WOOTTON PARISH COUNCIL

Botley West Solar Development Phase 2 Consultation - Response to PVDP

- 1 Wootton Parish Council opposes the development of the Botley West Solar Farm for the following major reasons:
 - the scale of the development and the choice of site in an area where landscape resource is increasingly scarce and likely to become more so with further housing, economic and commercial development already planned
 - the impact of the solar arrays and associated converters on the visual amenity and recreational amenity of local residents and visiting tourists
 - the high proportion of the development on Green Belt land

and urges the developer to recognise the strength of informed opposition to the proposals.

2. However, The parish council recognises that there will be considerable pressure on the Planning Inspectorate to satisfy the need for a rapidly increased supply of renewables of all types; that the climate emergency requires major investment across the UK; and that the grid infrastructure in Oxfordshire will allow quick and straightforward implementation. If the Planning Inspectorate is minded to accept the need for some generating capacity, despite the arguments against that provision in this location, then the WPC would want to see very substantial changes to the size and extent of the site and much higher levels of mitigation agreed. This should include all the following but is not limited to them:

A. Significantly improved measures to ameliorate the effects of the solar farm on the visual landscape and the landscape resource. At the very least this should involve:

- Wider buffer zones around residential properties and sensitive locations such as Conservation areas, listed buildings and the UNESCO World Heritage site. There should be at least a 20% increase over those currently proposed, or where the buffer currently proposed is zero it should be at least 25 metres.
- A minimum width of 20 metres along all footpaths/cycleways with wider stretches in key sections of the Oxfordshire Way and Akeman street footpaths. The existing plans would be very detrimental to the aesthetic enjoyment of these paths and rights of way because they will be encased between high fences or hedges or have views of solar arrays.
- Planting for screening purposes to be a mix of native hedgerow with both evergreen and deciduous trees and shrubs to ensure screening in winter and summer. A long term commitment to maintenance of the planting and replacement of unsuccessful sections/ plants.

- Rejection of arrays in field numbers: 1.12, 1.13, and the southern section of 1.11 (ie moving the boundary to the north, further away from the footpath)
- An improved flora and fauna and biodiversity survey with plans for improvement clearly specified in detail. We are aware that the Landscape and Ecology Management plan is still not completed and we require that the public and councils should be able to comment on it when it is complete. The plan must include the following improvements. The Biodiversity net gain target of 85% to be achieved across all sites: This target should be made a legal requirement. This should not be an average of all sites, but at each individual site. Currently the stated target is 70% but this is unacceptable because it be achieved with very little effort and does not constitute sufficient benefit or improvement. Appendix A lays out in more detail particular clauses with need to be addressed and resubmitted for consultation.
 - B. A very substantial increase in the level of Community Benefits including a community fund offering grants for improved recreational and wellbeing facilities to the villages affected (sports, green spaces, community projects and related buildings and restoration).

This should be managed by an independent foundation. The offer of £50,000 pa suggested as community benefit is a derisorily low figure. There are legitimate reasons to expect a significantly higher figure: the impact of the project on the green belt; its proximity to a UNESCO World Heritage Site; and the impact on the amenity of both residents and tourists.

- Considerably higher benefits have been agreed elsewhere on the basis of income per installed Megawatt; for example large renewable energy projects have set a payment of around £5,000 per Megawatt per year.
- C. The creation of a scheme to provide energy at materially reduced rates to affected villages.
- **D.** Commitment to work with the appropriate agencies to improve visual amenity and walking and cycle connections between villages in areas where the solar development and associated security fencing creates a visual and physical separation between villages. This should include greatly improved crossings at key road points, already identified by other organisations, along with investment in better foot and cycle paths with new signage which will help offset the creation of physical and psychological barriers. See Appendix 2 for details for the Northern Section which impacts Wootton

Appendix 1

EIA baseline needs to be established 6 months prior to any works commencing:

A number of studies have been concluded but a a genuine baseline cannot be established with out-of-date data. **All** species of Flora and Fauna must be studied and data collected accordingly. Studies should not be limited to just protected species or species of conservation interest. A full and comprehensive baseline is required to establish BNG.

Habitat Regulations Assessment to be compulsory 6 months prior to any works commencing.

Minimum 20m Buffer Zones: This to include but not limited to Housing, Footpaths, Hedgerows, Watercourse, Ponds, Woodlands etc.

Surveys of Flora, Fauna and Habitats: Every species of Flora and Fauna must_be studied. Deer and foxes to be included. It should not be limited to just protected species or species of conservational interest. Studies must be conducted continuously up until any works commence. Studies should then be conducted annually which will contribute towards ongoing management strategies to achieve min 85% BNG.

