Botley West Solar Farm: Comments for Deadline of 16 July 2026

From Nigel Pearce [redacted]

The following comments refer to two of PVDP's most recent responses to the Planning Inspectorate:

> 'Secretary of State RFI – Applicant's Response' (C1-087 EN010147_APP_20.3)
> '17.8 Applicant's Response to ExA's Rule 17'

Best and Most Versatile (BMV) land

In **C1-087**, this issue is mainly addressed in the opening chapter, on 'Alternatives and Site Selection', rather than in chapter 5 ('Soils and Agriculture').

In pages 26–29 of C1-087, PVDP/RPS are up to their old tricks again. They claim to have "fully considered the quality of the agricultural land", in the design process for the Project, "at an early stage". As I have pointed out several times, this is an inaccurate description of their slapdash and minimalist approach to the issue, in the "early stage" and for some considerable time thereafter.

Once more in this document, they spend a great deal of effort trying to prove how poor the soil is on the Site, in order to justify their use of extensive areas of BMV land. They begin (p. 26) by using Grades 1, 2, 3 and 4, which helpfully (for them) obliterates the important distinction between 3a and 3b, to 'prove' that the Project Site "compares favourably" (for them) with surrounding districts – an interesting choice of words that shows how determined they are to denigrate the land they want to build over. They wrongly claim that the detailed survey work has "confirmed" their original vague and underestimated assessment, and in any case the picture is more complicated than that, with a substantial proportion (42%) of the Site being BMV land, and with concentrations especially but not only on either side of Lower Road.

They then use the new predictive mapping to emphasise the 50.48% figure of BMV land in the agricultural total, thus making it appear that the Botley West Site is worse than it is. But the relevant BMV figure is the 40.6% one (40.9% in the final version of RDE118), against which the Site, at 42%, *does* "compare favourably", albeit the

difference is small. The non-agricultural and urban categories represent land that is already lost, and should not come into the equation. (Of these two figures they say, "The mapping predicts, as shown below . . ." I can't find what they're referring to.)

But before this sleight of hand, they attempt to conceal their principal weakness in the passage on the three land holdings. First of all, they say "the distribution of the BMV land is mainly located in pockets or areas of fields where removing panels would not provide accessible areas of sufficient scale to accommodate arable farming within these three areas of the three holdings affected". This is an odd point make, since farmers, to my knowledge, don't restrict their arable farming to BMV land. More importantly, though, it is palpably *not* the case in Holding 1 on either side of Lower Road, where the most extensive concentration of BMV land lies, and where there is clear access to it.

They clearly don't like this reality, because while they show us little maps of Holding 2 and Holding 3, in an attempt to prove their point, they don't show Holding 1. Instead, while admitting that BMV land "predominantly lies in Holding 1", they fall back on their commonly used tactic of trying to wear us down by cross-referencing, and refer us to another document. Furthermore, by design or incompetence (a Freudian typo?) they refer us to a document that does not exist in the Examination Library (APP-17.4). Perhaps they meant to refer us to APP-111 or CR2-034, neither of which shows the proportion of BMV land, which they have reproduced in their little maps for Holding 2 and Holding 3. They should really have referred us to APP-110, which is where the little maps come from, and which would have shown the concentrations of BMV land alongside Lower Road and in the north-west of the central section of the Site. Better still, they should have included a comparable little map for Holding 1 showing these concentrations. Instead, they seem to have gone out of their way to withhold information and mislead us.

In **'17.8 Applicant's Response to ExA's Rule 17'** there is another example of PVDP/RPS's misuse of statistical data, in an attempt to mislead. If you look at Figure 2, you might come to the conclusion that they want you to come to, namely that West Oxfordshire has much poorer land than the other Oxfordshire districts, and therefore offers a "favourable" choice of Site for Botley West. Indeed, the figure of 21.78% for West Oxfordshire is easily the lowest of the four districts (the Botley West percentage is claimed here to be 38.1%, presumably as a result of proposed changes to the extent of the panel coverage – changes made for other reasons, not BMV.)

However, none of the figures in Figure 2 is statistically significant. They admit that they refer only to land surveyed by DEFRA, but don't mention how little land DEFRA has surveyed in Oxfordshire. Thus, the land surveyed in West Oxfordshire amounts to 1898.28 hectares out of 71,494 hectares, just 2.65%. Likewise, the land surveyed in South Oxfordshire (supposedly the district with the best soil) amounts to 1010.7 hectares out of 67,340 hectares, just 1.5%. You cannot draw statistically sound conclusions from such limited data. Who knows what the actual figure for each whole district is? Certainly DEFRA don't, and neither do PVDP/RPS.

Furthermore, the 38.1% figure cited takes no account of the large concentrations of BMV land along either side of Lower Road, and in the north-west of the Site, which PVDP/RPS have repeatedly been told to avoid if possible. On the contrary, they have made no attempt to do so, and any small reduction in their latest proposal is incidental and made for other reasons. They have never taken this issue seriously because they know how weak their position on it is.

<u>Hydrology and Flood Risk</u>

A couple of points to make on this subject. The evidence cited suggests that "Any change in run-off characteristics from solar PV panels, compared to the existing situation, is likely to be insignificant, provided the ground beneath the panels remains vegetated." But if, as claimed, this ground is going to be "*extensively* grazed" by sheep (especially on the sloping ground to the east of Lower Road), the vegetation will be minimal, and increased kinetic energy of run-off will come into play (a substantial part of Lower Road quite often floods). As Cook and McCuen say, "the kinetic energy of the flow that drains from the panels was found to be greater than that of the rainfall, which could cause erosion at the base of the panels" ('Hydrologic Response of Solar Farms'), which would presumably add to the risk of over-grazing.

Moreover, PVDP/RPS fail to mention other research which does not so handily further their argument. For example, Baiamonte, Gristina and Palermo (December 2023) say, "Results showed that solar panels increase the peak discharge by about 11 times compared to the reference hillslope." I am not saying (because I don't know) that these three academics are correct, but a professional planning proposal of this size should make it clear that not everyone agrees with the evidence that the Applicant has chosen to rely on.

One last point. In their most recent documents, PVDP/RPS have started to introduce, or emphasise, certain 'green' concepts such as "regenerative farming techniques" and "conservation grazing areas". Given their consistently misleading approach throughout this planning process, how committed are they to these concepts? Can they really be entrusted with a *Nationally Significant* project of this size? Will they really fulfil their social and environmental commitments? In 40 years' time, the elusive Director [redacted] and mysterious funder [redacted] of Cranssetta Investments in Cyprus will, if still alive, be over 100 and nearly 90 years old. How many changes of ownership will there be in that time, and who will pick up and honour the commitments?