**Raywood, Simon**

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| **From:** | Nigel Pearce [redacted] |
| **Sent:** | 16 May 2025 13:36 |
| **To:** | Botley West Solar Farm |
| **Subject:** | Re: Best and Most Versatile Agricultural Land - Written representation - OFH1 and Deadline 1 |
| **Attachments:** | Response to Botley West Phase Two Consultation PEIR Ch 17.docx |

Dear Simon,

Thank you very much for your helpful email of 15 May.

I watched the Open Floor Hearing 1 livestream on 13 May and was frankly astonished by what Dominic Hare of Blenheim had to say about BMV land and soil quality. I am therefore submitting a written representation to you now on this subject, which I wrote last year for Stop Botley West. The attached document records in detail the misleading, inaccurate, and structurally biased approach that PVDP and its consultants have taken towards this issue, which has had the effect of consistent and coordinated downplaying of the quality of the agricultural land proposed for Botley West. It is clear to me that they regard this issue as a weakness in their application. Hence their considerable efforts to minimise its importance.

I would like this email - a response to Mr Hare's assertions - to be part of that written representation:

In his early remarks, Mr Hare spoke about "poor yields from poor soil", depleted land, and the climate-induced unviability of Blenheim land for growing crops. He then summed up his position by concluding, "I can without doubt say this is the poorest of our land for food production and therefore the most suitable for this project." There are a number of points to be made about these assertions.

1. They are are a continuation of the "poor soil" narrative that has characterised the application from the very start. The unnuanced tone with which he delivered these assertions made me think, once again, "the gentleman doth protest too much". There was an underlying air of desperation about them.

2. Mr Hare's words bear little resemblance to the findings of the ALC and Soil Survey Report by Reading Agricultural Consultants (APP-233), on behalf of PVDP, about the extent of BMV land within the site. Presumably he is aware of this Report?

3. If the piece of land that I know best (either side of Lower Road between the A40 and A4095 - see p.223 of APP-233) is among "the poorest of [Blenheim's] land for food production", then the rest of Blenheim's land must be staggeringly good land, because this piece of land to be covered by panels and infrastructure (some permanent - a substation?) has a clear predominance of Grade 2 and Grade 3a soil, and even some Grade 1.

4. I can believe that yields have fallen in the past few years, and this may well be climate-induced, among other things, such as intensive farming and lack of agricultural investment in anticipation of the solar farm. One has to ask what has Blenheim been doing to address the drop in yields? The implication is that the only way to improve the soil is to withdraw it from agricultural use and cover it in solar panels. There are other ways to improve soil, through the optimum kind of crop rotation, nature-friendly and regenerative farming, for example.

5. If, as Mr Hare believes, "We already see . . . increased flooding and hotter summers making our land unviable for growing crops," will it be pointless to return the land to agricultural use after 40 years? Is that what Blenheim is quietly assuming? Surely it is the *most versatile* agricultural land on the site that is best suited to adapting to climate change, the effects of which will be evident throughout the operational phase of the project?

6. Mr Hare's contention that "alternative sites" were discarded on the basis of comparative quality of the soil is a transparent post hoc justification for a decision that was taken for other reasons.

As a result of the "poor soil" narrative, PVDP and Blenheim have made absolutely no effort to avoid the higher concentrations of BMV land.

Finally, I was interested to hear the discussion about assessment methodology and matrices in the Open Floor Hearing of 15 May. In the attached document, I cover matrices, as they relate to BMV land and soil, at some length. I hope that may be of some assistance in your continuing deliberations.

With thanks,

Your sincerely,

Nigel Pearce
Interested Party Number/Unique Reference number 20052539

On Thursday 15 May 2025 at 00:08:51 BST, Botley West Solar Farm <botleywestsolar@planninginspectorate.gov.uk> wrote:

Dear Nigel,

Thank you for your email to the Inspectorate.

Annex C of the Rule 6 documentation which can be viewed at https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010147/EN010147-000706-01-%20Rule%206%20letter.pdf includes the impacts on agricultural land, best and most versatile agricultural land and other land as a principal issue within the Initial Assessment of Principal Issues.

