

Submission on behalf of the Forever Fields Community Art Project

The Botley West Solar Farm application should be refused for the following reasons:

- 1. The location, size, design, and funding model is flawed.***
- 2. The quality of the application is poor. The detailed work necessary has not been completed by the applicant and fails to reach the quality threshold required to merit approval.***
- 3. The applicant has not performed well in respect of answering information requests made by all parties during the process and consequently the final design of the scheme is uncertain.***
- 4. This is a highly speculative application which seeks to undermine the rigour of the NSIP process. Without the support of the cash hungry landowner Blenheim Estate, it would not have been considered a realistic or practical proposal by any experienced utility scale solar farm developer.***

Background:

The community project group, Forever Fields, have presented several 'interested party' submissions in writing, together with a verbal representation during the Examination. Despite the questions they contained, the applicant and principal landowner have failed to provide the detail necessary to give confidence that the following areas of concern are being addressed seriously and/or mitigated:

1. Health and Wellbeing.
2. Landscape and Heritage.
3. Decommissioning and Re-instatement.

It is very clear that the applicant has not completed the work necessary to support the Botley West Solar Farm application. It is no surprise to Forever Fields that the Secretary of State has taken the unusual step of repeating many questions that others have previously asked. Throughout the consultation and the examination itself, the applicant and Blenheim Estate have ignored local concerns. More recently they failed to perform during the Examination period and did not provide information requested in a timely manner.

Supporting information:

Health and Well Being.

A major theme of the Forever Fields project is that the Health and Well-Being of local people will be under threat if the application is approved. This is because the 'utility scale' of Botley West would occupy thousands of acres of largely green belt land which is relied upon by the local community to support their health and well being.

The applicant and Blenheim Estate have not sufficiently examined this issue and have not mitigated the negative impact on the community amenity value of the fields and greenbelt. No attempt has been made by either party to approach the Forever Fields Community Project Group to discuss this concern in more detail or to offer mitigating solutions.

The proposal is therefore missing important information about the impact on the health and well being of such a large proposal in a heavily populated area.

The applicant has not finished the work necessary in this area to enable full consideration of mitigation opportunities and as a result, many questions remain unanswered.

Landscape and Heritage.

The quantity and quality of heritage and landscape assets contained within the redline area of the Botley West Solar Farm, and the presence of a WHS at the centre of the proposal mean that this location was always a poor choice for siting a utility scale solar farm.

During the first two consultation phases, the applicant justified their choice of this location on the grounds that the land is largely owned by one party; Blenheim Estate. It was suggested that this would mean it would be much easier and more cost effective to locate the development here. The applicant has never answered the fundamental question about which alternative locations they considered prior to selecting Botley West. A reasonable justification for proposing this location has still not been provided despite the unique nature of the landscape and heritage in this area.

Partnering with Blenheim Estate does not mean that the applicant has permission to ignore the work and investment necessary to ensure that the impact to landscape and heritage assets in this setting is described accurately and mitigated appropriately. The applicant has not met the quality threshold necessary in this area to support the application.

The negative impact on the unique landscape and heritage assets is the most common concern of all the artists who contributed to the Forever Fields Art Exhibition and the large number of local people who attended. Several hundred comments regarding the negative impact on landscape and heritage can be found in the Forever Fields Book which was accepted as a submission in its own right and published by the Examiner. The applicant did not answer a single question from the Forever Fields book and merely 'noted' its inclusion in the submission at that stage of the Examination.

Neither the applicant or Blenheim Estate have approached Forever Fields at any point in the process to discuss local feedback and to consider mitigation opportunities suggested by Forever Fields in respect of landscape and heritage.

The most recent proposal by the applicant to increase the buffer zones between the solar array and heritage assets is too little, too late. It is also vague. It is not acceptable at this late stage to propose that these issues can be managed by a developer post approval by the SoS. Such fundamental changes to the red line area at this late stage, without the opportunity for local people to be consulted, undermines the rigour associated with the NSIP process of approval.

Once again, the applicant has not completed the work necessary to enable full consideration to mitigation opportunities and as a result, many questions remain unanswered.

Decommissioning and Re-instatement

The request for approval to go ahead with the construction of Botley West Solar Farm has been made on the basis of a 'temporary' use of the land for 42 years at which point it would return to fields. This in itself is hard to accept in that 42 years cannot reasonably be described as temporary.

To accept the reassurance that the land will be returned to fields in 42 years as a genuine commitment from the developer, the Forever Fields Community Project has, on multiple occasions repeatedly called for a detailed decommissioning and re-instatement plan. (Deadlines 5, 7 and at the public hearings)

Crucially, this plan must have financial commitment built in, to ensure the funding will be in place. Without clarity on funding, the description of this development as 'temporary' is invalid.

The applicant has not demonstrated any interest in taking this issue seriously and has not been willing to make any financial commitment which would validate the application as temporary.

An indicator of the lack of seriousness by the developer to this issue is not just the continued absence of detail in the so called decommissioning paper. The fulsome application and associated paperwork now runs to tens of thousands of pages and total amendments are in the thousands. However, the decommissioning and reinstatement plan, at just 14 pages, remains the shortest and least updated document in the entire submission.

Forever Fields has repeatedly asked for a more detailed plan which includes a funding model, to ensure decommissioning takes place in 42 years time. Again, PVDP have failed to complete this work. Without the assurance a funded plan provides, the application cannot reasonably be described as temporary.