of solar farms: a review of current science on landscape hydrology and guidance on stormwater management. *Environmental Research Infrastructure and Sustainability* 2: 032002.

Planning and Development

David Peckford, Assistant Director – Planning and Development

Cherwell DISTRICT COUNCIL NORTH OXFORDSHIRE

FAO Emily Park
on behalf of the Secretary of State
Environmental Services Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Bodicote House
Bodicote
Banbury
Oxfordshire
OX15 4AA

www.cherwell.gov.uk

Please ask for:	***Suzanne Taylor***	Direct Dial:	***01295 221656***
Email:	***suzanne.taylor@cherwell-dc.gov.uk***	Your Ref:	**EN010147-000009**

12th July 2023

BY EMAIL ONLY

Dear Emily Park,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Your Ref: **EN010147-000009**

CDC Ref: 22/03407/DCO

Applicant's Name: Photovolt Development Partners/Solar Five Ltd

Location: Botley West

Consultation end date: **13 July 2023**

Thank you for consulting Cherwell District Council (CDC) on 15 June 2023 regarding a Scoping Opinion for the Botley West Solar Farm.

The following comments only relate to development proposals within the administrative boundary of Cherwell District.

It is recommended that the Environmental Statement required for the proposed development should cover the format and topics as proposed by the applicant. CDC has considered the scope of each chapter to remain in the Environmental Statement and provides advice below as to where that scope should be widened.

The EIA should be undertaken in accordance with current legislation, national, regional, local and neighbourhood plans as relevant to the environment. The Environmental Statement should demonstrate the ways in which it complies with that requirement.

To assist the applicant, the relevant documents of the Development Plan for Cherwell District Council should be considered and comprise the following:

Cherwell Local Plan 2011-2031 Part 1 (CLP 2031 Part 1)
Cherwell Local Plan 2011-2031 Part 1 (Partial Review – Oxford's Unmet Housing Need)
Cherwell Local Plan 1996 Saved Policies (CLP 1996)

The following matters should also be addressed in the Environmental Statement.

Need and Alternatives Considered

5.4 Alternatives
The Scoping Report does not provide details of reasonable alternatives. As such, reasonable alternatives have not been considered at this stage by CDC.

The EIA should include a detailed consideration of reasonable alternatives to the development proposal, including sites outside the Green Belt. These should be considered in the Environmental Statement and details provided of the options and choices made.

Proposed Scope of Assessment: Environmental Statement Chapters

7.1 Historic Environment
It is agreed that the designated heritage assets identified that lie within Cherwell District should be scoped into the Environmental Statement. It is also agreed that these assets lie within the wider area surrounding the site and there are no Heritage Assets within the site itself.

It is noted that the study area is 2km from the boundary of the site and this appears to be quite a small area compared to the size of the site, although it is acknowledged that the zone of visibility will potentially extend any assessment beyond this.

There are three further conservation areas within Cherwell District that sit relatively close to the site that should be highlighted, Rousham, Shipton-on-Cherwell and Hampton Gay.

Furthermore, non-designated Heritage Assets are identified within the Conservation Area Appraisals and it is suggested that these should also be considered.

The methodology and approach to assessment is broadly agreed, however it is important that the impact to Heritage Assets through development within their wider setting is considered, including as part of the wider historic landscape.

7.2 Landscape and Visual Resources
The LVIA scoping section is comprehensive and promotes the use of appropriate assessment methodology except in respect of the following set out in Table 7.3: Impacts proposed to be scoped out of the project assessment for landscape and visual Impact Justification:

No visualisations of construction – Agreed as the construction period is temporary but, if phased, the proposed timeframe must be clearly set-out in the written narrative.

No permanent lighting is proposed – The impact of directional lighting for security and CCTV must be confirmed in the written narrative.

No significant effects expected that would overwhelm existing properties nor render properties an unattractive place to live – CDC's Landscape Officer disagrees and believes that residents may feel strongly that their visual experience is compromised.

Therefore, CDC recommend that 6.36 GLVIA3 is considered:
"The issues of whether residents should be included as visual receptors and residential properties as private viewpoints has been discussed in Paragraph 6.1. If discussion with the competent authority suggests that they should be covered in the assessment of visual effects it will be important to recognise that residents may be particularly susceptible to changes in their visual amenity – residents at home, especially using rooms normally in waking or daylight hours, are likely to experience views for longer than those briefly passing through an area. The combined effects on a number of residents in an area may also be considered, by aggregating properties within a settlement, as a way of assessing the effect on the community as a whole. Care must, however, be taken first to ensure that this really does represent the whole community and second to avoid any double counting of the effects."

Resident Receptor VPs should be agreed with the competent authority.

No significant effects are expected for highest sensitivity receptors beyond 5 km from the site boundary - Agreed however CDC's Landscape Officer observes that there are multiple boundaries and different AOLs which have to be considered. Recommend that the written narrative to confirm.

7.3 Ecology and Nature Conservation
CDC request clarification that the surveys referred to in paragraph 7.3.19 is not exhaustive and that others, such as Dormice and Wintering Birds, will be covered.

CDC also request clarification that the direct and indirect ecological impacts of the decommissioning phase will be addressed by the Environmental Statement. Whilst the Scoping Report states that full ecological enhancement plans would be provided at this phase in paragraph 6.4.2 these may not address any impacts from the actual work to do so and this could be extensive. Aside from this CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.4 Hydrology and Flood Risk
CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.5 Ground conditions
CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.6 Traffic and Transport
CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.7 Noise and Vibration
CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.8 Climate Change
CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.9 Socio Economics
CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.10 Human Health
CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.11 Agriculture Land & Soils
CDC is satisfied that the approach outlined in the Scoping Report is acceptable.

7.12 Cumulative Effects and Inter-relationship
CDC is satisfied that the approach outlined in the Scoping Report is acceptable subject to agreement of the list of existing and proposed developments that will be taken into account.

Supporting Technical Assessments

8.2 Air Quality (dust during construction)
CDC is satisfied with the proposed approach of producing a supporting technical report rather than being covered by a chapter of the Environmental Statement.

8.3 Glint and Glare
CDC is satisfied that the approach outlined in the Scoping Report is acceptable however we are aware that London Oxford Airport have expressed concerns about glint and glare. It is noted that a proposed technical report on this topic will include a detailed modelling assessment in respect of London Oxford Airport.

Topics Scoped Out

CDC agree that the following topics can be scoped out of the ES:

. Material Assets
. Daylight, Sunlight and Microclimate
. Waste
. Transboundary Effects

However, CDC question the scoping out of the following topics:

Electromagnetic Fields (EMF) Concerns have been expressed by London Oxford Airport about High Intensity Radio interference. It is recommended that the potential for interference from panels should be assessed and mitigation proposed if required.

Major Accidents and Disasters Should not be scoped out as there are concerns expressed by London Oxford Airport regarding emergency access to the site in the event of an emergency landing/plane crash. This is particularly pertinent when considering the parcel of land within Begbroke which is immediately to the south of the runway. CDC recommends that this is addressed.

Furthermore, to demonstrate that topics have not been overlooked, where topics are scoped out prior to submission of the application, the ES should clearly explain the reasoning and justify the approach taken.

Summary of council response

Cherwell District Council is broadly in agreement with the Environmental Statement topic areas set out in the Scoping Report June 2023 and the identified areas of environmental impact, except where stated under ‘Topics Scoped Out’ and subject to the above technical matters being addressed.

Yours sincerely

Suzanne Taylor BSc (Hons) Dip UP MRTPI
Principal Planning Officer – South Area Major Projects Team
Development Management Division
Communities Directorate

COTSWOLD DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

NEIGHBOURING AUTHORITY CONSULTATION

Proposing to build and operate a new ground mounted solar farm in Oxfordshire. The development site (the Site) has a total area of approximately 1400 hectares (ha) and is located within parts of the administrative areas of Cherwell, West Oxfordshire and The Vale of White Horse Districts at Botley Solar Farm

APPLICATION REF: 23/01996/NEI **DATE OF DECISION: 23rd June 2023**

YOUR REF: EN010147-000009

Dear Sir/Madam

I refer to your consultation received on 15.06.2023 in respect of the above and confirm that this Authority has **no comments** to make on the proposal.

Should you have any queries in respect of this response please do not hesitate to contact me.

Yours faithfully

Phil Shaw

Phil Shaw
Business Manager - Development & Sustainability

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'*

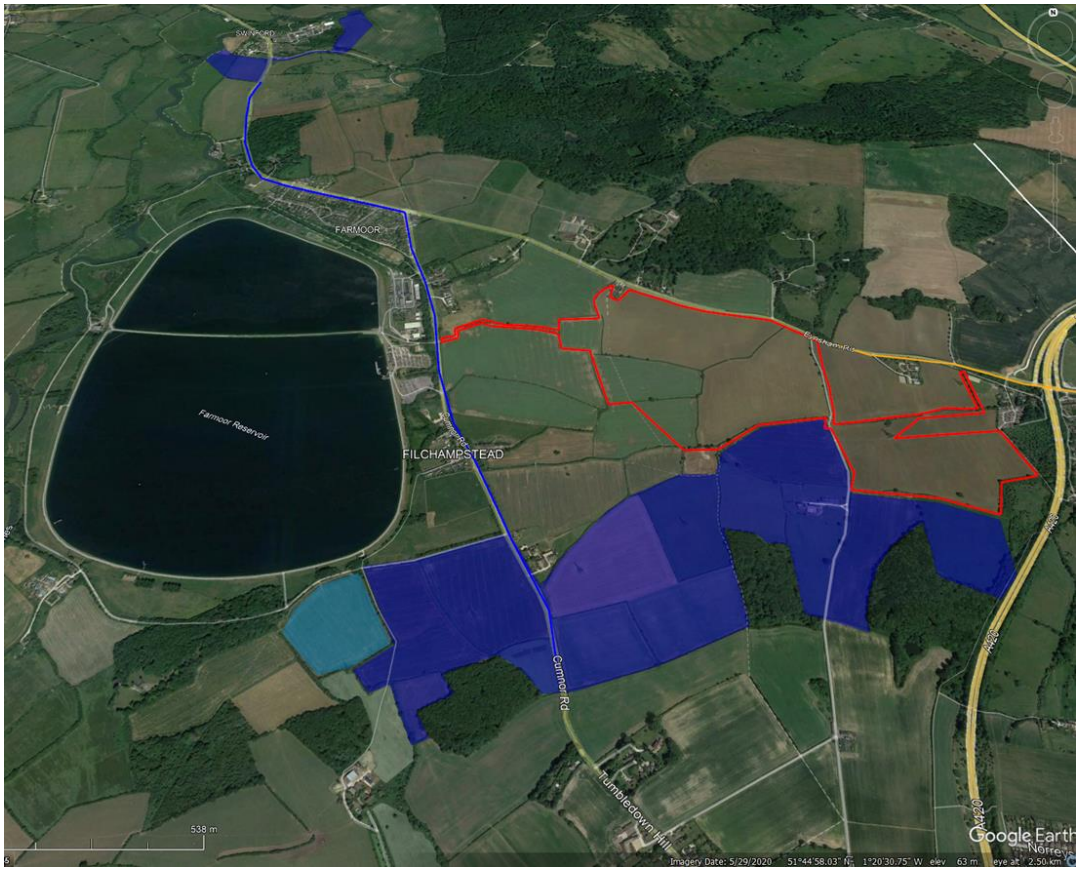


Figure 1
showing 'Botley West' in dark blue, the most likely alternate location of the 440kV National Grid substation in light blue, and the perimeter of the proposed Red House Farm solar power station in red

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

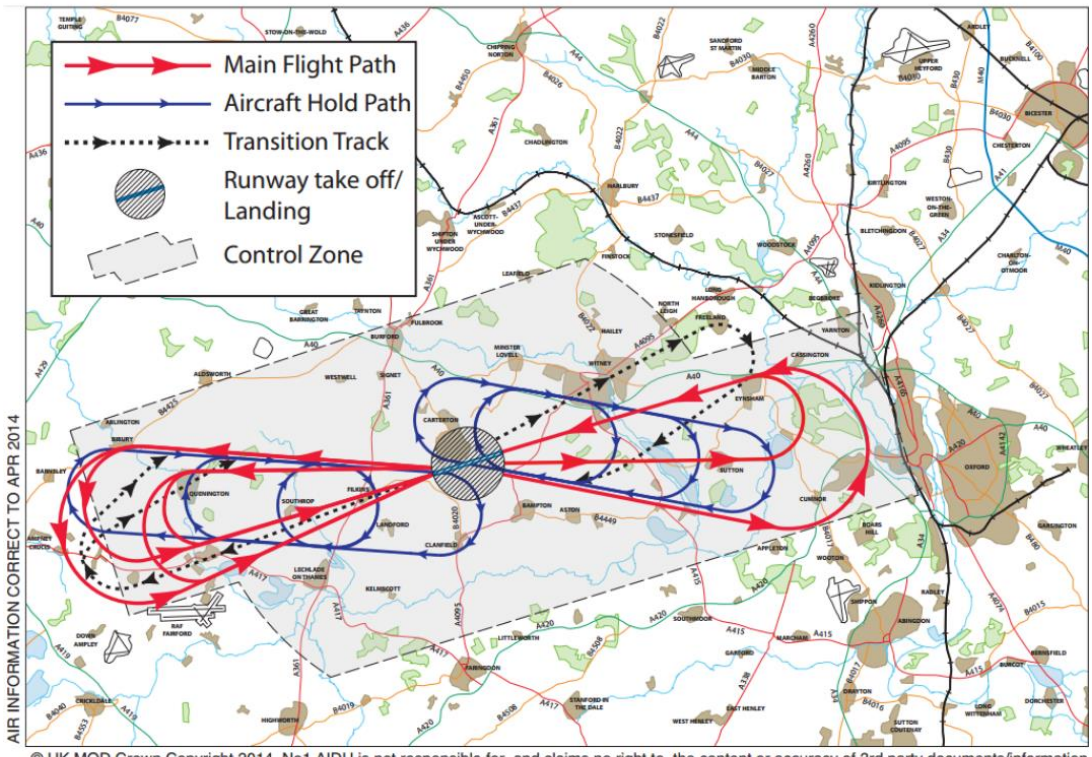
Council believes this needs to be scoped in given the proposed high voltage cable routings running past residential and childcare facilities in the parish (e.g. along the B4044 and B4017) and the proposed 3.8 hectare, 15m tall, 400,000V substation.

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).



RAF Brize Norton Control Zone

Figure 2

Emily Park
Infrastructure Planning Commission
Alison Down
Temple Quay House (2 The Square)
Temple Quay
Bristol
Avon
BS1 6PN

Our ref: XA/2023/100010/01-L01
Your ref: EN010147-000009

Date: 12 July 2023

Dear Emily Park

EIA scoping opinion: application by Solarfive ltd. (the applicant) for an order granting development consent for the Botley West Solar Farm (the proposed development)

Botley West Solar Farm

Thank you for consulting the Environment Agency on the Environmental Impact Assessment (EIA) Scoping Opinion for the proposed development. We have reviewed the 'Botley West Solar Farm Scoping Report' by RPS (dated 15 June 2023, version 6). We were consulted by the Planning Inspectorate on 15 June 2023.

For the topics within our remit, we broadly agree with the topics that have been scoped in and scoped out of the EIA, and wish to make the following comments.

Please note, we have included a section regarding the **Thames Valley Flood Scheme**, which has the potential to overlap with the proposed development site of Botley West Solar Farm.

Flood risk
The application site lies partly within Flood Zones 1, 2 and 3 defined by the National Planning Policy Framework (NPPF) and associated Flood risk and coastal change Planning Practice Guidance (PPG) as respectively having a low, medium and high probability of flooding. The development is considered 'Essential infrastructure' under annex 3 of the NPPF. The site is partly defended by Environment Agency maintained flood defences, and third-party maintained defences.

Please note there is an error in paragraph 2.1.5 of the Scoping Report which states the Northern Site is entirely within Flood Zone 1. There is a small area of Flood Zone 3, as highlighted in table 7.5.

Part of the application site is likely to lie within the 3.3% annual exceedance probability (AEP) flood outline, which is identified by the Table 1 of the Flood Zone and flood risk tables of the PPG as within Flood Zone 3b (the functional floodplain). Please be aware that development should be avoided within the 3.3% AEP (Flood Zone 3b) where

possible, which is defined by the PPG as land where water from rivers, or the sea, has to flow or be stored in times of flood.

It is likely that detailed hydraulic modelling will be required, and we welcome that this is acknowledged in paragraph 7.4.17 (although please note more than one model is likely to be required). For any detailed modelling that is undertaken, a range of flood events including the 3.3% AEP, 1% AEP and 1% AEP plus an appropriate allowance for climate change should be modelled. If the site is within Flood Zone 2 and/or 3 from fluvial flood risk from the following rivers, then detailed hydraulic modelling will be required as no modelling is currently available:

- River Evenlode – *including a tributary that joins the Evenlode just upstream of Eynsham Mill*
- River Glyme
- Eynsham Mead Ditch
- Filchampstead Brook
- Rowel Brook – *detailed modelling should extend further upstream than the existing JFLOW data*

We will need to review and sign off any flood modelling to ensure it is fit for its intended use. Once the modelling is agreed, a detailed comparison should be made between the modelled flood levels and a detailed topographic survey. This will help establish the likely flood extents. The proposed scheme should then be designed in consideration of agreed flood extents and levels.

There are two existing detailed models available that can be used to provide information on flooding from the River Thames. Please note, additional River Thames modelling may be required to determine the 1% AEP plus an appropriate allowance for climate change event:

- Thames (Shifford to Eynsham) & Windrush (A40 to Thames Confluence) 2011
- Thames (Eynsham to Sandford) 2018 2022

The red line boundary is also in close proximity to the Chil Brook and we have a detailed model in this area, namely the Chil Brook (Eynsham) 2013 model.

We are pleased to see that section 7.4.17 mentions that the applicant will prepare a Flood Risk Assessment (FRA), for the proposed development. The FRA should also include some assessment of the likelihood and consequences of a breach or overtopping of the defences located on site, and mitigate against this accordingly. An assessment of the structural integrity of the defences should be provided, and consideration of ongoing maintenance requirements for the operational lifetime of the development.

<u>Sequential approach</u>
A sequential approach should be taken to both the choice of site, and the layout of development within the site boundary, locating the most vulnerable development in the areas at lowest flood risk. In this instance, the most vulnerable development may be any equipment that would be damaged by flood waters. As development is considered ‘Essential infrastructure’, although it is deemed compatible with all flood zones (subject to the application of the Sequential Test), it will need to pass the Exception Test in areas of both Flood Zone 3a and 3b, and should be designed and constructed to remain operational and safe in times of flood. As the site includes large areas of Flood Zone 1, it may be possible to avoid any development in the 1% AEP plus an appropriate

Cont/d..

allowance for climate change flood extent. If this is not possible, then we would expect to see detailed justification within an FRA, as to why built development is required in areas at high flood risk.

Whilst the majority of site is within Flood Zone 1, particularly in the Northern and Southern Sites, large areas of the site do appear to be within Flood Zone 3. We welcome paragraph 7.4.17 '*PV arrays, electricity sub-station, battery storage units and other building elements of the solar farm will be, where practicable, kept out of the surface water flood extents associated with these flow paths'*, which should include flow paths from the 1% AEP fluvial event, plus an appropriate allowance for a climate change fluvial flood event, and 300mm freeboard. We are concerned that this may not be possible in some areas of the Central Site which contains significant areas of Flood Zone 3. Paragraph 2.1.14 of the Scoping Report does state that for areas in Flood Zone 3 from the River Evenlode '*it is not proposed to develop solar arrays in these high-risk areas'*, we strongly advise other built development is also excluded from areas at high flood risk especially if the equipment could be damaged by flood waters.

Please view our guidance on allowances for climate change flood events here: Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk)

Increases in flood risk elsewhere

Any land raising or increases in built footprint within the 1% AEP, plus an appropriate allowance for climate change flood extent, can lead to increases in flood risk elsewhere. This is due to a loss of available floodplain storage and/or impedance of flood flows. Therefore, floodplain compensation would need to be provided for any loss in floodplain storage within this flood extent. Level for level floodplain compensation is the preferred method of mitigation, and should be considered within the FRA. Cumulative impacts should be considered, as due to the scale of the proposed development, the total volume of storage lost from footings in the floodplain could be large in total.

To avoid losses in floodplain storage from the impendence of flood flows, access roads should be set at existing ground level. If there are safe access and egress issues relating to access routes in the floodplain, we recommend you discuss these with the Local Planning Authorities. Similarly, cables that are to be set above ground may need to be located outside the 1% AEP plus an appropriate allowance for climate change flood extent. This is to prevent impedance of flood flows, unless they are set above flood levels (such as by using pylons).

We welcome that paragraph 7.4.17 states the PV arrays would be raised above the 1% AEP, plus an appropriate allowance for climate change flood level. Please note that at least 300mm freeboard above the design flood level should be provided to reduce the risk of flooding to property (taking into account wave action and inaccuracies of modelled data). Any other buildings/structures, proposed within the 1% AEP plus an appropriate allowance for climate change flood level (such as transformers, inverters etc), should also be raised at least 300mm above this design flood level, or designed to ensure they are not damaged by flood water. This and any other measures to ensure the solar farm would operate in times of flood should be considered within the FRA.

Any changes in land level, such as for earthworks or in decommissioning and enhancement plans, within the 1% AEP plus an appropriate allowance for climate change flood extent, should be assessed within the FRA. We note any surplus material (such as from transformer foundation excavations) is proposed to be reused in landscaping and restoration of the site and will not be exported. This surplus material should be located outside the 1% AEP plus an appropriate allowance for climate change flood extent, to prevent a loss in floodplain storage.

Cont/d..

