



**Re: Phase 2 PVDP Consultation on Botley West Solar Farm
Approach to “delivering opportunities beyond solar”**

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About Sustainable Woodstock:

We are one of 100 plus Community Action Groups that make up the Community Action Group network in Oxfordshire. These groups are an accessible way of getting involved in many kinds of events or activities that support climate action in our local communities and/or environment. Our aim is for residents, schools, businesses and our elected officials in Woodstock to not only be aware of the climate and nature emergency but to work together to build a greener, zero carbon future for all ... and as soon as possible. The steering group consists of 15 members with a local following of at least 438 supporters.

We, alongside 45 other communities working together, are a community shareholder of [Low Carbon Hub](#), a social enterprise that is making energy that is good for the people ... as well as the planet

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1. Overview:

The UK Government has put into law a target of net-zero greenhouse gas emissions by 2050 ([Climate Change Act 2008](#)). However, the target for decarbonisation of electricity in the UK is 2035.

Sustainable Woodstock supports the application from PVDP for Botley West Solar Farm in principle. We acknowledge it because we understand the scale of the climate emergency and recognise the need for urgent and largescale action and transition to the generation of clean and renewable energy. We believe this development is necessary. Projects such as this are urgently required to combat global warming alongside of nature recovery. As a result of insufficient urgent action in the last decade or so, and until other technologies have advanced sufficiently, solar



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installation is recognised as a correct choice of clean energy solutions to rapidly, and cost effectively, reduce our dependence on fossil fuels.

This could be an excellent opportunity for PVDP and the main landowner (Blenheim Estates) to show what can be achieved when building a solar development of this size. Considering Oxfordshire County Council’s report that Oxfordshire needs 3 more such solar developments then hopefully BWSF can be held up as an excellent example of the standards required. If the bar is set high from the beginning, then surely communities and nature will benefit. It may also lead to increased acceptance of these much-needed projects in the future.

Given the scale of local opposition to the scheme we think the applicant should make further significant improvements to its overall offer in order to secure popular support. The impact on homes nearby should be lessened. Our hope is that Botley West Solar and PVDP will be sympathetic to people and to nature, and be an exemplar resulting in a rapid transfer from fossil fuel electricity generation to renewables. The mitigation measures suggested in the consultation for landscape and visual impact with larger buffer zones and ecological development are very welcome but there should be a firm commitment rather than simply an ‘exploration’ of these elements as noted in the consultation. Given the farmland, the local communities and rural setting we think a commitment with regards the impact on the visual and local resource is a necessity. Mitigation measures should also include a much more ambitious commitment to biodiversity gains than that stated in the consultation document. We address each subject later.

We welcome PVDP’s commitment in their Phase Two consultation document: *“Botley West Solar Farm is committed to establishing an environmental and long-standing legacy across the area. We are committed to working with the community to inform what a package of community benefits could look like”*.

An appropriate and proper fund, carefully managed and delivered could have a great positive impact on local people. PVDP will rightly deliver rewards to their investors but there should be appropriate, just, and fair community benefits for the duration of the project. This is a very large solar development that impacts many local communities and the developer and landowner should understand and appreciate that it deserves a more significant level of community benefit. The community benefit package offered by PVDP is wholly inadequate and demonstrated when comparisons are made with similar UK projects (see later).

2. Ethical working practices, ethics, finance, suppliers, methods, materials:

The proposal should be an exemplar for ethical practice to which others can aspire and follow. All activities related to this proposal from PVDP and Blenheim must consider the climate emergency, biodiversity loss, and climate justice throughout the supply chain i.e., suppliers, methods and materials. The entire supply chain must be financed ethically and with ethical working practices.

In the event of the “development” being sold on we would expect subsequent owners to be required to comply with all the recommendations of this consultative response



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We welcome a dedicated reserve to cover decommissioning costs and that the land will return to its original use, and not become brownfield land. We also welcome your commitment to work with landowners and relevant stakeholders to explore how particular features of your proposals – such as planting, landscaping, and permissive access – could provide continued benefits by remaining in place beyond the life of the solar farm.