I am not able to provide definite answers at this point on when BMV agricultural land will be directly addressed going forward. But as an Interested Party you may choose to include reference to this or any other matter of relevance in a Written Representation at the appropriate deadline. The final timetable will be set out in the Rule 8 documentation that we will send you notification of publication.

Kind regards,

Simon

Planning Inspectorate

**Simon Raywood** (He/His)

Case Manager – National Infrastructure

**Planning Inspectorate**

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**From:** Nigel Pearce [redacted]
**Sent:** 13 May 2025 14:38
**To:** Botley West Solar Farm <BotleyWestSolar@planninginspectorate.gov.uk>
**Subject:** Best and Most Versatile Agricultural Land

It is not clear to me at what point during the Examination BMV agricultural land will be addressed.

Can you clarify?

With thanks,

Nigel Pearce

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DPC:76616c646f72

# Botley West Solar Farm: Preliminary Environmental Impact Report

*Response to*

## Volume 1, Chapter 17: Agricultural Land Use & Public Rights of Way

*From Nigel Pearce, 1 City Farm, Eynsham, OX29 4YA; 2 February 2024*

### 1. Best and Most Versatile (BMV) agricultural land – the story so far

In the Phase One Community Leaflet of November 2022, apart from one mention of "improving soil quality" (in the context of increasing biodiversity), there was no reference to the issue of BMV land or agricultural productivity. Given the nature of the land covered by the proposed site – farmland – this was an odd omission.

At the Cassington consultation event on 25 November, a representative of the developer claimed that the agricultural land was "poor quality". They then admitted that no Agricultural Land Quality (ALC) survey had been done. It appears that the leaflet's text reflected "a high-level site search exercise" only (page 2). As I said in my response of 10 December, it was difficult to understand how the land could be casually dismissed at this stage as "poor quality".

I also pointed out that Defra's Magic Map had very little relevant data on the area of the site, although in two of the site's fields next to Lower Road, there was "a significant area of Grade 2 and Grade 3a BMV land. Furthermore," I added, "the ALC survey commissioned by Grosvenor for Salt Cross Garden Village identified a wide strip of Grade 2 and some Grade 3a land on the opposite side of Lower Road. It is therefore quite likely that the fields on both sides of Lower Road following the Evenlode Valley northwards as far as the A4095 have higher grade soil."

(Grosvenor employed Reading Agricultural Consultants for their survey, the same consultants that PVDP have been using.)

My comments apparently made no impression on PVDP and their consultants, RPS. Botley West's 'Scoping Report' of June 2023 said of the northern section of the site that it was "low-grade agricultural land", and that ALC007 data "confirms the area as likely to be Grade 3 agricultural land", although it would require further surveys (not least because the data did not distinguish between 3a (BMV) and 3b). They

made the same claim about the central section, that it was "likely to be Grade 3", having earlier implied that all Grade 3 was low-grade. Of the southern section, they said the same data source "confirms the area as likely to be Grade 3/4 agricultural land". If The Planning Inspectorate looked only at Figure 4a, it could not be blamed for concluding that, apart from a small patch to the east of Lower Road, BMV land was hardly present and not really an issue at all. But in any case, how can the 'Scoping Report' maintain that something "provisional" "confirms" anything? It merely "indicates", as paragraph 17.5.1.17 of Chapter 17 of the PEIR admits. And what is being confirmed – PVDP/RPS's wishful thinking about "low-quality" land?

I point out below how inaccurate these claims have proved to be, but it was very useful for PVDP/RPS to rely on them at this stage of the planning process, in order to help them get the proposal past the hurdle of acceptance for examination by The Planning Inspectorate.

In my response of 4 July to the 'Scoping Report', I pointed out that, "When Grosvenor surveyed the Salt Cross Garden Village site [adjacent to Botley West's central section], after the Council had asserted it was 3b, they found a wide strip (30% of the land east of Cuckoo Lane) was Grade 2 and 3a, of which the larger part was Grade 2. It is ridiculous, or worse, to make sweeping claims before proper surveys have been undertaken."

