

Planning and Strategic Housing

Reply to: Andrew Thomson
Direct Line: [REDACTED]
Fax: (01993) 861451
E-mail: [REDACTED]@westoxon.gov.uk



Emily Park,
Senior EIA Advisor,
Environmental Services,
Temple Quay House,
2 The Square,
Bristol.
BS1 6PN

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Our Ref:

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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/jscjctcl/salt-cross-aap-pre-submission-august-2020.pdf>

³ <https://www.westoxon.gov.uk/media/wkojqf3/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
<p>2. Existing Baseline</p> <p>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.</p> <p>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.</p>	
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	<p>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.</p> <p>Cassington Meadows SSSI also forms part of the Oxford Meadows Special Area of Conservation.</p> <p>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.</p> <p>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.</p> <p>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.</p>
5.2 Need	
Para 5.2.5	<p>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.</p>
5.4 Alternatives	
Para 5.4.2	<p>The Scoping Report does not provide details of the alternative sites considered by the applicant for the location of their proposal.</p> <p>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.</p> <p>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.</p> <p>Details should be provided of the options assessed and the reasons why choices have been made to identify the preferred location.</p>

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	<p>Further assessment is required to confirm the productivity of the arable land and the ecological value of the proposed development area.</p> <p>The selected location is in close proximity to a number of settlements including villages and rural service centres in West Oxfordshire.</p>
7.1 Historic Environment	
Para 7.1.2	<p>Additional policy documents to be included in legislative and policy context</p> <ul style="list-style-type: none"> • 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	<p>Additional guidance documents to be included</p> <ul style="list-style-type: none"> • Bladon Conservation Area Character Appraisal⁶ • Cassington Conservation Area Character Appraisal⁷ • Blenheim World Heritage Site Management Plan 2017⁸
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/nfyjlj5j/cassington-conservation-area-character-appraisal.pdf>

⁸ <https://www.westoxon.gov.uk/media/b0rbyzlg/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	<p>Additional policy documents to be included in legislative and policy context;</p> <ul style="list-style-type: none"> • Salt Cross Garden Village Area Action Plan (Subject to Judicial Review - Carries significant material weight) • Cassington Neighbourhood Plan (adopted June 2023) <p>Additional guidance documents to be included ;</p> <ul style="list-style-type: none"> • 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	<p>Relevant policy, legislation and guidance to be included;</p> <ul style="list-style-type: none"> • 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/lzlddxb/3-design-guide-geology-and-landscape.pdf>

Scoping Report Chapter / Paragraph / Table	WODC Comments
Para 7.3.16	<p>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.</p>
Para 7.3.19	<p>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.</p> <p>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.</p> <p>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.</p>
Para 7.3.38	<p>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.</p>
<h4>7.4 Hydrology and Flood Risk</h4>	
Para 7.4.2	<p>Relevant guidance to be included</p> <ul style="list-style-type: none"> • Evenlode Catchment Management Plan (March 2021)¹² • Thames river basin district river basin management plan: updated 2022¹³
Table 7.5	<p>Central Section – Where the Evenlode crosses the Central section there are also areas of Flood Zone 2.</p>
Table 7.6	<p>Row 10 should include potential increase in flood risk associated with run-off from solar panels.</p>

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; <ul style="list-style-type: none"> • Oxfordshire Local Transport and Connectivity Plan (July 2022)¹⁴
7.8 Climate Change	
Para 7.8.5	Additional guidance to be included; <ul style="list-style-type: none"> • 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; <ul style="list-style-type: none"> • 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; <ul style="list-style-type: none"> • Oxfordshire Insight¹⁷
Table 7.18	<p>Construction</p> <ul style="list-style-type: none"> • 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	<p>Operation</p> <ul style="list-style-type: none"> • 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	<p>Additional sources of baseline data to be included;</p> <ul style="list-style-type: none"> • Oxfordshire Insight¹⁸ • Oxfordshire Joint Strategic Needs Assessment (JSNA)¹⁹
Table 7.19	<p>Health related behaviours</p> <ul style="list-style-type: none"> • 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>

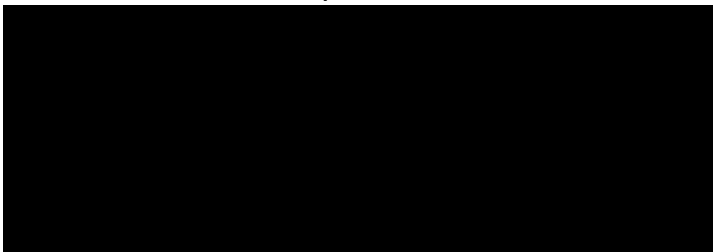
Scoping Report Chapter / Paragraph / Table	WODC Comments
Table 7.19	Social environment <ul style="list-style-type: none"> Housing - Clarification on the scale of the workforce during the construction phase would be useful in reaching a judgement about impacts on the social environment.
7.11 Agricultural Land and Soils	
Para 7.11.9	Additional Policy and guidance to be added; <ul style="list-style-type: none"> 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,



Andrew Thomson
Lead Planning Policy and Implementation Officer