

PVDP's pre-application consultation with local communities on proposals for BWSF

Introduction

The Stop Botley West campaign, Oxfordshire, (SBW) carried out a survey to find out how appropriately the Developer (PVDP) consulted (during the pre-application phase) with local residents about their proposals for Botley West Solar Farm.

The questionnaires, which were made available in local towns and villages most affected by the BWSF proposals, produced 661 responses. They were made freely available to all residents¹, with drop-off points in local village pubs/shops for hard copies. The questionnaire could also be completed on-line.

Awareness of the Consultation

Only two thirds of respondents (66.3%) became aware of the Botley West Solar Farm proposals before Christmas. The rest (33.7%) did not become aware until after Christmas, well after the first consultation had closed in December 2022.

Only one fifth of respondents (21.5%) became aware as a result of a letter through their door (which one can assume was the formal consultation document distributed by PVDP). This infers that the vast majority (78.5%) were not reached by the formal consultation invitation.

It is possible that some received the consultation letter, but dismissed it as irrelevant to them (and therefore have forgotten they received it) due to the name of the proposed solar farm being 'Botley West', when the larger sites are several miles away from Botley. Comments made in response to our questionnaire indicate that many people were confused by this, and they expressed concern that this was a deliberate tactic ("misleading") on behalf of the Developers, PVDP.

It is clear that the consultation process was inneffective in communicating with the local population to engage them. On the contrary, one third of respondents (34%) first heard about the proposals by word of mouth; a quarter (25%) via a leaflet (SBW - the Stop Botley West campaign group - has distributed a series of leaflets around local villages); 3.9% via social media (mostly Facebook); 3.9% through SBW placards and events; and 1.8% via local village magazines or Parish council information. The remainder heard through business connections, e-mails and 4.6% via local news – radio / TV or on-line.

Even in the best-case scenario, if all those who responded that they heard via a 'leaflet' actually meant the PVDP consultation brochure (which is most unlikely, given the very wide distribution of leaflets through doors by the Stop Botley West campaign), a maximum of only 46.5% of respondents could have been made aware by PVDP, with the likelihood being it was much closer to the 21.5% outlined above.

So it appears that as many as 78.5% of respondents, and at the very least 53.5%, were not effectively even reached by the consultation invitation! This is a major source of concern.

This same point is further evidenced by comments from respondents in specific areas where it seems no attempt was made to communicate with them².

We also know that an independent resident directly adjacent to Sansom's Platt, an Historic England scheduled monument site (Heritage Asset ID 1006346), informed PVDP that the countryside immediately around this site is protected, and pointed out that under the BWSF proposals this protected countryside would be covered with solar panels. He sent a list of 19 questions about this to PVDP, and didn't get any response from them.

The situation is perhaps best summed up in this comment from a respondent to the questionnaire:

'We feel in the dark. It's a massive proposal and one where we don't have nearly enough information as residents.'

Awareness of the scale of BWSF

Interestingly, by the time of filling in the questionnaire, over a quarter of respondents (25.9%) did not realise the scale of the proposed solar farm, with only 74.1% able to select the correct size (out of the three options presented).

Awareness of and Engagement in PVDP's Consultation

Only just over half of the respondents (54%) were aware of the Community Consultation events run by PVDP; and less than a third (31.9%) attended an event.

Comments included 'Seems to be very little public consultation, the sessions I recall being held during most people's working hours, and not widely advertised.'

301 (45.5%) of the respondents to the questionnaire completed a PVDP consultation response form or their on-line questionnaire, or both.

Interestingly, 336 responded to the question as to whether the PVDP form/questionnaire was easy to use. This infers that 35 people looked at it and did not complete it.

47% of the 336 said it was not easy to use – which may explain why 35 people looked but did not complete it. However, it seems some chose not to respond because the form did not allow them to respond as they wished. For example, one respondent wrote: "I did not complete the form/ questionnaire as it was slanted to achieve a particular response and the issues considered were not comprehensive enough to reflect my views".

Ease of Response to the Consultation

223 people (74% of those who completed a PVDP consultation form, in hard copy or on-line) expressed a clear view as to whether the form allowed them to reply as they wanted.

72.6% said that the form did not allow them to reply as they wanted. 15.2% commented specifically that the form was 'biased' or 'loaded' towards responses that would favour the Developer. Others said that they had insufficient space to articulate their opinion, or that the questions were not

comprehensive enough to enable them to reflect their views. Some stated that questions were too generic or simplistic, not allowing for nuanced *answers about this specific proposal*.

This is not surprising, as an analyst looking at this questionnaire can very quickly see that it has been designed to elicit more positive responses and to discourage the expression of concerns.

Worryingly, one person commented "I looked at it but thought it was biased and wouldn't be able to reply as I wanted to so I didn't complete it". If others were similarly put off responding, and given the obvious bias in the design of the questionnaire itself, it is highly likely that the reported consultation responses from PVDP artificially inflate the level of support for their scheme.

Of the 61 (27.4%) who felt the PVDP consultation form had allowed them to respond as they wanted, one person stated "Yes, but was unaware of the downsides at the time", inferring that they now feel they were not given a sufficiently full picture to properly inform their views.

This is a theme that comes through strongly in relation to the consultation events too, with people feeling that their questions (e.g. about carbon generated in the creation, maintenance and decommissioning of solar farms, potential toxic waste issues, ecological impacts etc) were not adequately answered. For example "... the PR person I spoke to was unable to answer my questions about the solar farms the company claimed to have developed and he became quite dismissive of me".

