

Cassington Parish Council Response to the Botley West Solar Farm: Information Change Note on Targeted Consultation, June 2024

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Introduction

A Targeted Consultation was launched by PVDP on the 14th June, 2024 with little or no prior warning to the public. Many of the public received notification via post during the week following the start of the consultation (in my case on the 19th June) reducing the time to respond. This is a material consideration given that the deadline for response to this Targeted Consultation was just 6 weeks (July 28th).

The Targeted Consultation was stated to be required because:

The original proposal has been adjusted to:

- Reflect better boundaries reflecting OS maps as well as land ownership.
- To present refined routes for cabling.
- To adjust the scheme for more access points for both construction and maintenance of Botley West Solar Power Station. These access points may have been modified to improve safety (e.g. modification of splays to improve visibility for vehicles entering / leaving the proposed sites.
- Removal of land from the proposal that is no longer required.

General Comments

Adequacy of the Public Consultation

It is surprising that this Targeted Consultation is needed following the consultation in December 2023 / January 2024. This first official Public Consultation presented a vast quantity of (unindexed) information begging the question of why a second Targeted Consultation presenting 57 changes, is needed. Cassington Parish Council can only conclude that the first official Public Consultation was rushed, meaning that the information presented now was missing unrefined or inaccurate. This suggests that the First Consultation was indeed inadequate.

Inadequate Information

The information provided provides comments on 57 boundary changes along with thumbnail maps showing where boundary changes are proposed. These maps and associated descriptions of the changes to the proposed scheme were wholly inadequate, in many cases lacking important detail or left so open as to leave the reader unable to assess what likely impacts were going to be (for example, making a substantial boundary change for a cable crossing point somewhere within the designated area). Examples of inadequate information included:

- Not showing the actual rights of way on thumbnail maps.

- Not providing any information on the environment other than general habitat types that may be affected in some cases. This was of material consideration as it left the reader unable to assess the amount of habitat lost nor the quality of the habitat (i.e. whether or not a hedgerow is “ancient”).
- Not showing local designations for nature recovery or habitats of national significance even though these are available on national databases and environment maps.
- Not showing nearby heritage assets so that potential impacts on archaeological sites for example can be assessed (e.g. Sansom’s Platt).
- In one case maps being so ambiguous that it is not possible to identify where the proposed change is (see 35 below).

This significantly lowers the value of the consultation as the nature of the proposed changes are not clear to the public as well as the environmental, amenity and heritage impacts. This suggests that as with the First Public Consultation, this second Targeted Consultation is inadequate, being deficient in the information it presents to the point where the public are unable to comment on many aspects.

Specific Comments

Impacts of Changes

1. Dornford Lane, an ancient drover’s track will be included in the scheme to be used for maintenance vehicle traffic. This is currently a public right of way. At the northern end the lane forms a track. However, as it nears the southern end, and junctions with other footpaths such as Akeman Street it narrows to one or two feet wide, with wide swathes of vegetation, bushes, hedging and trees, etc. It would be impossible to drive vehicles down this path without causing massive damage so it is assumed the developer will therefore have to remove these hedges. It is likely they are older than 1845 making them “ancient hedgerows”. The most ancient parts of the hedgerow along this track include ash and oak trees and can be 15 to 20 feet across. The small Roman town of Sansom’s Platt is also in the immediate vicinity of Dornford Lane.
2. Access between field, impacts unclear from information presented.
3. Dornford Lane included in the scheme for access. Also, a 33Kv cable to be placed across the roadway in a place as yet undetermined.
4. Access through a hedge along the A4260 for construction site and substation. Loss of hedgerow; no information provided on status or likely age of hedgerow.
5. Hedgerow removed along the B4027 to allow construction and maintenance of solar arrays and delivery of power converters. The applicant states (as in 4) that any protected species will be safeguarded. It is difficult to imagine how you can safeguard a protected species within a hedge that is due to be removed especially if the species is dependent on the environment provided by the hedge.
6. Inclusion of B4027 and Stratfield Lane in the development to connect fields and enable cable laying. This includes a public right of way.
7. Widening of the boundary along Stratford Lane which may lead to loss of hedgerows.

