

**Botley West Solar Power Station**  
**Representation comments on the Inspectors EXa questions**  
**No 2 posed in early August 2025**

I have made previous Reps at every deadline so far, and merely wish to comment on or add to some of the recent incisive questions posed by the Exa Inspectors of the applicant and others.

Those points made in connection with [REDACTED] are on behalf of Mr and Mrs R Cooke who are APs and whom I represent.

**Questions referred to as per numbers in EXa Q2 August letter**

2.1.7 - If infra red light sensors are used, they are quite likely to be triggered by nocturnal animals such as badgers and deer (possibly owls) as well as humans and at night this could lead to lights going on and off at more secure locations protected by such devices and thus to additional light pollution in otherwise dark sky locations and potential light nuisance to people living near the site.

2.1.9 - No dimensions are shown for the struts on the panel table structures - this needs to be understood in relation to sheep grazing under the panels. The struts could present further restriction to animal movement.

2.1.10 - Working hours - I have already suggested shorter hours namely :- weekdays 7.30 to 6pm in summer time and 7.30 to 5 in winter time; 8 am to 1pm on Saturdays and no working on Sundays and bank holidays.

2.1.13 - It is remarkable that by now all the missing documents requested /promised are still not yet available - in particular the latest financial statements/ results/ accounts(audited or not) of the applicant and PVDP their agents - both organisations being in the same private ownership. The documents provided so far and loaded up in the library have all the relevant figures redacted making the evidence worthless.

The continuing lack of transparency is increasingly worrying given the scale and complexity of this project and serves only to undermine the applicants credibility in leading such a major project. In any Court case where he had asked for speedy production of evidence, the Judge would have lost his temper understandably.

2.1.17 - In the agreed lease with Blenheim Estate interests, there must surely be clauses that provide for guarantee bonds or similar financial penalties ensuring agreed reinstatement at the end of the lease with appropriate restoration of the land/removal of infrastructure as proposed/specified in the application and draft DCO. **Mr Dominic Hare of Blenheim Estates could be asked to confirm the details ( see also 2.5.6 below).**

2.3.3 - As pointed out in my earlier REP3 - 097, there seems to be continuing uncertainty about the date the NGET substation **might** be ready to connect up the whole solar farm to the. NGET say they **aim** to apply for consent mid to late next year and **if** approved by Vof WHDC, they would **hope** to start work in late 2027 and **might** complete it by end of 2029 - this doesn't match the dates quoted by the applicant - the connection licence date was October 2027, then they said they were seeking an extension to October 2028 and now the latest possible date might be the first quarter 2029. **So which is it?**

How can a scheme of this magnitude be approved with no current certainty that the NGET substation would be delivered in time? NGET repeatedly state their site for the substation is the one they prefer.

**Maybe the Exa Inspectors could request urgently that NGET engineering representatives appear to be examined over all this - see the latest draft SOCG drafted by the applicant which still says October 2027 on the last page.**

See also question 2.7.7 and lack of adequate applicant response to Michael Field's questions raised in his Rep2 -122 and Rep3 -108 about similar related matters of a technical electrical engineering nature. Whilst wind turbines can be turned off to stop power

generating, it is not clear how one can turn off solar panels on a hot sunny day when the Grid has no further capacity to accept additional electricity - **can the applicant or NGET be asked to explain what happens if there is no battery storage available.**

Solar Five Ltd the applicant has no employees and one might expect PVDP to have put forward one of their consultant engineers to respond to all these points - but sadly complete silence. **No doubt the Inspectors will pursue this vigorously and obtain answers.**

2.5.1 - It should be possible to ask [REDACTED] Blenheim Estate to spell out the components of rental clauses in their lease agreement; eg basic rent, bonus rent linked to actual output over agreed defined power output hurdles, some indexation formula, and any regular rent review formula and cycle over the 40 year lease period - as well as the clauses covering decommissioning specifications, infrastructure removal and land restoration methodology and timeframes. **No doubt he could be invited to explain in more detail.**

2.5.4 to 2.5.8 - see my Rep3 -098 on behalf of the Cookes of [REDACTED] [REDACTED] which posed very similar questions to those of the Inspectors.