Clause by clause comments on Chapter 9 of the PEIR on Ecology and Nature Conservation

- 9.1 no removal of any Hedges / Trees / Woodlands
- **9.2** 20m buffers
- 9.4 20m buffers
- 9.8 Deliver at least 85% BNG
- 9.12 85% BNG

The following should be implemented across **all areas** of sites:

- bee hives
- log piles and other refugia
- bird boxes on retained trees
- bat boxes on retained trees
- **9.16** Fencing must not eliminate the badgers or <u>any</u> other animal's ability to 'forage or roam.' Other methods must be sought to prevent harm to wildlife.
- 9.18 Herras fencing is too high

- **9.10.2.1** Planting within the panel arrays to be sown with appropriate wildflower mixes suitable for the land. Advice on planting and grazing plans to be sought from relevant experts / organisations. This must be carried out across all sites and planting/ grazing plans and strategies must be carried on for the whole period the solar farm is in use. At the end of the period; 35 or 42 yrs whichever is first (but before decommissioning) Wildflower areas must be studied and records taken. Appropriate measures for protection of important areas must be sought.
- **9.10.2.73** Any vegetation removal must be carried out outside of any breeding season. No exceptions.
- **9.10.2.95** Badger activity to be continuously monitored, any set locations noted that are in use or not in use should be assessed every 3 months.
- **9.10.2.121** Specific surveys for dormouse/hazel mouse MUST be undertaken and continuously assessed every season.
- **9.10.2.129** Specific surveys for Otters MUST be undertaken due to the likelihood to use areas of the sites for commuting and foraging.
- **9.10.3.139** Specific surveys MUST_be carried out.
- **9.10.3.37** 20m buffers
- **9.10.3.73** 20m buffers
- **9.10.3.85** Emphasises the need to carry out studies for Dormice.
- **9.10.3.131** 20m buffers to be implemented. No set closures. Continuous monitoring of all sets occupied or unoccupied.
- **9.10.3.143** Sensitivity of the receptor to be changed to HIGH due to the conservation importance level and low ability to recover.
- **9.10.3.167** Specific surveys MUST be undertaken.
- **9.10.3.169** Features to be identified and mapped. Species survey MUST be undertaken.
- **9.10.3.180** Specific surveys MUST be undertaken.
- **9.10.3.195** Specific surveys MUST be undertaken.
- 9.10.8.2 Target gain of 85 % BNG to be a LEGAL requirement.
- **9.10.8.3** Wildflower meadows to be planted and managed in all solar panel array areas. Grazing plans to be implemented in accordance with expert advice. No mechanical cutting. No removal of cuttings.

Buffers to be minimum 20m. Planting/Management strategies to be implemented.

New woodland planting to increase to 10ha

New hedgerow planting to increase to 40km. Current hedgerows within site to be reinforced/gapped-up with relevant species. All hedgerows to be 3m in width.

- 9.10.8.29 New woodland planting within site boundaries to increase to 10Ha
- **9.10.8.45** New hedgerow planting to increase to 40km. at 3metre width

9.10.9 - **Future monitoring.** This should take place across all sites. All species of Flora and Fauna should be studied. This should be done annually throughout the life of the solar farm. All results to be published.

Decommissioning - Current mitigation plans for the decommission of the site are, at this stage, to only be considered as 'recommended steps'. With a BNG of 85% to be achieved this will greatly impact the way in which all areas of site would be decommissioned. Many ecological and environmental changes can occur in 35/42 years and as such, full studies across all sites should be carried out to assess the impact decommissioning could impact the BNG achieved.

Sensitivity of receptors at decommissioning stage cannot currently be estimated. With an 85% BNG to be achieved this will greatly increase the sensitivity of receptors across the entire project. Full studies must be carried out no earlier than 1yr prior to decommissioning to assess the ecological impact it will have to all sites.

Appendix 2

With reference to the northern site, the documents in the second consultation propose a cycle path which joins the public right of way at Hordley and continues across fields along the Glyme Valley which are part of the Wootton Conservation Trust land. This route needs to be discussed with other parties involved in creating a new route for cycle paths, in particular the Village Travel Network and Blenheim Estates. The route of the cycle route apparently being proposed by the Developer is not feasible because of both the annual flooding of water meadows and the steepness of the terrain. The developer needs to ensure proposals of this nature are practical and feasible.

At the meeting of the Wootton Parish Council held on 5 February 2024 this statement was unanimously approved and formally adopted for submission to the Developer as the response of the Council to their Phase 2 Consultation (November 2023)

John Harwood Chair of the Council