8. Correction of project boundary to align with OS maps.
9. Change in the project boundary to allow cable to be placed underground. Will potentially impact the Glyme Valley way and National Cycle Route 5.
10. Boundary change along the B4027 to ensure access for construction.
11. Change of boundary to align with OS maps.
12. Change of boundary to align with OS maps.
13. Change of boundary to allow access from the Banbury Road for construction and maintenance traffic. Will result in loss of hedgerows of indeterminant age.
14. Change of boundary related to land ownership.
15. Potential widening of the boundary along Banbury Road to the north of Hensington. This may result in the loss of hedgerows but there is insufficient information here to evaluate ecological impact.
16. Use of a track for a 33kV cable connecting arrays. This may result in the loss of a public right of way or impact its use during construction.
17. Adjustment of boundary to reflect land ownership.
18. A site boundary change that may impact on several major Oxfordshire footpaths including the Greenbelt Way, the Eynsham and Thames Path Promoted Routes. Disruption to the use of these footpaths may occur during construction. There is no further information on likely impacts to ecology.
19. Boundary change to reflect OS map.
20. Boundary change to reflect OS map.
21. A boundary change to reduce potential impacts on archaeology. This would appear to be a beneficial change in terms of heritage.
22. Boundary change to align with the OS map.
23. Access to construction site to the east of Langford Lane. This will result in the loss of mature hedgerow. See comments to (5) above.
24. Disruption to the cycle and footpath running along the A44 for cable laying during construction. It is noted that this is the main foot and cyclepath connecting Woodstock / Bladon to Begbroke, Yarnton and Oxford. This route is in daily use by cycling commuters into Oxford, the villages between Woodstock and Oxford and to the Begbroke Science Park.
25. Boundary change to allow for a 30m wide "path". This is to allow for commercial development associated with the growing industrial parks to the east of Oxford Airport.
26. Boundary change to align with OS maps.
27. Change in boundary to allow for cable laying across the Cassington (Burleigh) Road. This road is now a busy route taking a lot of local rush hour traffic moving between Oxford / Yarnton and from the A40 through Cassington to the Bladon / Long

Hanborough Road (A4095). Any disruption to this route will cause considerable inconvenience to local road users and also will likely result in heavier traffic in the surrounding area (e.g. traffic from Yarnton going instead through Cassington or up the A44 and through Bladon, a route already heavily congested. The mature hedges along this road are also not mentioned here and presumably they will also be damaged or a part removed for this work.

28. This is a rather non-specific boundary change, the impacts of which are not possible to determine because the precise cabling route for which the change is made is yet to be determined. It is another example of where the information provided in the Targeted Consultation is insufficient to allow assessment of impacts, in this case on Heath Lane, Bladon and on a Bridleway.
29. Boundary change potentially causing loss of trees and hedgerow along Cassington Road to allow for cabling. We note that this may effect the edge of Burleigh Wood, an area of ancient woodland (see PEIR, Chapter 9, P17). This wood was already damaged by a tornado on the 31st October, 2021. As with (27) we note the disruption to traffic this may incur along the Cassington Road.
30. Installation of a bridge over and cabling under the River Evenlode south of Mill Farm

It is noted that in the PEIR rivers are described as being protected with a buffer corridor from the proposed scheme. The Evenlode specifically, is identified as an important landscape-scale corridor running from north to south (PEIR Chapter 9, P42). Clearly there will be at the very least temporary disturbance and habitat destruction during construction along the Evenlode at or close to the very area that is identified as where a floodplain meadow could be established (PEIR Chapter 9, P18, P19, P28, P57) and where the corridor along the Evenlode could add to the Cassington Nature Recovery Network. The Lower Evenlode is also identified as a Conservation Target Area (CTA; PEIR Chapter 9, P40) and as good territory for foraging bats and otters (PEIR Chapter 9, P46, P47). Presumably the bridge would be used for maintenance traffic for the Solar power station causing disturbance during the operation of the facility (see (32)).
31. Boundary change to match OS map.
32. Widening of the access to Mill Farm from the B4449 to allow access for placement of Power Converters and for maintenance traffic. Again, removal of hedges with no detail of how mature these are or of details of removal (see 5).
33. Change of project boundary to reflect OS maps.
34. The proposal here is for a footbridge over the river Evenlode. The positioning of this footbridge would seem to connect land to the west of the Evenlode to land surrounded by the river as it splits in two to the north and reconnects to the south. A priority identified on the Cassington Neighbourhood Plan is connecting the footpath from Cassington via Purwell Farm which ends at the River Evenlode just north of Goose Eye Farm, potentially opening a pedestrian and cycling commuting and amenity route between Cassington and Long Hanborough (see Cassington Neighbourhood Plan). This footbridge does not seem to achieve this goal although it may if the additional footbridge (35) is positioned on eastern loop of the River Evenlode in this location. Unfortunately the maps provided with the Targeted Consultation are not clear on this matter (see 35 below). Although impacts to the