Once again, this made little impression on PVDP and RPS. Nor was I alone in making this point about BMV land. Nevertheless, Botley West's Phase One Consultation Summary Report of July 2023, while acknowledging respondents' concerns about a loss of agricultural land and crops, did not specifically address BMV land, merely claiming that they had "strong local knowledge of the quality of the land" and that there were opportunities to improve it. If that knowledge was strong, how come it turned out to be inaccurate?

## 2. **BMV agricultural land – what the Chapter 17 Figures say**

Figure 17.1 is limited in some ways, but revealing in others. It is limited not only because it is provisional, but also because it does not distinguish between Grades 3a and 3b. It is revealing because of what it gets right and what it gets wrong.

For example, in the northern section, the MAFF provisional ALC mapping suggests that a wide winding strip of land that follows the river Glyme to and through Woodstock is Grade 4. However, once the Defra data from post-1988 surveys have been added, one can see that the part of this strip that is covered by the new data is a mixture of Grades 2, 3a, 3b and 4, with Grade 4 being one of the smaller proportions. This gives an indication of how unreliable Figure 17.1 can be, while showing how proper surveys could change the overall picture significantly.

In another example, the southern section is shown as almost entirely Grade 4 by MAFF. However, work done so far for PVDP by Reading Agricultural Consultants (RAC) shows, in Figure 17.3, that it is mostly Grade 3b with some areas of 3a and 2.

On the other hand, Figure 17.1 can be quite accurate. In the central section it correctly identifies a sizeable patch of Grade 2 immediately north-west of Cassington, as confirmed by RAC.

All in all, though, Figure 17.1 is not very helpful, merely showing the extent to which the important detail was unknown in the provisional MAFF map. One wonders why it has been used by PVDP/RPS as part of their evidence base. Is it because it downplays the likely area of BMV land?

Figure 17.2 is not much use either, and again gives the wrong impression – one that, like Figure 17.1, downplays the potential area of BMV land. (It is incorrectly referred to in paragraph 17.5.1.20 as Figure 17.3.)

One example will suffice, one which by chance I happen to know quite a lot about. Figure 17.2 suggests that there is only a moderate likelihood of BMV land (20%–60% area BMV) in a wide strip of land to the immediate west of Lower Road, stretching from the A40 northwards to Church Hanborough, and less likelihood beyond that. I have told PVDP/RPS that RAC, working for Grosvenor, identified the part of this strip to the south of where the central section begins as largely Grade 2 and 3, with more 2 than 3. Therefore BMV land was likely to be present to a significant extent either side of Lower Road going north. Figure 17.3, with RAC's data, shows precisely that, in fact more Grade 2 and 3a than I expected, and even some Grade 1. The percentage of BMV land is certainly more than 60% to the west of Lower Road, and looks as though it might be to the east as well.

In short, the only Figure worth looking at is Figure 17.3, because it is objective and does not downplay the extent of BMV land. The full ALC survey may discover or upgrade even more both in areas already surveyed and in those that haven't been surveyed yet. For example, the unsurveyed area near Begbroke looks as though it will contain Grades 2, 3 and 3a, because that is what the survey of the surrounding area has shown (remembering that all references are to "semi-detailed" survey.)

**So what does the text in Chapter 17 say about these Figures?** In answer to questions I put to them about how their percentages were arrived at, and could they provide a link to the data underlying the maps, PVDP said:

> "The percentages of BMV land given in chapter 17 were provided to us by our surveyors, who calculated these by sampling the land area at a ratio of one trial hole per hectares [sic: it should say per 2 hectares].
> As for the provisional figures described in the chapter, these are . . . derived from Natural England's website and were originally pulled together by the old Ministry of Agriculture, Fisheries and Food from several decades ago."

