

The Forever Fields Community Art Project Team appreciates that the Planning Inspector has taken the points we made in the first Open Floor Hearing very seriously.

However, after several months of examination, and despite thousands of pages of additional paperwork from the applicant and landowner, Forever Fields still considers the application flawed.

It should not be recommended for approval.

We are however, mindful of the complexity of the issues being discussed and can understand the challenges facing the Inspector in reaching a decision to recommend approval or not.

With this in mind, our submission for Deadline 5 is solely focused on decommissioning and re-instatement in the event of a recommendation to approve.

This is because Forever Fields is about protecting the landscape for future generations and about how the landscape plays a vital role in our culture and sense of health and wellbeing. If approval is to be justified partly on the basis that it is 'temporary' there must be a clearer understanding of what decommissioning and re-instatement means and how it is to be funded. This is because without an agreed plan for what happens in 42 years time to restore the fields, the word 'temporary' is not suitable to describe what is being examined, and re-instatement will not be taken seriously by the applicant or the landowner.

In respect of PVDP and The Blenheim Estate, how seriously the definition of 'temporary' is taken will be measured in the context of investment and financial return. Neither party is proposing this scheme with civic priorities as their main ambition. If they are not held directly financially accountable for delivering a 'temporary' scheme it will be uncertain in 42 years time what will happen and there is the potential that green fields lost will be green fields lost forever.

To achieve certainty that the application is for 'temporary' use of the land, the applicant and the landowner must be held financially accountable for decommissioning and re-instatement, whether or not they are directly involved for the entire 42 year period.

Compulsory purchase of the land may otherwise remove any future commitment from the landowner. Equally, based on previous experience of the applicant's business model, the likely sale of the planning approval and CPO for the solar farm land prior to the build out, means that PVDP are also potentially absolved from any future commitment.

It is reasonable in this circumstance to make approval conditional on the creation of an escrow account for decommissioning and re-instatement with funds held independently. This fund could be added to as Botley West becomes operational, by insisting that ongoing contributions to the escrow account in the form of a percentage of profit are made annually to satisfy future cost liabilities.

It is difficult to estimate how much it will cost to decommission and re-instate the fields to their current condition if approval is given. However, there are various sources online that suggest decommissioning may cost between £40 - £50,000 per MW. This would suggest that Botley West may cost:

£45k X 840MW = £37.8m to decommission

If one considers the impact of inflation over the last 42 years - based on Bank of England calculators, one would need to apply a factor of 3.4 if similar inflation occurs over the next 42 years:

£37.8m x 3.4 = £128.5m.

It is reasonable to assume that restoration of this quality and scale of Greenbelt/Farmland adjacent to such rich heritage and landscape assets could cost even more:

At least £150m - £175m cost in 42 years time seems realistic.

It is reasonable to request at least half of this sum is paid into escrow at the point of approval. Based on a minimum £150m being required in 42 years time, and discounting that sum by the factor of 3.4 this would require:

£44.1m to be deposited into an independent escrow account on approval of the scheme.

(This also has the benefit of part ‘insuring’ against any ‘half-built’ scheme in the event of default or financial over-run which leads to the developer being unable to complete the build out.)

A proportion of the balance of funds needed could then be paid annually based on actuarial valuations each year.

We acknowledge that these numbers are our estimates based on information available online that is general rather than specific to the Botley West proposal. The applicant and the landowner will be able to resource the access of better quality information, and provide guidance to the Inspector as to the estimated cost of decommissioning and re-instatement in the case of Botley West.

The Forever Fields Team therefore request the Inspector asks the applicant and the landowner to provide guidance on this issue prior to making any recommendation for approval.

In addition, we request that using their cost estimates the applicant provides a detailed, fully funded plan to satisfy the Inspector that any recommendation for approval to the Secretary of State is based on a comprehensive plan for a ‘temporary’ scheme that holds as a condition, funding for decommissioning and re-instatement.

This would ensure that the application and approval can genuinely be described as ‘temporary’ and that the land will be FOREVER FIELDS.