



EYNESHAM PARISH COUNCIL

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Photovoltaic Development Partners (PVDP)

Sent by email – info@botleywest.co.uk

31 January 2024

Dear Sir/Madam

Proposal	Botley West Solar Farm – Phase 2 Consultation
Location	1400 hectares across Oxfordshire - the 'Middle Section' is closest to Eynsham.
EPC Response	Strongly object

Eynsham Parish Council strongly objects to development of this magnitude and location in Oxfordshire. Whilst it is understood that energy needs to be created that does not use fossil fuels (Eynsham already has two solar farms), the wholesale development of this scale is tantamount to piracy of our natural environment, residential amenity and biodiversity. The proposal, as it is currently designed, will have such adverse impacts that it will significantly and demonstrably outweigh the benefits and is considered contrary to the National Planning Policy Framework 2023.

The consultation appears to be entirely biased and seeks to downplay the negative points. Further, that it does not cover subjects that the Council requested to be scoped in that were raised in the previous consultation. For instance, the Garden Village and West Eynsham Strategic Development Area are not shown or their corresponding landscape assessments provided.

Historic Environment

The proposals are contrary to NPPF (2023, para 13 and 156) and ENP14 Sustainable Growth due to the Oxford Green Belt and wider countryside being developed and not safeguarded. We call on the Planning Inspectorate to refuse this application as there are insufficient 'special circumstances' (para 156) associated with it – its scale and massing do not make it 'special', but rather wholly inappropriate.

Landscape and Visual Resources

Eynsham's Wharf Stream Way permissive footpath appears to have been omitted from Fig 8.6 which is part of an art trail widely used by the community and beyond.

Insufficient impact has been considered for views of Church Hanborough church and surrounding rolling hills at viewpoint 29 at 206/12/10.

The viewpoints included in the report are for the north/north east, however in accordance with ENP14 (G) they should have regard to its impact on the village edge as viewed from public paths and bridleways particularly over open fields towards the historic village centre and significant distance landscape features such as Wytham Hill. The village edge is south from the viewpoints.

Eynsham Parish Council's previous consultation response requested that the proposed Salt Cross Garden Village of 2200 homes be scoped into assessments which so far, has been ignored. Salt Cross Garden Village ([Garden City Principles](#) re 'enhancing the natural environment') will be impacted by the proposals - panels will go from the end of site to the end of Church Hanborough and beyond. The cumulative urbanising effect on the current green landscape will have a significant detrimental effect.

At Fig 8.2, it is not understood how the proposals will impact Dovehouse Close Woodland owned by Eynsham Parish Council and Oxfordshire County Council.

Ecology and Nature Conservation

It is noted that consideration has been given to the importance of Long Mead Wildlife Site and that Horizontal Directional Drilling is planned for the cable route (as opposed to more damaging methods) which appears to be beneficial. Method statements would highlight potential risks if provided.

Hydrology and Flood Risk

Eynsham Parish Council request to be consulted on a Hydrogeological Risk Assessment and associated reports for the River Thames cable crossing. We object to any development that will increase flood risk to the community, local amenities or accessible countryside. (See Fig 1 Flood Risk Map).

Traffic and Transport

Page 27 of the Chapter 12: Traffic and Transport report advises that the Link 18 speed limit is 50mph whereas it is in fact 40mph.

It is noted at page 33 that a construction compound is planned for the B4044 Eynsham Road (compound number 4) and for the route to use the Swinford Toll Bridge. Given the limited highway width over the bridge, existing substantial volume of traffic and Listed Building status of the bridge, it is recommended that an appropriate assessment (and mitigations) of the development impact is made. Where at all possible, Swinford Toll Bridge should not be used as it is unsuitable for Heavy Goods Vehicles.

Should HDD 5 Option C or HDD 6 be pursued, it is requested that under no circumstances should the development impact Eynsham Parish Council's Allotment site or Public Rights of Way which are accessed via Wharf Road.

Eynsham residents access the countryside, Wharf Stream Way and Eynsham Allotments by crossing the B4449 to/from PROW 206/5 Bitterell. Sight lines are difficult at this crossing and the ability to safely cross the road will be further impacted by construction traffic. An assessment of this should be undertaken as part of the Construction Traffic Management plan which the Parish Council request to be consulted on.

Climate Change

Eynsham Parish Council consider that a change of mindset is required on the approach to addressing Climate Change and providing green energy is only one aspect. The Council support that new homes built by 2030 are to LETI¹ zero carbon standards which could negate the need for such vast solar farms such as Botley West.

Socioeconomics

It is noted at page 35 that the operational stage will last for 42 years (15.9.2.17). However, this appears contrary to 31 operating years quoted in table 14.11 of the Preliminary Environmental Information Report. It is unknown why there is a difference in figures quoted.