This is not particularly helpful, and the links provided are to the Natural England maps, not to the data underlying them. Table 17.9 and paragraph 17.5.1.22, presumably based on Figure 17.2, come to the conclusion that 541 hectares, or about 42% of the Study Area, is predicted to be BMV land. Table 17.11 and paragraph 17.5.2.2, presumably based on RAC's survey work in Figure 17.3, then reduce that percentage to 38%. It is very difficult to know how accurate these percentages are; the two maps are not methodologically comparable. Using the eye alone, it is questionable whether Figure 17.3 really does indicate a smaller percentage than Figure 17.2. According to Natural England's TIN049 document, about 42% of agricultural land in England, on average, is Grade 1, 2 or 3a (BMV). Have PVDP/RPS used their interpretation of the data to show that the Botley West site area has a lower percentage of BMV land than the national average? If anything, it looks higher.

The main issue, though, is not whether the overall percentages are correct, but the extent of substantial areas of concentration of BMV land that RAC has so far identified: for example, along both sides of Lower Road; near Cassington and Purwell Farm; and north-west of Begbroke. Indeed, it almost looks in places as though the panels have been placed deliberately, and coterminously, where BMV

land is most concentrated. Even the National Grid substation has been located in a part of the southern section of the site where it will obliterate Grade 2 and 3a land. Why?

These substantial areas of concentration of BMV land should not be taken out of agricultural production and covered in solar panels, because the percentage of BMV land within them is too high. The Project site is huge, after all. Nor is the whole site necessary for the viability of the Project. The 'Scoping Report' inadvertently admitted as much in paragraph 5.2.4: "The costs of submitting a project larger than 50MWe to the Development Consent Order process are high, and the need to generate cheap, subsidy-free power means these power stations must be utility scale – in excess of 250MWe." As I pointed out in my response, "In other words, in order to meet the aims of government energy policy, and be economically viable for the applicant, this Project need only have a capacity of, say, one-third of its proposed size, namely 280MWe."

Furthermore, it is disingenuous of PVDP/RPS to draw unnecessary attention, in paragraph 17.5.2.3, to the majority of BMV land being of the "lowest quality", as if it doesn't really matter; BMV land is BMV land whether it is Grade 1, 2 or 3a. It does, however, give yet another of many insights into their biased approach, which can also be seen in the references to Grade 3b agricultural land.

The ground is prepared in the 'Scoping Report', which cites Natural England's ALC007 map as *confirming* "the area as likely to be Grade 3/4 agricultural land, which would require further surveys". This turned out not to be accurate. So the Phase Two Community Consultation Leaflet describes Subgrade 3b land as "lower quality", as does the PEIR 'Non Technical Summary'. Strictly speaking, 3b is indeed "lower quality" than 3a, but it is misleading to use that phrase, when the proper term to use is "moderate" quality. Likewise, in Chapter 17, 3b land is described as "lower quality" land five times, and only once as "moderate" (where it cannot be avoided, in Table 17.16, which sets out the official criteria).

And what does "moderate" mean? Here is the official definition of Subgrade 3b: *"Land capable of producing moderate yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops."* Right from the beginning, PVDP/RPS have tried to suggest through their choice of words that 3b

land has little agricultural value and need not be taken into account when assessing the impact of Botley West. The official definition says otherwise.

### 3. BMV agricultural land – what the assessment matrix says

The sections on Ground Conditions and Socio-Economics in Volume 3, Appendix 4.1, 'Scoping Report' show an assessment matrix with 16 cells. This matrix is described as the mechanism RPS have chosen to assess the "significance of likely effects during construction, operation and decommissioning of the Project determined from the predicted magnitude of an impact and the sensitivity of the receptor" (paragraph 7.5.25). Paragraph 7.9.37 goes on to say that any effects [which can be either beneficial or adverse] classified as moderate or major are considered to be significant. Any effects that are minor or negligible are not significant.

This raises a number of interesting points.

First, it is indeed a matrix that has been "chosen" by RPS. There doesn't appear to be a standard matrix that all consultants are obliged to use, so that exactly the same methodology is used by all consultants for all major projects.