Walls and fences can have a significant impact on the flow and storage of flood water, especially if they are constructed across a flood flow route. This can lead to higher levels of flood water on the upstream side of the fence, or wall, which will potentially increase the flood risk to nearby areas. Therefore, walls and fences should be permeable to flood water.

Works within 8m of a Main River and flood defences

We welcome that paragraph 7.4.17 of the report sets out that PV arrays, electricity sub-station, battery storage units and other building elements of the solar farm are proposed to *'be set back by at least 8m from the Main River and ordinary watercourses'*. To ensure essential access to rivers is maintained, all development (including any fencing) should be set back at least 8m from main rivers and ordinary watercourses where possible.

Works should be avoided if proposed in, under or over main rivers. From Figure 3 and Table 7.5, the red line boundary crosses multiple main rivers. If works are required to connect the site on either side of a main river, for example by cables, more information will be required on how this may be achieved. Whilst cables set under a river or significantly above a river through pylons may be acceptable, we would have concerns with new river crossings or alterations to existing crossings. This is because bridges/crossings can have a significant impact on the flow and storage of flood water; this can lead to higher levels of flood water on the upstream side of the crossing, which will potentially increase the flood risk to nearby areas.

Any temporary or permanent structures should be suitably set back from the flood defences, to avoid compromising their structural integrity. Access to the flood defences should be preserved for maintenance and inspection. The applicant should consider the effects of vibration on the structural integrity of the flood defences on site. This includes construction works, plant, machinery or traffic within proximity to the defences. It should be scoped in for the construction, operation and decommissioning phases of the project.

Controlled Waters

We have reviewed Section 7.5: Ground Conditions, and provide the following comments in relation to the protection of Controlled Waters.

Due to the large scale of the proposed scheme, the site is underlain by several geological formations. The main bedrock formations are the White Limestone, Cornbrash, Forest Marble and Oxford Clay. The White Limestone and Cornbrash Formations are both classified as Principal aquifers, whilst the Forest Marble is a Secondary A aquifer, and the Oxford Clay is a Secondary undifferentiated aquifer.

Superficial deposits include the Wolvercote Sand and Gravel, the Summertown-Radley Sand and Gravel Member, and Alluvium. These are all classified as Secondary A aquifers.

One historic landfill, Hensington Railway Cutting, lies beneath the proposed development (cable route section). This historic landfill comprised of two areas of tipping:

- EALHLD 13550, centred on grid reference SP 45600 17100 received waste from December 1979 to December 1980. The material deposited included semi-inert, bio-degradable, building waste, extensive tipping of asbestos, liquid sludge, household waste, commercial, industrial and inert waste. Monitoring in October

Cont/d..

1989 identified 1% LEL methane in spiking tests.

- Area 2 (ref EAHLD13551) centred on SP 45900 17100 also received waste from December 1979 to December 1980. Inert, semi-inert, industrial, commercial, building, household and special waste was deposited, along with liquid sludge and extensive tipping of asbestos. A temporary gas monitoring borehole was installed in 1990. No methane was detected, and no routine monitoring is undertaken.

We are largely satisfied with the topics that have been scoped out of requiring further assessment. We have provided comments on Section 7.5, pollution prevention and drainage, and some general informatives about the scheme.

Ground conditions have been scoped in as requiring assessment, on a parcel-by-parcel basis. The report references our Land Contamination Risk Management guidance - all assessments should follow these guidelines.

Paragraph 7.5.19 states that, *"For land parcels scoped in as requiring ES assessment for ground conditions, there will be an assessment of the likely significant effects from the construction, operation and decommissioning of the Project on controlled waters receptors (groundwater and surface water)."* A series of assessments for land contamination will inform the baseline conditions, including a desk top study and preliminary risk assessment for each land parcel that has been scoped in. Ground investigations will be undertaken where required.

There may be some areas of land within these parcels that were brownfield and have been redeveloped. It is therefore possible that site investigation and other useful site-specific information will be available on the Local Planning Authorities planning portals. These could help with the assessment of baseline conditions.

The assessment should be clear about the receptors that may be at risk from existing contamination. The scoping report does not detail the aquifers that are present beneath the site; it is a very large site underlain by several geologies, some of which are principal and secondary aquifers. Abstractions (including private water supplies) must be included in the assessment.

If our comments above are considered, we are satisfied with the overall approach to the assessment in relation to land contamination (ground conditions).

<u>Pollution prevention</u>
Pollution prevention during construction and operation of the development is mentioned in paragraph 4.2.21 where it is stated that, "*Measures to be adopted during construction to avoid and minimise environmental effects, such as pollution control measures. These measures would be implemented through the Code of Construction Practice and/or a Construction Environmental Management Plan."*

Table 9.1 summarises the issues that will be scoped in and out of the Environmental Statement. We note that deterioration of water quality in main rivers and surface water courses during construction will be scoped in. There is no mention of groundwater quality being affected by construction activities. We would expect this to be included in the assessment, as the site is underlain in places by a Principal aquifer that is highly vulnerable to pollution.

Cables for the new scheme will be laid in trenches, typically between 40 and 100cm in depth. Driven piles are proposed for the installation of some elements of the proposed

development. Where the placement of these cables and piles takes place in land affected by contamination, the management of the waste material will need to be carefully considered. Their use, and the prevention of mobilisation of contamination as a result, should be included in the Construction Environment Management Plan (CEMP). The possibility of encountering rapidly changing geologies and groundwater displacement should also be considered.

Horizontal directional drilling (HDD) is listed in the glossary, although it is not mentioned in the body of the report. If HDD is proposed for the installation of cables, this work could involve the use of drilling muds, and their use may require risk assessment to ensure they do not pose a risk to Controlled Waters. The potential to use HDD techniques should therefore be included in the CEMP if it is likely to be an option.

It's advisable that the land is tested for any contaminants. Should any works unearth any leachable contaminants, this would have an impact on the runoff from the site - any runoff should be clean and uncontaminated. The applicant will need to be mindful of mitigation measures when it rains and the ingress of any run-off. Any run-off should be clean and uncontaminated.

If any excess energy is stored in batteries for this development, then the applicant should consider where any fire water would be contained and disposed of; chemicals within the batteries could cause environmental harm. We'd expect further information detailing how these fires would be put out. We would have major concerns if water were to be used from nearby watercourses.

Drainage

The report mentions that a drainage strategy will be compiled for the scheme. The strategy should include measures to prevent pollution. This is particularly important in the areas of the site that overlie a Principal aquifer. The strategy should ensure that any proposed used of Sustainable drainage systems (SUDS) is in line with our guidance, Sustainable drainage systems: non-statutory technical standards - GOV.UK (www.gov.uk).

'The Environment Agency's approach to groundwater protection' sets out where SUDS drainage is acceptable in relation to controlled waters. The applicant should be particularly mindful of policy G9 in relation to deep bore soakaways.

Waste

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to our:

- position statement on the Definition of Waste: Development Industry Code of Practice and;
- website at https://www.gov.uk/government/organisations/environment-agency for further guidance

Cont/d..

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

Any waste soil arisings will need to be properly classified, in accordance with Waste Classification Technical Guidance - WM3, and sent to an appropriately permitted facility. If any waste materials are to be imported for use in construction, an environmental permit may be required (see **environmental permitting**).

Fisheries, biodiversity and geomorphology
We have reviewed the scoping report for this application and are generally satisfied with its contents. We would however like to mention the following at this early stage, to ensure that the watercourses are adequately assessed.

Under section 5.4.11, we would like to see the importance of the watercourses and corridors reflected in the imposition of ecological buffer zones around each of the watercourses. River-based habitats should be free to expand into the buffer zones, to allow natural expansion of valuable habitats wherever possible.

Section 7.3.4 should mention that surveys for rivers and streams should use the MoRPh survey system. This system ensures robust capture of the ecology/morphology of both the channel and corridor. Habitats surveys, recorded as Phase 1 classifications, should provide details on how the habitat type has been converted to UK Habitats Classification types for the Biodiversity Net Gain (BNG) metric.

We are pleased to see that section 7.3.37 states that the BNG metric will be used to demonstrate measurable BNG for the development. The applicant should embed a mechanism to record & monitor ecological data on created, or evolving habitats, during the operation of the development. This will support BNG and facilitate the inclusion of these habitats into the Local Nature Recovery Network/Local Wildlife Site Designation.

We are pleased to see section 7.3.8 mention that field surveys have been conducted for various species. Water vole surveys should include all watercourses, including ordinary watercourses and ditches.

We would like section 7.3 to recognize and consider the impact that temporary access structures/river crossings may have on ecological buffer zones. These are likely to have a negative impact within the ecological buffer zone, and suitable mitigation should be considered. The temporary effects of cable crossings should also be included, as-well as mitigation for the possible de-watering of any watercourses to allow cable installation.

Cont/d..

All of the watercourses within or adjacent to the development are failing to achieve good ecological status under the Water Framework Directive (WFD). We would like to see the development looking to improve the habitat value of all watercourses, and their associated floodplain, within and adjacent to the development. For main river, the environmental objectives of the Thames River Basin Management Plan, such as creating buffer zones, removing barriers, improving river geomorphology, should be implemented to improve the WFD status of the watercourses within the project area. This will support the WFD obligations of the Local Planning Authorities within which this development is located. Additionally, these actions could provide mitigation and/or enhancement/Biodiversity Net Gain opportunities for the development.

We welcome the opportunity to engage further with the applicant, by advising on enhancement activities that may be suitable within this locality. Wider benefits such as Natural Flood Management could be explored to provide ecosystem services and community benefits.

Environmental permitting
Active discharge consents are located within the site boundary. The applicant should be aware of the potential impact their development may have on these permits, and may wish to talk to their respective owners. The consent reference numbers, and associated owners are as follows:

- CNTW.0934 (Millsdale Corporation)
- CTCU.1403 (Conoco Limited)
- CTCR.1749 (Thames Water Utilities Limited)
- CNTW.0933 (Blenheim Business Park)
- CAWM.1310 (The Oxford School of Drama)

Due to the construction work being carried out, the applicant should consider any de-watering activities that may take place. Dewatering is the removal/ abstraction of water (predominantly, but not confined to, groundwater) to locally lower water levels near the excavation. This activity was previously exempt from requiring an abstraction licence. Since 01 January 2018, most cases of new planned dewatering operations above 20 cubic metres a day will require a water abstraction licence from us prior to the commencement of dewatering activities at the site. A regulatory position statement may be available/suffice. The applicant should consider if the time of year they are carrying out any works and whether this will require any dewatering activity.

If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. More information can be found here,
Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk)

If they don't meet the exemption and require a full abstraction licence they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here,
Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk)

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our

Cont/d..

National Permitting Service early in the project planning.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here,
Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk)

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

For a list of activities that may be exempt from a permit, given that they meet certain conditions, see Exempt flood risk activities: environmental permits - GOV.UK (www.gov.uk). Please note, directional drilling within proximity to a watercourse, may be considered for an exemption, if it meets certain conditions.

If the applicant is intending to disapply legislation, we advise them to consult with us at the earliest opportunity to discuss if this would be acceptable.

Further Advice
We would welcome the opportunity to further engage and advise further on the matters outlined above. This can provide you with confidence and clarity in relation to our position on the Development Consent Order proposals, prior to formal submission and outside the statutory engagement process.

This would fall within the scope of our Cost Recoverable Planning Advice service, and as such would be subject to a fee of £100 per staff hour of time. We will contact you further in relation to this, but in the meantime should you wish to gain our views on any draft assessments or proposals, please contact us at NITeam@environment-agency.gov.uk for a quote.

Thames Valley Flood Scheme
The Thames Valley Flood Scheme (TVFS) is an emerging Environment Agency plan, progressing in close proximity to the Botley West Solar Farm area. Whilst the TVFS is at an early stage, there is potential for it to overlap with the development boundaries of this project.

Cont/d..

We recommend that the applicant contact the TVFS project team as soon as possible, to explore how to work together going forward. Please contact them at tvfs@environment-agency.gov.uk

Yours sincerely

Mr Morgan Haringman
Planning Specialist

Direct e-mail lnplanning@environment-agency.gov.uk

End

Freeland Parish Council

Response to proposal for Botley West Solar Farm

Introduction

Freeland Parish Council is very much aware of the demand for renewable energy in the UK and the contribution that solar energy can make to meeting this demand. However, the scale of the proposal is completely unacceptable as it would be the largest solar farm in the country and the second largest in Europe covering a vast area of valued countryside.

The fundamental flaw with this development is the fact that the choice of location for such an unprecedented scale, major infrastructure site hasn't been made strategically, but rather it is opportunistic and profit driven.

The proposed site is made up of an area of approximately 1400 hectares, which is 14% larger than that of London Airport. Blenheim have stated they are committed to lending 2000 acres (809+hectares) of their land to the project and that they expect to receive the land back in 40 years. Other landowners including Merton College, Oxford, are also contributing to the project. It will completely industrialise a vast area of valuable and beautiful countryside, much of it in Oxfordshire's greenbelt.

In proposing over 50MW of energy (actual proposal is for up to 840MWe, it is treated as a Nationally Significant Infrastructure Project (NSIP). Due to its scale, it bypasses the local democratic process, thus marginalising local communities, as it will be determined at a national level by the Secretary of State for Business, Energy and Industrial Strategy (BEIS).

The recent release of the developer's Scoping Report illustrates the extreme scale and complexity of this development. The ability of lay people to fully comprehend, yet alone comment on, this document, highlights the difficulty of ensuring full public consultation.

Freeland Parish Council have major concerns about the siting and vastness of the project and the extremely detrimental impact it would have on the community and the countryside and therefore strongly opposes the project in its current scope and scale believing it to be totally unacceptable on multiple grounds, including the following:

1. **Landscape impact**

a) The proposal exacerbates the landscape impact of previous power supply infrastructure in West Oxfordshire, including the National Grid power lines which blight the views over Oxford's "Dreaming Spires" skyline when approaching the city from the Greenbelt to the west and north and the more recent Charlbury Solar Farm, incredibly located within the beautiful Evenlode Valley, overlooking the listed historic Cornbury Park Estate, both of which are within the Cotswolds AONB. Both these power infrastructure projects demonstrate in microcosm the devastating impact the Botley West Solar Farm would have upon the undulating, small scale, high quality Cotswold landscape of West

Oxfordshire. Ironically, the proposed Middle Site Area would also severely impact upon the wider estate farmlands, which form the setting to Blenheim Palace Park, a UNESCO World Heritage Site. The proposed Botley West Solar Farm would, therefore, compromise the setting and integrity of three landscapes of international significance: the historic City of Oxford, the Blenheim Estate and the Cotswolds AONB.

b) National policy recommends the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land (BEIS, Draft National Policy Statement for Renewable Energy Infrastructure (EN-3), September 2021.)

c) Photovolt Development Partners {PVDP) propose using greenfield sites even though extensive brown field sites are available, eg Didcot Power Station and the former USAF airfield at Greenham Common.

d) National policy allows for a proposal involving Grade 3b greenfield land of moderate quality agricultural land: 'It is likely that applicants' developments may use some agricultural land, however applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land.' (BEIS, Draft National Policy Statement for Renewable Energy Infrastructure (EN-3), September 2021.) However, PVDP has not produced evidence that the proposed land, on which crops have successfully been grown, is better used for solar farming than for agriculture.

e) The proposed site includes the use of Green Belt land and NPPF para 147 states:

'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'

PVDP is required to show what the very special circumstances are.

f) Similarly, Local Plan Policy EH6 proposes to minimise impacts on biodiversity and landscape character and quality. 'Applicants will need to demonstrate that cumulative effects do not become a significant or defining characteristic of the wider landscape.' (Para 8.43)

g) The landscape is formed of hills, fields, woods and rivers. The varied topography will be reduced and sacrificed to a vast plane of angled reflecting panels.

2. Visual Impact

a) The unsightly industrialisation of the rural landscape with acres of solar panels, frames, security fencing, cameras, access roads, power lines, signage and concrete kerbs in place of open grazing and arable fields, will severely impact upon local residents, motorists and others high quality rural views when passing through the area.

b) PVDP have not indicated how many panels per hectare. There is therefore no information as to the likely visual impact from a hectare of land.

3. Quality of Life

a) These severe visual impacts will significantly reduce the quality of life for thousands of local residents, blight local villages and result in corresponding falls in the value of residents' homes.

b) The construction of the solar panels will severely disrupt traffic movement along Lower Road, a single lane highway, linking the A40 to the A44 and a main access road to the villages of Church Hanborough and Long Hanborough. The road is heavily used by HGVs, travelling between the A40 and A44, which will divert to the A4095 through the parishes of Long Hanborough and Freeland and impact on the community. More local traffic would no doubt use Pigeon House Lane which is already a dangerous single track road.

c) Aspects of Indicative Project Timeline appear to be extremely optimistic. This is a major infrastructure project, requiring considerable time for setting up the arrangements for, and management of, the installation in 1000 hectares. It would not be achieved in roughly six months, between the anticipated DCO decision in early 2025 and the start of construction work in the summer 2025.

d) Further, the preparation of the land, the installation of the concrete foundations, panels, posts, hedges etc in 1000 hectares could not possibly be achieved in a year. The impact on communities and wildlife during the construction phase will be considerable.

e) Blenheim's 'lending' of the land for 40 plus years for industrial use raises the issue of Blenheim's status as a UNESCO World Heritage Site, and its responsibility to its surrounding countryside.

> *'The manager's (of a World Heritage site) aim must be the continuing sustainable use of the landscape, whether urban or rural, while keeping …… what is important from the past, ... As a consequence, management must also change to accommodate the views of others and the interests of those who live and work in an area.'*

(UNESCO's 'Managing Cultural World Heritage' section. Sub section: UNESCO World Heritage sites: Criteria/rules. The wider obligation of heritage management: Protecting the natural environment (eco systems in and around sites)

f) Blenheim needs to be reminded of, and required to consider, both this responsibility and the impact on the neighbouring communities and on the countryside and landscape before surrendering 809 hectares of land for 30-40 years for the development of the largest solar farm in the country.

g) The enclosure of fields with 2m high fencing will result in the loss of popular countryside walks and render any remaining or diverted footpaths, bridleways and cycleways totally undesirable routes.

4. **Biodiversity**

a) Construction, enclosure and operation of the proposed solar farm sites would sever important wildlife corridors, reducing connectivity - a key requirement for a healthy countryside capable of adaption to climate change. Whilst there will be a huge loss of open foraging, grazing and feeding grounds for mammals and birds currently common throughout the area, including deer, badgers, foxes, hares, rabbits, bats, small rodents, raptors, owls and bats.

b) There are many promises of increasing wildlife diversity, making new footpaths and cycle routes. However, cycling and walking between a sea of fenced solar panels rather than beautiful countryside is not an attractive proposition. Any wildlife returning after the construction would be surrounded by concrete, steel and glass. Not an encouragement for biodiversity.

c) There is concern regarding the impact of extensive areas of panels on the population of British wild bee, an ancient species, long thought to be extinct, but recently discovered in the Blenheim estate. The panels and possible depletion of wildlife would affect their foraging habit and behaviour.

d) There is no evidence, as claimed in the BWSF leaflet, that there would be 'significant environmental gains in Oxfordshire 'resulting from the solar farm, or 'a meaningful net gain biodiversity across the site area'. For their claim that 'existing landscape and ecological features, improving soil quality and introducing new habitats to provide an attractive area for a variety of wildlife' PVDP has produced no evidence as to how this would be measured or achieved.

e) There is evidence, however, that solar panels can confuse insects and birds, especially water birds who realise too late that the panels are not water and crash into them.

Conclusion

The concept of a solar farm on this scale and in this location is totally inappropriate and unacceptable. One of the principle benefits of a National Electricity Grid is that power generation can be remote from the consumer, thereby protecting the public from radiation, in the case of nuclear power stations or, in the case of solar farms, from adverse landscape and visual impacts. A national facility of this scale should be strategically located within an expansive, sparsely populated, flat landscape where peripheral, multi layered, woodland belts can effectively screen views into the site throughout the year, thereby maintaining the quality of the rural landscape.

Freeland Parish Council believes that this proposal would have an extremely detrimental impact on the surrounding communities and countryside and therefore strongly opposes it.

Freeland Parish Council

10th July 2023

HANBOROUGH PARISH COUNCIL

Response to Scoping Report prepared for Photovolt Development Partners acting for Solarfive Limited.

1. This Response is made to West Oxfordshire District Council ("WODC"), who have asked local Parish Councils to provide submissions in respect of a Scoping Report ("SR") dated 15/06/2023 relating to a planning application for a Development Consent Order for the proposed Botley West Solar Farm ("BWSF").

2. This response from Hanborough Parish Council ("HPC") has had the benefit of comments from local residents, and has been considered by Parish Councillors. HPC are aware of the wider considerations which of necessity relate to this SR, not least because of the sheer size and scale of the BWSF proposal. HPC notes that this project is the largest solar PV "farm" in the world to be planned to be so close to so many towns, villages and communities.

3. We note that the developer, PVDP GmbH for Solarfive Ltd (the Applicant, but herein, for convenience referred to as "PVDP") proposes to send out notification of its forthcoming statutory consultation phase to some 22,000 local addresses. By comparison, in those parts of the world seemingly more favoured for solar PV projects, such as the drier and more arid areas of Spain, Portugal, Southern Europe, and the US, the size of individual populations affected by such projects are measured in the low hundreds, not in many thousands. There is, of course, a reason for that. Such areas are much more likely to receive greater amounts of solar irradiance than can be expected here in West Oxfordshire, given the respective latitudes involved.

4. HPC estimates that some 30% of the entire parish area will be taken up by the BWSF proposal. That, in itself, demonstrates the extent to which this BWSF proposal will dominate the landscape for the foreseeable future. HPC is aware that other adjoining

parishes will be involved to a similar or greater extent in the "contribution" of parish area to the BWSF proposal.

