

## Responses to the Examining Authority's Second Written Questions

### **2.5.5 Compulsory Acquisition – Land retention at Church Hanborough**

1) I have no recollection of any consultation for community food growing. Field 2.116 (marked in yellow) and the northern section of Field 2.115 (marked in light green) have been farmed by successive farmers, and continue to be farmed, for cereal and other crops. I do not believe that either field/part of field has a water supply.

The Legend to the plan at sheet 8 of AS-022 describes the light green land as: 'Areas of grassland beneath, not beneath solar rays are managed through conservation grazing, and to deliver BNG'. I would happily arrange for a farmer to graze sheep on this land and offered to purchase it both in the past and from the Applicant but to no avail. It seems clear to me that neither the light green land in field 2.115 nor the land marked yellow in fields 2.115 and 2.116 are required for the solar farm but should remain protected by the conservation area.

2) No.

3) I do not believe there is any tangible benefit to the applicant beyond dubious offers to both provide community food growing in 2.116 and take on 40 yrs responsibility 'to deliver BNG' in a small part of 2.115. In any event I believe it is likely that the Applicant would sell any DCO for others to build and operate the solar farm, whom I doubt would be much interested in either community food growing or supposed BNG in a tiny corner of a vast solar farm for which the Applicant already claims 80% BNG. And with little interest I doubt even that would last 40 years.

4) Yes

### **2.6.9 Cultural Heritage – Church of St. Peter and St Paul, Church Hanborough (Grade 1)**

The ExA says that it is minded to agree with HE's assessment that the project would not disrupt the views of the church spire or impact its landmark qualities, although as the ExA note HE also say that the project would erode the character of the church within its open agricultural setting. With respect to both the ExA and HE, the views of the church spire and its landmark qualities appear to me to be severely disrupted. An example is at viewpoint 38 looking down the 'tunnel' as shown in the photomontage at APP-078, Fig. 8.338. This shows clearly not only grey fields of solar panels but also two large white coffin shaped power converter stations in front of the narrow view of the church spire and tower. If this photomontage was more accurate it would also show further grey solar panels and white converter stations in field 2.115.

#### **2.9.4 Environmental Impact Assessment – Consequences of assessments**

I do not believe that the proposed mitigation comprising narrow buffer zones and extensive hedging would be adequate even for an assessment of effects of less than significant. The more so the greater the significance. Whether the significance is less or more, sensitive receptors need much more protection than is currently proposed.

My clear impression is that the proposed mitigation is the least that the Applicants hope to get away with. They started with panels and fencing almost up to the boundaries of sensitive receptors such as peoples' homes & gardens and ancient woods. Most of these have now been pushed back by only a few yards and fronted by new hedges so existing views would be restricted and even blotted out. If there have to be panels, fencing, converter stations near residences they should be upwards of 200 metres away.

Additionally if there is to be reasonable protection for conservation areas, listed buildings and other heritage assets, the quality of the existing views towards them from roads and footpaths should be retained as far as reasonably possible, the more so the greater the assessment of impact. Two examples show this:

1. The views of Church Hanborough in its elevated setting and its church spire from the southern end of Lower Road should not be blighted by panels, fencing and many power converter stations all the way from the roadside to the higher points of the upwards slope. The power converter stations alone are due to be up to 3.5m high and 14m long. There is an example of such a station near a PRoW at viewpoint 113 (Fig 51 at REP2-032). These, like the panels themselves, cannot possibly blend into the landscape as the Applicant appears to contend.
2. The view across the Evenlode Valley towards Church Hanborough from viewpoint 38 will be impacted by fields of panels, fencing and converter stations. The proposed hedging, when mature and in leaf aims to mask the immediate impact to the south but at the same time will turn the current open footpath with wide views across the valley into a narrow tunnel. (Fig 8.338 APP-078). This is the case whatever assessment of significance is considered, and the irony is that it is this PRoW that the Applicant proposes to connect Cassington with Church Hanborough. In order to at least reduce the tunnel effect of the footpath down from viewpoint 38, the pathway between the lines of new hedging should be much wider, and the proposed panels, fencing and converters within the wide view should be removed.

These are only examples but do support the Host Authorities and ICOMOS opinions that the Evenlode Valley is an inappropriate place for a solar farm and should be removed from the project whatever assessment is made of impact significance. The greater the significance the greater the need for protection both from and towards sensitive receptors.