RPS's chosen matrix has an in-built structural bias. Of the 16 cells, 10 are negligible, negligible or minor, or minor (not significant), and just 4 are moderate, moderate or major, or major (significant). The other 2 are minor or moderate, which could go either way. So let's say the ratio is 11:5 in favour of not significant – a handy bias when it comes to an environmental category that will inevitably suffer an adverse impact. Helpful, too, if you are trying to accentuate what you claim will be the "beneficial" aspects of your Project.

For 'Agricultural Land Use and Public Rights of Way', which is one of the suffering categories, RPS has chosen to expand the matrix by another row (Table 17.19), adding "very high" as a fifth layer of "sensitivity of receptor". This addition actually reduces the structural bias: of the now 20 cells, 11 are negligible, negligible or minor, or minor (not significant), and 7 are moderate, moderate or major, or major (significant), with 2 being minor or moderate, which could go either way. But there is still an in-built ratio bias of 12:8 in favour of not significant.

Furthermore, RPS have not added a corresponding column of "very high" for "magnitude of impact", which is odd. Choice of matrix is important. In the comparable PEIR for the Medworth Energy from Waste Combined Heat & Power Facility,[1] currently with The Planning Inspectorate, Wood Group UK have duly added that fifth column of "very high magnitude of change" (ie, impact). Their 25-cell "significance evaluation matrix" has 10 significant cells, 10 not significant, and 5 probably significant". Those 5 cells may skew the overall balance slightly in favour of significance, both beneficial and adverse (depending on how you define "probably"), but that seems appropriate given that any large development is bound to have a significant effect on the environment. Overall, though, it is a far more balanced matrix, and one has to ask why RPS didn't choose it, or one like it.

To take one example from Public Rights of Way, the assessment of effect on NCR5 is distorted by the choice of matrix, shifting assessment subtly to the right, towards not significant. Using the RPS matrix, the very high sensitivity of the national route NCR5 and negligible impact (questionable?) results in a minor adverse effect (not significant). The same sensitivity and impact in the Medworth matrix results in a "Moderate (Probably significant)" effect. However, as Table 17.22 makes clear (see below), the RPS matrix has had the effect of a *general* weakening of any adverse conclusions on agricultural land, starting as it does from an unbalanced premise of structural bias. (For an example, see page 8 below.)

It seems that RPS have decided that nothing about the construction, operation and decommissioning of Botley West will have a very high magnitude of impact, despite the high and very high sensitivity of some receptors. Hence the absence of the fifth column in their matrix. Perhaps, if it is not in fact an omission by mistake, they justify this decision on the grounds of their "expert" and "professional" judgement (paragraphs 7.8.4.1 and 17.8.4.2). But it should be remembered that they are being paid by PVDP, not primarily to be as objective as possible, but to guide the Project successfully through to the granting of a Development Consent Order in as close a form as possible to the original concept. As such, it would be naïve to believe they could do so with being influenced or pressured, consciously or unconsciously, by their paymaster. Otherwise, it is hard to understand how they can say, at paragraph 17.14.11, "It is concluded that there will be no significant effects on agricultural land, arising from the construction, operation and decommissioning of the Project."

[1] See mvv-medworthchp.co.uk, PEIR Chapter 4, Table 4.1. In another variation, jftacademy.com's Environmental Risk Assessment matrix has 25 cells, of which 10 are very high or high, 9 very low or low, 5 medium and 1 'text'.

Commonsense alone says this is unlikely. Nevertheless, it is a claim that is reinforced in Tables 17.22 and 17.23.

## 4. BMV agricultural land – what Tables 17.22 and 17.23 say

Table 17.22 at least admits that there are no beneficial environmental effects of Botley West on agricultural land.[2] Otherwise, it is misleading, incomplete and even wrong in terms of RPS's own matrix criteria.

For the three rows that address agricultural land, the Table gives 8 "minor adverse effects", and 2 "moderate adverse", but not significant in EIA terms", presumably because this assessment refers to only 5.7ha of BMV land out of 956 developable hectares (less than 1%). For "The temporary loss of agricultural land, including BMV land" during *construction and decommissioning*, with "medium" magnitude of impact and "medium to very high" sensitivity of receptor, "Significance of effect" and "Residual effect" are also both assessed to be only "minor adverse".