**On the Cookes behalf the following points are raised and we would be grateful for the Inspectors to ask the applicant to clarify their position on this apparent discrepancy.**

**The applicants have only recently recognised the restrictions on land adjoining [REDACTED] and have proposed a reduction of panels on the land immediately adjoining [REDACTED] in their proposed change notification No 2 letter; however they have left some of the “restricted” land remaining in their scheme rather than remove it all, as the Cookes have requested - something the applicant could still so easily do.**

**In this context however, in their Rep3 - 008 and 009 Land Tracker Negotiations they have now deleted the subject land over which the Cookes have restrictive covenants and say no agreement is now necessary.**

**This seems contradictory given the Book of Reference in their Rep3 - 011 still has the various plots of land that are subject to the restrictive covenants; these covenants can only be cancelled with compulsory powers being exercised to acquire or neutralise them.**

**The restrictive covenants clearly prevent solar panels being installed on the land shown on the contract plan of 2006 attached to my Rep3 - 098 on behalf of the Cookes.**

**This matter needs to be resolved at the CA hearing - hence the Cookes and myself asking to be represented/present at that hearing unless, of course, the applicant withdraws the restricted land completely from the CA plan between now and October.**

2.6.8 - From my own experience, aerial photos are increasingly important in property searches/assessment by discerning purchasers and their buying agents - to identify offending pylons, sewage works, pig or poultry farms, slurry lagoons, motorways, airfields etc which are immediate negative impacts on assessing any rural property. The proximity of a solar array covering 100 acres would be an issue, but one of nearer 1800 acres would be a massive issue for any prospective buyer, and bound to put them off. Nobody would accept 40 years being a temporary use - most large rural property changes hand at least once in thirty years or so and often many more times.

2.6.12 to 2.6.18 - Removing the solar panels from the field nearest Hordley House (listed Grade II\*) was something I asked the applicant to do back in Feb 2024 along with other objectors but we were totally ignored. Listening to reasonable suggestions has yet to appear on their agenda sadly. Whilst they have relented on the land on the southern edge of Bladon, they have not so far responded sensibly on the northern edge of Cassington, round Goose Eye Farm or College Farm both off Lower Road Long Hanborough.

(I have commented above on [REDACTED] where restrictive covenants would prevent panels being installed on land

Shown on a plan attached and referred to a contract signed between the Cookes and Blenheim in 2006, when the Cookes purchased some land from Blenheim.)

They have made no effort to avoid close proximity to the group of nine homes at Shipton Slade.

These are all simple, small adjustments that would not seriously impact the overall size or viability of their project but which they could still make before the Examination closes.

The applicant claims to listen to consultation and examination responses but the reality is different.

2.7.8 - Replacing panels might, it is claimed, happen over a period of up to five years about 25 years after installation - this was not made clear in the original application and could involve a much longer period of repeated disruption to local roads etc when this occurs, let alone the likely need to replace, at or around the same time, large sections if not all of the 2m high fencing planned over c. 65 miles (before the latest possible site reduction near Bladon and airfield safety zone). This seems to highlight the lack of practical thought in the construction planning papers. See also questions 2.17.2 to 4.

2.11.1 and 2 - In my previous Reps 2 and 3, I raised the whole question of grass establishment on the arable fields prior to panel erection and then how it would all be grazed by sheep during the operational period. The timings and management issues are far greater than the applicant appears to understand or acknowledge.

2.11. 4 to 2.11.8 - again I have raised the issues on BMV land in previous reps. Might I ask has anyone (who really knows what they are talking about), state with any authority based on experience what the condition of any soil would be after 40 years in the shade, ambient heat from the panels in sunny conditions, and without any direct rainfall. I doubt anyone can provide such evidence with confidence.

Resting land for 40 years is simply not the same as fallowing land for one or two years. If the soil is compacted during installation and

again when decommissioning /removal takes place, nobody can carry out any meliorating cultivations or actions in the interim period because the panels are in the way. If on the heavier land drainage problems arise due to damage caused by thousands of piles, the land/soil could become waterlogged during the long winter months with long term soil structure damage the result.

**See also Professor Sherratt Rep3 -112.** What he states is absolutely right, in my opinion.

2.13.14 - there may have been 55 viewpoints but only 33 photo-montages were produced - generally perceived as poor quality on various grounds by many consultees and objectors - especially the Host Authorities. I emailed the applicants agent about this after the Cassington public consultation exhibition where many key photomontages were not displayed and it turned out not even available. The public were being mislead as to the real impacts in landscape terms, public rights of way and many other factors because the applicant was overwhelming them with facts figures etc but obscuring the real potential damage. PVDP would not and still will not accept this blatant misrepresentation that so many other people pointed out.

2.14.1 Background noise from the 6 smaller substations and 156 PCS converters ( these figures may be slightly less after site boundary reductions change notified) but the cumulative background hum on sunny days has not been given due consideration - in the same rather dismissive way as the initial landscape assessments by the applicants experts - who have since had to concede their position was wrong ( see recent Bladon and airfield site boundary changes removing c 200 acres of panels).

