

I would like to summarise the substance of my oral submission given on 14/05/2025 by way of the attached summary document. Unfortunately the transcript is not particularly accurate so I hope the summary document provides greater clarity around the Glyme Valley Project and its' relevance to consideration of BWSF.

## WODC LIR Specific Issues List re

### Glyme Valley REM (Regional Energy Market)

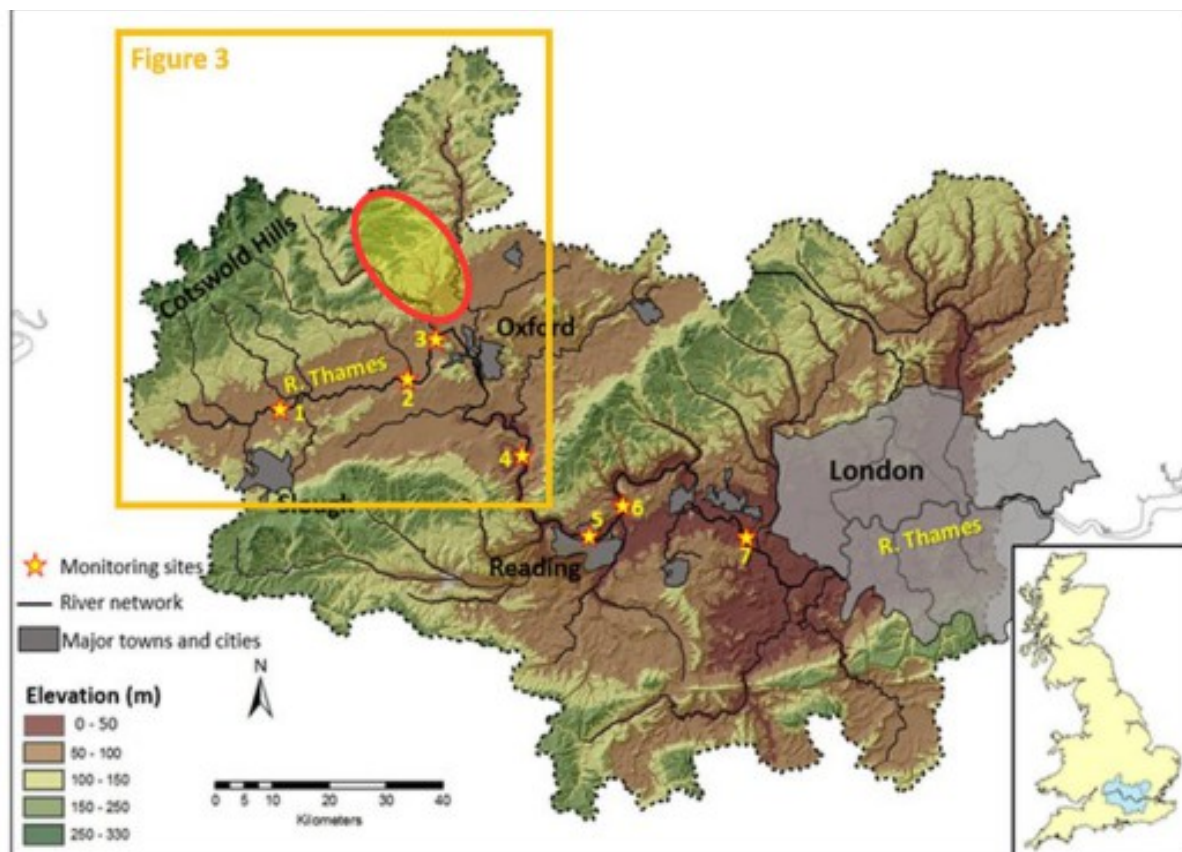
## CONTENTS

**Specific Issue 1 :** Strategic Alternative – Glyme Valley REM

**Specific Issue 2 :** Cumulative Impact on Heritage and Noise

**Specific Issue 3 :** Cumulative Impact on Frameworks

**Actions**



**Fig 1 : Upper Thames Bioregion Map : Glyme Valley Bioregion with red border**

## Introduction:

In reviewing the Specific Issues list re the WODC LIR, we identify three additional Specific Issues to add to the current list :

### Specific Issue 1 : Strategic Alternative : Glyme Valley REM (Regional Energy Market)

The Botley West Solar Park proposal is a mono-cultural behemoth predicated on a private equity financial model that is neither *resilient* nor *equitable* nor responsive to cross-governmental imperatives of a *just transition* and to incoming devolutionary regional empowerment in Oxfordshire (2028). Recent discussion about 'Alternatives' re BWSF Specific Issues seems focussed only on locations for alternative sites for BW substations (SI meeting 150525) rather than genuine alternative models for renewable infrastructures. .

The Glyme Valley REM is a place-based RE model, an Alternative to BWSF. It was conceived in 2023, well prior to the announcement of BWSF, as a resilient solution, not just an isolated 'energy' solution. The project brief with DESNZ is to produce a model for regional-scale, place-based, distributed, community-owned, equitable solar renewable energy infrastructure in the Glyme Valley Oxfordshire. The first pilot 7mw site (one of six across the REM region) is proposed to be at Goose-Eye Farm, just south of Woodstock.

DESNZ is currently scoping <5MW Mandatory Shared Ownership Models. The Glyme Valley REM is one such renewable model with DESNZ that foregrounds social innovation in scaling regional community infrastructures. To support this, we have built up a team of highly reputable mature companies with significant expertise in renewables projects. With Arups (we first engaged Ove Arups in the REM in 2024, prior to their OXLAEP selection), we are currently expanding our team to a specialist regional focus group within OCC's OXLAEP programme (2026 OXLAEP completion date). We are aligned with other UK regions in which regional community work at-scale is already maturing and where strong relationships with aligned infrastructure banks are already present. Oxfordshire has a lot to catch up on in this area, we are providing one such conduit. The Glyme Valley REM also provides an opportunity to test and prove renewables as a pillar to infrastructure resilience, anticipating the Oxon devolution deadline in 2028.

