



Begbroke and Yarnton Green Belt Campaign (BYG)

Deadline 6, BYG: Written Summary of Oral Submission Made at ISH2 by BYG representative, Dr. Alan Hearne

This submission summarises Dr. Hearne`s verbal contributions made on behalf of BYG at ISH2 and provides further comments which could not be made at the Hearing.

The items on the ISH2 agenda to which this submission relates were 3a - DCO; and 3d - Cultural Heritage.

1 Item 3a - DCO

1.1 We welcome the ExA`s decision to require the DCO to be amended to include a Decommissioning Fund (PD-015; PC002). The importance of decommissioning and securing the funding for this activity has been a significant element of BYG`s argument since its first appearance in our Relevant Representation (RR-0092). This view was reinforced by the Applicant's inadequate response to ExA`s questions at ISH1 (transcript part 3, from 01:05). It is anticipated that the Applicant will accept the amendment, and we need not repeat our arguments on this matter here. If it *is* rejected by the Applicant at D6, we will comment on the reasons given for the rejection in a further representation at D7 and summarise our views on this fundamental matter in our Closing Statement.

1.2 In REP3-084 we suggested that PART5: para 20(1) of the DCO should be modified by reducing the 5 years allowed to start the CPO process to 2 years. REP3-084 provided detailed reasons for this suggestion. However, the ExA has not included such an amendment in PD-015. Alternatively, we therefore suggest that consideration is given to including deliverable milestones in the 5 year period so that the OHA and/or SoS can review whether reasonable progress is being made. After 2 years the money required to execute the CPO might be provided and irretrievably ring-fenced. At year 3, a significant proportion of the total funding required for the construction of the scheme might be independently evidenced and monitored until a material start has been made on construction.

1.3 At ISH2 concern was expressed about the grid connection date slipping back to 2029. As PART 5: para 20(1) of the DCO is currently drafted, acquisition of the land by the Applicant will not even have been required by that time, let alone the connection of a functioning scheme to the grid.

2 Item 3d - Cultural Heritage

2.1 During ISH2 we drew the ExA's attention to two D6 representations already submitted by BYG. These have not yet been given a document number and may not have been read by the ExA before ISH2.

2.2 The first was a "*Comment on tor&co's representation on behalf of Blenheim Estate*" (REP5-063) regarding the impact of BWSF on the setting of the WHS (Receipt ref. 37741). This attached an eleven-page representation from Heritage England to Cherwell District Council (CDC) dated 31 July 2025. This representation criticised the inadequacy of tor&co's analysis of the heritage impact which was submitted as part of the Application for housing proposed by Blenheim Estates at South Perdiswell Farm in June 2025 (APP 25/01510/OUT). On the basis of this highly critical representation by HE we suggested in our own representation that tor&co lacks the authority to opine on BWSF as it does in REP-063. The speaker before our representative at ISH2 was Dr James Weir, representing BE. Dr Weir is the Technical Director responsible for heritage at tor&co. Not surprisingly, he repeated the approach taken in REP-063.

2.3 Having heard HE's comments at ISH2 about the impact of BWSF we suggest that the approach taken by HE in respect of the proposed development at South Perdiswell is materially different from this and deserves consideration by the ExA.

2.4 The second D6 representation by BYG that Dr Hearne referred to in respect of this matter was an *Addendum* to the first representation (Receipt ref. 37747). The purpose of this was to place before the Examination a letter from the Director of UNESCO (dated 17 September 2025) to the Ambassador of the UK Delegation to UNESCO which also concerned BE's proposed housing development at South Perdiswell Farm. It confirms that UNESCO and ICOMOS concur with HE's critical position on the Application. However, it goes further in a manner which is relevant and of significance to this Examination: "*ICOMOS has, however, noted the existence of other ongoing applications in the wider setting of Blenheim...which should be considered in assessing cumulative impacts in addition to those of the BWSF*".

2.5 Having introduced the UNESCO letter when Dr. Hearne spoke at ISH2, BYG was surprised to hear the Applicant suggest it has little relevance to forming an opinion about BWSF. In this regard and following the representations from HE and UNESCO, it is notable that CDC has moved the target decision date for the application for housing on land South of Perdiswell Farm from 29/9/25 to 28/2/26. We presume this is to ensure that the required additional heritage analysis is completed, although we do not yet know by whom.

2.6 As part of its argument about UNESCO the Applicant thought it appropriate to refer to Stonehenge and the Government decision in 2024 regarding putting the A303 in an adjacent tunnel. The *Stonehenge, Avebury and Associated Sites WHS* is the only other WHS in open countryside in the Southeast of England. The Applicant claims this was its primary area of search in its site selection process. The other WHSs are in urban areas: London, Bath and Canterbury. The Applicant wants us to believe that it could not avoid placing its desired solar farm adjacent to a WHS, despite the fact there are only two in open countryside in the Southeast, together comprising only about 3500ha.

2.7 Whatever the respective merits of Blenheim and Stonehenge in heritage terms, in terms of planning designation Blenheim is the only one of those two which abuts an area of Green Belt. On this basis, it can be argued that the Application Site is the most constrained solar farm site in the Southeast. [The presumption being that land inside either WHS could not be used.]

2.8 As we have indicated in several representations, starting with RR-0092, we believe that the Applicant's explanation of its site selection process lacks credibility. Perhaps before the SoS decides on any DCO made for BWSF he might like to pause and read the plaque at the entrance to Stonehenge (see photograph below in Annex 1).

"The UNESCO World Heritage Convention lists cultural and natural sites of Outstanding Universal Value which should be protected for the benefit of all humanity."

2.9 Anyone dealing with matters relating to historic assets would undoubtedly not support the Applicant's view that the opinion of UNESCO should be ignored. It seems to us that UNESCO rarely intervenes in detailed planning matters. The fact that UNESCO and ICOMOS have taken a detailed interest in developments proposed by BE around the Blenheim WHS is highly significant. Of similar significance is their view that there should be a cumulative impact assessment of all developments around the WHS. This is something that HE appears to support by virtue of its support for the ICOMOS technical reviews.

2.10 A third D6 representation already made by BYG is relevant to the topic of *"derivation of benefits to heritage assets"*. Our representation (uploaded on 21.9.25) commented on REP5-065 produced by Withers LLP on behalf of BE. Our analysis of this concluded *"...no firm evidence has been provided...that the WHS will obtain any additional benefit from the solar project."*

2.11 This representation did not refer to the 2006 Maintenance Fund mentioned in REP3-068. However, as the ExA specifically asked about it in ISH 2 (ISH2 Action point 15), our opinion continues to be that it provides no guarantee of the provision of additional funds from BWSF to the WHS. It does not therefore change the conclusion in our document already submitted.

Annex 1