And yet, if we refer to the RPS matrix, we find that medium sensitivity and medium magnitude of impact result in a moderate adverse effect; high sensitivity results in a moderate or major adverse effect; and very high in a major adverse effect. (The Medworth matrix gives results of, respectively, moderate (probably significant), major significant and major significant.) Is this "minor adverse" a mistake, or worse? Is this the quality of assessment we can expect from RPS's "professional" and "expert" opinion?

And this is before we realise that the 35–42 year *operational* phase is not addressed at all in the table for temporary loss of agricultural land, or disruption or access to it. How can the loss of 956ha of developable agricultural land including 541ha of BMV land *not* have a significant adverse effect on food production, and landscape, over four decades? The comparison in paragraph 17.9.2.11 that RPS make with Longfield solar farm, possibly as a justification for omitting consideration of the operational phase, is disingenuous for two reasons: first, Botley West's 541ha of BMV land is over 3½ times the size of Longfield's; and, second, the text cited says that Longfield is "unlikely to lead to significant *permanent* loss of BMV agricultural land" [my

[2] Curiously, paragraph 17.9.2.18 says, "No further effects on agricultural land quality and soils are assessed during the operational period of the Project." Not even beneficial? The Botley West Phase One Community Consultation Leaflet claimed that it could *improve* soil quality (page 8).

emphasis], when what is omitted in Table 17.22 is the significance of long-term *temporary* loss. In any case, why on earth is a decades-long loss of 150ha of BMV land considered to be acceptable at a time of climate change and geopolitical impacts on food security?[3]

Table 17.23, which introduces cumulative environmental effects (such as those from Salt Cross), does conclude that there will be a "major adverse" effect regarding the permanent loss of BMV agricultural land. But this refers only to the 5.7ha of BMV land that will go under substations and any other residual infrastructure.

## 5. BMV agricultural land – other matters arising

### *i) Sheep and community agriculture*

Not all the productive agricultural land in Botley West will be lost during the decades-long operational phase of the Project. Paragraph 17.9.3.2 says, "Opportunities are being considered to maintain agricultural productivity in area [sic] of the Project, including the potential for sheep grazing and also community based agricultural production." There is an urgent need for far more detail on this, if these ideas being "considered" are to be properly assessed for their viability before irreversible decisions are made.

For example, how large is the area, or areas, being put aside for these ideas, and where will they be? How can we be assured that the areas will in practice fulfil these agricultural functions? Will they compete with land set aside for biodiversity net gain?

The sheep idea has been mooted (and used) in other solar farms, but its implementation needs to be continuously well managed if the grass is not to be over-cropped, to the detriment of biodiversity, flood risk and soil improvement. When you drive past the reservoirs around Datchet, for example, it is good to see sheep grazing there, but the grass is clearly intensively cropped and biodiversity-poor, and there is no apparent rotation of land use.

[3] Incidentally, paragraph 6.8.19 of the Environment Statement's Technical Summary, Vol. 4, for **Longfield** says: "The total area of agricultural land permanently required from construction of the Scheme would be approximately 15ha." There may be a good reason, but I would like to know why a Solar Farm (Longfield) that is half the size of Botley West requires a permanent loss of almost three times as many hectares of agricultural land. Are RPS/PVDP underestimating the area that will be permanently lost to agriculture?

The key to best agricultural practice for the land that's left over from the solar panels is mixed rotational nature-friendly farming, including different types of livestock. Blenheim wants to create and leave a green legacy, but in choosing a huge solar farm, a dominant new monoculture, it is missing an equally huge opportunity for an optimal mix of ecological, productive and renewable energy uses of its land, from rotational mixed food farming, to wind turbines, energy crops and green gas production from grass, and habitat creation – and even some ground-mounted solar, although Oxfordshire already has over 800MW of capacity in place or approved or waiting for connection to the grid.