5. This response adopts, for convenience and easy reference, the content headings in the PVDP SR. Where paragraph references are cited, these are references to paragraphs so numbered in the SR, unless specifically noted otherwise. HPC is well aware that the SR deals with matters which PVDP consider should be included – or excluded – from the scoping procedure. For that reason, HPC does not engage with a wider debate as to the desirability or otherwise of the proposed BWSF as a whole, except for the comment in paragraphs 6 and 7, below.

6. HPC notes with regret, and some concern, the efforts made by PVDP in the SR to advertise the self-proclaimed and so-called benefits which will flow from the BWSF proposal. It must be beyond doubt that climate change is with us all. The need to reduce CO_2 emissions to the level existing in 1990 is undeniable. That is what net zero carbon means.

7. It does not, in HPC's view, advance the cause of PVDP's promotion of BWSF for them to say that it is essential to the UK's need going forward for a greater supply of renewable energy from specifically solar PV generation and even more specifically from the BWSF scheme itself. In HPC's view, that approach is nothing more than a "sales brochure" promotion of the BWSF proposal and ignores the continuous and rapidly increasing development of sources of renewable energy generation from multiple sources (i.e. not just field-mounted solar PV panels) across the entire UK.

8. HPC does not comment further on this specific point. It is quite clearly self-serving to the BWSF scheme, and does not excuse the failures noted below in respect of specific scoping issues.

9. We turn to the particular sections of the SR.

Chapter 2 – Existing Baseline:

10. This chapter sets out what is called the existing baseline. There is a recurrent theme in this chapter – as also in most of the rest of the SR – which repeatedly makes reference to the need for further surveys, studies and assessments *[see e.g. paragraphs 2.1.4, 2.1.13, and 2.1.22]*. It is clear to HPC - and we are sure to other parishes – that PVDP does not at this time have complete knowledge of the landscape which it proposes to use for BWSF. In HPC's view, this significantly detracts from the point of the SR, which is to set out not only those matters which will be "scoped in" to the Environmental Statement, but also sets out those aspects which are proposed to be "scoped out".

11. It is those matters to be scoped out which are of greatest concern: how can PVDP know what may or may not be scoped out unless they have done sufficient work to know and understand the land, the landscape, the environment, and its existing state. HPC considers that this is a serious deficiency in the SR, and would wish to see a further commitment to work before the SR can be accepted by PINS.

12. There is a small inaccuracy in paragraph 2.1.11, where reference is made to the A34. HPC believes that this should be a reference to the A44, which is the major road running to the north-east of the Central Site.

13. Paragraph 2.1.21 refers to the plan for the BWSF scheme to connect to the National Grid at some point in the Southern Site. Although this area is not within the parish of Hanborough, the proposed connection is fundamental to the whole scheme. HPC notes the uncertainty surrounding the fact of any connection to the Grid, and that an assumption is being made by PVDP which may require further scoping enquiries and a revised SR before any Scoping Opinion can be delivered by PINS. HPC does not understand the reference to paragraphs 1.1.13 to 1.1.16 here. There are no paragraphs with those numbers in this SR.

14. HPC notes that at paragraph 4.2.4 of the SR, no actual date or range of dates is given for any assessment of the existing baseline conditions. This is an omission which should be rectified. It is important that a clearly identified starting date is known so that the existing baseline can be recognised. HCP would expect that starting date to be before any work even starts on the BWSF scheme; and further considers that the baseline date should be not less than one full year and preferably more than one year so as to allow for seasonal changes.

Chapter 5 - Need and Alternatives Considered:

15. HPC notes the efforts made to justify the BWSF scheme set out in paragraphs 5.2.1 to 5.2.5. HPC takes particular note of the confirmation stated in 5.2.3 that the UK Grid is constrained and that the HV Overhead Line network is being reinforced all over the country. No evidence is provided or is proposed to be provided about the real capability of the NG to accept any connection from the BWSF. HPC considers that this is crucial information which should be thoroughly assessed before any solar farm proposal can be approved. Any Environmental Statement must therefore include sufficient detail to verify, clearly, that BWSF's current status as having "reserved" access to the National Grid will in fact turn into a certain reality.

16. Paragraph 5.2.5 of the SR presents a confused view. It is quite unclear whether the "Do Nothing" suggestion relates specifically to the BWSF proposal, or whether it really suggests a national lack of progress towards renewable energy generation. If the latter, then HPC considers that this interpretation flies in the face of obvious national progress in developing sources of renewable energy from multiple ways and locations. That accords with Government policy. If, on the other hand, the "do nothing" relates specifically to a refusal of the BWSF scheme, then that is in the view of HPC simply arrant posturing by PVDP. If BWSF does not succeed in being built, the lights will not be going out across the UK. Notwithstanding the proposed size of BWSF, its claimed importance to the UK energy supply is not so great as to require BWSF to be built regardless of the harm and destruction it would bring.

17. At paragraph 5.3.17, it is asserted that the specific need for solar generation needs to reach 70GW by 2035. Given a claimed nameplate capacity for BWSF of 840MW, that generation would provide just 1.2% of the 2035 target, which is hardly "significant" as a contribution.

18. HPC notes at paragraph 5.4.3 a repetition of the confused thinking mentioned above. The bold assertion that the Government's strategy of net zero by 2030 (sic) would be materially undermined if BWSF is not built is simply absurd.

19. HPC rejects the assertions in paragraph 5.4.6 that the BWSF Site is suitable because:-

- its location is on low-productivity arable land of low ecological value
- its location relative to the area energy demand is highest
- its location [is] away from main settlements.

None of these are proven and recognised facts. PVDP recognises that it will need to include proper land surveys to ascertain quality; BWSF's location is not near any specific area energy demand, being mostly several kilometres away from the putative sub-station connection; and the proposed scheme is surrounded by or adjacent to over 11,000 properties, which makes the BWSF scheme the largest scheme in the world to be built so close to so many people. The fact that PVDP are mailing out leaflets to some 22,000 properties locally simply adds to this point.

20. In relation to the proposal that 75% of BWSF be built on the Oxford Green Belt, HPC also rejects any assertion that this will be reasonable because the factors identified by PVDP will constitute "very special circumstances". HPC expects that any such arguments will have to be a significant part of any ES produced for any application to PINS.

Chapter 7 – Proposed Scope of Assessment: ES Chapters:

7.1 – Historic Environment:

21. HPC repeats that its concern is more about what is proposed to be "scoped out" from assessment than what PVDP is suggesting will be included in any ES. Thus, the suggestion

in paragraph 7.1.33 that there would be no need to include consideration of effects upon buried archaeology during any decommissioning stage of the Project is considered to be quite inadequate. First, there is as yet no detail at all as to what decommissioning would actually entail. Indeed, there appears to be no certainty that the Applicant, PVDP, would even have any residual interest in the BWSF site at all, let alone being in a position to be responsible for decommissioning.

22. Second, it appears to be fanciful to think that once any damage has been inflicted on buried archaeology during any construction phase, any further damage during decommissioning will not matter. Decommissioning must be as likely to involve construction-type vehicles and movement across the Site. HPC considers that the possible effects of all vehicle work on the Site must be scoped into assessment, including the decommissioning phase.

7.2 - Landscape and Visual Resources:

23. HPC notes the content of Table 7.3, setting out those impacts proposed to be scoped out of the project assessment. It is considered that the sheer size of the BWSF proposal, covering so many communities across a large swathe of countryside is bound to have impact effects upon those who live and work within a reasonable distance of the boundaries of the Site. For that reason, HPC considers that nothing should be scoped out under this heading. The assertion that "*no significant effects are expected*" does not offer any sufficient excuse to avoid a proper and thorough scoping exercise. Table 6.2 includes mention of manually operated lighting and PIR motion sensor activated security / emergency lighting. Scoping should therefore include assessment of the likelihood that such lighting will be activated by wildlife movement or human intrusions, and should include adequate details of any control mechanisms to guard against unintended illuminations.

7.3 – Ecology and Nature Conservation:

24. HPC notes that scoping assessment will be made of the considerable areas of land which are not identified as designated sites; in other words, the whole of the areas on which BWSF works will be carried out. HPC notes that no mention is made of larger vertebrate mammals such as deer, hares, rabbits, all of which are known to inhabit the landscape and agricultural land to be taken up by BWSF. HPC considers that that is an omission in itself which should be corrected.

25. It is noted that PVDP seem to be suggesting that there will be no need to consider habitats within the specified designated sites such as Bladon Heath, Burleigh Wood and Pinsley Wood (the last of which comes within HPC's boundary). It appears that PVDP do not wish to consider that wildlife – of all sorts – which might make use of those designated sites will also – without any doubt at all – be found in the areas to be part of BWSF. Wildlife does not recognise artificially constructed boundaries, and keep within them or away from them. Species of deer which roam over open farmland also use the protected woodlands. The construction of secure fencing around the various parts of the BWSF site will substantially affect wildlife using the designated sites as much as it will keeping animals out of the land to be covered in solar panels. HPC considers that it is essential that impact effects must be considered and scoped for the designated sites as well as for the more open land around those areas.

7.5 – Ground Conditions:

26. HPC notes that land within the Parish area is to be at least partially included in the relevant scoping exercise.

7.6 – Traffic and Transport:

27. Table 7.12 of the SR sets out the proposed areas of impact which will be scoped out of the ES. HPC considers that this Table significantly underestimates (a) the local traffic conditions which already exist, and (b) the additional impact which any BWSF development would make to the area, including but not limited to the area within HPC.

28. HPC appreciates that traffic and transport matters arising during the construction phase of the Project will be included in any scoping / assessment exercise. HPC notes the omission of reference to the A4095 road which connects the A44 and the Northern end of the proposed BWSF to the Parish Council area of Hanborough and then on westwards to Witney. By virtue of its two connecting roads (Lower Road and Cassington / Burleigh Road) the A4095 also feeds traffic to and from the A40 at the Eynsham roundabout. These roads are a very well-known "rat-run" for traffic, including a high number of HGVs seeking to avoid the need to travel from the A40 to the A44 (and A34) via the Oxford ring road connection at Wolvercote.

29. HPC hopes that this quite localised but extremely busy road connection will be adequately considered within the context of any Construction Traffic Management Plan ("CTMP") prepared as a part of the application by PVDP to PINS in due course. HPC is aware of the CTMP produced as evidence to the PINS Examination for the Sunnica Solar Energy Project: Sunnica is a proposal which has just concluded its PINS Examination, and concerns a proposal for a 500MW solar facility some 5 miles or so north of Newmarket, in Suffolk. The CTMP for the Sunnica project disclosed that during the first six months of the construction phase, up to 400+ HGV movements per day could be expected to and from the various parts of that site (which is about two-thirds the size of BWSF).

30. HPC is therefore acutely aware that the addition of anything like that quantity of HGV traffic into the local road network around the BWSF proposed site could, quite simply, cause absolute traffic chaos. HPC hopes that any scoping assessment for traffic matters will fully reflect the particular situation for HPC and surrounding Parishes.

31. In that context, HPC considers that it would be inappropriate to simply suggest, as Table 7.12 does, that traffic management will not need to be scoped in for the operation and decommissioning phases of BWSF. In HPC's view that would be a dangerous misjudgement. If PVDP is still going to be responsible for decommissioning work in 40+

years time (which HPC frankly doubts, given PVDP's track record of starting but not finishing other solar projects), then it is at the least surprising to see PVDP suggesting that traffic volumes for the removal of the solar farm infrastructure would be much less than for its construction. The same materiel brought in at the start will have to be removed at the end.

32. And given that it is widely accepted that solar PV panels have an effective lifespan of some 25 years, and that PVDP expect BWSF to function for up to 40 years, then it seems likely to HPC that there will be a point where replacement of solar PV panels will take place. That, during the operation phase, will again generate traffic in some significant quantity. HPC considers that this in itself requires a fully adequate assessment of traffic movements as part of the ES, and that should therefore be reflected in the SR now.

33. In addition, HPC notes the content of paragraphs 7.6.40 to 7.6.42 (Cumulative Effects). Hanborough PC is at the centre of a number of proposed housing development projects, including a proposed scheme for 600 new houses to be adjacent to the western edge of the BWSF scheme. There is also the planned Salt Cross Garden Village of 2,200 new homes just north of the A40 by Eynsham. These are significant other projects where traffic movements could also impact upon both "normal" traffic flow and any additional traffic related to the BWSF scheme. These schemes should also be taken into account and given special attention in any scoping / assessment process.

7.7 – Noise and Vibration

34. HPC notes the point made that vibration as such is not likely to be an issue for scoping. However, HPC considers that noise is likely to be an issue during all phases of the construction, operation and decommissioning of BWSF, and that the SR should ensure that a proper assessment will be necessary for the ES. HPC further considers that a separate study of noise in respect of decommissioning will be necessary, because the nature of the noise is likely to be different to that emanating from the construction phase. There would be, for instance, no real requirement for pile driving noise at the end of the

BWSF life: but HPC notes that no information would be available as to the methods of removing the BWSF structures if no separate scoping assessment is made.

7.8 - Climate Change

35. HPC notes that paragraph 7.8.1 of the SR proposes that the effect of climate change, including the impact of greenhouse gases ("GHGs") should be scoped out of the ES. HPC profoundly disagrees with that suggestion, and considers that it is fundamentally necessary that the full effect of the BWSF project be taken into account under this heading.

36. HPC notes with some astonishment that PVDP is happy to quote, in paragraph 7.8.10, the current baseline figure for the current average carbon intensity of electricity generation in the UK National Grid is 0.23963 $kgCO_2e/kWh$. A footnote to that point states that that figure is inclusive of the associated "well to tank" emissions derived from the extraction, refining and transportation of primary fuels before their use in the generation of electricity.

37. It seems to HPC that PVDP needs to make the same comparison with solar PV panels. Instead of wishing to scope out the associated cost of the whole process of manufacture and shipping of panels for use in BWSF, it must surely be correct to adopt the same process as is set out for primary (fossil) fuels. HPC strongly expects that PVDP must provide a fair comparison here, and have to scope in those associated costs for PV panels.

38. The problem is, of course, that the mining of minerals, manufacture of panels and transportation to the location of use is in fact a quite dirty business. It is said, and HPC has no reason to doubt, that it takes a tonne of coal to generate the electricity to make one solar PV panel. BWSF is going to consist of about 2,663,570 panels, thereby consuming the same number of tonnes of coal and causing a huge amount of GHG emissions in the process. That means that solar PV panels arrive at the BWSF site with a carbon debt already, before any electricity has even been generated.

39. In a study by Cranfield University for the Sunnica Examination, it was calculated that the carbon debt inherent in the PV panels to be used for that 500MW project was unlikely to be repaid by emission-free generation of electricity for up to 26 years. Indeed, and depending on whether either the solar PV panels, and / or the BESS batteries in the Sunnica project were replaced part way through the 40-year life of that scheme, it was possible that the accumulated carbon debt might never be repaid by clean and renewable energy generation.

40. For these reasons, HPC considers that it is essential that any scoping assessment for the ES must include a proper calculation of the full carbon debt associated with the BWSF proposal, rather than simply being scoped out – and therefore ignored - as set out in paragraph 7.8.16 of the SR.

41. It follows that PVDP's suggestions for other exclusions by scoping out, as set out in paragraphs 7.8.29 to 7.8.34, should equally be rejected in favour of scoping in, so that a true and fair view of the real cost in carbon terms of the BWSF scheme can be properly considered.

7.9 – Socio-Economics:

42. HPC notes that some of the items set out in Table 7.18 and indicated as being scoped out under this heading may be included in the part of this Chapter under the heading of 7.10 - Human Health.

43. HPC notes the reference to the accommodation of temporary workers during the construction phase of the BWSF project. It is noted that evidence for the Sunnica Solar Energy Project indicated that for a construction phase of 2 years (the same time scale as is being suggested for BWSF) a total of some 1200 temporary workers would be required. HPC sees no reason to think that the construction of the BWSF scheme would require less than at least this number, and quite probably a number closer to 1800. Given that number of temporary workers moving in and out of the BWSF site, HPC considers that it is

essential that a proper assessment of the environmental impact of this number of workers over at least a two-year period should be made, and this item should be scoped in.

44. Other estimates relating to the impact of temporary workers are simply speculative. For that reason, sufficient detail should be provided at an early stage so that the ES can be as detailed as possible. Residents in the parishes and towns surrounding and surrounded by, the BWSF proposal are entitled to know what influx of workers might be expected.

45. In relation to the item “Crime and Safety”, it is becoming increasingly obvious to police forces across the UK that the incidence of crime from solar farm sites is increasing quite rapidly. That is understandable as criminals, including those associated with organised crime, increasingly appreciate the value of materials used in the construction of solar farms, including copper wiring and cables, and the solar PV panels themselves.

46. Given the sheer size of BWSF and the fact that the overall site is interlaced by country roads leading quickly to more major parts of the road network, HPC considers that the whole issue of possible crime is one which needs to be scoped in, and not ignored. HPC understands that police forces increasingly aim to respond to potential crime incidents within about 20 minutes. The design of appropriate fence structures to resist attempts to enter the site requires that fencing to be able to resist attack for at least 20 minutes. Such a standard is laid out by the UK Building Research Establishment, and does not consist of 2 metre high “deer fencing”. Rather, the suggested standard for at least all external (i.e. all public roadside and accessible trackside) fencing is for 2.3 metre high “palisade-type” fencing which will have an obviously adverse impact on the visual assessment of that fencing.

47. In addition, the rise in criminal attacks upon solar farms leads to an increased fear of rural crime generally. For these reasons HPC believes that a proper assessment must be made in the scoping process for inclusion in the ES, so that the risk and adverse impact can

properly be considered. It is frankly absurd for PVDP to consider that the proposed scheme is *"unlikely to affect the crime profile of the area"* covered by the BWSF proposal.

7.10 – Human Health:

48. HPC notes that a number of issues stated to be scoped out for ES assessment purposes are already covered by other sections, such as 7.9 – Socio-Economic, immediately above. HPC's comments made there are equally applicable under this section heading.

49. So far as the item relating to Health and Social Care services is concerned in Table 7.19, HPC notes the assumption being made that a high proportion of the proposed workforce will come from within the regional area. HPC does not consider that there is any evidence that this will be the case, and notes the relatively high mobility of those who work in the construction industry. In addition, HPC considers that the demographic of residents in the villages and communities most closely impacted by the BWSF scheme do not, in the main, include any great number of younger construction workers able and capable of working long and arduous days constructing the BWSF project.

50. Local primary healthcare services are already stretched in the local communities. There would be limited room for additional temporary workers, who would therefore have to take their complaints and ailments to local A&E departments. Those are even more under pressure of numbers than local primary healthcare providers. HPC considers that a careful and thorough consideration should be given to this aspect of the SR, to ensure that it is adequately dealt with in the ES assessment in due course. This item should not be scoped out, as suggested.

7.11 – Agricultural Land and Soils:

51. This item has already been mentioned under the general points made above. HPC considers that it is necessary for a full and proper assessment of soil classification to be included for the ES, and that PVDP's conclusions as to agricultural land classification cannot be taken without any such assessment. In that context, the reference in paragraph

7.1.31 to taking just 1 soil augur boring for each 2Ha is not considered to be at all adequate to determine soil type and classification. HPC considers that this would not be a sufficient approach to an important aspect of the proposed development for the BWSF scheme.

52. Given that no details have been disclosed of what the decommissioning process might involve, it is impossible to know what assessment of the effects of that decommissioning might be upon soil quality, especially at a distance of some 40 to 42 years into the future. As noticed above, there is a distinct risk that PVDP will no longer be involved with the BWSF scheme by that time, and no information at all as to who might then be responsible for the decommissioning process. This issue should be considered now as a part of the ES assessment and should therefore be scoped in.

7.12 – Cumulative Effects and Inter-Relationships:

53. HPC notes, as it knows to its' cost, that the local area around the proposed site of the BWSF scheme is subject to a regular number of proposed housing and other developments. The rate of development is inexorable. HPC considers that the cumulative effect and impact upon local communities, including particularly Hanborough itself, requires that particular attention be given to this cumulative impact. HPC is also aware of other communities such as Cumnor / Botley where three separate solar farms are currently being proposed for planning consent within those parish areas, one of which is the Southern section of BWSF itself.

Chapter 8 – Proposed Scope of Assessment – Supporting Technical Assessment

54. HPC notes the content of this Chapter, and comments only on paragraph 8.2.15, in relation to the assertion that *" .. the level of construction and operational traffic is expected to be low*". HPC considers that this comment must be seen to be wrong given the content of paragraphs 29 to 31 above. It is simply fallacious to consider that the level of construction traffic will be low, especially when taken together with the normal high level of other traffic already using the local road network.

55. HPC considers that at least this aspect of any Air Quality assessment should be scoped in.

56. As for other parts of this Chapter, and Chapter 9, HPC does not comment at this time, and notes that much of what is contained therein will in any case be covered by technical assessments anyway.

57. As to the “Summary of Issues scoped in or out of the EIA”, HPC relies upon the detailed comments above for its responses to the SR.

For and By Hanborough Parish Council.

11 July 2023

Historic England

Ms Emily Park [redacted]

Planning Inspectorate (Botley West Solar

Farm)

Our ref: PL00793324

7 July 2023

Dear Ms Park,

Re. Botley West Solar Farm , Oxfordshire

Thank you for consulting us on the scoping report for the above mulit-site solar farm.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We note the summary of designated and undesignated assets in the scoping report and that at this stage no assets have been scoped out.

