

Answers to Examiners' Written Questions 2 for deadline 4 (Aug 22nd 2025)

Question ExQ2.13.8

This is, of course, an unanswerable question, a Hobson's choice of the worst possible kind!

Choice 1: Yes, plant hedges:

Planting would NOT provide screening at eye level for at least 8 years - assuming it was watered and well managed (unlikely), before that it would be scrubby, unsightly with panels still visible. When fully grown the hedges would be overwhelming, ugly tunnels and would never be removed. The landscape as we know it would be lost forever.

Choice 2: No, leave panels exposed:

A horrible prospect for the next 40 years and it relies on the promise to remove all the infrastructure (including buried piles) and for the landscape to be restored as before and returned to agricultural use. None of this is guaranteed as I believe a bond to decommission and reinstate has not yet been agreed. I'll be dead in 40 years and my grandchildren will be nearing retirement but at least there's a chance that they - and future generations - will be able to enjoy the true rolling countryside in this area.

So, on balance, if forced, my answer would be "No, leave panels exposed" for the sake of future generations but please give serious consideration to the following points;

1. The question would not need to be asked if the Applicant had acted more responsibly in the first place and sited panels only in the less impacted, flatter and less highly visible areas in sympathy with the landscape rather than against it. The Applicant has acted with no regard to the landscape character and features (eg steeply contoured river valleys), the visual sensitivity or the reversibility of the impact on sensitive receptors.
2. ExA rule 17 letter (17th June) point 4 asks the Applicant to explain how they have applied the mitigation hierarchy. The Applicant's reply references only minimal avoidance (35 hectares near archaeological features plus one field near Blenheim and vague references to derisory 25 buffer zones and case-by-case individual properties on visual grounds). No mention of avoidance regarding PRow.
3. I still believe that Applicant's LVAA is flawed as has been pointed out by several key IPs (including OHA, WODC, and ICOMOS). These comments have been inadequately answered and the many calls to remove panels on landscape and visual impact grounds been ignored.
 - 3.1. How can the Applicant justify (in Chapter 8: Landscape and Visual Impact Assessment, November 2024. Para 8.6.80) that *"Due to the low level of the project, particularly the solar arrays, and proposed mitigation, there is no potential for any private views to be adversely affected to an extent that would result in a level of harm of Substantial, which trigger the threshold for an RVAA being required. As such private views are not considered further in this Chapter."*? I could identify half a dozen locations where panels would surround 2, 3 or even 4 sides of a property - some within 25m - which are highly visible for an unbroken distance of 1km or more! I am not a planner but I cannot understand how this can be assessed as anything less than a substantial level of harm?
 - 3.2. Oxfordshire Host Authorities, in their Local Impact Report, section 7.3 landscape and visual impact assessment (LVIA) summary, say; "The approach and methodology used in the LVIA [by the Applicant] (PD8-006) underplays the impact of the development" and, in paragraph 7.3.138, they add "The OHA consider that, following the revision of the application documents, many areas of solar panels need to be removed from the proposed development to prevent significant landscape harm."
 - 3.3. In their written representation (para 22) West Oxfordshire District Council note that "a landscape plan aimed at hiding the panels does not equate to mitigation" In paragraph 28 they add that "the removal of panels from land parcels adjacent to public rights away will be much more beneficial in reducing the visual impact of the proposed development and protecting views of the wider countryside". They provide a map showing the proposed areas for removal.

