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Rebekah Morgan  
**Cherwell District Council**  
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**By email only**

9<sup>th</sup> June 2023

Dear Rebekah

22/03873/F

**Land North And Adjacent To Mill Lane Stratton Audley**

**Installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers together with a switchgear container, inverter/transformer units, Site access, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements.**

Thank you for re-consulting us on the above planning application. We have reviewed the documents which do not appear to address the concerns set out in our original response which is appended to this letter. We therefore stand by the comments made in our original response in full.

Whilst standing by all our original response we would particularly like to draw attention to the fact that the updating of the Landscape and Habitat Management Plan that has taken place provided the opportunity to address our concerns set out in section 3 in relation to the seed mix and management regime for the main area of grassland (49.27 ha) within the panel area, but that has not taken place so our concerns remain.

We wrote in our original response:

*“In particular we are concerned that the seed mix (Habitat Aid ‘Grazing Meadow Seed Mix’ or similar) to be sown within the solar array fence which will cover the vast majority of the site (49.27 of 58.05 hectares) is a grazing mix rather than a wildflower seed mix and contains a high proportion of perennial ryegrass. It therefore may not achieve the predicted other neutral grassland in moderate condition within five years (see paragraph 4.2.4 of the applicant’s BNG statement) especially as most of this area will be shaded by the solar panels.”*



The same seed mix is still being recommended in the updated Landscape and Habitat Management Plan, as set out in section 3.7. As we said before we have concerns that such a “grazing mix” as opposed to a “wildflower mix” (the latter being proposed, which we welcome, for the remaining 7.49ha around the edges), may not achieve the criteria for Other Neutral Grassland - Moderate condition, which would require it to pass Criterion A in the condition scoring criteria for Medium, High and Very High Distinctiveness grasslands.

As set out in our original response (appended) we consider that with the considerable biodiversity impact of what is in effect the semi-industrialisation of a rural area of great value for wildlife, then the compensation should seek to create the highest standard of habitat that can reasonably be achieved within the solar array compounds, as opposed to only the small area outside them, and propose a species-rich wildflower grassland using an appropriate seed mix and management within the solar array compounds.

For further details on this see section 3 of our original response. Many solar parks do propose such species-rich wildflower meadow habitat within the solar array compounds and there are many examples of successful delivery.

We hope that these comments are useful. Please do not hesitate to get in touch should you wish to discuss any of the matters raised.

Yours sincerely

Nicky Warden

Public Affairs and Planning Officer

Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust

**Appendix 1 BBOWT response to 2203873F Padbury Brook Solar Farm**