River Evenlode and surrounding meadows would be less than the bridge described in (30) nonetheless care would need to be taken in design and construction of the footbridge given the sensitive nature of the habitats in this area (see 30 above).

35. It is completely unclear where this footbridge is located as no arrow points from the (35) box on P9 of the Targeted Consultation document to the river crossing point. A location at the end of the footpath from Cassington, crossing the River Evenlode north of Goose Eye Farm, before the River splits in two would make most sense. It is also likely that this was the historic crossing point of the river and the footpath probably continued to the west. If this is the location of the proposed footbridge it would be compatible with the proposal in the Cassington Neighbourhood Plan and the footbridge described in (34) unnecessary. This will only be a useful ProW if the additional footpaths are put in place to the west of the River Evenlode connecting Cassington to Church Hanborough or (preferably) Church Hanborough. Again, although impacts to the River Evenlode and surrounding meadows would be less than the bridge described in (30) nonetheless care would need to be taken in design and construction of the footbridge given the sensitive nature of the habitats in this area (see 30 above).
36. As with the Cassington (Burleigh) Road, Lower Road takes a significant load of local rush hour traffic from the A40 and the southern stretch of the B4449 (linking to Oxford via the Swinford Bridge) to Long Hanborough. Any disruption of this route will lead to significant congestion in the area and likely traffic overspill into Cassington. The mature hedges along this road are also not mentioned here and presumably they will also be damaged or a part removed for this work.
37. The boundary change here includes an existing rural (farm) track. It is assumed no hedge removal or other activities will be required here as these are not mentioned.
38. The Boundary is changed to remove New Barn Farm from the scheme.
39. The project site boundary is made here to allow connection of 33KV cabling between solar arrays. It is noted that this cabling would need to cross the River Evenlode with all the potential impacts on an important environmental corridor as described above (30). This crossing is just north of Eynsham Mill.
40. The note identifies boundary changes to reflect land ownership and to give the project more “engineering flexibility”. We note that the area including both the boundary to Cassington Sewage Farm, the access track to it and the boundaries of the railway line comprise a lot of mature hedgerow and semi-wooded habitat. Many birds use these areas for nesting or foraging opportunities. Any loss of these habitats will entail an impact on plant, insect, bird and other diversity.
41. Boundary adjusted to match with OS maps.
42. The boundary of the scheme has been modified to include the private access road to Purwell Farm. It is assumed that there will be no need to alter the boundaries of this track which comprise mature hedgerows to allow access for the power converter units. What is a significant concern is the route by which the Power Converter units will be delivered to this site. Coming from Yarnton the route includes a narrow bridge which is likely to be unsuitable for HGVs. This leaves access either from the A40 via Cassington, which has a weight limit through the village, reflecting the proximity of

buildings (included listed buildings) to the roadway and its narrowness. Another route would be via the A4095 but again through Bladon the road is extremely narrow.