If Blenheim needs advice on the optimal use of its agricultural land, there is plenty of it available. Here, for example, is James Rebanks in *English Pastoral: An Inheritance* (Penguin, 2021):

> The essential thing we know about the future – whether we are looking at economics, climate or biology – is that it is unpredictable, so we need to maintain our library of agricultural diversity, both for things we know now that we need, but also many things that we do not yet know we may require in future. The strength of diversity is that it gives us resilience and robustness for the future. It gives us options. It spreads our risks. [page 178]
>
> . . . we must decide how and when, and with which animals, we graze our fields: whether we graze in rotation around the paddocks, or permanently graze through 'set stocking'. How heavily we graze, and how much vegetation we leave behind, and how long we let the field recover for: long enough to grow three inches of lush grass as conventional farmers would do, or longer still for orchids and wild flowers to flower and seed over thirty or forty or more days. We are now trying to graze to increase biodiversity and create healthier soil, and that is different to our old ways. It requires longer periods of rest between grazing, and a greater mix of animals doing the grazing. [page 232]

As another farmer, Wendell Berry, put it, "the great problems call for many small solutions". Blenheim has chosen the opposite course, and it is a big mistake.

*ii) Adjustments to the first map of Botley West*

The maps in the Phase One and Phase Two Community Consultation Leaflets show how RPS/PVDP have refined the layout of their site as part of an ongoing process. A comparison of the two maps is instructive.

As far as I can see, there are no changes to the **northern section** at all.

The alteration in the **southern section** is to accommodate the National Grid substation where there were formerly solar panels. Otherwise, no change.

The most substantial changes are in the **central section**:

- The largest presumably comes as a result of Merton College's withdrawal from the Project.
- Over by Begbroke, the small reductions in panel area are "to enable the installation of runway lighting that will improve safety" for Oxford Airport. Not exactly an environmentally positive change: will it add to air traffic, noise and light pollution at the airport?
- South of Long Hanborough an area of panels has been sliced off, in order to make room for 600 houses that Blenheim wants to build there. RPS/PVDP have kept quiet about that. Thank you, Blenheim, for even more adverse environmental impact. Will those houses be net zero carbon in construction and operation, with solar panels on their roofs making a net contribution to the Grid? I think we should be told.
- Over by Church Hanborough and Bladon, small sections of panels have been removed to protect conservation areas. As Chris Rock says, "What do you want, a cookie?" You're *supposed* to protect conservation areas.
- For some reason, an area of panels next to Lower Road opposite New Wintles Farm has been reduced in size,[4] but it still coincides exactly with an area of known Grade 2 BMV land. Botley West continues to make no effort to avoid concentrations of BMV land.

What are the implications of these reductions, together with increased buffer zones, for the gaps between the solar arrays? If there are the same number of panels as before, will they be more densely packed together? Or will they just be reduced in number?[5] We need to be told now.

[4] Is this where a construction compound is going?

[5] The Project site was 1,400ha, and is now 1,300ha, a 7% reduction in size.

*iii) Other individual points and queries*

**Table 17.5** makes it abundantly clear, as elsewhere in the text, that the *temporary* loss of agricultural land, including BMV land, and the disruption and reduced access to it during the operational phase, have not been considered in RPS's assessment. Given that "temporary" means 35–42 years, which could conceivably be extended further as solar technology improves, this is a most extraordinary omission. How can it be justified?

**Paragraph 17.5.1.18** has an interesting Freudian typo: the second 3b should be a 3a. To draw attention to this comparatively small area of land gives it more prominence than it deserves because it implies that it is typical of the site as a whole.

**Paragraph 17.5.4.1** cites a Defra and Welsh Government report of 2014, which suggested the "the greatest impact [from climate change] on the proportion of BMV in England and Wales will take place after 2030", ie, just when large areas of it will be unproductive under Botley West and all the other solar farms in the country.