Human Health

Para 16.9.3.4. reports that there is a ‘...potential disruption to public open spaces and PRowS’ that has a potential impact on population health effect. The Council wish to draw to the applicant’s attention that Eynsham has only 1.1%/16.2ha² of total green space accessible to the public within the Parish (compared to an average of 2.2% in England). Therefore, any disruption is strongly objected to, for the health and well-being of the community. Urbanisation of the PRowS due to installation of the solar arrays cannot be mitigated through the use of information boards, benches etc. The Council’s previous consultation response requested that consideration of the potential substantial impacts of the proposal to existing residents, is undertaken. It was recommended that a comprehensive, location-specific, impact assessment of human health was undertaken, but this is not evident.

Agricultural Land and Public Rights of Way

We note on page 27 of Chapter 17 the PRowS that could be affected by the proposals. In regards to Eynsham³:-

Bridleways

- 206/23/20 – Access from Eynsham Allotments north via Mead Lane to Cassington Road.
- 206/23/30 – Provides access to Eynsham Allotments.
- 206/8/20 – Popular path for children to Eynsham Primary School.
- 206/8/30 – Very well used path for daily recreation.

Footpaths

- 206/5/10 – Hazeldene/Bitterell footpath – Very well used path for daily recreation. Provides access to Oxford Road Playing Field (North) and Oxford Road Play Area/Skate Park.
- 206/6/20 – Leads from Pumping Station/Hazeldene to 206/23/20 and 206/23/10 – Heavily used path for recreation which links to Eynsham Allotments footpath and Wharf Stream Way (206/5/20).

Please see comments made under Human Health for the Council’s strong objection to any proposals that would impact on these PRowS.

¹ https://www.leti.uk/files/ugd/252d09_d2401094168a4ee5af86b147b61df50e.pdf

² https://www.oxford.gov.uk/districtdata/site/scripts/download_info.php?fileID=1663

³ <https://publicrightsofway.oxfordshire.gov.uk/standardmap.aspx>

Eynsham Neighbourhood Plan

The proposals are considered contrary to Eynsham Neighbourhood Plan policies:-

ENP14 Sustainable Growth –

(C) Protect the wider village setting including its relationship to the Oxford Green Belt and the wider countryside.

(H) Provide accessible and safe connectivity between new development and Eynsham for pedestrians, cyclists, riders and motorised vehicles designed to minimise the impact on through traffic and existing road users.

Community Benefit

The proposed community benefit of £50,000/year seems very low for the scale of this development. There is an 800MW proposal for a solar farm in Nottingham where the offer being discussed is £1,200/MW/year, a total of about £1m/year; this project is slightly smaller than Botley West. It is therefore recommended that a more appropriate, increased community benefit sum is provided.

If the Planning Inspectorate is minded to approve this scheme contrary to Eynsham Parish Council's strong objections, we formally request the following benefits which are based on the theme of low carbon, nature/biodiversity promotion and aimed at increasing the community wellbeing:-

Engagement with local groups

- It is recommended that the applicants liaise with local groups such as the Eynsham Allotment Association and Nature Recovery Network to identify opportunities.

On-site benefits – (Biodiversity Net Gain target) -

- Nature Recovery
 - More hedgerows including either side of wide new footpaths/bike routes with wildflower strips (not just narrow paths between tall fences!); reinforce the landscape character by adding substantial hedgerows outside new fence lines.
 - Larger buffer strips and corridors for nature.
 - Extension of future Eynsham's nature networks and linking to the Evenlode Valley Nature Reserve (Eynsham Green Wheel) into Evenlode valley (link to Evenlode partnership).
- Active Travel
 - B4044 Community Path, Lower Road bike route and connections through the solar farm to provide a connected network.
 - Wide pleasant routes with hedges and wildflower verges.

Supporting the Local Community

- Helping to reduce energy bills through community energy opportunities - a local power company with discount to residents is offered and should include other benefits: a) smart flexibility services and time of use tariff like Octopus and b) give people a fair price for any electricity exported to the grid. These are examples of the types of support we would expect of a community energy services company.
- The Council is looking for funds to procure grounds maintenance equipment that will enable grass cutting to be undertaken in the recommended practise of 'cut and collect' to promote biodiversity. The equipment will be used on highway verges and larger areas such as play areas.
- Financial contributions are sought towards our net zero Sports Pavilion rebuild project.

Please confirm safe receipt of this consultation response.

Yours sincerely

A handwritten signature in black ink that reads "K. Doughty". The signature is written in a cursive style with a large, looping 'D'.

Mrs Katherine Doughty
Clerk to the Council

CC Andrew Thomson, West Oxfordshire District Council