We would draw your attention in particular to the Blenheim World Heritage site which lies close to the northern area of the solar scheme. UNESCO and the Advisory Bodies to the World Heritage Committee (ICCROM, ICOMOS & IUCN) have recently issued *Guidance and Toolkit for Impact Assessment in a World Heritage context* - new guidance for assessing impacts from projects that could potentially affect World Heritage Sites: https://whc.unesco.org/en/news/2465/. The new guidance incorporates and replaces ICOMOS' *Guidance on Impact Assessment for Cultural World Heritage Properties* (2011) and IUCN's *World Heritage Advice Note on Environmental Assessment* (2013). It therefore now represents the most updated reference on conducting and reviewing impact assessments for all World Heritage properties.
https://whc.unesco.org/en/guidance-toolkit-impact-assessments/.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. We you're your intention to assess these assets. Assessment and evaluation of the historic should be carried out at as early stage as possible so that the information can feed into your design. For below-ground archaeological remains this process should include trial trenching.

We would strongly recommend that you involve the Conservation Officers of the relevant district councils and the archaeological staff at Oxfordshire County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. In particular please note that the site area may include archaeological remains which are of equivalent importance to designated remains.

Given the topography of the surrounding landscape, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. In particular, photographs with wirelines/ shaded areas showing location of solar array and other above ground units from key points should be included. Where there is possibility that glint and glare from the solar array could be visible within sensitive historic views we recommend a glint and glare assessment takes place and is included in submission documents.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

The EIA should be cross-referenced and internally coherent - the cultural heritage

chapter should not be a stand-alone exercise but should refer to and make use of the findings of the landscape and visual assessment. Significant heritage assets should be considered in the LVIA as sensitive receptors.

The applicant's heritage consultants have contacted Historic England to initiate discussons and pre-application advice - we welcome this.

Please note these specific points from the scoping report.

3.2.10 We welcome the opportunity to advise on and be consulted on the PEIR.

4.2.14 The confirmation that some impacts should be considered permanent is noted and is in line with a recent planning appeal decision (S62A/2022/0011, Land East of Pelham Substation, Maggots End, Manuden, Mr C Parker, 11/5/23).

7.1.17 It should not be assumed that magnetometry will be the best geophysics technique for all areas - other techniques may need to be considered.

7.1.17 If land for environmental mitigation is to include new planting this is potentially damaging to archaeological remains and the land may therefore require geophysical survey.

7.1.33 It does not seem possible to entirely dismiss the possibility of damage to archaeological deposits during decommissioning, especially at a distance of 40 years into the future. Some consideration should be given to this.

7.1.24 Although views and visibility are an important element of setting, HE guidance is clear that our experience is also influenced by 'our understanding of the historic relationship between places.' Historic England 2017, *The Setting of Heritage Assets*, Historic Environment Good Practice Advice in Planning Note 3, p.2. To give an example, the contribution that rural environs make to a heritage asset's significance (eg to a deserted medieval village or medieval moated site) is not negated because a hedge separates the asset from those environs. Therefore a change to those rural environs is a potential impact on the significance of the asset.

We trust you will find the above advice to be helpful,

Yours sincerely,

David Wilkinson

David Wilkinson
Inspector of Ancient Monuments

Historic England

[redacted]@HistoricEngland.org.uk

cc: Richard Oram. Team Leader, Oxfordshire County Council Archaeology Team

4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Kidlington Parish Council has adopted a climate emergency statement, and acknowledges that there is a need for alternative renewable energy to avoid the use of fossil fuels; however, the council is opposed to the proposals by Botley West Solar Farm (BWSF) on the scale proposed and in the location identified by the proposers.

By 2050 the area around Oxford will be heavily developed largely in existing green belt. The BWSF will cover further parts of the green belt in the same area, which will change the landscape substantially, decreasing the attractiveness of the areas to live and work in, and have significant impact on the tourist industry.

The key arguments behind our objection are as follows:

1. Botley West Solar Farm (BWSF) would be the biggest Solar Farm in Europe (currently the eleventh biggest in the world), and would be the biggest solar farm anywhere globally built on farmland.
2. The Green Belt is for leisure, health and landscape views, not for solar factories. More than three-quarters of BWSF falls within Oxford's Green Belt, occupying more land within 2kms of the city than all of the proposed new houses being built there.
3. There is a food emergency as well as a climate emergency. Britain currently imports more than half of the food we eat. We should not use any productive farmland for solar farms when there are 250,000 hectares of unused, south-facing commercial roofs in the UK.
4. Solar Farms are a very inefficient way of generating green energy. In the UK, solar panels produce their maximum output for fewer than three hours each day, and none at all during the night. Offshore wind turbines produce maximum power for at least four times longer each day, including during the night-time.
5. The developers claim that Botley West will provide sufficient power to meet the electricity needs of 330,000 homes. But this applies only to the sunniest day of the year, not to the other 364 days. On average, throughout the year, only 220,000 homes will be provided with Botley West's solar power, which goes straight into the National Grid supply to the entire country, not just to Oxfordshire.
6. There are no evident direct benefits for local residents; alternatives can easily be located elsewhere.
7. Solar farms are usually established for 30 or more years, but decommissioning costs can be twice as large as original installation costs. Solar farms frequently change ownership during their lifetime and there is no guarantee that future owners will pay for decommissioning.
8. Solar panels can occasionally catch fire spontaneously. Given the very large number of panels involved, Botley West presents a 10 sq. km fire hazard, in many places without obvious access for fire control measures.
9. Many claims are made for increased biodiversity within solar farms. The reality is different. Toxic chemicals leak slowly from commercial panels and permanently pollute the soil. Run-off from the panels causes gulley erosion of the soil and possible flooding of nearby properties.
10. Botley West would be situated between Oxford city and the Blenheim Palace World Heritage site, sits on the border of an Area of Outstanding Natural Beauty (the Cotswolds), is overlooked by ancient woodlands and the world class Site of Special Scientific Interest, Wytham Woods, and is consequently an obvious tourist destination. Botley West would occupy a total of 1400 hectares, an area greater than Heathrow Airport. Who wants to visit Heathrow Airport in the Cotswolds?
11. Property values are decreased by between 0% and 30% when utility-scale solar farms are built nearby. No Solar Farm of this size has ever been built anywhere on earth so close to major human settlements. The impact is greater the larger the solar farm.

From:	.Box.Assetprotection (National Gas)
To:	Botley West Solar Farm
Cc:	[redacted]@stirling-land.co.uk
Subject:	RE: [EXTERNAL] EN010145 - Botley West Solar Farm - EIA Scoping Notification and Consultation
Date:	19 June 2023 10:10:28
Attachments:	image001.png image003.png image004.png image005.png image006.png

---

Good morning,

Thank you for your email.

Regarding your consultation EN010145, there are no National Gas Transmission assets affected in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

Asset Protection Team

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Complex Land Rights
Ellie Laycock
Development Liaison Officer
UK Land and Property
[redacted]@nationalgrid.com
Tel: +44 (0)7989 208211

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
BotleyWestSolar@planninginspectorate.gov.uk

11 July 2023

Dear Sir/Madam

APPLICATION BY SOLARFIVE LTD (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE BOTLEY WEST SOLAR FARM (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 15th June 2023 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET). Having reviewed the scoping report, I would like to make the following comments regarding NGET infrastructure within or in close proximity to the current red line boundary.

NGET has existing high voltage electricity overhead transmission lines within the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Overhead Lines

4TE 400kV OHL	Cowley – Walham
	Cowley – Minety

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004)".

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully

[redacted]

Ellie Laycock
Development Liaison Officer, Complex Land Rights

[redacted]

From: Beata Ginn [redacted]@nationalhighways.co.uk>
Sent: 04 July 2023 14:07
To: Park, Emily [redacted]@planninginspectorate.gov.uk>
Cc: Planning SE <planningse@nationalhighways.co.uk>; Patrick Blake [redacted]@nationalhighways.co.uk>; Spatial Planning <SpatialPlanning@nationalhighways.co.uk>; transportplanning@dft.gov.uk
Subject: FORMAL RESPONSE@2023 07 04: NH/23/01659 (Tracker No: #20452) EN010147-000009 - Botley West Solar Farm - EIA Scoping Notification and Consultation

FAO: Emily Park, Planning Inspectorate

Reference: EN010147-000009

Our reference: NH/23/01659 (Tracker No: #20452)

Location: Land in West Oxfordshire, Cherwell and Vale of White Horse Districts, across approx 1400 hectares

Proposal: Solar photovoltaic array and connection infrastructure, with a maximum intended generation capacity of 840MW.

Consultation on request for a Screening or Scoping Opinion of the Local Planning Authority under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Dear Emily,

Thank you for your letter dated 28 June 2023, consulting us on the EIA Scoping Report for the proposals for the new Botley West Solar Farm in Oxfordshire.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34 which is located east of the site. The proposed site is large and spread out, but at the closest point to the SRN it is approximately 0.8 miles west of the A34.

We do not offer a view of the scope of EIA's as this is for the Planning Inspectorate to determine. However, we note that the applicant states in section 7.6 of the scoping report that a Transport Statement (TS) will be produced to accompany the application. Based on what is known about the development proposals, it is highly likely that the A34 will be impacted by the development, particularly during construction. Therefore, we would recommend that the applicant contacts us to determine any requirements we may have for the scope of the TS. This can be done by contacting us through our inbox:

PlanningSE@nationalhighways.co.uk . It is essential that the views of the Local Highway Authority, in this case Oxfordshire County Council, are also sought.

In addition, section 7.6.25 of the scoping report states that the applicant intends to submit a Construction Traffic Management Plan (CTMP) alongside the DCO. This should properly assess the impact of construction traffic on the A34.

We look forward to working with the Applicant and Oxfordshire County Council as Local Highway Authority to develop the scope of the subsequent TS. We would expect the TS to assess any potential impacts to the A34 and take into account any other development in the area.

Due to the above we would strongly recommend early engagement with the applicant prior to the submission of any future formal application.

I hope this is helpful.

Regards,

Mrs Beata Ginn
Assistant Spatial Planner (Area 3)
National Highways | Bridge House | Walnut Tree Close | Guildford GU1 4LZ
Tel: [redacted]
Web: https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/

DPC:76616c646f72

Date: 26 June 2023
Our ref: 438578
Your ref: EN010145 EIA Scoping Opinion

BotleyWestSolar@planninginspectorate.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Emily

Environmental Impact Assessment Scoping consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: EN010145 EIA Scoping Opinion Consultation for Botley West Solar Farm.
Location: Land between A4260 and the Dorn River Valley down to land near Farmoor Reservoir and north of Cumnor, Oxfordshire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 01 June 2023, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant a DCO.

Natural England advise that the following matters be assessed within the Environmental Statement supporting the application. Natural England's full advice on the scope of Environmental Impact Assessments (EIA) is set out in Annex A below.

European Sites- Oxford Meadows Special Area of Conservation

The proposal could have potential impacts on Oxford Meadows SAC. We advise that hydrological impacts and air pollution impacts on this site are assessed within the Environmental Statement.

An assessment of any Likely Significant Effects on the SAC will be required as detailed in the Habitats and Species Regulations 2017.

Nationally Designated Sites- Sites of Special Scientific Interest

The proposal could have potential impacts on Blenheim Park SSSI, Rushy Meadows SSSI, Wytham Ditches & Flushes SSSI and Wytham Woods SSSI. There are a number of potential impact pathways to consider at these sites during the construction and operational phases of the development which will require further assessment within the Environmental Statement.

Ancient Woodland

Natural England consider robust assessment of the implications for ancient woodland to be of significant importance for this project due to the scale of the project, potential for loss of connectivity at the landscape scale and habitat fragmentation.

Protected Landscapes

The proposals are located within the setting of the Cotswolds Area of Outstanding Natural Beauty. Regard should be given to the direct and indirect effects of this proposal on the designated landscape.

Best and Most Versatile Agricultural Land

We consider the retention and safeguarding of Best and Most Versatile Agricultural Land to be an important consideration for this project.

It is recognised that due to the nature of the development a good proportion of the agricultural land affected by the development will not be permanently lost. However, the large development area and 42 year development lifetime give rise to additional concern with regard to agricultural productivity.

Topics Scoped 'out' of the Environmental Statement

We advise that the topic of 'direct habitat loss effects within the boundary of designated sites' not be prematurely scoped out of the ES.

The red line boundary for the development appears to be located adjacent to unit 5 of Wytham Woods SSSI and unit 3 of Blenheim Park SSSI, therefore direct impacts to these sites during construction and operation cannot be ruled out at this stage. We will require further information as to how potential impacts to these sites can be mitigated as the scheme evolves.

Natural England have not had any pre-application engagement with this project nor have we been consulted on any alternative locations, layout or design options. We appreciate that all of the design information is not available at this stage.

Should the applicant wish to discuss any of the above and scope for mitigation with Natural England, we are able to provide further assistance through our Discretionary Advice Service.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us. For any queries relating to the specific advice in this letter please contact Laura Elphick at [redacted]@naturalengland.org.uk.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Laura Elphick
Sustainable Development Lead Adviser
Thames Solent Team

Annex A – Natural England Advice on EIA Scoping

1. General Principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided[1].
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

From the Scoping report provided, Natural England consider that these general principles have been, or will be, appropriately addressed through the EIA process.

2. Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects
b. approved but uncompleted projects
c. ongoing activities

[1] National Infrastructure Planning (planninginsepctorate.gov.uk) Insert 2 – information to be provided with a scoping request, Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements

d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Natural England are aware of a number of other Solar projects in the surrounding area. These should be included within the in combination assessment and the approach to in-combination assessment should be described including the distance criteria selected.

The scope of an in-combination assessment should include plans and projects which are 'live' at the same time as the assessment being undertaken. These can potentially include:

1. The incomplete or non-implemented parts of plans or projects that have already commenced;
2. Plans or projects given consent or given effect but not yet started.
3. Plans or projects currently subject to an application for consent or proposed to be given effect;
4. Projects that are the subject of an outstanding appeal;
5. Ongoing plans or projects that are the subject of regular review and renewal
6. Any draft plans being prepared by any public body
7. Any proposed plans or projects that are reasonably foreseeable and/or published for consultation prior to application

3. Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

4. Biodiversity and Geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

We advise this include the emerging Local Nature Recovery Strategy (LNRS) for Oxfordshire which will be the key mechanism for planning and mapping local delivery of the NRN. The Nature Recovery Network (NRN) refers to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife Local nature recovery strategies GOV.UK (www.gov.uk).

Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Many public authorities e.g. National Highways, National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy, or have agreed approaches to BNG. Further information around general duties is available here.

5. Designated nature conservation sites

International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s):** Oxford Meadows Special Area of Conservation

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

The Habitats and Species Regulations 2017 require a determination as to whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. An appropriate assessment will be required where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Table 1: Potential risk to International designated sites: the development is within or may impact on the following European/Internationally designated site(s)

Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required.**
Oxford Meadows SAC European Site Conservation Objectives for Oxford Meadows SAC - UK0012845 (naturalengland.org.uk)	Lowland Hay Meadows Creeping Marshwort	Air Quality The impact of additional vehicle movements both during construction and operation on the local road network and strategic road network considering Oxford Meadows SAC as a sensitive receptor alone and/or in combination with other plans or projects.

		Hydrological connectivity to the site Groundwater Quantity impacts Groundwater Quality impacts Surface water Quantity impacts Surface water Quality impacts Hydrological impacts in the context of climate change/periods of drought/extreme rainfall events

6. Nationally designated sites

Sites of Special Scientific Interest

The development site may impact on the following **Sites of Special Scientific Interest:** Blenheim Park SSSI, Rushy Meadows SSSI, Wytham Ditches and Flushes SSSI, Wytham Woods SSSI and Cassington Meadows SSSI.

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Table 2: Potential risks to nationally designated sites: the development may impact on the following:		
Site name with link to citation	**Features which the ES will need to consider**	**Potential impact pathways where further information /assessment is required**
Blenheim Park SSSI blank (naturalengland.org.uk)	Wintering Wildfowl -Gadwall -Great Crested Grebe Mesotrophic Lakes	Hydrological connectivity to the site Groundwater Quantity impacts Groundwater Quality impacts Surface water Quantity impacts Surface water Quality impacts Hydrological impacts in the context of climate change/periods of drought/extreme rainfall events
		Biodiversity- Birds Assessment/survey for potential impacts to aggregations of breeding and non breeding birds including the 42 species recorded at Blenheim Park

		Assessment/survey for potential impacts to Great Crested grebe Assessment/survey for potential impacts to Gadwall
Rushy Meadows SSSI blank (naturalengland.org.uk)	Lowland mire grassland and rush pasture	Hydrological connectivity to the site Groundwater Quantity impacts Groundwater Quality impacts Surface water Quantity impacts Surface water Quality impacts Hydrological impacts in the context of climate change/periods of drought/extreme rainfall events
Wytham Ditches and Flushes SSSI blank (naturalengland.org.uk)	Ditches Lowland Fen Greater Water Parsnip	Hydrological connectivity to the site Groundwater Quantity impacts Groundwater Quality impacts Surface water Quantity impacts Surface water Quality impacts Hydrological impacts in the context of climate change/periods of drought/extreme rainfall events
Wytham Woods SSSI blank (naturalengland.org.uk)	Lowland mixed Deciduous & Ancient Woodland Black Hairstreak Butterfly Vascular Plant Assemblage	Assessment of impacts during construction and operation.

7. Regionally and Locally Important Sites

We are not aware that the applicant has considered regionally and locally important sites through as we have not had prior engagement regarding this project. We would welcome the Inspectorate reminding the applicant that the ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group. The ES should set out

proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

8. Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*.

Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Applicants can also make use of Natural England's (NE) charged service Pre Submission Screening Service for a review of a draft wildlife licence application. NE then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See **Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning** For details of the LONI process.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

9. District Level Licensing for Great Crested Newts

Where strategic approaches such as district level licensing (DLL) for great crested newts (GCN) are used, a letter of no impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

The DLL approach is underpinned by a strategic area assessment which includes the

identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).
If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.
The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

10. Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

We advise that the ES specifically assesses the impacts on and potential for mitigation and compensation for the following priority habitats and species:

- **Floodplain Grazing Marsh**

Grazing marsh is defined as periodically inundated pasture, or meadow with ditches which maintain the water levels, containing standing brackish or fresh water. The ditches are especially rich in plants and invertebrates.

Grazing marshes are particularly important for the number of breeding waders such as snipe, lapwing and curlew that they support. Internationally important populations of wintering wildfowl also occur including Berwick swans and Whooper swans.

There are several areas of floodplain grazing marsh where potential impacts could occur due to the proposals. We advise that additional habitat compensation measures be considered where necessary. This could be achieved through direct habitat creation, or alternatively a financial contribution. The agreed level of funding should be used to support projects that facilitate the management, or creation of new or existing areas of lost priority habitat within the district. Natural England would be happy to discuss with the applicant how this might be achieved.

11. Ancient Woodland, ancient and veteran trees

Natural England consider the implications for ancient woodland to be of significant importance for this project due to its scale, the potential for loss of connectivity and indirect habitat fragmentation and degradation.

The ES should assess the impacts of the proposal on the following areas of Ancient Woodland and specifically consider the impact of barriers to movement and habitat fragmentation on the following:

- Dornford Grove
- Begbroke Wood
- Bladon Heath
- Burleigh Wood
- Pinsley Wood
- Wytham Wood
- Whitley Copse
- Bushy Leaze Copse
- Smith Hill Copse
- Denmans Copse
- Saddle Copse
- Stroud Copse

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

The Environmental Statement should include details of where impacts might occur from this development proposal on the local ancient woodland and how these can be mitigated. Information that might require consideration to inform this work includes:

- Any historical data for the site affected by the proposal (eg from previous surveys);

• Additional surveys carried out as part of this proposal, likely to include detailed habitat and species surveys;
• The habitats and species present;
• The status of these habitats and species (eg whether priority species or habitat);
• The direct and indirect effects of the development upon those habitats and species;
• Full details of any mitigation or compensation that might be required.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) on ancient woodland, ancient and veteran trees.

12. Biodiversity net gain

Biodiversity Net Gain can help to deliver the Nature Recovery Network whilst protecting and enhancing our most protected designated sites and their wildlife, irreplaceable habitats and species. It can protect and enhance nationally designated landscapes, our National Parks and Areas of Outstanding Natural Beauty and make a positive contribution to local landscapes.

The ES should use an appropriate biodiversity metric such as The Biodiversity Metric 4.0 - JP039 (naturalengland.org.uk) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve as a minimum a net gain in biodiversity. We encourage applicants to deliver at least a 10% net gain in biodiversity as best practice.

The metric should be used to:
• assess or audit the biodiversity unit value of land within the application area
• calculate the losses and gains in biodiversity unit value resulting from proposed development
• demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

13. Landscape

Nationally Designated Landscapes

The development site is within the setting or may impact on the **Cotswolds Area of Outstanding Natural Beauty.**

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A (2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The ES should consider potential impacts on access land, common land and public rights of way where appropriate. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other

relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

14. Heritage Landscapes

Blenheim Palace World Heritage Site

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

15. Soils and Agricultural Land Quality

It is recognised that due to the nature of the development a good proportion of the agricultural land affected by the development will not be permanently lost. However, the large development area and 42 year development lifetime give rise to additional concern with regard to agricultural productivity. In order to both retain the long term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its important functions and services (ecosystem services) as possible.

Natural England advise the following issues should be considered and included as part of the Environmental Statement (ES):

• The quantity and quality of land that will be permanently and temporarily lost to the development. This should include the cable route and all excavations to be required for additional ancillary features such as buildings etc.

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and
The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

16. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

OXFORDSHIRE COUNTY COUNCIL

County Hall
New Road
Oxford
OX1 1ND

FAO Emily Park
on behalf of the Secretary of State
Environmental Services Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email only to:
BotleyWestSolar@planninginspectorate.gov.uk

Corporate Director: Bill Cotton
Environment and Place

13 July 2023

Your Ref: EN0101147-000009

Dear Emily Park,

Proposal: Scoping consultation
Location: Botley West Solar Farm
Consultation end date 13 July 2023

Thank you for consulting Oxfordshire County Council (OCC) on 15th June 2023 regarding an EIA Scoping Opinion for the Botley West Solar Farm.