3.4. ICOMOS (in REP2-070) also considers that “parts of the current proposals are altogether unacceptable because they impinge too closely upon adjacent villages”. They go on to say; “It is as if the topography of the landscape has not been analysed, as if no independent landscape mind has been involved”. They also provide maps showing “areas unsuitable for solar panels” (REP2-071 to 074)

3.5. The only response made by the Applicant to any of the concerns raised at D2 is to refer to their Change request 2 (PD-011). But this which includes only minimal areas where panels would be omitted on Heritage, flooding and airport safety grounds. None of the changes refer to Landscape and visual amenity (LVA). The Applicant makes no response to any of the maps offered showing areas for omission on LVA grounds merely reverting to their mantra of “National need”

4. Further, this issue is not only about hedging and screening around PRowWs. Exactly the same arguments apply to the screening of properties.
5. Many of the residents living on or in very close proximity to the redline boundary (nearly 200 in total) have told me that being boxed in by high hedges within 25m of their boundary would be intolerable and overwhelming. Yet the Applicant has not been in touch with the majority of those affected to explain their plans or to ask the property owners’ opinions on whether “new vegetation” is acceptable mitigation for them. In their response to ExA’s Rule 17 Letter (17th June 2025), the Applicant names just one property they have considered (Purwell Farm which is owned by Blenheim, their willing landowner!). I could immediately name another 60 who should have been considered and contacted for their opinions.
6. In the unlikely event of the BWSF proposal going ahead and of no hedges being planted, I would suggest that there should be a huge increase in the amount of Community Benefit payable due the savings in supplying, planting and maintaining the hedges. Though, I would add that I have no confidence that any maintenance would be carried out anyway!
7. Ongoing Concerns relating to Visual Impact.

7.1. I still have serious concerns about the lack of a Residential Visual Amenity Assessment (RVAA) and the Applicant’s rebuttals of ExA’s Scoping Opinion that it should not be scoped out and I will read, with interest, the Applicant’s answer to ExQ2.13.15.

7.2. We still await the promised revised Glint & Glare (G&G) Assessment which ExA have had to ask for again - now due at deadline 4.

7.3. The Applicant has still not supplied maps (described as “available on request” in the original G&G report) to show exactly where “proposed vegetation” is apparently going to give instant screening to shield properties in the Central and Southern sites from glint and glare or, indeed, from overwhelming views of the panels glinting or otherwise! I asked for these in March 2024.

7.4. I would like to highlight one particularly worrying example of a property which would be overwhelmed by views of panels within 25m, stretching 1.5km down into Evenlode valley and up the other side but with the additional imposition of a proposed cycle path around 3 sides of the property which would seriously impact their privacy. It is not clear, from the plans available whether the cycle path would have “mitigation” hedging on one or both sides? The resident has their own well maintained 1.5m hedge and does not want to be overwhelmed by one or two further rows of 3-4m hedging. Nor should they have to endure a cycle track less than 25m away from their property. The Applicant has not consulted with the resident about their plans at all. Given the level of impact, this is totally unacceptable.



Legend	
Order Limit	
Inset Plan	
Existing Landscape Elements	
Ancient Woodland	
Mature Woodland / Scrub	
Existing Tree or Small Groups of Trees	●
Hedgerow	
Watercourse	—
Young Woodland	
Public Right of Way	—
Proposed Public Right of Way	- - -
Footbridge	—
Veteran tree	○
Proposed Landscape Elements *	
Areas of grassland beneath solar arrays **	
Areas of grassland not beneath solar arrays **	
Land Available for Community Food Growing Area	
New Hedgerow	
Reinforced Hedgerow	
Indicative Area for New Tree Planting	●
Woodland	
Cycle Path	- - -
Permissive Path	—
Ponds	
Buffer strip	
Bund	
Skydark Plot	

Answer to question ExQ2.9.4 Consequences of assessments

I totally endorse WODC's concerns about the applicant's methodology (particularly on landscaping) underplaying the effects arising from the proposed project, and I consider the applicant's rebuttals defending the decisions made to be very weak, playing their usual game of doing the minimum necessary within the law and relying on their mantra of "Climate Emergency and National Need caps all".

The mitigation to be adopted by the applicant is equally underplayed - indeed it is not even fully explained in regards to the impact on Residential Amenity. The areas where the mitigation proposals have been underplayed is close to the villages and to individual impacted properties, where they have hardly been considered due to the lack of an RVAA, and in the highly contoured areas of the Evenlode Valley and Tumbledown Hill, Cumnor where no amount of hedge planting can obscure the panels from sight.