**Table 17.15**. Where will the soil and subsoil heaps be kept? How much ground will they cover?

**Table 17.18**. What access routes are going to be relocated, where to and why? What is going to be "recontoured" and why?

**Paragraph 17.9.2.1** skips over Subgrade 3a land, which has high sensitivity.

**Paragraph 17.9.2.2** does not mention access and maintenance roads. It should say whether some or all of these "unbound stone" tracks, requiring the stripping and storage of topsoils, will be permanent.

## 6. Conclusions

**Table 17.1** cites Draft National Policy Statement (NPS) EN-1, saying that "Applicants should seek to minimise effects on 'best and most versatile' agricultural land except where this would be inconsistent with other sustainability considerations.

Applicants should preferably use land in areas of poorer quality . . . " [is this the reason for RPS's repeated and misleading emphasis on the "lower" rather than "moderate" quality of Grade 3b land?]
EN-1 goes on to say, "The examining authority [ie, The Planning Inspectorate] should ensure that developments are not located on the best and most versatile agricultural land without justification. It should give little weight to the loss of poorer [ie, not "moderate" – see definition on page 5 above] quality agricultural land except in areas where agricultural practices contribute to the quality and character of the environment or economy."
Draft NPS EN-3 says, "Where possible, ground mounted Solar PV projects should utilise previously developed land, brownfield land, contaminated land, industrial land, or agricultural land preferably of classification 3b, 4, and 5 (avoiding the use of "Best and Most Versatile" cropland where possible). However, land type should not be a predominating factor in determining the suitability of the site location."

This is the crux of the BMV land issue. It should not be a "predominating factor" (in itself questionable), but equally, it should certainly not be ignored and should be avoided where possible. Even though the vast size of the site gives room for manoeuvre, RPS/PVDP continue to ignore BMV land as a material consideration and have done nothing to avoid it. They have not met their "objective to utilise low-productivity land of low ecological value", and in any case, low-productivity land is often of high ecological value. They have not, as Draft EN-5 requires, "used space effectively . . . to minimise the adverse effects on existing land use and rights of way".[6] Far from it.

Reading between the lines, it seems clear that RPS/PVDP feel vulnerable on this issue. They have consistently made efforts to downplay the importance and extent of BMV land. They have ignored my warnings about the likely extent of BMV land along both sides of Lower Road. They have repeatedly used language in the PEIR and elsewhere – when using data that were limited, broad brush and only provisional – to "confirm" the "low grade" quality of the land, which proved to be inaccurate when proper surveys began to be undertaken. They have consistently dismissed Grade 3b land as if it is agriculturally irrelevant.

[6] Many of the references in Tables 17.1 and 17.3 to the measures to minimise impact refer to "section 17.1 of this chapter", but section 17.1 is the Introduction.

They have not set out the data behind the maps to explain how they arrived at percentages of 42% and 38% for the proportion of BMV land on the Project site. To the eye, it appears to be more than that, especially in substantial areas of high concentration of BMV land. Such areas should not be taken out of agricultural production but largely or completely avoided.

They have chosen to use an assessment matrix that has an in-built structural bias in favour of reducing the level of adverse effect, while leaving open the opportunity to accentuate beneficial effects, although there are none for agricultural land.

They have made an arbitrary and baffling decision not to assess the significance of effect of the temporary loss of agricultural land, including BMV land, and the disruption and reduced access to it, during the decades-long *operational* phase. Their ideas for considering alternative ways to maintain agricultural productivity are rather limited, given that the Blenheim land could set an example for optimal diversity of land use.

They have left an unacceptably large number of questions unanswered.

Their conclusion that "there will be no significant effects on agricultural land, arising from the construction, operation and decommissioning of the Project" is an affront to commonsense. If this sounds like a subjective judgement on my part, it is no more so than the subjectivity buried in their "expert" and "professional" opinion. And I am not being paid by anyone, let alone the developer.

In sum, Chapter 17 is a highly unsatisfactory piece of work that does not meet an acceptable standard of professionalism. The Planning Inspectorate would do well to throw it out and ask RPS/PVDP to start again, this time objectively.