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By email only

13 July 2023

**Your Ref: EN0101147-000009**

**Our Ref: P23/V1415/3PC**

## **Planning**

Dear Emily

**Proposal: Scoping consultation**  
**Location: Botley West Solar Farm**  
**Consultation end date 13 July 2023**

Thank you for consulting the Vale of White Horse District Council on 15 June 2023 regarding a Scoping Opinion for the Botley West Solar Farm.

The following comments only relate to development proposals within the administrative boundary of Vale of White Horse District Council and are based on the proposals submitted. Should the final scheme be revised compared to that currently submitted and/or a substation be included, it is considered a further scoping opinion may be required.

It is recommended that the Environmental Statement required for the proposed development should cover the format proposed by the applicant. The Vale has considered the scope of each chapter to remain in the Environmental Statement (ES) and provides advice below as to where that scope should be widened and other matters to be scoped into the ES..

The EIA should be undertaken in accordance with current legislation, national, regional, local and neighbourhood plans as relevant to the environment. The ES should demonstrate the ways in which it complies with that requirement.

To assist the applicant, the relevant documents of the Development Plan for the Vale of White Horse District should be considered and comprise the following:

Vale of White Horse Local Plan 2031 Part 1 (adopted December 2016)  
Vale of White Horse Local Plan 2031 Part 2 (adopted October 2019)  
Cumnor Neighbourhood Plan (adopted May 2021)

The following matters should also be addressed in the Environmental Statement.

## **Need and Alternatives Considered**

### *5.4 Alternatives*

The Scoping Report does not provide details of reasonable alternatives. As such, reasonable alternatives have not been considered at this stage by the Vale.

The EIA should include a detailed consideration of reasonable alternatives to the development proposal, including sites outside the Green Belt. These should be considered in the ES and details provided of the options and choices made.

## **Proposed Scope of Assessment: Environmental Statement Chapters**

### *7.1 Historic Environment*

Generally supportive of the proposed approach to Built Heritage as outlined in the report. Given the topography of the landscape surrounding the southern of the proposed sites it is likely that impacts may go beyond the 2km site boundary limit and will need to be informed by a carefully plotted ZTV (following the recommendations below on the methodology for defining the ZTV). Any extension beyond the 2km area because of the ZTV assessment should include potential non-designated heritage assets as well as designated heritage assets where these have a specific historic relationship to the landscape or area affected. This should extend into those areas within the Vale that are part of the Oxford City View Cones policy.

### *7.2 Landscape and Visual Resources*

The Landscape and Visual Resources section of the Scoping Report refers to the relevant Methodology in the Guidance Documents such as GLVIA 3, Technical Guidance Note 02/21, Assessing Landscape Value Outside National Designations and Technical Guidance Note 06/19 Visual Representation of Development Proposals, but there is limited detail on how these Guidance Documents are specifically going to be applied to the Botley West Application. For example:

- There is no detail of what type of visualisation is proposed, the expected quantity and their suggested locations.
- Section 7.2.31 states “*The assessment process will follow the approach set out in GLVIA3, with regard to identification of resource and receptor sensitivity (susceptibility and value), impact magnitude and evaluation of significance of effects.*” but it does not state if they will be using Technical Guidance Note 02/21, Assessing Landscape Value Outside National Designations to establish the baseline value of the landscape, although this document is listed in the relevant methodology guidance documents.

In addition:

*Legislative and Policy Context*

- 7.2.3 should include Core Policy 41: Renewable Energy of the Vale of White Horse Local Plan 2031 Part 1

#### *Guidance Documents*

- 7.2.3 does not refer to the Vale of White Horse Landscape Character Assessment published as part of the Local Plan Part 2 Evidence Base, therefore the Landscape Types referred to in section 7.2.13 do not reflect the District Landscape Character Assessment. The assessment can be found in the following link:  
<https://data.whitehorsedc.gov.uk/java/support/Main.jsp?MODULE=FolderView&ID=789122104&CODE=498F5A0A897C751630F233DEB1E72432&NAME=19.+Landscape+Character+Assessment&REF=Local%20Plan%202031%20Part%202:%20Publication%20Version%20Publicity%20Period>
- There is also the Oxfordshire Historic Landscape Characterisation Project to consider: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/landscape-characterisation>