OCC has considered the proposed scope of each chapter and recommends that additional information is included in the ES and that the scope is widened in accordance with the comments table set out at Appendix 1 of this letter. In particular, further detail on landscape, cumulative impact and reasonable alternatives should be covered in the Environmental Statement.

If you or the applicant have any queries, please do not hesitate to contact me. Please update OCC's contact details for this application with my name and the email address below.

Yours sincerely

Dawn Pettis

Strategic Planning Team Leader

Email: **planningconsultations@oxfordshire.gov.uk**
www.oxfordshire.gov.uk

Appendix 1

Botley West Solar Farm: OCC comments on Botley West EIA Scoping Opinion and additional information to be included/topics to cover in the Environmental Statement

Topic	Comments
Historic Environment	Chapter 7: Proposed Scope The applicant's documentation states that the cultural heritage chapter of the Preliminary Environmental Information Report (PEIR) will be informed by an archaeological desk-based assessment (DBA) assessing the archaeological potential of the site and that this will be undertaken in line with the Chartered Institute for Archaeology standards and guidance including the submission of a written scheme of investigation. We would agree that this is appropriate. The proposed scope of the assessment also sets out that the results of an aerial photographic and Lidar assessment and a desk-based assessment would be included. We would agree that this is appropriate. 7.1.18 states that any land considered to have potential for buried archaeological features may require further archaeological investigations. We would however highlight that geophysical survey on its own cannot be relied upon to identify all possible archaeological features and there are numerous examples within the county where significant archaeological sites have been identified from field evaluation which were not visible on geophysical surveys. As such we would advise that an archaeological evaluation will need to be undertaken across any areas of the site that are likely to be disturbed by this development. This evaluation would need to be undertaken in advance of the determination of any permission for the site in order that the impacts of this proposed development are fully understood when making a decision. The results of this evaluation will need to be incorporated into the cultural heritage chapter of the PEIR.

	7.1.33 states that there will be no effect on buried archaeological remains from decommissioning activities. These activities however do have the potential to impact on archaeological remains particularly when removing cables and areas of hardstanding which are likely, without care and monitoring, remove previously undisturbed areas outside of the original impact. This potential impact should be assessed within the PEIA.
Landscape/visual Resources	Figure 1 shows that the proposed development appears to have increased compared to what was presented in the Phase One Community Consultation Leaflet (November 2022) <u>Landscape and Visual Resources (7.2.3; p44)</u> Guidance documents missing from the guidance documents list: • SODC Landscape Character Assessment • Oxfordshire Historic Landscape Character Assessment (HLC) • Cotswolds National Landscape Management Plan • Potentially also conservation character appraisals for settlements in close proximity to the scheme, e.g. Woodstock, Bladon, Cassington, Cassington, Eynsham, Cumnor <u>Baseline environment</u> The baseline information seems to be missing long-distance routes, i.e. The Thames Path National Trail, the Oxford Greenbelt Way, the Oxfordshire Way, Sustrans Routes. Potential impact on conservation areas will need to be considered in the LVIA unless covered in the Historic Environment section. <u>Proposed methodology</u> The landscape and visual resources chapter makes reference to LVIA guidance but provides little detail on the methodology to be used. No information on visualisation has been provided. I agree with para 7.2.16, which states that representative viewpoints should be agreed with local authority representatives. In addition, in line with the Guidelines for Landscape and Visual Impact

	Assessment, 3rd Edition (GLVIA3) the assessment methodology, ZTV creation, receptors, viewpoint locations and visualisations (method, type, number, locations) should also be agreed with landscape officers of the affected local authorities. <u>Zone of Theoretical Visibility (ZTV) and Figure 7</u> Para 7.2.18 states that figure 7 shows an indicative ZTV along with representative viewpoints but it is unclear how the ZTV was created. Some important views identified/designated in Neighbourhood Plans are omitted (e.g. Cumnor Neighbourhood Plan) and should be included. The landscape chapter mainly focusses on the visibility of solar arrays, but the development also includes other elements that have the potential to cause significance landscape and visual effects. The scheme elements are outlined in table 6.1 (Solar Design Parameters) and table 6.2 of the scoping report and include amongst other things a NGET substation (165m x 135m x 18m), transformers of varying sizes (e.g. 15mx10mx6m), 2.1m-high security fencing, CCTV cameras and poles (3-4m high) and cabling that needs to be installed. The ZTV will need to take account of the height and visibility of the different components. A bare-earth ZTV as well as a ZTV that takes account of vegetation and built features should be provided. This information should be used to define the extend of the study area and viewpoint selection. The viewpoint plan is not accompanied by a list of the receptor/receptor groups the viewpoints seek to represent. Notwithstanding that there has not been an opportunity to check viewpoints on site, only a limited number of viewpoints seem to be selected in the middle section, e,g, nr Eynsham, B4044. The viewpoint selection does also not seem to include views from the Thames National Trail. <u>Potential Project Impacts</u> Table 7.3 *Impacts proposed to be scoped out* includes the following:

	• Night-time assessment: it is recognised that no permanent lighting is proposed, however, the document includes references to movement sensors and temporary lighting. Depending on the level and frequency of the temporary lighting, consideration should be given to impacts of lighting as part of the LVIA assessment process. • Residential Visual Amenity Assessments: these have been scoped out on the basis that no significant impacts are expected. However, this is difficult to judge at this stage as the impact depend on the visibility of solar panels and other structures to the development. <u>Cumulative effects</u> It is unclear what developments will be considered when assessing cumulative impacts. More clarity is required. Oxfordshire is subject to a lot of development pressures including other national infrastructure projects, that have the potential to cause significant landscape and visual effects. A significant number of smaller scale solar farms are already proposed (e.g. Red House Solar Farm to the south). <u>Arboricultural information</u> The scoping report includes a reference (para 7.2.22) that it will seek to avoid impacts on important landscape features including trees and hedgerows where practicable when siting solar panels. However, the scheme also includes other elements that have the potential to impact on trees and hedgerows, eg cabling, creation of access points / tracks, larger structures. The Scoping report makes no reference to the need for arboricultural survey information but impacts on trees and mature hedgerows are closely linked to landscape and visual effects. The ES should be accompanied by an Arboricultural survey in accordance with BS5837:2012 (Trees in relation to construction) and an Arboricultural Impact Assessment (AIA) where the development has the potential to affect trees and other mature vegetation (eg hedgerows).

	In summary: Limited detail has been provided in the Scoping report and there is a need to agree the LVIA methodology, ZTVs, study area, receptors, representative viewpoints, visualisations (method, type, number, locations) and cumulative impact assessments.
Ecology/Nature Conservation	Existing baseline conditions It should be noted that as well as bordering sites of nature conservation interest, the Project area includes parts of Long Mead and Swinford Farm Meadow Local Wildlife Sites; historic water meadows with a range of rare and unique flora and fauna. The impact on these Local Wildlife sites must be fully assessed and alternative routes for the cable explored. The project area also requires crossing of the River Thames. Scope of baseline studies It is recommended that the following surveys are also included within the baseline study (or sufficient justification provided to scope them out): dormouse, badger, protected plants. Effects proposed to be assessed It is recommended that the potential operational effects of the solar panels as attractants for mobile species including birds and aquatic invertebrates is scoped into the assessment. Effects of air pollution from traffic arising from the scheme on the Oxford Meadows Special Area of Conservation will need to be screened under the Conservation of Habitats and Species Regulations 2017 and considered within the EIA. Biodiversity Net Gain. It is noted that the Defra Biodiversity Metric will be used to demonstrate the project will deliver a biodiversity net gain. This is welcome, and in line with the local approach prior to biodiversity net gain becoming mandatory. It should be noted that whilst BNG is not currently mandatory for NSIPs it will become so from November 2025.
Hydrology/Flood Risk	Requirement for full Flood Risk Assessment. Acknowledgement that the surface water drainage design will need to be consistent with the LLFA Local Standards. Improvement of water quality, biodiversity. Deliver benefits as part of the scheme for drainage receptor areas.

Ground Conditions and Waste	The proposed approach to ground conditions is acceptable. Management of the waste relating to the replacement any of the solar panels during the lifetime of the development and at the final decommissioning stage should be scoped in.
Traffic and Transport	Use of recycled materials, AI traffic management, extended working, phased operations (excluding joint holes) collaboration with other partners (OCC capital works etc) pre-planning of routes and mitigation has taken place. The proposals are to scope out the decommissioning phase of the works due to the construction phase presenting a worst-case scenario, two main reasons for this are given. Firstly that the number of vehicle movements associated with the decommissioning would be lower than construction. This is difficult to validate however does seem likely, it is expected however that given the scale of the scheme the number of movements would still be significant. Secondly it is considered that the decommissioning traffic would be set against a higher level of background traffic in the future. This assumption conflicts with the LTCP ambition to remove approximately half of car trips from the network. The point of decommissioning is unknown however likely to be 2050 or later at which time if policy objectives are met whilst the overall level of network movements would be higher the mode by which these are taken would be materially changed. The number of active travel movements is likely to increase significantly, and these modes are more susceptible to impact from construction traffic.
Climate Change	Proposed approach to GHG assessment seems reasonable, adopting a whole life cycle approach. However, emissions at decommissioning are considered out of scope as deemed insignificant – given the scale of the development, this could still have a considerable impact, eg in disposal / recycling and potentially in transport movement and should be scoped in.
Human Health	We acknowledge the fact that the disturbances to access to green space and public rights of way have been scoped into the assessment. However, it will be vital that the impacts on physical activity in relation to these disturbances are assessed and where possible mitigated through methods such as temporary diversions to PRoW. Areas where informal public access is permitted (as well as formal PRoW) should be included in the assessment.

	The potential construction phase impacts on the ability for people to engage in active travel have been scoped in, and this should also be accompanied by an acknowledgement that alternative routes will be provided and appropriately signposted. It is noted that any changes or improvements to access to public open space and PRoW will be considered during the operational phase. While this is welcomed, this needs to be accompanied with consideration of the design of any routes through or around the new solar farm as this application develops further. We need to ensure that local residents and visitors to the area are encouraged to use them. The scoping in of education and training opportunities for local and vulnerable groups in relation to the construction and decommissioning phase is welcomed. The assessment of air quality and noise and vibration via management plans will help to mitigate the impacts on the local population, however it will be imperative that those walking, wheeling, cycling and horse-riding in the vicinity of the site are considered as vulnerable receptors, due to their potential proximity to construction and operational works as they navigate PRoW. It is noted that the 'operational phase – transport modes, access and connections' element has been scoped out, and instead the human health assessment will keep a watching brief on the transport assessment. This is a concern because it is presumed as the needs of non-motorised users – their access to PRoW and associated connectivity to local green space - should be considered at every stage in the life cycle of the development. A full Health Impact Assessment will be required as part of this application, details of which can be found on the Future Oxfordshire Partnership website
Public Rights of Way/Access Land ("Countryside Access")	Countryside Access is scoped in under landscape, human health and transport. Baseline surveys of countryside access networks and use patterns should be undertaken pre-development as desk surveys and standard transport surveys do not usually capture these and there are no other data sources. OCC would welcome engagement in formulating the methodology; a spread of access typologies capturing key access and user types is needed (e.g. promoted route, utility route, connecting route, horse, walker etc). Any countryside access assessment for this development could

	also follow the approach used for transport WCHARs - looking at a wider impact area (for wider network impact/opportunity) and as part of that looking at source/destinations as well as different current and potential activity type (e.g. active travel routes, health & fitness routes, greenways etc). Finally, the countryside access network should be assessed for its potential in delivering co-benefits for (better) connected habitats, species corridors, landscapes, amenity and social spaces.
Reasonable Alternatives	5.4: This section does not adequately cover reasonable alternatives. Reasonable alternatives to the development proposal, including alternative sites, should be detailed in the Environmental Statement.
Other	8.3 Glint and Glare: the site is directly under the Brize Norton run-way alignment which should also be considered in the assessment. 9.5 Major Accidents and Disasters: potential fire risk from the substation and solar panel sites on the water source at Farmoor reservoir and the Brize Norton runway should be assessed. Local Plan Development: Impacts on proposed and allocated residential developments that will be completed within the lifetime of the solar farm (for example Salt Cross Garden Village) should be considered.

Proposed Application by Photovolt Development Partners (PVDP) for Botley West Solar Farm Project

Royal Mail response to the EIA Scoping Consultation

Introduction

Royal Mail and its consultants BNP Paribas Real Estate have reviewed the consultation material for the above project and wish to submit this holding response as part of this consultation.

Royal Mail – relevant information

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any statutorily authorised project.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail position

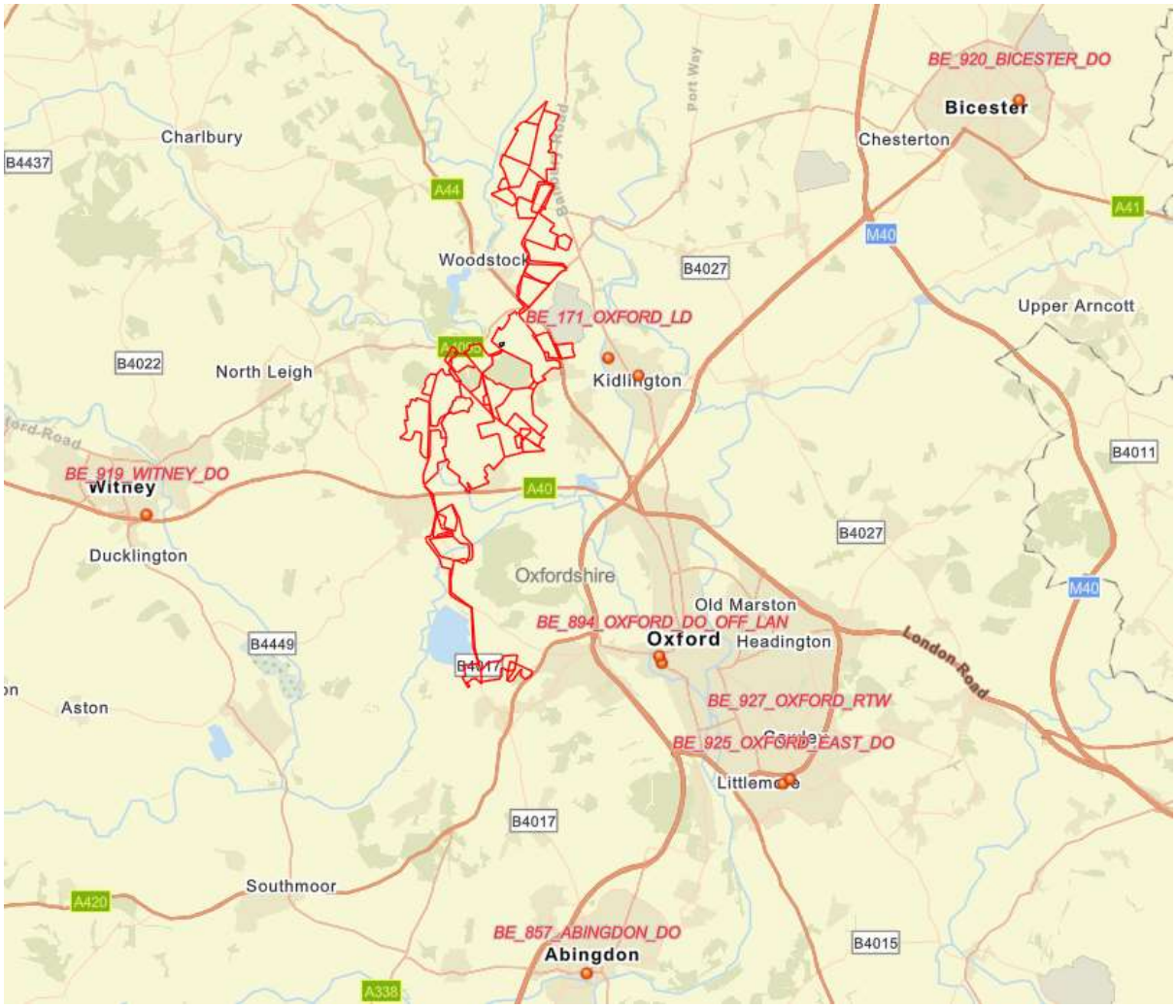
Royal Mail and its advisor BNP Paribas Real Estate have reviewed the Scoping Report that was published on 15th June 2023.

The Scoping Report confirms that there are *"a range of potential impacts on traffic and transport [that] have been identified which may occur during the construction, operation and maintenance and decommissioning phases"* of the proposed Solar Farm. It is states *"other emerging developments are predicted to generate traffic within the traffic and transport study area during construction of the Botley West Solar Farm which may contribute to a cumulative effect."*

Royal Mail has 9 operational properties within 10 miles of the proposed works. A map showing their locations in comparison to the proposed scheme is provided below.

- BE 171, Oxford LD Langford Locks (OX5 1HP) – approx. 950m east;
- BE 890, Kidlington DO, Sterling Road (OX5 2DW) – approx. 2km east;
- BE 894, Oxford DO, Royal Mail House, Oxpens Road, Oxford (OX1 1XX) – approx. 3.6km east
- BE 3158, Oxford Becket Street PAR, Becket Street (OX1 1PP) – approx. 3.6km east
- BE 919, Witney DO, 6-7 Parkside, Avenue Two (OX28 4WS) – approx. 8.25km west;
- BE 927, Oxford RTW, 7000 Alecs Issigonis Way (OX4 2ZY) – approx. 7.8km south-east;
- BE 925, Oxford East DO, Ledgers Close, Oxford (OX4 6HA) – approx. 7.8km south-east;

- BE 3509, Littlemore PAR (OX4 6NA) – approx. 8km south-east;
- BE 857, Abingdon DO, Ock Street, Abingdon (OX14 5AD) – approx. 8.63km south;
- BE 920, Bicester DO, 1 Launton Business Centre, Murdock Road, (OX26 4ZZ) – approx. 13.5 miles northwest.



It is expected that the following documents will be prepared and submitted as part of the future DCO application:

- Environmental Statement;
- Preliminary Environmental Information Report;
- Transport Assessment; and
- Construction Traffic Management Plan.

As the proposal is still in its very early stages, there is little information regarding likely significant effects on traffic and transport, and of proposed mitigations. The Scoping Report states that future information will likely be provided in the application's Environmental Statement. Based on the site location plan, it appears that the following routes on the highway network may be affected:

- A34, A40, A44, A420, A4095, A4260, A4360, B4027.

Every day, in exercising its statutory duties Royal Mail vehicles use all of the roads that may potentially be affected by the proposed Botley West Solar Farm ("BWSF") works.

Any periods of road disruption / closure, night or day, on or to the roads immediately connected to BWSF or the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail does not wish to stop or delay BWSF and its works from occurring. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service to the public from and to the above identified operational facilities in accordance with its statutory obligations. The nature of the scheme itself (a solar farm) is considered to have low potential to impact Royal Mail assets or operations during its construction and operational phases. However, due to the scale of this proposed solar farm and the large number of Royal Mail operational properties close to the development area, the proposed construction works may impact the local highways network and Royal Mail operations on them.

Therefore, Royal Mail wishes to reserve its position to submit a consultation response/s later once sufficient information is available.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

Holly Trotman [redacted]@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

Daniel Parry Jones [redacted]s@realestate.bnpparibas), Director, BNP Paribas Real Estate

Please can you confirm receipt of this consultation response by Royal Mail.

Comments on the Botley West Solar Farm Scoping Report

Shipton-on Cherwell & Thrupp Parish Council

July 2023

Scope of Scoping

We were a little surprised that no reference is made to the UK Government Handbook for Scoping Projects available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296952/geho0411btrf-e-e.pdf, especially with regard to the timing of the scoping - see p12 of the Handbook "*It [scoping]should be carried out at a stage when **alternatives are still being considered** and mitigation measures can be incorporated into project designs*.", which appears not to have been the case here. Also, some components (*feasible alternatives, list of stakeholders*) of the scoping process listed below (page 15) appear to be missing or given only brief treatment.

We recognise that a stakeholder consultation process has been undertaken - see Botley West Solar Farm Consultation Summary Report July 2023, but the credibility of this consultation process has been seriously undermined by the following website - https://botleywestnimbys.com - believed to be linked to the project proponents - seriously undermining the claim to consult meaningfully and treat all responses from the local community both seriously and respectfully.

It would have been useful, and clear best practice, if the scoping report had been more clearly organised along the widely accepted project impact mitigation hierarchy of Avoid, Minimise, Restore & Offset, especially with regard to community, landscape and wildlife impacts. This could be corrected in the full Environmental Impact Assessment and we recommend that the project proponent engages with the University of Oxford Biodiversity Network which has developed a Mitigation and Conservation Hierarchy to address University estate impacts through these actions:

1. Refrain – refrain from actions that damage biodiversity
2. Reduce – reduce the damage our remaining actions create
3. Restore – restore biodiversity that has been damaged
4. Renew – renew and enhance nature

Institutional Assessment

Although probably not an obligatory requirement for a scoping report, it would have been useful to have been provided with more information about the previous experience of RPS with environmental impact assessment (EIA) of large-scale solar power infrastructure - perusal of their website found only one example for just 25MWe compared with the 840MWe of Botley West Solar Farm (BWSF) – see https://www.rpsgroup.com/projects/tuckey-solar-farm/

In a similar manner, it would have been appreciated to see more information on the financial viability and funding stability of PVDP GmbH, especially in the light of recent media coverage - see https://www.private-eye/issue-1599/in-the-back.