43. The boundary has been altered to allow cabling to be routed between solar arrays. There is no identification of impacts in the Targeted Consultation documents, but it is noted that an area of woodland borders this change which is an environmentally sensitive habitat.
44. Access to the fields west of the Cassington (Burleigh) Road will be widened to take delivery of Power Converter Substations. This is likely to involve loss of mature hedgerows (see 5, above and notes below). Again, this raises concerns about the transport via HGVs along roads which are likely to be suitable for such large vehicles.
45. Boundary of the scheme is adjusted to reflect the OS map.
46. The boundary of the scheme will be adjusted to include the maintenance track to the Sewage Works. This track is also part of a public footpath which is used by walkers (including dog walkers), joggers and for commuting from Cassington to Begbroke Science Park. Disruption to this footpath during construction along the highlighted area, as well as the footpath beyond the concrete track will be a major inconvenience to walkers who often use this route. It is noted that additional traffic during construction and for maintenance will be on top of the relatively light use of the current track for traffic to / from Cassington Sewage farm and fields connecting to this track. It is assumed that there will not need to be removal of hedges from either side of this track which are rich in wildlife (see 40).
47. The boundary changes incorporate land around the railway line and the boundaries of Cassington Sewage Farm. As above (40), we note that the area including both the boundary to Cassington Sewage Farm, the access track to it and the boundaries of the railway line comprise a lot of mature hedgerow and semi-wooded habitat. Many birds use these areas for nesting or foraging opportunities. Any loss of these habitats will entail an impact on plant, insect, bird and other diversity. It is also not understood why this change refers to highway when it lies around the railway line running from Oxford.
48. The boundary change is to improve the visibility line to the north to enable safe access of vehicles presumably along the track to Cassington Sewage Farm. This access already comprises a considerable splay of concrete to enable vehicles to enter or leave this track. The Cassington – Yarnton road in this area is lined by mature hedgerows which would be impacted if changes are made to increase visibility from the track to the road.
49. Alteration of the boundary to align with land ownership.
50. Land classified as species-rich grassland is removed from this scheme which is positive. However, the boundary is increased elsewhere to the south of the Cassington Road and to the west of Cassington Canal. This land is in the existing core nature recovery network and is also identified as Priority Habitat Inventory Coastal and Floodplain Grazing Marsh (see Magic maps and Cassington Neighbourhood Plan's Green Infrastructure Plan). 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 is also concerning that land adjacent to Eynsham

Allotments is also included in the boundary as this includes a complex of hedgerows and wooded habitat. Overall, the land identified for entrenching the cable is entirely unsuitable given its ecological sensitivity. This is unsurprising as there is a complex of such habitat running along the north bank of the Thames in this area (see Cassington Green Infrastructure Plan).

51. This is a minor adjustment of the scheme boundary of little consequence.
52. This is a minor adjustment of the scheme boundary of little consequence.
53. An adjustment of the boundary to reflect legal ownership of the land.
54. An adjustment of the boundary to align with the OS map.
55. An adjustment of the boundary to avoid loss of trees or hedgerow.
56. An adjustment of the boundary to avoid loss of trees or hedgerow.
57. Denman's Lane is a significant public footpath connecting Cumnor with Eynsham Road and also including a circular walk from Cumnor which also connects to the Oxford Greenbelt Way. Entrenching a cable along this footpath will lead to significant public inconvenience, even if temporary. There are no details of likely environmental impacts of this part of the scheme

Hedgerows

Some loss of hedgerows will be incurred as a result of new access areas and other activities proposed as part of the targeted consultation. Mitigation for this is proposed as the replanting of 25.5km of new hedgerow as part of the scheme. It is noted that this is significantly less (~12%) than proposed in the PEIR, Chapter 9 (29km of new hedgerow with a further 28km of hedgerow reinforced). Cassington Parish Council asks why there has been a 12% decrease in the planting of hedgerows between the First Public Consultation and this Targeted Consultation? Is it because information was incorrect in the materials presented in the First Public Consultation or have the applicants deliberately reduced hedge planting and if so why?

As previously identified by Cassington Parish Council 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. Consequently, the Hedgerow Regulations (1997) were introduced to halt the removal/ degradation of what remains of the resource. In particular, Ancient Hedgerows are of concern for nature conservation and as part of our heritage in terms of preserving the landscape of the English countryside. Ancient hedgerows, which tend to be those which support the greatest diversity of plants and animals, are generally defined as those which were in existence before the Enclosure Acts, passed mainly between 1720 and 1840 in Britain. These hedgerows are protected as Important Hedgerows under the Hedgerow Regulations (1997) and it is estimated that something like 70% of the U.K.s hedgerows are classified as "Important". Such hedgerows need permission from the Local Planning Authority to be removed and although the Botley West proposal is submitted to the Planning Inspectorate, it is assumed the LPA will still need to be consulted over removal of Important Hedgerows.