3. PVDP’s Commitment to Community funding:

“We are committed to ensuring funding is available to support local initiatives for each year that the solar farm is operational. Establishing a Community Benefit Fund - As part of Botley West's objective to establish a legacy across the area through working with the community, we are committed to exploring making a fund available that will be similar in size to Blenheim's bursary fund of £50,000. We are seeking feedback on the potential projects and initiatives that this fund could support”.

Commentary

The community benefit package being offered by PVDP is wholly inadequate. £50,000 community funding being offered represents about 1 hour of revenue generated on a single sunny day in July.

Research shows that other UK projects offer fairer and more generous community benefit funding. The level of community benefit should reflect current values at comparable installations.

Related to the circumstances listed below, we think that the amount of £5,000 per MW of renewable energy developed would be appropriate; we would expect the range to be **up to £4.2m** per year. Whatever sum is agreed, it must be **index linked** or otherwise linked to the revenues of the solar farm, so that it does not lose its value over time. The **reasons** for a higher figure include:

- 1) the high percentage of this project sited on green belt (72%)
- 2) the percentage of project on grade 1-3a agricultural land (38%)
- 3) the size of the project 840MW
- 4) the land is adjacent to a UNESCO World Heritage Site
- 5) the impact on the local amenity - as the solar farm surrounds local green spaces

Legacy – The agreement must be protected and passed on if the developer sells the farm to another company to run and remains index-linked.



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4. Ecology and Biodiversity

We **strongly support** Blenheim Estate becoming the environmental steward for the site for the duration of BWSF. This would provide a simple and direct route for feedback regarding BWSF for local residents.

- a. Mitigation measures.

Commentary

We would like PVDP to make **a clear commitment** and not simply write that you have been “exploring the potential” for mitigation. - see also Landscape and Visual. We **strongly support** Blenheim Estate becoming the environmental steward for the site for the duration of BWSF. This would provide a simple and direct route for feedback regarding BWSF for local residents.

- i. **Biodiversity Net Gain.**

We’d like to see Commitment. Studies should demonstrate the condition prior to the start of the solar farm, managed appropriately and monitored to maximise pollinators and aim to maximise nature recovery.

Given the previous use of some of the land that may have been farmed intensively using fertilizers, pesticides and herbicides, the biodiversity net gain should be substantially greater than the proposed 70% (70% of very little ...is very little). Conversely, we understand there may be some fields that have been fallow for years and be species-rich already - consequently data collection and analysis is important. For some areas, the target could/should be more ambitious and demonstrate to other developers that biodiversity can be enhanced considerably. Can biodiversity be enhanced by 2-300%? The figure will be dependent on the starting point/baseline surveyed.

- ii. **Fragmentation of habitat /wildlife corridors**

We’d like to see Commitment. Habitat fragmentation is a major contributor to nature and biodiversity loss. This is a largescale development and wildlife corridors appear to have no mention. The creation of appropriately-sized wildlife corridors should be incorporated in the design to maximise nature recovery.

- iii. **Creation of woodland belts.**

We’d like to see Commitment. Again, choices to maximise, landscaping, potential future resource and nature recovery.

- iv. **Planting and management of lengths of new hedgerows along lengths of PRoWs.**



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We’d like to see Commitment. Hedgerow planting should be specified and have elements for biodiversity/nature recovery. Management of hedgerows is important for nature recovery, for example, pruning on a 3year cycle, to maximise food sources/wildlife cover while still allowing good and easy access for RoW users. Pruning should be completed at a suitable time of year so that fruits and berries are not destroyed/stripped before or during the winter food-source season.

*Example: Sansoms Lane
Woodstock. A local wildlife-rich RoW*



v. PUBLIC SAFETY/SECURITY – RoWs, and PRoWs flanked by high security fences

CCTV will help with the security of solar farm (some may have personal issue with CCTV) but due to loneliness of some parts of a route with 2.1m high flanking security fencing, solutions should be considered/sought to allow for points of egress. There may be safety issues regarding long stretches of footpath enclosed with high fencing. I believe this will deter the public from using these footpaths and rights of way. Secondly it will restrict the free roaming of larger mammals such as deer. There should be some possibility of “escape”.

vi. Reinforcement of existing field boundary hedgerows.

We’d like to see Commitment. Same comments as in iv above in order to support nature recovery.

vii. Meadow grassland to perimeter of solar array areas and areas of enhancement.