#### *Study Area*

- 7.2.4 refers to the 2.5m high solar arrays but not the NGET Substation 164m x 135m, maximum height of 15m, excluding connecting tower structures. This element of the application is a different character to the solar farm and should be picked up as a separate element as part of the application. It should have its own ZTV to understand where views of the NGET Substation may be visible, where the solar farm is not, and to aid understanding of potential mitigation proposals.
- There is no information given with regards to the ZTV methodology including the Representative Viewpoint figures which does not state what heights have been plotted for the ZTV. A bare earth ZTV should also be provided and a clear explanation and methodology of how the ZTV has been modelled and created.
- 7.2.6 - The Study Area may need to be wider to incorporate representative views from Oxford View cones from the east of the city such as South Park. Also, potential cumulative impacts to the Greenbelt may have a wider study area than 5km.

#### *Baseline Environment*

- Under Baseline Environment, long-distance footpath routes should be listed in this section such as the Thames Path a national trail, and other routes such as the Oxford Green Belt Way.

#### *Potential cumulative impacts*

- The Scoping Opinion request does not list any sites that it may consider for cumulative impacts.

- 7.2.35 refers to 'large' but doesn't define what this may be. There are also potential sequential Cumulative Impact with other existing and proposed solar and other development in the Oxford Green Belt, especially those sites that the Oxford Green Belt Way passes. This area of the Oxford Green Belt contains numerous rights of way with limited detractors and is a key recreational resource to Oxford and surrounding urban areas.

*Assumptions and limitations*

- 7.2.38. There should be representative viewpoints to represent residential or other private views.

*Figure 4B Land Parcels with Constraints*

- This indicates that there is a considerable land within the redline southeast of Eynsham but little indication of development in this area. It is noted that there are no representative viewpoints in this area but both the Thames Path and Oxford Greenbelt Way pass through this area. Cabling away from existing road routes, especially in the floodplain may have both potential landscape and visual impacts and these should be covered by the assessment.

*Figure 7 Representative Viewpoints*

- The range of viewpoints are limited, such as views from the road users of Eynsham Road, the wider footpath network such as to the north and east of the site and the residential properties especially those along both Eynsham Road and Cumnor Road. GLVIA expects the identification of the people within the area who will be affected by the changes in views and visual amenity including residents.
- There should be additional viewpoints to represent residential properties and footpaths. This includes views from Eynsham Road, including near Farmoor village and north of viewpoint 49 (which could represent the footpath route and Eynsham Road). There should also be a viewpoint from the footpath to the east towards Tudor Court and Hill End. Although Hill End is not publicly accessible it has been used for over 100 years for outdoor education and there are extensive views from the middle and top of that site southwards.
- It is noted no view is proposed from Cumnor Hill, however the ZTV indicates that there is a view from this location. As it is an important view in the Cumnor Neighbourhood Plan, with a 360 view and potential cumulative impact effects with the Cumnor Solar Farm (P23/V0306/SCR) should be included as a viewpoint.
- It is further noted there is also the Red House Farm solar farm proposal (P22/V2581/SCO) which abuts the Botley West Solar Farm redline and this site should be considered during the selection of viewpoints and the cumulative impact effects, there may also be other cumulative impacts sites which will impact where viewpoints are needed.

- Viewpoints should include the extent of the Solar Farm in the view. It is not clear that this is the case, such as viewpoint 48 is looking southwards but there are also likely views to the east and west.

Overall, it is considered little detail has been provided as part of the Scoping Report and there is a need for additional information post Scoping to agree the detail of the Methodology of the EIA including LVIA Methodology, ZTV creation, viewpoint locations, representative receptors, visualisation (locations, types, and methodology) and sites to be considered during the cumulative impact assessment.

