

Botley West Solar Farm
Submission for Deadline 7
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In May 2024, Stop Botley West submitted an evidenced response to the Adequacy of Consultation. [AoC-011](#)
It was comprehensively ignored, perhaps because the consultation was written to conform to minimum requirements.

A summary of the SBW response is below and Rule 17 Letters indicate that no regard was paid to the points raised, to the extent that the Examiners have had to request very much the same information and have had to wait for responses delaying the examination that have frequently been inadequate or are still outstanding.

The AoC submission considered the application in terms of the Gunning Principles:

Gunning Principle 1 (Proposals are still at a formative stage): we found that while a decision had not yet been made by the Secretary of State for Energy Security and Net Zero, the Applicant (also a decision maker) had made public statements that suggested the decision was in effect predetermined.

Gunning Principle 2 (There is sufficient information to give intelligent consideration and provide an informed response): we found that key surveys and assessments and other important information required for a proper understanding of the proposal were yet to be conducted and were not available for consideration. Numerous statements and claims were inaccurate and, in effect, misleading.

Key point of information that were listed as missing from the consultation - many of which have since appeared in Rule 17 Letters from the Examiners included:

- information on alternative options including alternative scale, sites, cable routes, technologies and forms of renewable energy
- Heritage Impact Assessment for the World Heritage Site of Blenheim including its setting, and historic and listed buildings, scheduled monuments and conservation areas and their settings
- explanation of the Very Special Circumstances for using green belt land
- assessment of the impact on the Cotswolds AONB/National Landscape
- full assessment of Residential Visual Amenity.
- visualisations that represent a full range of viewpoints and are compliant with professional guidelines
- map of the entire project site to a minimum scale of 1:2500 as required by PINS and showing all solar farm infrastructure including substations, inverters and construction compounds
- Biodiversity Net Gain report including baseline data and metrics to be used
- outline Landscape and Environmental Management Plan
- full wildlife baseline surveys that are compliant with national guidelines
- Traffic and Noise Management Plans
- full agricultural land classification with BMV breakdown for each of the three sites
- assessment of loss of agricultural land and mitigations
- assessment of impact on all Public Rights of Way including maps and overlay with the Zone of Theoretical Visibility
- full assessment of Cumulative Effects including in-project cumulative effects and new housing in Local Plans
- information on community benefits

It was requested, inter alia, that:

- the consultation documents were more accessible and less repetitive:
- the Community Consultation Leaflet should be delivered to all households in the consultation zone
- Events should be attended by technical experts able to answer consultees' questions
- they should present information (including maps) in a more organized and intelligible way

Gunning Principle 3 (There is adequate time for consideration and response): we found that the consultation period was neither realistic nor proportionate to the proposed project given the unprecedented scale of the proposed solar farm, the size of the affected population and the range of impacts. Furthermore, despite numerous requests not to do so, the Applicant scheduled the consultation during the busy Christmas and New Year holiday period. This had a predictably serious impact on the public's ability to engage in the consultation.

Gunning Principle 4 (Conscientious consideration must be given to the consultation responses before a decision is made): following the initial informal consultation on the proposal, it appeared that the Applicant took little account of the public's responses. Following the statutory public consultation, our survey suggested that 61% of 1,000 consultees who responded believed they did not have adequate opportunity to influence what is being proposed and do not believe the Applicant listened to their comments in the consultation.

Conclusion

A significant effort was invested in providing the applicant with a detailed and serious response to their proposals. Had the applicant taken the meaning of consultation or the request for information seriously at the time, or over the last 18 months, then it is possible that a great deal of time and money could have been saved.