#### **2.13.8 Landscape and Visual Amenity - Landscape mitigation and decommissioning**

I am not familiar with the 'current management guidelines' relied on by the Applicant for asserting that removal of the new hedging at decommissioning 'is unlikely to be recommended'. Since the ExA has not asked the Applicant to justify this assertion I am left wondering how the management guidelines could possibly have been intended to extend to many miles of new hedging planted not to enhance the landscape but as an attempt to reduce the impact of industrialisation by solar panels and accompanying equipment. If the intention of the management guidelines is to prevent the removal of ancient hedging that would be easy to understand and approve, but to grow new hedging to reduce views of industry and then say that when the industry goes 40 yrs later that all the hedges have to stay seems unlikely to have been in the minds of those either drafting or setting the guidelines. The more so when the new hedging will not follow the lines of the current ancient hedging with all its quiriness but rather will follow the Applicant's panel layout for maximum output.

If however the guidelines are as wide reaching as asserted by the Applicant, It is difficult to answer the ExA's question addressed to IPs as one of only two options, either no new hedging or leave the new hedging at 3m high after decommissioning. Both would be of high adverse impact to landscape, visual amenity and heritage settings. I have read paragraph 2.10.151 of NPS EN-3. It requires the Secretary of State to consider both the operating period (typically 40yrs – 2.10.149) and the extent to which the site will then return to its original state. However it also provides that such consideration has to be within the context of the impacts on landscape, visual effects and the settings of heritage assets.

So the starting point for me is the degree of impact on landscape, visual amenity and settings of heritage assets if the solar farm goes ahead as proposed. It is clear from a number of the ExA's other questions that it has reached the provisional conclusion that the impacts would be much greater than so far conceded by the Applicant. The clear evidence from the West Oxfordshire District Council and other Host Authorities and other expert bodies and individuals supports their opinion that some parts of the project should be omitted altogether because of the degree of damaging impacts to particularly valuable and vulnerable landscape, views and heritage.

In trying to answer the ExA's question therefore it seems to me that the only way of addressing the impasse is to remove the most sensitive areas from the project altogether much as proposed by WODC and other OHA. So far as other areas are concerned could new hedge planting be limited to those locations where the panels would be particularly oppressive leaving other locations without new hedging ? All this would be a compromise aimed at reducing the magnitude of the impact and protecting at least those areas identified by WODC and other OHA and others.

Any other answer to the ExA's question pits present generations against future generations, and also cannot take into account changes in attitudes, guidelines,

policies or politics over the next 40 yrs.. In order to protect as much as our generation can of the best countryside and at the same time recognise the importance of renewable forms of energy production I would support what has been said so persuasively by WODC and OHA.

In the question to all interested parties it is reassuring that the ExA recognises that the proposal would have visual impacts on the landscape. The degrees of impact vary in different locations, and include many very significant adverse impacts. Viewpoint 24 looking east across the Evenlode Valley and viewpoint 38 looking west across the same valley are but two examples of very significant impacts. Both are on PRoW and provide wide vistas which the project would destroy. If the existing hedge at viewpoint 24 is to be infilled this will eventually at least reduce the view, and if a new hedge is to be planted at and beyond viewpoint 38 the view would be limited to a narrow slit at the end of a tunnel as clearly shown on Fig.8.338 APP-038.

Regarding future maintenance either after maturity at 15 years or after decommissioning in 40 years, the likelihood of conscientious and regular maintenance, whatever is written into the documentation, seems to me to be slight. The reality is that whoever is by then farming the land will have their own way of looking after their land in the context of any management guidelines then pertaining.

#### **2.14.1 Noise and vibration – Cumulative noise in Public Rights of Way**

The ExA refers to ‘someone walking the full length of a path and being susceptible to multiple PCS units’. I believe that this point applies equally to landscape and visual impacts on someone walking the full length of a path. Even if the proposed hedges provide partial protection from views near and far from a path, the hedges will not be continuous and will include gaps not least for access between fields and views through when not in leaf. The impacts will be repetitive and therefore cumulative, and increase the adverse impact.

The ExA also raises the point about accumulation of impacts at question **2.6.7** in the further context of cumulative impacts on multiple heritage assets on other projects. So this issue of cumulative impacts is one that has general recognition.

MB 21.8.25