### *7.3 Ecology and Nature Conservation*

. The following comments are offered.

- Additional policy consideration to those listed in 7.3.2:
  - Development Policy 30 of the Vale of White Horse Local Plan Part 2
  - Policy RNE1 of the Cumnor Neighbourhood Plan
- In addition to the habitats listed in 7.3.25, it is recommended that Important Ecological Features (IEFs) include any priority habitats (e.g., arable margin) and ditches/land drains that meet the definition of watercourse provided in section 72 of The Land Drainage Act 1991
- The flexible approach to identifying IEFs is supported, depending on the results of ongoing ecological surveys (7.3.27). The ES should not be finalised until all relevant surveys are complete and results analysed
- Impacts of any cabling beneath designated wildlife sites, priority habitat sites and ancient woodland, and impacts for wildlife and birds using Farmoor reservoir need to be scoped into the EIA.

### *7.4 Hydrology and Flood Risk*

The submitted scoping opinion request refers to the River Thames as a tributary of the Thames whereas it is actually designated as the River Thames at this point. The Flood Risk Assessment provided as one of the assessments informing the Cumnor Neighbourhood Plan identifies parts of the site as being at risk of surface water flooding which should be assessed in the EIA. One of the routes for cabling does go through the Longmead Meadow site which may have flooding consequences on this highly significant environment and biodiverse site, which is adjacent to the River Thames, and this needs to be assessed.

### *7.5 Ground conditions*

The Council is satisfied that the approach outlined in the Scoping Report is acceptable.

### *7.6 Traffic and Transport*

Operation and decommissioning and effects for the B4017 which is narrow and a main route to and from Cumnor Primary School, Farmoor reservoir and for HGV's needs to be scoped in to the EIA. .

#### *7.7 Noise and Vibration*

The Council is satisfied that the approach outlined in the Scoping Report is acceptable.

#### *7.8 Climate Change*

The Council is satisfied that the approach outlined in the Scoping Report is acceptable.

#### *7.9 Socio Economics*

Construction and decommissioning effects for leisure and businesses should be scoped into the EIA.

#### *7.10 Human Health*

Electro Magnetic Field effects should be scoped in.

#### *7.11 Agriculture Land & Soils*

The Council is satisfied that the approach outlined in the Scoping Report is acceptable.

#### *7.12 Cumulative Effects and Inter-relationship*

The Council is satisfied that the approach outlined in the Scoping Report is acceptable subject to those development proposals identified under comments for Landscape and Visual Resources above being considered.

### **Supporting Technical Assessments**

#### *8.2 Air Quality (dust during construction)*

It is noted that air quality will be considered as a part of the ES (Chapter 8) and that construction dust will be considered, and a dust management plan will form part of a Construction Environment management Plan.

NO<sub>2</sub> impacts have been scoped out as emissions will relate only to construction traffic which will be temporary and limited. This is accepted.

#### *8.3 Glint and Glare*

The effects of glint and glare for aircraft should be scoped into the EIA as this part of the site is on the RAF Brize Norton runway flightpath.

### **Other Matters to be Scoped In**

*Waste* – The disposal of materials and plant following decommissioning of the development.

*Electro Magnetic Fields* - on the grounds of the substation proximity to Cumnor primary school and the effects on bird navigation and their reproduction at Farmoor Reservoir.

*Major Accidents* - on the grounds of the fire risk and proximity to the Farmoor Reservoir's water quality and the RAF Brize Norton's runway flightpath.

### **Topics Scoped Out**

The LPA agree that the following topics can be **scoped out** of the ES:

- Material Assets
- Daylight, Sunlight and Microclimate
- Transboundary Effects

To demonstrate that topics have not been overlooked, where topics are scoped out prior to submission of the application, the ES should clearly explain the reasoning and justify the approach taken.

### **Summary of council response**

The Vale of White Horse 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 technical matters being addressed and other matters that should be scoped into the EIA.

Yours sincerely,



Stuart Walker  
Major Applications Team Leader