We’d like to see Commitment. Should be managed appropriately and monitored to maximise pollinators and nature recovery.

viii. Planting of individual trees where appropriate.

We’d like to see Commitment. Choice of trees for wildlife and possibly future resource.

ix. Skylark plots and bird recovery more generally.

We’d like to see Commitment. Establishing new plots between the solar arrays. Monitoring / surveying of birdlife more generally and publishing results aiming for nature recovery.



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x. **Bird and bat boxes.**

We’d like to see Commitment. Placing bird and bat boxes in appropriate sites on trees and monitoring, publishing results aiming to maximise nature recovery.

xi. **Bee hives.**

We’d like to see Commitment. Establishing bee hives on the site and managing /protecting them for the future long-term health of our bee populations and nature recovery (and honey collection possibly). Advice should be sought from bee/conservation specialist such as Filipe Salbany (Blenheim Estate)

Ref: <https://www.apicultural.co.uk/do-managed-honey-bees-compete-with-wild-bees-for-floral-resources>

xii. **Buffer zones.**

Minimum buffer zones should be greater and aim to maximise nature recovery for example,

- Minimum **10m** for hedgerows, trees, ponds and woodland,
- Minimum **10m** buffer for watercourses
- Minimum **30m** for ancient woodland and Weavely Furze

We welcome the specified mitigation measures to minimise the effects on ecology such as:-

xiii. **No removal of hedgerows, woodland, waterbodies, or watercourses.**

xiv. **Creating a new landscape-scale corridor along the Evenlode River** that maximises nature recovery.

xv. **Log piles.**

Providing log piles and other refugia maximises nature recovery.

b. **Environmental stewardship.**

We welcome that PVDP is working with Blenheim Estate to ensure there is long term environmental stewardship in place, with the primary goal of supporting the project to achieve a substantial biodiversity net gain within the area. We **strongly support** Blenheim Estate becoming the environmental steward for the site for the duration of BWSF. This would provide a simple and direct route for feedback regarding BWSF for local residents.



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Commentary:

We also suggest the following:-

- i. **Maximising possibilities.** Specialists such as Wildlife Trust Consultancies, RSPB and others should be used/commissioned to better understand and maximise opportunities.
- ii. **Studies, surveys, long-term monitoring** to ensure success and failure stories are shared and knowledge gained to aid nature recovery .
- iii. **Education.** Working with study groups such as Brookes University, University of Oxford, DEFRA and/or other appropriate bodies so that results and commitments are reported, published, shared and lessons learnt.

5. On-site benefits:

We welcome the proposals to deliver benefits to local communities but urge you to expand these commitments to include :

a. Connectivity.

- i. We welcome proposals for new footpaths and cycle routes.
Regarding cycle routes, we recommend that you consult with local cycling organisations, groups and the Village Travel Network <https://www.vtn.org.uk>
- ii. We welcome a new footpath to connect Cassington and Church Hanborough
- iii. We welcome upgrade of existing footpaths e.g. connecting Bladon to Campsfield.
- iv. We welcome all RoWs are protected from disruption during construction.

Commentary

- v. Improvement of the National Cycle Network (NCN) Route No 5 from Woodstock to Upper Dornford in order to create a viable and popular long distance cycle link north from Woodstock
- vi. Upgrading of the existing bridleway between Bladon and Begbroke to enable use for routine active travel as well as use for recreational purposes.
- vii. Upgrading of existing bridleway between NCN Route 5 and Sturdy's Castle (A4260) to create a viable link to Tackley village
- viii. In association with OCC as the roads and traffic authority, improvements to safety for pedestrians and cyclists crossing the A4260 at Sturdy's Castle and the B4027 at Weaveley Crossroads (junc. With Banbury Road Woodstock)



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b. Community Food production.

We welcome the recognition of the need for land for local community food production including the provision of land for food production. We support both Cherwell Collective and Cutteslowe Community Larder.

Commentary

- i. Ground/Soil should be augmented/improved for use.
- ii. Explore the possibility of community allotments

c. Education

Commentary

- i. A new facility - creating a facility that would be beneficial to all communities, visitors and trainees. A learning/training/visitor centre that can be used by schools, colleges, public, for training, etc., to promote the values of climate change resilience, sustainability and renewable energy generation.
- ii. Motivation
Live readout of electricity being generated on the BWSF website would be good to see.

