

Written Submission for Preliminary meeting/Initial Hearings

This submission is intended to apply to whichever is felt more appropriate: Items 3 or 5 of the Preliminary meeting or to one of the Initial Hearings.

As is clear from Annex B to the letter of 28th March 2025 from David Wallis the Examination Process takes on an inquisitorial approach, which means the ExA will probe, test and assess the evidence. In order to be able to do this, reliable evidence rather than merely assertions is required. The applicant's evidence should be clear, complete and relatively unbiased. Thus far I do not believe that it is.

There are many references in the Relevant Representations to the absence of genuine dialogue, material or response by the applicant to important issues raised by Interested Parties at earlier stages of this project, as well as the failure by the applicant to engage with parties. In addition I am concerned about non-compliance with a requirement in the PINS Scoping Opinion relating to photomontages.

In order for the Examination to proceed smoothly and be completed within 6 months I believe that at least some of these matters should be addressed at an early stage, preferably before the Preliminary Meeting is closed, perhaps by further Sec. 51 Advice or clarification in addition to 1-7 in David Wallis's letter.

I have set out below some examples where these matters have been raised in Relevant Representations by others more expert than myself under headings: (A) lack of engagement, material or response by the applicant; (B1,2&3) need for fuller pictorial evidence; (C) further specific material urgently required; and (D) submission.

(A) Examples of lack of engagement, material or response by the applicant:

- Oxfordshire County Council (RR-0793 at annex 1, paragraph 1.1.1, and AoC -003)
- West Oxfordshire District Council (RR-1102, paragraphs 14, 45,47, 49 and 100, and AoC – 009)
- Siemens Healthcare Ltd. (RR-0967 at paragraph 11)
- Southern Gas Network (RR-0981)

(B) Need for fuller pictorial evidence, and examples

1. There is a widespread view that 55 viewpoints are not enough for a project of this size and complexity – see examples below.
2. The ES largely ignores the cumulative nature of the impacts
3. There is a specific requirement for photomontages in the PINS Scoping Opinion (APP-126 at pages 13 and 14) in the following terms:

ID Ref Description Inspectorate's comments 3.2.5 Table 7.2 Photomontages Table 7.2 of the Scoping Report states that photomontages will be used "where appropriate". No further detail is provided on the number of photomontages or locations proposed. Scoping Opinion for Botley West Solar Farm 14 ID Ref Description Inspectorate's comments The Applicant

should justify the location and number of photomontages, ensuring these capture a worst-case scenario of impacts from the Proposed Development and are representative of visual receptors. The Applicant should seek agreement from relevant consultees regarding the appropriateness of selected photomontages and evidence of this agreement should be provided within the DCO application. The photomontages should show all components of the Proposed Development, including security fencing, CCTV poles, battery storage system, substations etc., and demonstrate the Proposed Development before and after mitigation in order to enable a worst-case scenario and the effectiveness of mitigation to be fully understood.

Despite this unambiguous requirement in the Scoping Opinion, of the 55 viewpoints only 31 have photomontages. The relevant consultees (District Councils) have written to me saying that they were not consulted about the selection of 31 of the 55 viewpoints. Also I have not been able to find in the DCO Application any evidence of agreement as required by the Scoping Opinion.

I note also that the Non-Technical Summary (APP-037) makes no reference to photomontages. Members of the public who have limited their reading to this Summary will be unaware that any photomontages exist at all.

The only reasons for limiting the photomontages to 31 viewpoints given by the Applicant that I have found are in these terms: *Not all the viewpoints would be appropriate to show as a photomontage due to distance and/or proportion of the Project visible within the view.* (APP-045 at pages 26 and 38 within Table 8.5, and APP-034 at pages 622/3 and 793).

However these reasons are contradicted by even a cursory look at the remaining 24 viewpoints' photographs. A classic example of such a viewpoint photograph 24 (no photomontage) shown in an attachment to Rosemary Lewis's Relevant Representation (RR-0912).

Another aspect about photomontages is that they are based on viewpoints at static points. Assessments of impact of little significance from thousands of solar panels, fencing and other equipment are therefore made by the applicant only at individual points. There is negligible attempt to show the cumulative impact at a series of points along either public footpaths or roads despite an acknowledgement by the Applicant that: *effects may be present along lengths of the PRoW or roads for example*, in response to Oxfordshire County Council.(APP-045 at page 24)

My own Relevant Representation addressed all these points in greater detail. (RR-0998 at paragraphs 2 –18)

Examples to support B1, 2 & 3:

- Oxfordshire County Council (RR-0793 at annex 1, paragraph 1.5)
- West Oxfordshire District Council (RR-1102 at paragraphs 17, 34 and 35)
- Historic England(RR-0398, section2)
- Oxford Gardens Trust (RR-0794, paragraph 7)

- Russell Canning, Landscape Architect (RR-0919 at paragraphs 2.38 and 2.43)
- Professor Alex Rogers (RR-0018 at paragraph 4)
- Marrons, consultants on behalf of Stop Botley West Ltd (RR-1007 at 3.4.2,3.4.8, 4.4.9 and 3.5.1)
- Rosemary Lewis (RR-0912)

(C) Further specific material urgently required

In addition to the need for fuller pictorial evidence Relevant Representations have highlighted the absence of necessary material at this stage. Like the need for more viewpoints, photographs and photomontages this material is a pre-requisite for the Examination. Examples are:

- Full Heritage Impact Assessment – World Heritage UK (RR-1110) and Russell Canning – (RR-0919 at paragraph 2.10)
- Statement of Need – Sec 51 Advice letter on 13th December 2024
- Full Assessment of Landscape Value in accordance with the Landscape Institute Technical Guidance Note 02/21 – Russell Canning (RR-0919 at paragraph 2.29)
- Full Residential Visual Amenity Assessment – Russell Canning (RR-0919 at paragraph 2.37)

(D) Submission

I have sought to explain and to provide a few examples in support of my contention that there is much required before the Examination begins.

I would also like to propose that the last Principle Issue ‘Landscape and Visual Amenity’ should include an item about ‘Proximity of the development to residential properties’.

Additionally I am unsure where highways and traffic fit into the Principle Issues, and whether the network could cope with the extra large and heavy lorry deliveries and 100’s of personnel car movements.