Strategic Environmental Assessment

The report contains information about this individual project, but provides little evidence on how the project fits into the broader government strategic policy response to the climate emergency, which our Parish Council has formally recognised. For example, large scale solar energy is not mentioned in the (former) Prime Minister's Ten Point Plan, as contained in the **Energy White Paper - Powering our Net Zero Future** - see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf and appears in the strategy document mostly in the form of household roof-top solar energy, which we support, even though England has, along with Ireland, the lowest solar energy potential in the world - see Figure 3.8 (Part 3) on page 31 of https://documents1.worldbank.org/curated/en/466331592817725242/pdf/Global-Photovoltaic-Power-Potential-by-Country.pdf.

The more recent UK Government policy document "**Powering Up Britain - The Net Zero Growth Plan**" (March2023) states that "*We (UK Government) will establish a solar government/industry taskforce and we will publish a solar roadmap setting out a clear step by step deployment trajectory to achieve 70GW of solar by 2035*". We believe that such large-scale projects as Botley West Solar Farm should be assessed as part of a national roadmap, not precede it.

Net Carbon Benefits

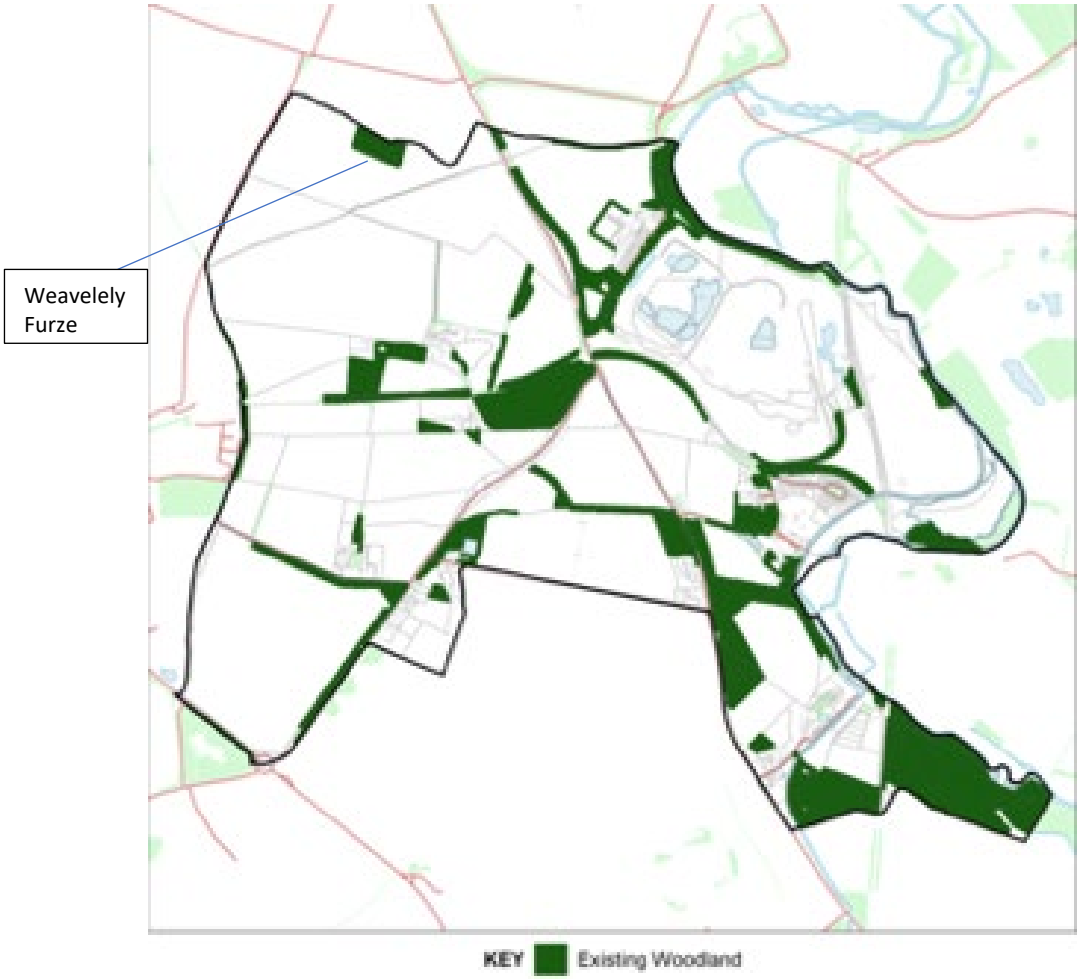
Solar panel product and power warranties usually run for 10-12 and 25 years respectively, with power warranty guaranteeing our performance of 80% at 25 years. The scoping report should require the EIA to provide more clarity on expected panel replacement and/or power drop-off in the second half miles me operational period. This could be included in an energy-return-on-energy-invested (EROEI) analysis to demonstrate how the project compares with other energy generation options.

Para.1.3.5 states that the solar farm will be operational for 42 years after which all infrastructure will be removed, as does para. 6.4.1, whereas Table 7.12 (page 88) states that "*retired infrastructure/ equipment will **either be left in situ** or transported away from site in bulk*". Inconsistencies such as these undermine the credibility of the scoping report as project boundaries are not clearly defined.

Local Community Impacts

Our main concerns about this project mainly revolve around loss of amenity value to the parish community due to the proximity of the 316ha. Northern site to the Shipton-on-Cherwell & Thrupp parish boundaries, especially to the mature woodland known as Weaveley Furze which is an important local biodiversity "hotspot", especially for fungi, which are not mentioned at all in the scoping reports, and is also an important nature recreational site for the parish. We would request that special attention is paid to this location in the EIA especially with regard to wildlife movement, light pollution, visual amenity and overall landscaping/proximity. Weaveley Furze is a marked component of the UK Nature Recovery Map. We do not have access to the entire Nature Recovery map but recommend that this be included in the

landscape/biodiversity component of the EIA to assess potential overlap of proposed Nature Recovery areas with BWSF.



Miscellaneous Comments

In places, the report reads more like an advocacy document, than a scoping report - see, for example, **Para 5.2.5**. This undermines the neutrality of the scoping consultant.

Para 5.3.3 The Kyoto Protocol mentioned here is no longer operational and has been largely superseded by the 2016 Paris Agreement.

Para 5.3.14 Carbon Capture Utilisation and Storage (CCU&S) cannot meet energy demand - maybe the reference is is to Biomass Energy with Carbon Capture and Storage (BECCS)?

Para 5.4.7 "*It is recognised that much of the Project is in the Green Belt. Very special circumstances will be set out to explain why the Applicant is siting the development in the Green Belt.*"

The UK Government policy document "Powering Up Britain - The Net Zero Growth Plan (March 2023) states that: "*Government seeks large-scale solar deployment across the UK, looking for development mainly on* ***brownfield, industrial and low/medium grade agricultural land****. The Government will therefore not be making changes to categories of agricultural land in ways that might constrain solar deployment."* We feel that the BWSF EIA should explicitly assess any alternative brownfield/industrial locations before using Green Belt land. **Para 5.4.5** indicates that "*a high level site search was undertaken by PVDP*" but no data are provided the support this statement. Also, no mention is made to potential clashes with the UK Government Environmental Land Management (ELM) policy - see https://www.gov.uk/government/publications/environmental-land-management-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services/environmental-land-management-elm-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services

Para 6.1.1 Concern has been raised to the Parish Council by parishioners that invoking the "**Rochdale envelope**" should not be used to mask potential impacts at either the Scoping or full EIA stages.

Para 6.2.17 See: Lambert, Q., Bischoff, A., Enea, M. & Gros, R. **Photovoltaic power stations: an opportunity to promote European semi-natural grasslands?** *Front. Environ. Sci.* **11**, 1137845 (2023); https://www.frontiersin.org/articles/10.3389/fenvs.2023.1137845/full

Solar energy: managing biodiversity risks -
https://www.thebiodiversityconsultancy.com/fileadmin/uploads/tbc/Documents/Resources/Solar-energy-TBC-IBN-March-2020.pdf

Para 6.2.8 No explicit mention is made of the visual impact of the lighting and 200 CCTV cameras to be located along the fences and at the sub-station. This should be included in the visual amenity assessment, including privacy impacts for public rights of way, etc.

Para 7.2.8 and **Para 7.2.9** We recommend that both summer and winter photography should be provided as visual evidence to support EIA and any proposed mitigation with regard to visual amenity.

Para 7.3.8 We recommend the use of eDNA for Greater Crested Newt surveys; see: Biggs, J. et al. **Using eDNA to develop a national citizen science-based monitoring programme for the great crested newt (Triturus cristatus)**. Biological Conservation **183**, 19–28 (2015)
https://onlinelibrary.wiley.com/doi/10.1002/ece3.1272

Rees, H. C. et al. **The application of eDNA for monitoring of the Great Crested Newt in the UK**. Ecology and Evolution **4**, 4023–4032 (2014) https://onlinelibrary.wiley.com/doi/10.1002/ece3.1272\

Para 7.3.36 "*Provision of new commuting routes for bats or new foraging habitat for birds, specific plots for skylark etc.* ***may*** *also be incorporated, based on the findings of the assessment as required*"

We used the Conservation Evidence database to check the feasibility of the creation of new unlit [bat] commuting routes using planting and found 0 cases - see
https://www.conservationevidence.com/actions/2034

Para 7.6.34 This part of the EIA should use the existing traffic baseline, but should also include the projected numbers for all other developments with traffic impacts (eg. Housing) as part of the cumulative impact on future traffic – and projected out for the next 40 years?

Para 7.8.19 Should the EIA consider the potential impact of average temperature increases likely over the next 40 years? **The optimal temperature for solar panels is around 25°C (77°F)**. Solar panels perform best under moderate temperatures, as higher or lower temperatures can reduce efficiency. For every degree above 25°C, a solar panel's output can decrease by around 0.3% to 0.5%, affecting overall energy production.
Source: https://blog.ecoflow.com/us/effects-of-temperature-on-solar-panel-efficiency/

Page 130: Table 9.1: Summary of issues scoped in or out of the EIA.

See also **Frischknecht, R. *et al.* (2020). Life Cycle Inventories and Life Cycle Assessments of Photovoltaic Systems: Task 12: PV Sustainability. https://www.osti.gov/biblio/1561526/**

TACKLEY PARISH COUNCIL

[redacted]
Email: parishclerk@tackleyvillage.co.uk

PINS
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref: EN010147-000009
13 July 2023

Dear Sirs,

Scoping consultation response in respect of:

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by SolarFive Ltd. (the Applicant) for an Order granting Development Consent for the Botley West Solar Farm (the Proposed Development)

Thank-you for you letter dated 15 June 2023 inviting Tackley Parish Council (TPC) to provide details of the information we consider should be included in the Applicant's Environmental Statement (ES).

TPC consider that the following elements should be included in the Applicants' Environmental Statement:

1. The impact on biodiversity. We note the opportunity to increase the natural biodiversity of the land in Tackley Parish that will be impacted by the Proposed Development. Therefore, at the very least, we expect the ES to cover all of the elements of biodiversity, to set out how the design of the Proposed Development provides an opportunity for an increase in natural biodiversity, and to set out the measures that will be put in place to ensure that this is achieved. We would expect the ES to consider the entirety of the "Natural Capital Best Practice Guidance – Increasing biodiversity at all stages of a solar farm's lifecycle" as published by the Solar Trade Associate (aka Solar Energy UK) in 2022, and to refer to the evidence provided to the House of Commons Environmental Audit Committee regarding technological innovations and climate change: onshore solar energy, HC 856. 11 January 2023.
2. The impact on food security. Within a national context, the ES should consider the environmental impact of the off-shoring of the equivalent acreage of food producing farmland, including: i) transportation of the equivalent tonnage from the most likely suppliers ii) impact of the creation of new arable farmland/deforestation to meet new production. Where it is considered that mitigations to this are achieved through increased productivity in other farmland within the UK, innovation and/or changes in consumer habits, the ES should provide robust, credible, peer-reviewed evidence of the achievability and the economic reality of this.
3. The net benefit of the Proposed Development on carbon emissions. The ES should consider the level of embedded carbon in the Proposed Development (i.e. the asset and the construction activity), in particular providing robust evidence that the use of any imported

solar panels (instead of solar panels produced in the UK) is not significantly detrimental to the carbon emissions abatement provided.

4. (10.2[1]) Whether any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?
5. (12.1) Whether there any areas or features (whether designated or not) which may have archaeological value on or around the location which could be affected by the project?
6. (8.1) Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?
7. (8.2) Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (For example, due to water contamination or air pollution.)
8. (6.1) Will the project produce solid wastes during construction or operation or decommissioning? How will these wastes be handled/disposed of?
9. (7.1) Will the project release pollutants or any hazardous, toxic or noxious substances to air?
10. (7.2) Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?
11. (7.3) Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?
12. (13.1) Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?

This last point also gives rise to TPC to require the ES to specifically state if and how access to an enjoyment of Dornford Lane will be impacted by the Proposed Development (across its lifecycle of construction, operation and decommissioning). Whilst Dornford Lane is not within Tackley Parish, it is enjoyed by many of Tackley's residents.

TPC have received a request from a parishioner to request that the ES also specifically consider the impact on Long Mead meadow – a Local Wildlife Site near Eynsham. Again, whilst not in Tackley Parish, it is clearly of interest. We would expect the ES to consider this site specifically but also within the analysis indicated in point (1) above.

Many thanks for the invitation to respond to your request. We do hope the above matters can be included in your Scoping Opinion and that the matters will be covered by the Applicants ES.

Yours faithfully

[redacted]

Liz Marshall, Chair and on behalf of Tackley Parish Council

[1] Numbers in brackets refer to points provided by the Stop Botley West campaign

From: BUILDOVERS@THAMESWATER.CO.UK
To: Botley West Solar Farm
Subject: RE: RE: EN010145 - Botley West Solar Farm - EIA Scoping Notification and Consultation
Date: 05 July 2023 16:42:51
Attachments: image006.png
image007.png
image008.png
image004.png
image009.png
image001.png
image002.png
image003.png
image004.png
image005.png
~WRD0000.jpg

Hello Sir/Mam

Thames Water has reviewed this H4 consultation. Your client requires a build over agreement before commencing works, because we believe the proposed development is within 3 metres of a public sewer (of which, the internal diameter is less than or equal to 150mm).

Your client can find out more and apply on our website .

Please also advise your client, if applicable, that Thames Water do not permit driven piles within 15m of a public sewer. Our technical guidance can be found here.

Kind regards,

Gaurav (On behalf of Sahil Sirohi)

Pre-Build over, H4 Consultations Team

Developer Services, Thames Water

From: Botley West Solar Farm <BotleyWestSolar@planninginspectorate.gov.uk>

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@phe.gov.uk
www.gov.uk/ukhsa

Your Ref: EN010147-000009
Our Ref: CIRIS 63764

Ms Emily Park
Senior EIA Advisor
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

11th July 2023

Dear Ms Park

Nationally Significant Infrastructure Project
Botley West Solar Farm
Scoping Consultation Stage

Thank you for consulting the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID), and the response provided is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the consultation documents, we wish to make the following specific comments and recommendations:

Environmental Public Health

We recognise the promoter's proposal to include a human health section in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Identification of local human receptors

The installation will be located in Oxfordshire, covering a significant area of land and has the potential to impact local receptors. Local receptors have not been fully identified in the current documentation as the assessments are not detailed at this stage.

UKHSA would recommend more detailed identification and consideration of local receptors when considering baseline of existing environmental quality and the assessment of potential future impacts. The development location and distance to off-site receptors should be clearly identified. We would recommend the identification and consideration of impacts on residential and sensitive receptors (e.g. schools, nursing homes and healthcare facilities, as well as other vulnerable populations) in the areas which may be effected by emissions. Details of mitigation measures that will be in place and that it will meet appropriate guidance / standards to minimise risk to local receptors, should also be provided.

Impacts of emissions from the proposed development to air quality

UKHSA would agree with the applicant that there is the potential for emissions to air of dust/particulate matter during the construction phase of this proposed development. We are reassured that an assessment of the construction phase dust impacts will be undertaken by the promoter. However, we are unclear of the rationale to scope out consideration of the traffic related impacts on air quality. Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold, i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We

encourage their consideration during development design, environmental and health impact assessment, and development consent.

We would recommend evidence is provided to support any decision to scope out elements and that this demonstrates that the proposed development will not have a detrimental effect on human health, the environment and local air quality.

Major Accident risks and/or Disasters
UKHSA is reassured that the promoter will consider within the ES, potential Major Accident risks and/or Disasters that could impact the Project and outline proposed mitigation measures where appropriate. However, due to the size of the proposed development and locality to local human receptors, the potential for accidents such as fire in the solar panels or battery unit storage or equipment failure should be assessed and appropriate management of the risk should be considered.

Electric and Magnetic Fields
UKHSA requests that the promoter confirms that either the project does not contain any EMF sources that has a potential public health impact; or ensures that an appropriate health impact assessment is carried out in the ES. For information, please see the EMF section of the supplementary material that accompanies this reply, entitled '*Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*[1]*'.*

We hope the information provided is useful and would welcome discussions to clarify any specific concerns or enquiries you may have.

Yours sincerely

On behalf of UK Health Security Agency
nsipconsultations@ukhsa.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

[1] https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

Head of Service: Adrian Duffield

FTAO Emily Park
on behalf of the Secretary of State
Environmental Services Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email only

CONTACT OFFICER: Stuart Walker
registration@southandvale.gov.uk
Tel : 01235 422600
Textphone: 18001 01235 422600

Abbey House, Abbey Close
ABINGDON OX14 3JE

13 July 2023

Your Ref: EN0101147-000009
Our Ref: P23/V1415/3PC

Planning

Dear Emily

Proposal: Scoping consultation
Location: Botley West Solar Farm
Consultation end date 13 July 2023

Thank you for consulting the Vale of White Horse District Council on 15 June 2023 regarding a Scoping Opinion for the Botley West Solar Farm.

The following comments only relate to development proposals within the administrative boundary of Vale of White Horse District Council and are based on the proposals submitted. Should the final scheme be revised compared to that currently submitted and/or a substation be included, it is considered a further scoping opinion may be required.

It is recommended that the Environmental Statement required for the proposed development should cover the format proposed by the applicant. The Vale has considered the scope of each chapter to remain in the Environmental Statement (ES) and provides advice below as to where that scope should be widened and other matters to be scoped into the ES..

The EIA should be undertaken in accordance with current legislation, national, regional, local and neighbourhood plans as relevant to the environment. The ES should demonstrate the ways in which it complies with that requirement.

To assist the applicant, the relevant documents of the Development Plan for the Vale of White Horse District should be considered and comprise the following:

Vale of White Horse Local Plan 2031 Part 1 (adopted December 2016)
Vale of White Horse Local Plan 2031 Part 2 (adopted October 2019)
Cumnor Neighbourhood Plan (adopted May 2021)

The following matters should also be addressed in the Environmental Statement.

Need and Alternatives Considered

5.4 Alternatives

The Scoping Report does not provide details of reasonable alternatives. As such, reasonable alternatives have not been considered at this stage by the Vale.

The EIA should include a detailed consideration of reasonable alternatives to the development proposal, including sites outside the Green Belt. These should be considered in the ES and details provided of the options and choices made.

Proposed Scope of Assessment: Environmental Statement Chapters

7.1 Historic Environment

Generally supportive of the proposed approach to Built Heritage as outlined in the report. Given the topography of the landscape surrounding the southern of the proposed sites it is likely that impacts may go beyond the 2km site boundary limit and will need to be informed by a carefully plotted ZTV (following the recommendations below on the methodology for defining the ZTV). Any extension beyond the 2km area because of the ZTV assessment should include potential non-designated heritage assets as well as designated heritage assets where these have a specific historic relationship to the landscape or area affected. This should extend into those areas within the Vale that are part of the Oxford City View Cones policy.

7.2 Landscape and Visual Resources

The Landscape and Visual Resources section of the Scoping Report refers to the relevant Methodology in the Guidance Documents such as GLVIA 3, Technical Guidance Note 02/21, Assessing Landscape Value Outside National Designations and Technical Guidance Note 06/19 Visual Representation of Development Proposals, but there is limited detail on how these Guidance Documents are specifically going to be applied to the Botley West Application. For example:

- There is no detail of what type of visualisation is proposed, the expected quantity and their suggested locations.
- Section 7.2.31 states *"The assessment process will follow the approach set out in GLVIA3, with regard to identification of resource and receptor sensitivity (susceptibility and value), impact magnitude and evaluation of significance of effects."* but it does not state if they will be using Technical Guidance Note 02/21, Assessing Landscape Value Outside National Designations to establish the baseline value of the landscape, although this document is listed in the relevant methodology guidance documents.

In addition:

Legislative and Policy Context

- 7.2.3 should include Core Policy 41: Renewable Energy of the Vale of White Horse Local Plan 2031 Part 1

Guidance Documents

- 7.2.3 does not refer to the Vale of White Horse Landscape Character Assessment published as part of the Local Plan Part 2 Evidence Base, therefore the Landscape Types referred to in section 7.2.13 do not reflect the District Landscape Character Assessment. The assessment can be found in the following link: https://data.whitehorsedc.gov.uk/java/support/Main.jsp?MODULE=FolderView&ID=789122104&CODE=498F5A0A897C751630F233DEB1E72432&NAME=19.+Landscape+Character+Assessment&REF=Local%20Plan%202031%20Part%202:%20Publication%20Version%20Publicity%20Period
- There is also the Oxfordshire Historic Landscape Characterisation Project to consider: https://www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/landscape-characterisation

Study Area

- 7.2.4 refers to the 2.5m high solar arrays but not the NGET Substation 164m x 135m, maximum height of 15m, excluding connecting tower structures. This element of the application is a different character to the solar farm and should be picked up as a separate element as part of the application. It should have its own ZTV to understand where views of the NGET Substation may be visible, where the solar farm is not, and to aid understanding of potential mitigation proposals.
- There is no information given with regards to the ZTV methodology including the Representative Viewpoint figures which does not state what heights have been plotted for the ZTV. A bare earth ZTV should also be provided and a clear explanation and methodology of how the ZTV has been modelled and created.
- 7.2.6 - The Study Area may need to be wider to incorporate representative views from Oxford View cones from the east of the city such as South Park. Also, potential cumulative impacts to the Greenbelt may have a wider study area than 5km.