## 2. Specific Issue 2 : Cumulative Impact on Heritage and Noise

We are concerned that the scale of the Blenheim PVDP proposal invalidates many monitoring and surveying results in a number of Specific Issues. NSIP methodologies are not fit for purpose. For example :

### (i) Cumulative Impact on Heritage :

We note from PVDP heritage experts in the Specific Issues Meeting May 16 2025, that risk to heritage assets is only required to be defined on an asset-by-asset basis. But at the scale at which BW is proposed – 3000 acres - the aggregate of the assets becomes important. Aggregation of numerous single asset assessments cannot possibly be valid at this scale. At no point has this scaling issue been addressed in the cumulative impacts on heritage methodology due to the unprecedented scale of assessing this heritage landscape for the BW application. The current methodology is not for purpose for such NSIPs.. We are currently consulting with UNESCO and ICOMOS.

### (ii) Cumulative Impact on Noise and Vibration :

It has also been confirmed by PVDP experts that noise and vibration is also only monitored on a point-by-point basis. As with heritage, our concern with such a vast NSIP project, is that the sonic environment has to be assessed in its entirety, not point-by-point, which at best will indicate little, at worst will produce misleading results and distort the environmental, ecological and social outcomes. For instance, we have raised the concern that aviation safety is critical given the proximity of the proposed BW development to Oxford airport. But there is no requirement to review the cumulative impact of the noise from BWSF operationally, as an additional not-insignificant homogenous sonic layer sitting on top of the airport's own single point noise ratings. This is a significant safety hazard given that this airport is a major training facility, used daily by many inexperienced trainee pilots, many of whom are barely out of sixth form, learning to fly over urban residential areas and much-used roadways. There are also many recreational flying lessons that take off from Enstone airport only 6 miles north of the proposed BW site whose flight-path is frequently over the BW proposed site. The cumulative impact at scale of these sonic layers have not been addressed in any meaningful way. The current methodology is not for purpose for such NSIPs..

### 3. Specific Issue 3 : Cumulative Impact in Disparate Frameworks

Third, we raise the matter about the disparity between the Specific Issue of Cumulative Impact within a) the Planning Inspectorate Framework versus b) Local Government statutory Frameworks. This Specific Issue needs addressing, again due to the unprecedented scale of this project, coupled to its adjacency to densely populated urban areas espaliered up against Europe's biggest proposed industrial RE facility.

As with DESNZ, social metrics and social capital are increasingly being integrated into statutory decision making processes that bind Central Government, Local Government (OCC, WODC, Cherwell, VOWH, Parish Councils). Social and well-being metrics have fast emerged as the other side of the coin to the environmental ecological narrative and are inextricably bound up to the transition to 2050 Net Zero. With this trajectory in mind, OCC have already committed to adopting an exemplary framework called OXLAEP (Local Area Energy Plan) with Ove Arups, a world-renowned lead engineering and sustainability consultant. Further, in addition to SDGs and Circular Economy tools, OCC have also recently adopted a framework for governmental decision-making that is dependent on social metrics, called Doughnut Economics. DE has already been adopted formally by the European municipalities of Amsterdam, Brussels, Copenhagen, Glasgow. This promotes Oxford and Oxfordshire squarely into the same league as this forward-looking Northern European municipal group.

The significant risk here is that the Planning Inspectorate will be looking through an entirely different lens for reviewing BWSF that is not fit for purpose for today's local government legislation. Add onto this stack, the incoming OXLAEP 2026 and Devolution 2028 agendas, and the rifting between the lenses of the Planning Inspectorate and OCC/WODC will become even more pronounced and incoherent. Omitting this 'Cumulative Impact' Specific Issue on any NSIP (above 50MW), let alone a project of the BW scale, 840MW, will lead to significant distortion and risk and health disparity and inequity. Which is why initiatives such as DESNZ's Mandatory Shared Ownership Model and the REM are both important. But they will not be able to be meaningfully and coherently generated *at scale* without a robust Cumulative Impact focus built into the Planning Inspectorate framework. Note that the matter of scaled social capital is central to this – the current NSIP framework is not fit for purpose for this.

### 3. Actions

We would like to add three Specific Issues to the current WODC LIR list of nine :

- Rochdale envelope
- **Strategic Alternatives : Glyme Valley REM - our Alternative proposal**
- Cultural Heritage
- Green Belt
- Aviation Safety
- Development Consent Order DCO
- Landscape and Visual Matters
- Climate Change
- Noise and Vibration
- Traffic and Transport
- **Cumulative Impact on Heritage and Noise - our proposal**
- **Cumulative Impact on Statutory Frameworks - our proposal**

In the case of BWSF, to apply this lack of cross-issue methodological Cumulative Impact re BWSF would sit a mono-cultural plastic and aluminium black box in the middle of a productive rural landscape. The outcome would be to create a generational impediment to a) resilience b) alternatives, c) heritage, d) aviation safety. There are more. It would block and prevent the incoming plethora of place-based regional resilience initiatives as required by current councils, future devolved Combined Authorities, DESNZ, DEFRA, Natural England, UNESCO, OCC, WODC, VOWH etc for at least the life-time of this proposed project, ie 40 years = 2065, which is 15 years after reaching the net zero deadline. Given the current financial conditions of Local Governments, such opportunity absolutely cannot be ignored.