Cassington Parish Council also notes 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.

Whilst negative impacts of hedgerow loss are assumed to be mitigated because of the planting of new hedgerow (whether this is 25 or 29km is not clear and nor is the location), emphasis must be placed upon the fact that proposed changes are losing a long-established, biodiverse habitat in exchange for a brand new one. As with many aspects of the impacts of solar power stations on the environment and biodiversity, the effects of hedgerow age on species richness and abundance are poorly studied (Tresise et al., 2021). However, scientific peer-reviewed literature indicates that the biodiversity of hedgerows relates to their age, and the expected recolonisation time for biodiversity depends on the groups of species involved as well as other factors (e.g. location). Hedge biodiversity estimates (species richness or diversity measures) are often based on the plant species they host, and they can be especially important for woodland species in agricultural landscapes where much of ancient woodland has been lost (e.g. Litza & Dieckman, 2018; Montgomery et al., 2020). In southern Britain, the number of species in a 30m length of hedgerow is approximately one per hundred years of age (Pollard et al., 1974 in Montgomery et al., 2020). Newly established hedges can generate a high species richness in a relatively short time although species tend to be dominated by grasses and ruderal species (i.e. early colonisers of disturbed land or weedy species) whereas ancient hedgerows are dominated by stress-tolerant woodland species (Montgomery et al., 2020; see also Litza and Dieckman, 2018). At least one study in Oxfordshire has demonstrated that abundant and diverse spider and beetle populations can develop in well-managed and newly planted hedgerows in five years (Pywell et al., 2005).

Taking this together we assume that any replanted hedgerow may not necessarily replace habitat and associated biodiversity lost as a result of the changes outlined in the Targeted Consultation, especially if they are ancient hedgerows and possibly not if they are Important Hedgerows (older than 30 years or regarded as important for other reasons). Even where new hedges successfully establish it is unlikely their biodiversity will match that of Important hedges for many decades and for ancient hedges, perhaps centuries.

Summary

- The Targeted Consultation is clearly rushed with the result that information required for the residents of West Oxfordshire and other affected communities are not in a position to judge the impacts of the proposed boundary and other changes and request changes to the proposed plans or ask questions.
- Given the supposed comprehensive nature of the First Public Consultation it is unclear why the developers missed or were forced to implement these 57 changes. This leads us to the conclusion that the First Consultation was also rushed and therefore inadequate for its stated purposes.
- In many cases insufficient information is presented in the Targeted Consultation to understand the changes proposed and their effects on nature, heritage and amenity. Given this, it is very difficult for the public to respond to this consultation (at short notice) with questions, requests to make changes or other points.
- Some of the proposed changes are at face value positive (e.g. proposal for footbridges across the River Evenlode and provision of new Public Rights of Way).

Other changes are neutral (e.g. minor changes to reflect land ownership or OS maps).

- Many of the changes are concerning because of the potential impacts on nature, amenity, heritage and traffic. Given that many of these changes are to the Central Area of the scheme they have an impact on the residents of Cassington and Worton. We have noted these impacts pertaining to the Cassington (Burleigh) Road and the Lower Road. The fact that the scheme still requires a cable crossing sensitive ecosystems along the Thames is a significant concern.

References

Litza, K., Diekmann, M. (2018) Hedgerow age affects the species richness of herbaceous forest plants. *Journal of Vegetation Science* 30: 553–563.

Montgomery I., Caruso, T., Reid, N. (2020) Hedgerows as ecosystems: service delivery, management, and restoration. *Annual Review of Ecology, Evolution, and Systematics* 51: 81–102.

Pollard, E., Hooper, M.D., Moore, N.W. (1974) *Hedges*. Collins New Naturalist Library Book 58. London: Collins.

Pywell, R.F., James, K.L., Herbert, I., Meek, W.R., Carvell, C. et al. (2005) Determinants of overwintering habitat quality for beetles and spiders on arable farmland. *Biological Conservation* 123: 79–90.

Tresise, M.E., Reed, M.S., Chapman, P.J. (2021) Effects of hedgerow enhancement as a net zero strategy on farmland biodiversity: a rapid review [version 1; peer review: 2 approved]. *Emerald Open Research* 3: 23.