Baseline Environment

- Under Baseline Environment, long-distance footpath routes should be listed in this section such as the Thames Path a national trail, and other routes such as the Oxford Green Belt Way.

Potential cumulative impacts

- The Scoping Opinion request does not list any sites that it may consider for cumulative impacts.

- 7.2.35 refers to ‘large’ but doesn’t define what this may be. There are also potential sequential Cumulative Impact with other existing and proposed solar and other development in the Oxford Green Belt, especially those sites that the Oxford Green Belt Way passes. This area of the Oxford Green Belt contains numerous rights of way with limited detractors and is a key recreational resource to Oxford and surrounding urban areas.

Assumptions and limitations

- 7.2.38. There should be representative viewpoints to represent residential or other private views.

Figure 4B Land Parcels with Constraints

- This indicates that the there is a considerable land within the redline southeast of Eynsham but little indication of development in this area. It is noted that there are no representative viewpoints in this area but both the Thames Path and Oxford Greenbelt Way pass through this area. Cabling away from existing road routes, especially in the floodplain may have both potential landscape and visual impacts and these should be covered by the assessment.

Figure 7 Representative Viewpoints

- The range of viewpoints are limited, such as views from the road users of Eynsham Road, the wider footpath network such as to the north and east of the site and the residential properties especially those along both Eynsham Road and Cumnor Road. GLVIA expects the identification of the people within the area who will be affected by the changes in views and visual amenity including residents.
- There should be additional viewpoints to represent residential properties and footpaths. This includes views from Eynsham Road, including near Farmoor village and north of viewpoint 49 (which could represent the footpath route and Eynsham Road). There should also be a viewpoint from the footpath to the east towards Tudor Court and Hill End. Although Hill End is not publicly accessible it has been used for over 100 years for outdoor education and there are extensive views from the middle and top of that site southwards.
- It is noted no view is proposed from Cumnor Hill, however the ZTV indicates that there is a view from this location. As it is an important view in the Cumnor Neighbourhood Plan, with a 360 view and potential cumulative impact effects with the Cumnor Solar Farm (P23/V0306/SCR) should be included as a viewpoint.
- It is further noted there is also the Red House Farm solar farm proposal (P22/V2581/SCO) which abuts the Botley West Solar Farm redline and this site should be considered during the selection of viewpoints and the cumulative impact effects, there may also be other cumulative impacts sites which will impact where viewpoints are needed.

- Viewpoints should include the extent of the Solar Farm in the view. It is not clear that this is the case, such as viewpoint 48 is looking southwards but there are also likely views to the east and west.

Overall, it is considered little detail has been provided as part of the Scoping Report and there is a need for additional information post Scoping to agree the detail of the Methodology of the EIA including LVIA Methodology, ZTV creation, viewpoint locations, representative receptors, visualisation (locations, types, and methodology) and sites to be considered during the cumulative impact assessment.

7.3 Ecology and Nature Conservation
. The following comments are offered.

- Additional policy consideration to those listed in 7.3.2:
    - Development Policy 30 of the Vale of White Horse Local Plan Part 2
    - Policy RNE1 of the Cumnor Neighbourhood Plan

- In addition to the habitats listed in 7.3.25, it is recommended that Important Ecological Features (IEFs) include any priority habitats (e.g., arable margin) and ditches/land drains that meet the definition of watercourse provided in section 72 of The Land Drainage Act 1991

- The flexible approach to identifying IEFs is supported, depending on the results of ongoing ecological surveys (7.3.27). The ES should not be finalised until all relevant surveys are complete and results analysed

- Impacts of any cabling beneath designated wildlife sites, priority habitat sites and ancient woodland, and impacts for wildlife and birds using Farmoor reservoir need to be scoped into the EIA.

7.4 Hydrology and Flood Risk
The submitted scoping opinion request refers to the River Thames as a tributary of the Thames whereas it is actually designated as the River Thames at this point. The Flood Risk Assessment provided as one of the assessments informing the Cumnor Neighbourhood Plan identifies parts of the site as being at risk of surface water flooding which should be assessed in the EIA. One of the routes for cabling does go through the Longmead Meadow site which may have flooding consequences on this highly significant environment and biodiverse site, which is adjacent to the River Thames, and this needs to be assessed.

7.5 Ground conditions
The Council is satisfied that the approach outlined in the Scoping Report is acceptable.

7.6 Traffic and Transport

Operation and decommissioning and effects for the B4017 which is narrow and a main route to and from Cumnor Primary School, Farmoor reservoir and for HGV's needs to be scoped in to the EIA. .

7.7 Noise and Vibration
The Council is satisfied that the approach outlined in the Scoping Report is acceptable.

7.8 Climate Change
The Council is satisfied that the approach outlined in the Scoping Report is acceptable.

7.9 Socio Economics
Construction and decommissioning effects for leisure and businesses should be scoped into the EIA.

7.10 Human Health
Electro Magnetic Field effects should be scoped in.

7.11 Agriculture Land & Soils
The Council is satisfied that the approach outlined in the Scoping Report is acceptable.

7.12 Cumulative Effects and Inter-relationship
The Council is satisfied that the approach outlined in the Scoping Report is acceptable subject to those development proposals identified under comments for Landscape and Visual Resources above being considered.

Supporting Technical Assessments
8.2 Air Quality (dust during construction)
It is noted that air quality will be considered as a part of the ES (Chapter 8) and that construction dust will be considered, and a dust management plan will form part of a Construction Environment management Plan.

NO2 impacts have been scoped out as emissions will relate only to construction traffic which will be temporary and limited. This is accepted.

8.3 Glint and Glare
The effects of glint and glare for aircraft should be scoped into the EIA as this part of the site is on the RAF Brize Norton runway flightpath.

Other Matters to be Scoped In
Waste – The disposal of materials and plant following decommissioning of the development.
Electro Magnetic Fields - on the grounds of the substation proximity to Cumnor primary school and the effects on bird navigation and their reproduction at Farmoor Reservoir.

Major Accidents - on the grounds of the fire risk and proximity to the Farmoor Reservoir's water quality and the RAF Brize Norton's runway flightpath.

Topics Scoped Out
The LPA agree that the following topics can be **scoped out** of the ES:

- Material Assets
- Daylight, Sunlight and Microclimate
- Transboundary Effects

To demonstrate that topics have not been overlooked, where topics are scoped out prior to submission of the application, the ES should clearly explain the reasoning and justify the approach taken.

Summary of council response
The Vale of White Horse District Council is broadly in agreement with the Environmental Statement topic areas set out in the Scoping Report June 2023 and the identified areas of environmental impact subject to the above technical matters being addressed and other matters that should be scoped into the EIA.

Yours sincerely,

Stuart Walker
Major Applications Team Leader

Planning and Strategic Housing

Reply to: Andrew Thomson

Direct Line: [redacted]

Fax: (01993) 861451

E-mail: [redacted]@westoxon.gov.uk

WEST OXFORDSHIRE DISTRICT COUNCIL

Emily Park,
Senior EIA Advisor,
Environmental Services,
Temple Quay House,
2 The Square,
Bristol.
BS1 6PN

Your Ref: EN010147-000009
Our Ref:
Date: 12 July 2023

BOTLEY WEST SOLAR FARM SCOPING CONSULTATION

Thank you for consulting West Oxfordshire District Council (WODC) about the information to be included in the Environmental Statement for the proposed Botley West Solar Farm DCO application.

WODC welcomes the opportunity to respond to the Scoping Report, due to the scale of the proposed development in West Oxfordshire and the potential for varied and significant environmental impacts to arise as a result of the project.

WODC has reviewed the information that describes the baseline conditions in the district, as well as the scope of each thematic element described in the Scoping Report, to understand where the scope of the environmental assessment is likely to be satisfactory and where it should be widened.

The following comments relate to development proposals within the administrative boundary of West Oxfordshire District Council.

The format and suggested topics as set out in the Scoping Report are supported and it is recommended that the Environmental Statement follows the same format for ease of reference and legibility.

The EIA should be undertaken in accordance with current legislation, national, regional, local and neighbourhood plans as relevant to the environment. The Environmental Statement should demonstrate the ways in which it complies with that requirement.

To assist the applicant, the relevant documents of the Development Plan for West Oxfordshire should be considered and comprise the following:

- West Oxfordshire Local Plan 2031 (adopted September 2018)[1]
- Salt Cross Garden Village Area Action Plan (Subject to Judicial Review - Carries significant material weight)[2]
- Cassington Neighbourhood Plan (adopted June 2023)[3]
- Eynsham Neighbourhood Plan (adopted February 2020)[4]
- Woodstock Neighbourhood Development Plan (adopted January 2023)[5]

[1] https://www.westoxon.gov.uk/media/feyjmpen/local-plan.pdf
[2] https://www.westoxon.gov.uk/media/jsccjtcl/salt-cross-aap-pre-submission-august-2020.pdf
[3] https://www.westoxon.gov.uk/media/wkojqqf3/made-cassington-neighbourhood-plan-for-web.pdf
[4] https://www.westoxon.gov.uk/media/ngkckyhi/eynsham-neighbourhood-plan.pdf

[5] https://www.westoxon.gov.uk/media/saynun5i/woodstock-neighbourhood-development-plan.pdf

The matters to be considered in the Environmental Statement for the Botley West solar farm proposal are set out in tabular format below;

Scoping Report Chapter / Paragraph / Table	WODC Comments
2. Existing Baseline Care should be taken to ensure that the description of the existing baseline is comprehensive and accurate. It is recognised that the existing baseline for each thematic element of the Environmental Statement will be described at each chapter, but any overarching description of the baseline environment should reflect any detailed assessment and understanding of conditions. The baseline description for each of the three development sections confirms that the areas lie outside designated landscapes, but provides no further description of the baseline landscape conditions in each area.	
Para 2.13	The baseline description indicates that the northern area is comprised of low grade agricultural land, but this is yet to be confirmed through detailed assessment of the land, as confirmed by the following paragraph in the report. Land is likely to be grade 3, but further assessment is required to confirm whether it is classed as best and most versatile.
Para 2.16	There are no statutory protection designations within the northern area but there are likely to be areas of priority habitat which should be recorded and described accordingly in the Environmental Statement.
Para 2.1.11	The A44 runs to the north east of the site rather than the A34. The A4095 marks the northern extent of the central section.
Para 2.1.14	Although the majority of the site is in flood zone 1, it is proposed that cable routes will have to cross the River Thames, with crossing points to the east of Eynsham. There are extensive areas of flood zone 2 associated with the River Evenlode and its tributaries within the application boundary.

Scoping Report Chapter / Paragraph / Table	WODC Comments
Para 2.1.16	The ecological baseline description for the central area focuses on the proximity of protected sites and designations. There are also likely to be areas of priority habitat within the proposed development area which should be recorded and described accordingly in the Environmental Statement. Cassington Meadows SSSI also forms part of the Oxford Meadows Special Area of Conservation. In addition to the two areas of ancient woodland enclosed by the site, there is an additional area at Pinsley Wood, to the west of and immediately adjacent to the red line area. A significant proportion of the central area is located within the Wychwood Project Area, a project that aims to restore the landscape character and mix of habitats associated with the Royal Hunting Forest of Wychwood. A proposed cable routing option bisects Long Mead Local Wildlife Site to the west of the Thames at a potential crossing point for the river.
5.2 Need	
Para 5.2.5	The scoping report indicates that the UK's future electricity needs will not be met without the project. It is recognised that if the project is delivered it could make a significant contribution to renewable energy supplied to the National Grid, but there is no indication elsewhere that national strategies or targets are dependent on the delivery of a utility scale solar farm in this location. The applicant's Environmental Statement should provide details of how the preferred type, scale and location of project has been determined through the testing of other reasonable alternatives.
5.4 Alternatives	
Para 5.4.2	The Scoping Report does not provide details of the alternative sites considered by the applicant for the location of their proposal. WODC is unable to comment on the alternative sites assessment and the selection of the preferred location, as insufficient detail is provided in the Scoping Report. The Environmental Statement should provide details of the reasonable alternative sites considered for the development proposal. This should include an assessment of sites outside of the Green Belt and outside of areas at risk of flooding. Details should be provided of the options assessed and the reasons why choices have been made to identify the preferred location.

Scoping Report Chapter / Paragraph / Table	WODC Comments
Para 5.4.3	The explanation of the 'do nothing' scenario indicates how the Government's strategies for net zero and energy security could be undermined without the project, but makes no indication of the impacts on the environment without the project.
Para 5.4.6	Further assessment is required to confirm the productivity of the arable land and the ecological value of the proposed development area. The selected location is in close proximity to a number of settlements including villages and rural service centres in West Oxfordshire.
7.1 Historic Environment	
Para 7.1.2	Additional policy documents to be included in legislative and policy context • Salt Cross Garden Village Area Action Plan (Subject to Judicial Review – Carries significant material weight) • Cassington Neighbourhood Plan (adopted June 2023) • Eynsham Neighbourhood Plan (adopted February 2020) • Woodstock Neighbourhood Development Plan (adopted January 2023)
Para 7.1.3	Additional guidance documents to be included • Bladon Conservation Area Character Appraisal[6] • Cassington Conservation Area Character Appraisal[7] • Blenheim World Heritage Site Management Plan 2017[8]
Para 7.1.4	Although the applicant indicates that there are no designated heritage assets situated within any part of the site within which development is proposed, the red line area does appear to overlap a Scheduled Monument (Roman Villa) in the Northern Area, to the south east of Wootton at Sansom's Platt.
Para 7.1.9	The applicant suggests that no part of the Project within which development is proposed would be within a designated conservation area. It should be noted that the red line area submitted with the Scoping Report includes land within the Conservation Areas at Hanborough and Bladon.
Para 7.1.20	Regard should be had to any archaeological findings arising from the development at Salt Cross Garden Village and Eynsham Park and Ride and consider how these affect the baseline conditions and understanding in the locality

[6] https://www.westoxon.gov.uk/media/5qofp2vq/bladon-conservation-area-character-appraisal.pdf
[7] https://www.westoxon.gov.uk/media/nfyj1j5j/cassington-conservation-area-character-appraisal.pdf
[8] https://www.westoxon.gov.uk/media/b0rbyz1g/blenheim-whs-management-plan-2017.pdf

Scoping Report Chapter / Paragraph / Table	WODC Comments
Para 7.1.33	It is proposed that effects on buried archaeology during the decommissioning phase should be scoped out. It may be necessary to confirm methodology for the removal of piles and foundations during the decommissioning phase to confirm that such activities will not result in further disturbance and potential permanent and irreversible loss of archaeological resources.
7.2 Landscape and Visual Resources	
Para 7.2.3	Additional policy documents to be included in legislative and policy context; • Salt Cross Garden Village Area Action Plan (Subject to Judicial Review - Carries significant material weight) • Cassington Neighbourhood Plan (adopted June 2023) Additional guidance documents to be included ; • Evenlode Catchment Management Plan (March 2021)[9] • Oxfordshire Historic Landscape Characterisation Project (July 2017)[10] • West Oxfordshire Design Guide (April 2016)[11]
Table 7.3	It is proposed by the applicant that Residential Visual Amenity should be scoped out of the project assessment for landscape and visual impacts. As the proposed development would be located in close proximity to a number of settlements, particularly at Bladon, Cassington, Church Hanborough and Woodstock, the impacts on residential visual amenity during the operational phase of the development, in these locations should be considered.
7.3 Ecology and Nature Conservation Section 7.3 outlines ecological surveys that are currently being undertaken on site. Overall, it is felt that this list is comprehensive with the exception of dormice and wintering bird surveys.	
Para 7.3.2	Relevant policy, legislation and guidance to be included; • Salt Cross Garden Village Area Action Plan (Subject to Judicial Review - Carries significant material weight) • Cassington Neighbourhood Plan (adopted June 2023) • Eynsham Neighbourhood Plan (adopted February 2020) • Woodstock Neighbourhood Development Plan (adopted January 2023) • Evenlode Catchment Management Plan (March 2021)

[9] https://uploads-ssl.webflow.com/62602eef03c83769e0539df4/63d2d4199ff6fa5dba861fb5_river-evenlode-smarter-water-catchment-plan%202021.pdf
[10] https://www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/landscape-characterisation
[11] https://www.westoxon.gov.uk/media/lzlddnxb/3-design-guide-geology-and-landscape.pdf

Scoping Report Chapter / Paragraph / Table	WODC Comments
Para 7.3.16	Paragraph 7.3.16 states 'consultation will be undertaken with Natural England via their Discretionary Advice Service'. I would suggest EPS licensing policy 4 is discussed with Natural England to understand whether this is a suitable option for dormice.
Para 7.3.19	Paragraph 7.3.19 lists non-breeding bird surveys but it is not clear if that includes wintering bird surveys. Given the nature and location of the site it is likely wintering birds will be impacted by the development. Competent authorities must aim to provide or protect habitat that allows wild bird populations to maintain their numbers in the areas where they live naturally. Therefore, wintering bird surveys should be undertaken to inform an appropriate mitigation and compensation strategy. Presumably a number of hedgerow sections will require removal to permit access and installation, this could impact dormice a European protected species. As stated within the Dormouse Conservation Handbook (2nd Ed) the presence of dormice should be assumed in any areas of woody habitat (including plantations, hedgerows and scrub) within their range. Given the scale of the development and the close proximity of suitable habitat south of the A4095, including Burleigh Wood, Pinsley Wood and Bladon Heath woodland, it is felt the species is likely to be present. Section 7.3.16 states 'consultation will be undertaken with Natural England via their Discretionary Advice Service'. I would suggest EPS licensing policy 4 is discussed with Natural England to understand whether this is a suitable option for dormice.
Para 7.3.38	The applicant suggests that there would be no direct habitat loss within locally designated sites, although the red line boundary submitted with the Scoping Report indicates cable routing options, between the middle and southern sections, cross the Long Mead Local Wildlife Site. There should be sufficient flexibility in the scope of the environmental assessment, to ensure that the impacts of direct habitat loss are assessed as necessary where development options impact on designated sites and rare and irreplaceable habitats.
7.4 Hydrology and Flood Risk	
Para 7.4.2	Relevant guidance to be included • Evenlode Catchment Management Plan (March 2021)[12] • Thames river basin district river basin management plan: updated 2022[13]
Table 7.5	Central Section – Where the Evenlode crosses the Central section there are also areas of Flood Zone 2.
Table 7.6	Row 10 should include potential increase in flood risk associated with run-off from solar panels.

[12] https://uploads-ssl.webflow.com/62602eef03c83769e0539df4/63d2d4199ff6fa5dba861fb5_river-evenlode-smarter-water-catchment-plan%202021.pdf
[13] https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022

Scoping Report Chapter / Paragraph / Table	WODC Comments
Para 7.4.17	Any increase in height of PV arrays to account for 1 in 100 (plus climate change) flood level should be taken into account in assessment of significant impacts for heritage, landscape and visual impacts.
7.6 Traffic and Transport	
Para 7.6.33	Additional policy and guidance to be added; • Oxfordshire Local Transport and Connectivity Plan (July 2022)[14]
7.8 Climate Change	
Para 7.8.5	Additional guidance to be included; • Oxfordshire Energy Strategy (2018)[15] • Oxfordshire Pathways to Zero Carbon (2021)[16]
7.9 Socio Economics	
Para 7.9.22	Additional local policy and legislation to be included; • Salt Cross Garden Village Area Action Plan (Subject to Judicial Review) • Cassington Neighbourhood Plan (adopted June 2023) • Eynsham Neighbourhood Plan (adopted February 2020) • Woodstock Neighbourhood Development Plan (adopted January 2023)
Para 7.9.32	Additional source of baseline information to be added; • Oxfordshire Insight[17]
Table 7.18	Construction • Temporary Workers Accommodation – Would be dependent on the scale of the workforce and level of demand for accommodation within the area. Could be cumulative impact with other developments being delivered in the locality at the same time as the solar farm. There is limited hotel provision within the locality of the development site. Could therefore be regarded as medium sensitivity receptor with medium magnitude of impact. • Crime and safety – Notwithstanding the security measures that are put in place, the potential for increased crime should perhaps be considered at the EIA stage. Solar panels and other related technology, including cabling are proposed to cover a significant area of rural Oxfordshire. Rural crime is already a concern, but it is considered that opportunities for criminal activity would increase dramatically due to the nature of the proposal and the relatively isolated nature of much of the development site.