22.16.8 I feel the winter roosting by swans in the Evenlode valley fields seems to have been overlooked in the context of these large birds and low-flying aircraft. Can the applicant or RAF Brize Norton and Oxford Airport be asked to address this air safety point.

## **Costs**

On a more general point I raised the question of costs in my Rep 3. I would like this matter addressed by the Inspectors before the CA hearing in October.

Do the Examination Inspectors feel the applicant has done its best to produce the standard of information we might all reasonably expect in a timely fashion? If not then perhaps the issue of costs is relevant; obviously any objector who is successful in removing their Land or rights from the CA process is in a position to claim costs reasonably incurred - can the Inspectors respond with clarification on all this please?

Harry St John  
August 21st 2025



# Skylark (*Alauda arvensis*)

## Habitat

Skylarks can be found on most areas of open farmland, preferring larger arable and grassland fields. The open areas are chosen to allow sightings of potential predators.

## Food

Adults feed on a range of seeds and plant shoots including knotgrass, groundsel, fat hen and grasses. Chicks are entirely dependent on insects until fledging, favouring sawfly larvae, beetles, ants, spiders and grasshoppers.

## Nesting

Breeding takes place between April and August. Skylarks nest on the ground in short grass or crops, avoiding vegetation over 60 centimetres high. Due to high predation rates, skylarks need to produce up to three broods a season. Winter-sown crops and silage fields are only suitable for a single brood, making buffer strips and spring crops essential to maintain adult populations.

## Song/call

“Preet” - the skylark has a variety of calls and sings from late winter to mid-summer. The song is rolling, chirruping and fast whistling.

## Beneficial management

- Include a spring cereal as part of the arable rotation. This provides ideal and much needed late-season nesting habitat.
- Retain overwinter stubble, especially cereal stubbles, to provide a source of winter food and a nesting habitat in spring/summer.
- Buffer strips and field margins will provide similar conditions and can attract very high breeding densities. Aim for a range of grass heights and structures.
- Be mindful of nesting birds and fledglings when cutting silage, fallow and buffer strips.
- Consider including ‘skylark plots’ within winter cereals.