6. Landscape and Visual and Noise

You say ‘*We need to take the public with us for our fight against global warming.*’ Our hope is that Botley West will be sympathetic to people and nature - an exemplar.

a. Buffer Zones.

Commentary

‘We’ve taken several steps to mitigate visual impacts’ This includes expanding the minimum buffer zone to 25metres between the solar rays and any building and increasing the buffer zones near residential areas.

Specification is UNCLEAR:

- i. Increasing buffer zone - Agree with WODC comments that: some buffers such as in Cassington and Bladon, the zones should be much greater dependent on the lie of the land.



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- ii. It is important to specify the minimum buffer zone for residential homes :

Minimum **50m** or much greater in some areas such as Cassington, depending on the lie of the land.

- iii. You note that buffer zone is increased “between solar arrays and any building”
. We think this zone should be at least **50m**

b. Lighting.

We welcome that there would be no permanent operation of security lighting but there will be infrared sensors.

c. Noise – Sound proofing

The number of inverters is significant ~ 156. Solutions for noise-proofing should be employed.

d. Mitigations.

Commentary.

We’d like to see Commitment for mitigation measures rather than simply writing that you have been “exploring the potential” for mitigation - see 4) **Ecology and Biodiversity** for detailed responses.

- i. Creation of woodland belts.
- ii. Planting of lengths of new hedgerows along lengths of PRowS
- iii. reinforcement of existing field boundary hedgerows.
- iv. Meadow grassland to perimeter of solar array areas and areas of enhancement.
- v. Planting of individual trees where appropriate.

7. Helping to reduce energy bills:

We support the suggestion that you are “*Exploring Community Energy Opportunities - The team also appreciate that energy bills are becoming a real burden for many people. Botley West is exploring the creation of a retail energy company to sell part of the energy generated by Botley West to the local community at a discounted rate.*”

We welcome that you state that you are “*are actively exploring potential mechanisms through which the project could directly supply electricity locally at a discounted rate.*”



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Commentary

Whatever sum is agreed, it must be **index linked** or otherwise linked to the revenues of the solar farm, so that it does not lose its value over time.

We would support and would like to see more details, and keen to find out how this might work in practice.

If the developer is to supply local communities with electricity this **must be done at cost (no profit)** for the developer to make it a true benefit to the community. It cannot be regarded as a benefit if the developer is making money from it. It should also be offered in a way that is flexible and easy to understand for the local communities, for example some companies offer different tariffs at night when wind generated electricity is in surplus.

8. **Local Farmers/ Farming**

Commentary

- a. **Tenant Farmers.** We would like to know if tenant farmers who have lost land to as a result of the proposal are being supported in the short, medium and longer-term.
- b. **Opportunities for sheep grazing** are mentioned. Sharing use of the land is desirable but careful management to ensure that enhanced biodiversity is maintained and is not neglected. This would require careful management practices to maintain nature recovery.
- c. **Bee Keeping - honey**

Repeat of 4 Ecology and Biodiversity xi - Establishing bee hives on the site and managing /protecting them for the future long-term health of our wild bee populations and nature recovery (and honey collection possibly). Advice should be sought from bee/conservation specialist such as Filipe Salbany (Blenheim Estate)

Ref: <https://www.apicultural.co.uk/do-managed-honey-bees-compete-with-wild-bees-for-floral-resources>

9. **Community ownership**

Commentary

We understand the developer has ruled out the opportunity to explore any form of community ownership. We understand that the technical and financial requirements of this proposal would make it very difficult either to split the site or the investment. However, it is mentioned often



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by community members and an opportunity that would be very much valued. We would ask, therefore, that the developer explore options with us to see if there is any that could fit the bill.

Low Carbon Hub have considered ways in which this may be implemented and may be found soon on their website.

10. Hydrology and Flood Risk

We agree with all the comments made.

11. Traffic, Access and Construction

We agree with all the comments made.

12. Heritage and Archaeology

We agree with all the comments made.

END of feedback

Sustainable Woodstock 7th February 2024