[14] https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/LocalTransportandConnectivityPlan.pdf
[15] https://www.oxfordshirelep.com/sites/default/files/uploads/Oxfordshire%20Energy%20Strategy.pdf
[16] https://www.eci.ox.ac.uk/publications/downloads/PazCo-final.pdf
[17] https://insight.oxfordshire.gov.uk/cms/

Scoping Report Chapter / Paragraph / Table	WODC Comments
Table 7.18	Operation • Recreation – There is potential to degrade access to recreational opportunities in the countryside as a result of the proposals. Should potentially be subject to further assessment at EIA stage, but recognised that this may be covered sufficiently in the Human Health chapter of the Environmental Statement • Open Space / Public Rights of Way – Changes as a result of the project could degrade access to public open space and public rights of way with health impacts and should potentially be subject to further assessment at EIA stage. Recognised that this may be covered sufficiently in the Human Health chapter of the Environmental Statement • Housing – Although the solar farm and substations are relatively low impact in terms of built form, the scale of the proposal is likely to dramatically alter the character of the rural landscape across a significant area and could have a detrimental impact on house values and the amenity of residents. • Crime and safety – Notwithstanding the security measures that are put in place, the potential for increased crime should perhaps be considered at the EIA stage. Solar panels and other related technology, including cabling are proposed to cover a significant area of rural Oxfordshire. Rural crime is already a concern, but it is considered that opportunities for criminal activity would increase dramatically due to the nature of the proposal and the relatively isolated nature of much of the development site.
7.10 Human Health	
Para 7.10.4	There may be potential to consider lower level Census Geography boundaries including MSOAs and LSOAs to understand the characteristics of and impacts on individual communities in more detail.
Para 7.10.8	Additional sources of baseline data to be included; • Oxfordshire Insight[18] • Oxfordshire Joint Strategic Needs Assessment (JSNA) [19]
Table 7.19	Health related behaviours • Risk Taking Behaviour – Clarification on the scale of the workforce during the construction phase would be useful in reaching a judgement about community health behaviours.

[18] https://insight.oxfordshire.gov.uk/cms/
[19] https://insight.oxfordshire.gov.uk/cms/joint-strategic-needs-assessment

Scoping Report Chapter / Paragraph / Table	WODC Comments
Table 7.19	Social environment • Housing - Clarification on the scale of the workforce during the construction phase would be useful in reaching a judgement about impacts on the social environment.
7.11 Agricultural Land and Soils	
Para 7.11.9	Additional Policy and guidance to be added; • Salt Cross Garden Village Area Action Plan (subject to judicial review - Carries significant material weight) Evidence to support the AAP indicates that there are areas of Grade 2 and 3a agricultural land within the Garden Village. The Garden Village adjoins the proposed solar farm development area.
8.3 Glint and Glare	
Para 8.3.14	Although requests for modelling impacts on aviation effects between 10 - 20km are less common, due to the nature and scale of the Botley West solar farm proposal, consideration should be given to the impacts on RAF Brize Norton which is approximately 14km to the west of the proposed development area.

To demonstrate that topics have not been overlooked, where topics are scoped out prior to submission of the application, the Environmental Statement should clearly explain the reasoning and justify the approach taken.

Summary of council response

West Oxfordshire District Council is broadly in agreement with the Environmental Statement topic areas set out in the Scoping Report June 2023 and the identified areas of environmental impact, subject to the above matters being addressed.

Yours sincerely,

[redacted]

Andrew Thomson
Lead Planning Policy and Implementation Officer

From:	[redacted]
To:	Botley West Solar Farm
Subject:	Your Ref: EN010147-000009
Date:	03 July 2023 12:58:37
Attachments:	image001.png image002.png image003.png image004.png

---

Dear Emily,

Thank you for consulting Wokingham Borough Council on the above application for the Botley West Solar Farm.

Wokingham Borough Council have no comments to make on this application.

Kind regards

Connie Davis
Principal Planning Officer
Development Management and Enforcement
Wokingham Borough Council
Wokingham Borough - a great place to live, learn, work & grow and a great place to do business
Website: www.wokingham.gov.uk

Woodstock Town Council
The Town Hall, Woodstock, Oxford, OX20 1SL

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

After reviewing the Scoping Report, Woodstock Town Council (WTC) would like to make 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

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 the 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. This option should be considered as only one of several alternative options that are considered as part of the process.

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 justify 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 Governments 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 Governments 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 cable 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. WTC 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 is 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.' WTC would like to know who has taken part in these discussions as WTC has not been approached directly at any stage during the process to take part in any discussions regarding the Project.

23) Para 6.2.8 – This paragraph acknowledges the PV technologies are developing rapidly and alternative PV technologies may become available at time of construction. WTC is concerned that due to the speed that PV technologies are developing that within a short period of time the chosen PV technology used by the Project will become outdated. The ES assessment should take this possibility into account.

Section 7 Proposed Scope of Assessment: ES Chapters

7.1 Historic Environment

24) Para's 7.1.2 & 7.1.3 – These paragraphs list the legislative, policy context and guidance documents that will be considered within the assessment process for Historic Environment. WTC believes that the "Revised Blenheim WHS Management Plan 2012-27" should also be include and considered within the assessment process.

25) 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.

26) 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 withing the 2km Study Area, as stated in paragraph 7.1.24.

27) 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

28) Table 7.3 – Residential Visual Amenity Assessment has been scoped out of the assessment for Landscape and Visual for all stages of the Project. WTC strong 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.

29) 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. WTC have also commented on this issue under point 44 of this document.

7.3 Ecology and Nature Conservation

30) 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.

31) 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.

32) It should be noted that neither deer nor foxes are mentioned anywhere within the Scoping Report.

7.6 Traffic and Transport

33) 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.

34) 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.

35) 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 then 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

36) 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.

37) 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

38) 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. WTC would like to know if different criteria is applied during their assessments under different chapters of the ES.

39) 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.

40) 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 39 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.

41) Table 7.18 – This table states that Tourism is scoped out as "Only potential short-term impacts to tourist economy at construction stage likely outweighed by spend of construction workers". This statement appears to be conflict with the statement within Risk Taking Behaviour in Table 7.19 of the Human Health section of the report which says "The workforce is unlikely to be sufficiently large in number to affect the local markets, e.g. for alcohol, cigarettes or gambling, to an extant which could significantly affect the local community health". The ES's should clarify the expected number of workers at each phase of the buildout and should explain how they have assessed that the spending habits of workers will be comparable to the spending habitats of tourists that visit the area.

42) WTC request that Tourism in not scoped out of the ES. Tourism is a major source of income to WODC and for Oxfordshire as a whole and as such deserves a specific item in the Scoping Report especially considering the impact of the project on tourism in terms of the attraction the area currently holds. Any assessment should encompass views from road, rail and the top of a double decker bus; loss of wider views of the countryside from PROW and cycle tracks because of boundary fences and features the will be in place around these tourist attracting routes; impact on picnic sites and leisure areas; and the effect on the attractiveness on use of all sorts of holiday accommodation when surrounded by construction traffic and later by fields of panels.

43) 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

44) 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.

45) Table 7.19 – This table states that Housing is out of scope at all stages of the Project. As explained in point 43 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

46) To be able to visualise the cumulative impact of developments in the area, WTC 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

47) 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)

48) 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

49) 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.

From: [redacted]
To: Botley West Solar Farm
Cc: [redacted]
Subject: RESPONSE TO CONSULTATION ON SCOPING REPORT
Date: 12 July 2023 21:05:29

Dear Ms Park

I am replying on behalf of Wootton Parish Council in West Oxfordshire to your letter of 15 June (ref: EN010147-000009) giving the council the opportunity to submit its observations on the proposed Scoping Report for the EIA for the Botley West Development.

For the sake of clarity, I need to make it clear that while it notes the statements and arguments made by PVDP in the first part of the Report, for example in section 5.44 on their reasons for this site being selected for the development, the council does not accept at this stage that these statements and arguments are valid. Nor does it accept, on the evidence so far put forward, that large parts of the proposed site of Botley West are suitable or appropriate for development for solar generation. The DCO application has yet to be made and the council will consider in detail the justification for the choice of this site, the
suitability of the areas put forward for development, and the other issues in the early sections, when the formal consultation on the proposed development takes place.

Turning to the current consultation on the Scoping Report for the Environmental Impact Assessment, and in the light of the widespread anxieties, scepticism and opposition to the scheme among the residents of West Oxfordshire, the council feels that it is important for the credibility of the EIA that 'scoping out' is kept to the absolute minimum, if at all. All concerns need to be fully and transparently assessed in the EIA.

Scale and Need: Section 5

Justification is needed for a project of this scale. Section 5.2.4 states that 250Mwe is the lower limit of efficient viability. Options above this, but smaller than the proposed development which is more than three times larger, should be considered as part of the assessment process.

Impact on residential property: section 5.4.11

A minimum buffer zone of 20 metres has been chosen by PVDP. This needs justification and evidence to support the sufficiency of such a size of zone in ameliorating the visual intrusion. The council believes that larger buffer zones would be appropriate near residential communities, rights of way, areas of recreation and specific individual residential properties at village edges or very close to the site. (See below in the ‘scoping out’ comments in relation to visual impact on residential properties)

The council has identified the following sections where ‘scoping out’ is of particular concern:

Visual Impact.

The Zone of Visual Impact (ZVI) is illustrated in the scoping document in Figure 7 and shows there is a wide area of potential visibility of the solar panels and associated equipment and installations. Table 7.3. refers to assessments that should be ‘scoped out’

of the project and included in these is the proposal to omit Residential Visual Amenity. The strong view of the parish council, in view of the acknowledged very significant impact on residents, is that Residential Visual Amenity Assessment should be included EIA and this must be 'scoped in'. The council also believes that it is not simply the solar array itself which will create visual intrusion but the associated equipment (eg inverters) and other installations such as security fencing, cable pylons, communication equipment, and camera mountings. We believe that residents who may be directly affected by adverse visual and operational effects must have all these impacts be included in the EIA.

We also believe that the parish council as a statutory consultee should be involved directly in the decisions on the viewpoints for visual effects assessment with the developer.

Noise impact

Aspects of this are currently 'scoped out' - see section 7.7.20 page 85. This is not acceptable and a full noise assessment should be carried out for both the construction and the operational phases. The council feels strongly that this should be 'scoped in' and an acoustic map created for the entire site.

Archaeology

The council notes that a geo-phys survey is proposed in order to identify potential archaeological remains, and agrees that such a survey should be required. The council feels however that in order to establish correctly the actual significance of the archaeology, and as decisions on panel location may be subject to variation in future, the whole site should be surveyed rather than just the areas of ground on which solar panels are currently planned to be placed.

Impact on Fauna: section 7.3

Surveys are being undertaken to identify fauna but deer and foxes are not mentioned. These categories should be specifically included and the assessment should include all fauna, not just those of conservation interest. The extensive newly planted woodland in the Northern Section already limits space for larger mammals. This should be considered in addition to the
exclusion of mammals from the areas with solar arrays..

Visualisations and maps

The stage one consultation maps clearly showed the areas where solar panels would be located, and the extent of the development using shading as well as outlines. The maps in the Scoping Report have added areas and are much less clear. For there to be informed consultation it is necessary to produce maps that show clearly which areas will have solar panels and also associated structures such as inverters and other equipment needed for construction and operational phases.

Finally, we have seen a copy of the response to your consultation from Woodstock Town Council and wish to support the submission they have made to you.

Yours sincerely

John Harwood

Chairman
Wootton Parish Council

Yarnton Parish Council

Clerk to the Council
Yarnton Village Hall
The Paddocks
Yarnton
Kidlington
Oxon
OX5 1TE

☎ 01865 378476

e-mail: parishclerk@yarnton-pc.org.uk

11th July 2023

To The Planning Inspectorate

Botley West Solar Farm Scoping Report – Consultation Comments from Yarnton Parish Council

Summary: The scale of this development – the largest single installation in Europe – remains a serious concern for Yarnton residents as it stands to change the character of the surrounding area beyond recognition and poses flood risks. To meet renewable energy targets, the Yarnton Parish Council supports solar panels on rooves rather than fields and maintains that wind power is a more suitable alternative for the UK's climate.

Historic Environment (7.1)

1. Yarnton is an historic settlement featuring the Grade II listed Yarnton Manor (7.1.8) and Grade I listed St Bartholomew Church. We hope these will be identified by the Lead Archaeologist in their review as 'designated heritage assets' (7.1.19; 7.1.20) requiring an appropriate buffer safeguarded between them and the project boundaries. BWSF would be within the 2km buffer from village boundary.[1]

2. Assessments should take into account that Yarnton has been settled for over 5,500 years with the earliest known piece of bread found in the vicinity suggesting the archaeological potential that might be disrupted by building and decommissioning works (including between 2 and 2.5 million piles driven into the ground).[2] Approximately 1km within the project boundary, at the top of Spring Hill (7.1.23) there is clearly visible ridge and furrow ploughing reflecting the historic agricultural character of the local area that is threatened by this sudden and complete switch to light industry through the development of a very large solar farm.

Landscape and Visual Resources (7.2)

[1] 2km boundary visible via these maps: https://www.cherwell.gov.uk/downloads/download/1078/pr50b-category-a-villages

[2] http://news.bbc.co.uk/1/hi/sci/tech/472505.stm#:~:text=Small%20pieces%20of%20burnt%20bread,oldest%20ever%20found%20in%20Britain.

3. Yarnton currently enjoys a range of landscapes (greenbelt; ancient and semi-natural woodland; ancient, replanted woodland; lowland village farmlands etc.). As one resident has emailed us, it is 'a very special place.' The development will have a significant effect on the visual amenity of the site with the installation of 2.5-meter-high arrays, a large number of lighting columns and CCTV cameras, security fencing, vehicular access routes, transformers, power converter stations, various substations, and the cable route corridor (6.2.3) (7.2.20).

4. The scoping report talks about the importance of access to high quality open space for health and wellbeing. But it then goes on to scope out the existing PRoWs of the ES which will change beyond recognition (7.9.10).

5. Shakespeare's Way is a nationally important long distance public footpath crossing the central site. The section nearest Yarnton, also known as Frogwelldown Lane, is an ancient drovers' route into Oxford and heads towards the ancient woodlands of Bladon Heath and hedgerows of veteran oaks by Begbroke village. The erection of the solar farm will substantially degrade the recreational amenity of Shakespeare's Way and its rural setting as well as its historic associations (2.1.19).

6. The elevated viewpoint of Spring Hill offers uninterrupted and unique views for many miles as far as the North Wessex Downs to the South and the woodlands of the Cotswold AONB and wooded estate lands of Blenheim to the West. Many residents watch the sun set over these fields. Residents are concerned about the 'industrialization of the countryside'. The change in the landscape's character from agricultural to industrial would be potentially devastating. The zone of theoretical visibility of the development is large (7.2.5). The full extent of the project will remain fully visible from Yarnton's vantage points (as one of the few points of elevation in the surrounding area) throughout all the stages of the project's lifespan (7.2.29). We would strongly urge that the representative viewpoints include the highest elevation of Spring Hill which, remarkably, is missing (see p165).

7. It is indisputable that the scale of this project will make the village a less desirable place to live affecting the quality of life of residents and house prices.

8. Yarnton Manor Gardens are Grade II listed (7.2.12). It should be considered that their views outwards would be affected.

Cumulative effects and Inter-relationships (7.12)

9. The site is said to be away from main settlements but in fact sits between several existing settlements which have or are due to be vastly extended in the current local plans filling in all of the surrounding area with different types of development (5.4.6) (7.12.2) including 4,000 homes. The long term aggregated environmental effect must be considered together with the disruption of this unprecedented scale of local development (7.12.4).

10. It will be greenbelt land that will almost totally be filled in between Yarnton and Long Hanborough (Fig 2) resulting in a complete loss of amenity for residents.

Hydrology and flood risk (7.4)

11. Small parcels of the sites are described as being in fluvial flood zone 3. But the scoping report focuses on rivers and watercourses and says nothing about the potential for flash flooding and field

drainage for Yarnton. Flash flooding is a significant issue for several of the villages locally and Yarnton has been subject to several flash flood events in the past (2.1.5). Rain landing on the panels will drain to the lower edges, line-drip to the ground and have an impact upon the drainage patterns over the site and on the local watercourse receptors. This could be the case during the construction, operation and maintenance, and decommissioning phases of the development of the Solar Farm. It is important that Yarnton residents are consulted about any surface water management plan and Flood Risk Assessment and drainage (7.4.17).

12. Lack of ploughing over a long period may cause the soil to become heavily compacted leading to flashier runoff rates.

Ecology and Nature Conservation (7.3)

13. We would question the veracity of the statement 'Much of the land within the Site boundary comprises agricultural fields bounded by hedgerows of varying quality' (7.3.12) and wonder which hedgerows they apply to. No BWSF-affiliated surveyors have been seen around Yarnton and we look forward to seeing the results of surveys for the PEIR/ES. We are concerned about the number of surveys that appear to be desk-based and based on old data.

14. The proposed site area near Yarnton includes a Priority area for Countryside Stewardship measures addressing Brown Hairstreak butterfly habitat issues.[3]

15. The project boundary would also be situated close to an area studied for Great crested newts in Begbroke Wood.

16. Shakespeare's Way is a Cherwell District Wildlife Site reflecting ancient woodland. Begbroke and Bladon Heath are Oxfordshire Local Wildlife Sites. Deer and hare are regularly spotted across these fields. There is a real risk of habitat severance and loss of ecological connectivity in the short term through construction activity and in the long term through miles of security fencing.

17. We strongly request that the Department for Environment Food and Rural Affairs (Defra) Biodiversity Metric is used (7.3.37) and a robust mitigation plan shared as promises of biodiversity net gain ring hollow following experiences with local developers on estates within Yarnton.

18. The panels will produce a significant area of shade which in itself could suppress the rate of growth of plants beneath them, impacting biodiversity and reducing the numbers of sheep the area could support.

Traffic and Transport (7.6)

19. We are concerned about the impact on traffic in the area during the build and decommissioning phases given the disruption of several large housing projects in the land adjacent to Botley West Solar Farm and the likely closure of Sandy Lane level crossing while a bridge is built.
20. We strongly request that the effects of dust generated during the construction of the Botley West Solar Farm will be considered in the detailed air quality assessment. (7.6.47). Yarnton already has a recycling centre which releases dust throughout the week that can be seen in adjacent woodland.

[3] https://magic.defra.gov.uk/MagicMap.aspx?&startTopic=GreyRasters&chosenLayers=baseIndex,bhairstreak&box=439337:209090:456171:217669&useDefaultbackgroundMapping=false

21. A resident has reported concerns of bridleways being affected such as the 132/5/10 (2.1.19). The addition of 2m high fencing poses risks to riders, walkers and dogs when sharing a confined space.

Human Health (7.10)

22. Physical activity is likely to be affected as residents share that they do not wish to walk among such an extensive area of solar arrays. Residents may choose to drive to visit AONB instead increasing the environmental impact of unnecessary car use.

23. Open land accessible to those living in urban areas is an important contributor to wellbeing and mental health.

Agricultural Land and Soils (7.11)

24. The land seems to be considered as low-grade agricultural land. However, this community witnesses a healthy crop harvest each year. Yarnton residents are concerned about the loss of arable farmland and the implications for national food security. Our presumption is that the designation is more arbitrary than it appears given that the land has been farmed for the past 500 years and not left to waste (2.1.3).

25. The site is said to have been selected due to its low productivity. If all so-designated land were removed from the food chain that would presumably lead to an intensifying of production on good productive land which is in short supply. That in turn would hasten the depletion of nutrients in those areas (5.4.6).

26. Reverting to arable use would be difficult given the disruption of removing 2–2.5 million piles driven between 1.0–2.5m below ground level together with extensive cables (Table 6.1).

Need (5)

27. The stated maximum output is 840MWe. There is no range given over the course of the year. We assume this to be best case on 21/22 June each year (longest day) and a few days either side with clear skies - 16 daylight hours. What would be the output on 21/22 December - 7 daylight hours with the mid-day sun at its lowest elevation? How does that compare with the figure of, in excess of 50MWe stated as that required for the project to be of national significance?

28. The running down of current energy generation resources is indeed a serious challenge to future energy supplies. However, there are alternatives to the wholesale paving over vast areas of the Oxfordshire countryside with arrays of solar panels. The UK stock of farmland is diminishing year on year whereas new roof-space continues to increase. The UK is an island and blessed with vast areas of coastal waters. It is better suited to utilising a mixture of offshore and onshore wind turbines, together with tidal water turbines. UK waters have one of the largest tidal ranges in the world, but the UK is one of the worst for annual average sunlight hours. Tides are a guaranteed source of power 24/7, whereas solar is not (5.2.1).

29. The proposal would be an inefficient use of space. There are vast areas of existing roof-space and other utility areas untapped in the UK. The proximity of these areas to the end users would also

remove the need for stepping up to 440Kv in order to connect to the National Grid and its associated energy losses (5.2.4).

30. The government's stated new housing target of 300,000 units per year would seem to provide an increasing resource of 1800 ha of new roof space per year - based on an average of 60 square meter per unit. That is excluding new public and commercial roof space. The area of BWSF is said to be 1400 ha of which 959 ha will be solar panels. New build developments seem likely to offer annually the order of four times that of the BWSF site. This figure does not account for retrofitting existing development.

31. Regarding energy security, there is still very likely to be an ongoing need for liquid and gas biofuels in the energy mix. Biomass produced on greenbelt land seems to be very well placed to satisfy that need. This would also lend itself to the preservation of the historic aims of the greenbelt.

32. Solar panels are also producers of waste heat and presumably mounted above ground to facilitate air cooling. With such a large array of panels the heat generated may have the potential to form a significant column of hot air rising above the site, drawing in moisture from all sides creating a microclimate that could have unforeseen impact on surrounding areas and the nearby airport. As far as we are aware, an array on this scale has never been installed in such a densely populated area before. The site is close to three SSSI. A change in the microclimate due to the thermal changes mentioned above may have an impact upon these sites and should be scoped in.

33. The draft EN-3 emphasised the key role solar will play in decarbonization, but we don't believe that it was at that time foreseen that so much would be installed in one block. BWSF will be the largest single installation in Europe (1.5.7).

Introduction (1)

34. We understood Merton College Oxford to be the majority landowner and not Blenheim Estates (1.3.4)

35. We would question the premise that this is a single site bearing the name of a location outside the site in Oxford (Botley). It looks very much like three sites linked by a utility cable. The only thing that seems to link these sites is land ownership pattern.

36. The description of 42 years as being an application for temporary consent is misleading. At the end of that period, most of the current population will have died or be too young to remember the landscape their parents knew (1.3.5).

Lynne Whitley,
Clerk to Yarnton Parish Council.