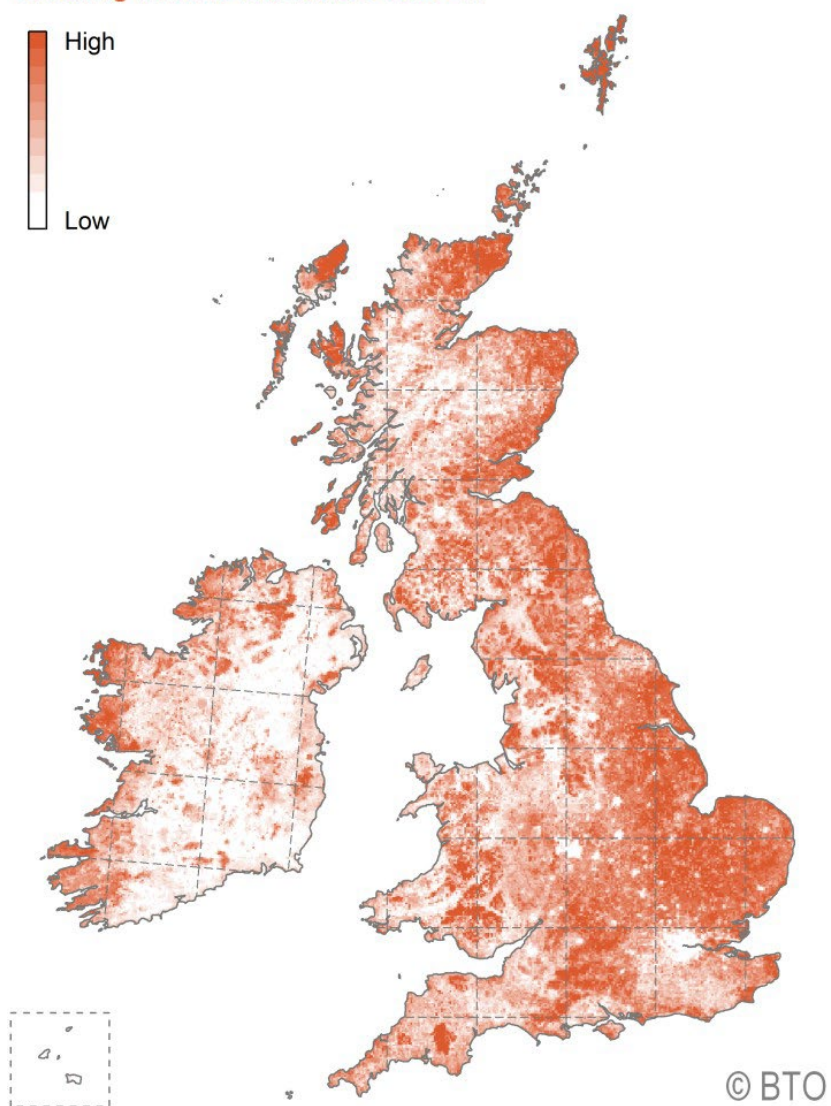
giving  
nature  
a home

LAND MANAGEMENT FOR WILDLIFE

## Skylark (*Alauda arvensis*)

The skylark can be found on all types of farm. Densities are highest on lowland arable and mixed farming systems, and unimproved grasslands. The UK skylark population fell by 60% between 1970 and 2013. This decline was largely caused by the move from spring to winter cereals, and by significant changes in grassland management, particularly the move from single cut hay to multiple cut silage.

Breeding Relative Abundance 2008–11



# WHAT DO SKYLARK NEED?

## Nesting habitat

Skylarks prefer large, open fields and tend to avoid tall structures such as woodland edges, or tall hedgerow trees. Skylarks nest on the ground, in vegetation that is 20–50 cm high. This vegetation must be open enough to give the birds easy access to the ground. They need to have two or three successful nesting attempts between April and August to sustain the population. Spring-sown cereals are often good nesting habitat for skylarks, but winter wheat generally grows too tall and thick to enable more than a single brood. In grassland areas, silage fields attract skylarks, but are generally cut too frequently to allow successful breeding. However, unimproved,

## ANNUAL LIFECYCLE

extensively grazed grassland can hold very high densities of breeding skylark.

## Summer food

Skylark chicks are fed exclusively on insects and spiders for the first week of life. These are also an important part of the diet of adults from April until August. Insects are collected from the ground, and from low-growing plants in crop and pasture.

## Winter food

Adults feed on seeds and sometimes leaves of crops and weeds. They are strongly associated with 'green' or weedy stubble.

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec

Wintering flocks on seed rich areas


	1st brood	3rd brood
Breeding pairs nest, multiple broods	2nd brood	

Wintering flocks form on seed rich areas

Breeding abundance map reproduced from Balmer et al 2013 Bird Atlas with permission from British Trust for Ornithology.

## HOW CAN I ENCOURAGE SKYLARK?

### Nesting habitat and summer food

- ☐ Include spring cereals in the rotation to provide more accessible nesting and feeding • habitat. 
- ☐ In winter cereals, create skylark plots (small bare patches) either by switching the drill off • during sowing or by spraying them out between crop emergence and the end of December. Two plots per hectare (approximately 20 m<sup>2</sup> each) in fields larger than five hectares can boost productivity by almost 50%.



valuable. Minimise the amount of topping to maintain taller patches. Introduce arable crops on livestock farms (other than maize) to provide feeding and nesting habitat in pastoral areas.

Make some areas of permanent grassland more skylark-friendly by shutting it up over the spring and early summer, or grazing it only very lightly during this period.

Skylark plot in winter wheat

- □ Create tussocky grass margins around arable fields to create over-wintering habitat for beneficial insects, which move into the crops in the spring. [L][SEP]

- □ Unimproved grasslands can be particularly **KEY POINTS** [L][SEP]

- □ Provide suitable nesting habitat on arable farms using spring cereals, or skylark plots in winter cereals [L][SEP]

- □ Extensive grazing to maintain areas of taller vegetation can support nesting skylarks in pastoral areas [L][SEP] [Contact Conservation Management Advice at: \[L\]\[SEP\] Post: The RSPB, UK Headquarters, The Lodge, Sandy, Beds SG19 2DL Tel: 01767 693308 E-mail: \[conservation-advice@rspb.org.uk\]\(mailto:conservation-advice@rspb.org.uk\) \[rspb.org.uk/conservationadvice\]\(http://rspb.org.uk/conservationadvice\) \[L\]\[SEP\]](#)

## Winter food

- □ Weedy over-wintered stubbles are the most beneficial winter-feeding habitat for skylarks on arable farms. The best stubbles are cereal stubbles that receive no pre-harvest desiccant and no post-harvest herbicides, and can be maintained until the end of the following March. [L][SEP]

- □ Allow some strips or blocks of ryegrass to go to seed and leave uncut and ungrazed through the winter in areas away from hedgerows or woodland. [L][SEP]



giving  
nature  
a home