Quality and availability of information

There were many expressions of dissatisfaction with the information provided³.

In response to the question "How satisfied are you with the information received from the Developers", the responses (from 542 respondents) were as follows:

Very satisfied	2.0%
Moderately satisfied	6.6%
Unsatisfied	32.7%
Very unsatisfied	58.7%

This indicates that 91.4% of people were <u>not</u> satisfied with the information received from the developer, with nearly 60% (close to two thirds) being very unsatisfied.

Responses from the Developer

136 people (20.6% of respondents) reported that they chose to write to the Developer.

Only 56 (41.2%) received a response, with all but 9 of them saying the response was not helpful. This means that only 6.6% of people who wrote to PVDP or their representatives felt that they got a helpful response.

In addition, the Developer has declined all requests to speak at meetings – for example they declined an invitation to present their proposals at a village public meeting organised by a local parish council in February 2023.

Importantly, PVDP have not only failed to respond to specific questions from the SBW campaign, or to meet with SBW representative/s – they have also expressly requested that (to the host local authority, WODC) that no information or relevant documents are to be shared with the campaign against BWSF.

Satisfaction with the Consultation process

Many people commented on:

- the (deliberately?) misleading name, "Botley West", pointing out that as a consequence they or others had not properly looked at / understood the consultation document, not realising the extent of the area covered;
- the poor quality of the maps, making it difficult for people to understand exactly which areas/villages would be particularly affected, and to what extent;
- the inability of staff at the consultation events, representing the Developer and/or their partners, to answer questions being raised by the public. People were given vague or unclear responses, and conflicting advice from different consultation events.
 One respondent said succinctly: "Most Developers representatives at the meetings were unable to answer questions satisfactorily" while another said they were "unable to answer simple questions";
- the propensity for staff, representing the Developer and/or their partners, to be dismissive and to infer that members of the public were simply being 'NIMBY's, when they were in fact asking perfectly legitimate and relevant questions;
- the lack of detail in the Developer's consultation document, and that information at the consultation events did not add much to that;
- the fact that information was vague and/or misleading (e.g. regarding the claims of 'local' benefits from the electricity generated; the alleged efficiency of ground mounted solar relative to other alternative options; impact on biodiversity, amenity; etc);
- concerns regarding the complete absence of meaningful information on the size and location of any sub-station required to connect BWSF to the national grid;
- concerns about the restricted timings of the consultation events, which were on weekdays between 11.00am and 5.30pm or Saturdays 11.00am – 4.00pm, and therefore not easily accessible to those in work, or with weekend family commitments. There was only one online evening consultation event, which was particularly poorly promoted.

The comments portrayed concern that there was no consultation event in Bladon – a village that will be (perhaps most) significantly affected by the proposals; and people in Eynsham felt similarly not included, as the Developers refused to run an in-person event there.

People complained that questions they submitted at the on-line consultation event were simply ignored, and in one specific case the PVDP Chief Executive insisted a question had already been answered, when in fact it had not.

Commenting on written responses from the Developer, one person commented "The Developers' response to my email was simply a formulaic standard text & did not address any of my criticisms. Simply stating that all concerns expressed & their responses thereto will be included in their final Consultation Report submitted with their DCO application is bureaucratic obfuscation"

Level of Support for the Proposals

All 661 respondents to our questionnaire responded to the question exploring whether or not they currently support the BWSF proposal, based on the information provided to date. 96.7% said 'No'.

Conclusions about the consultation process run by PVDP in November/December 2022

- 1. The vast majority of respondents are clearly dissatisfied with the process, and with the limited extent and poor quality of the information provided to them.
- 2. There were an inadequate number of face-to-face and on-line consultation events.
- 3. Several key communities were not offered any in person consultation event (Eynsham and Bladon in particular).
- 4. The consultation events were not promoted effectively, with many people being unaware of them.
- 5. Consultation events were held during times that many people with work or carer commitments were unable to attend.
- 6. The design of the consultation feedback form was widely perceived to be biased in favour of the Developers, and people found it difficult to express their views fully.
- 7. The above points indicate that the reported consultation responses from PVDP are highly likely to artificially inflate the level of support for their scheme.
- 8. Staff (representing PVDP and its partners) were unable to adequately answer questions raised. Additionally, contradictory responses to the same questions were given at different events.
- 9. Only 6.6% of people who wrote to the Developer felt that they got a helpful response.

The overall conclusion must be that the consultation was inadequate in both its reach and its content.

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On behalf of the Stop Botley West campaign, Oxfordshire.

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¹ Questionnaires were distributed through a variety of means and community outlets, including delivery through letterboxes and availability at 'hubs' (e.g. village pub or shop). The questionnaire had no reference to SBW on it, and collection was via local hubs that had no connection with SBW, in order to attract as wide a

range of views as possible.

² Examples of comments made by respondents:

'I live in Finstock. No information provided in my area so excluded from consultation'

'We live in North Leigh and should have been included in the consultation'

'Received no leaflet although I live in Freeland'

'We didn't receive the leaflet so missed the consultations'

'No information received or attempt to communicate from official sources linked to this development'

'Did not receive any information from Developers'

³ Examples of comments made by respondents:

'Insufficient information on all aspects of the proposals'

'The calculation regarding the plan and energy to be generated don't seem to add up'

'Maps provided in the leaflet are difficult to read and unclear'

'I was unsatisfied because the material supplied was very slanted towards approving the project'

'The claims in their documents are totally unsubstantiated around the effect on farmland'

'Developer unable to answer questions about carbon footprint of construction and disposal of panels after use'