

Comments on responses by the Applicant to the Examining Authority's First Written Questions

Part A General Comments

1. Despite searching questions by the ExA the Applicant's contention about minimal impact on both heritage, landscape and visual effects still appears primarily to rely on the partial judgement of its consultants and confusing reliance on 'moderate adverse' and 'not significant'.
2. There is still no attention by the Applicants to the cumulative impacts or the repetitive effects of miles of panels, fencing, PCS's in all directions as residents and visitors pass through even parts of the north, middle or south sites.
3. There is still little recognition of the industrialisation of the countryside
4. The value of conservation areas and heritage within them is largely dismissed.
5. A 25 metre buffer zone is asserted as reasonable and proportionate only because the Applicant says so.
6. The pretence continues that the Applicants have been listening to and addressing concerns. The reality is that the changes that have been made throughout this nearly three year's process since the original informal consultation have been minimal in the context of the enormity of the project.
7. Regarding insufficiency of viewpoints and photomontages, the only response seems to be that the numbers are proportionate. But there is no attempt to explain how that view is reached.

Part B Specific Comments relating to REP2-025

8. Q1.14.10 Levels of Significance in LVIA Methodology

8.1 The 'proportionality principle' on which the Applicant relies seems to depend on a proposition that each impact being assessed is only a very small proportion of the whole project site. If the site was not so large then each impact would be proportionately greater. This seems to me to be a flawed argument.

8.2 At one end of the spectrum a glimpse of an individual panel would not have a significant impact, but at the other end repeated sights of thousands of panels in an otherwise rural landscape would have a very significant impact. So just because an individual impact is small in relation to the vast scale of the project, and is therefore a small proportion of the project, does not mean that the cumulative effect of repetition is not of the highest significance.

8.3 The assertion by the Applicant on the second page of its response to this First Written Question that: *'most of the visibility is from PRow's, which represent transient, varying views'* is a repetition of what it has been saying throughout. It too is flawed. If less time was spent on desk investigation and more time was spent

walking and indeed driving around the area the reality would be clear namely that there are and will remain a myriad of views across the countryside from the PROWs. Some are wide open whilst others are limited in size and therefore encourage stopping and looking. Even if some are blocked by the proposed mitigation by summer 15 there will still be views during the winter and many views of panels in the gaps of the new planting – see for example new viewpoint 113 (Fig, 53) at REP2-030. Also Fig 51 at this viewpoint shows clearly a highly visible Power Converter Station (one of about 160) dominating the left foreground.

9. Q1.14.11 Landscape effects - Construction

9.1 The clear question has received another tortuous answer. Perhaps what it means is that adverse effects would be greater but only for that part of the site being worked on at the time. Another conclusion seems to be that because there will be no quarrying but rather activity only on the surface this somehow does not affect the landscape.

9.2 Elsewhere the Applicant asserts that the current patchwork of hedges, so typical of this part of the country, will not be spoilt by regimented and serried lines of new thick hedging in 15 years. I beg to disagree.

10. Q1.14.12 Landscape effects – Operational

10.1 With respect to the ExA, it has focussed here on one of the central issues about impact. The Applicant's response that *'change within the landscape would not be noticeable'* makes no sense to me. The sentence carries on: *'this would not be out of scale or at odds with the character of the area'*, and in the next sentence: *'the perceivable scale of the proposed development would not take over the existing landscape elements or the skyline.'* I'm afraid that I just do not understand what the Applicant is trying to say.

10.2 As for the 'skyline', I referred in paragraph 6 of my Written Representation (REP1-155) to the Applicant's misleading statement about 'keeping off high ground' (APP-034 at page 79). For example, the Illustrative Masterplans clearly show panels along the Purwell Farm ridge. Parts of this ridge are shown on the 3rd and 4th photographs in my 'Nomination for location for an ASI' (REP2-121)

11. Q1.14.14 and Q1.14.15 Visual Effects – Construction and Operation

11.1 The Applicant responds by merely referring to the corresponding Landscape Effects question. To my understanding, even if the responses to the corresponding Landscape Effects questions have any merit, I doubt such merit could possibly extend to the corresponding Visual Effects.

11.2 A difficulty for us all is that despite my and others repeated requests for more viewpoints and photomontages, there are for example still none along Lower Road in the long stretch between viewpoints 22 and 30, and important current viewpoints such as 22, 24, 26, 33 and 39 still have no photomontages. I suspect that the Local Planning Authorities would have asked for more viewpoints if they had anticipated

that the Applicant would assert that the impact on the landscape and visual effects would be so modest.

11.3 In this context I also note Historic England's view that additional visualisations are required so we can better understand all impacts on the historic environment. I would add landscape and visual amenity to this as well.

12. Q1.14.16 Retention of hedgerows following decommissioning

12.1 The Applicant appears to accept that the current open views will be lost for ever. This is obvious but appears to need to be said, namely that one of the major reasons for walking in the countryside is to enjoy the distant views. Retaining the new hedging will remove many distant views for ever and will also change the informal hedging that characterises this countryside. In the flatter parts of the country such hedging might be appropriate but I do not believe it is in the undulating countryside in this part of the country, and it will create a different perspective to other adjoining areas outside the proposed Order boundary. It is for future generations to decide how they want the countryside to look and I don't think that our generation should be imposing such a degree of permanent change on one part, albeit a large part, of the Oxfordshire countryside whilst the rest continues in an informal way as now.

13. Q1.14.4 Residential Visual Amenity Assessment

13.1 Professional judgement and applicable guidance is said to have been used to determine a minimum 25m buffer zone from individual properties and settlements. An exception is said to be Purwell Farm (which I believe is owned by one of the Blenheim companies or trusts) where the Applicant says: *it was considered appropriate to have a greater buffer zone.* We are not told why or by how much.

MB 21/7/25