

This is a cosmetic, retrofitted, incomplete and inconsistent application which still does not comply with the assessments and rationale required for a unified, optimised design. Information was required and requested many times before and after submission to PINS and now to the Secretary of State.

Consequently, this application comes across as a bird's nest - with many layers of unsubstantiated and inconsistent statements piled on top of a plan with a non-existent design.

1. Alternative sites considered:

- a) The applicant initially sought a site of around 250 hectares and may have considered alternatives for this size of site.
- b) However, when offered 1,500 hectares of the historic Blenheim Estate, 70% on green belt, no alternatives were sought despite this use being specifically against the current management plan for Blenheim, and incidentally not supported by the Duke of Marlborough.
- c) PVDP have not built and operated a solar site of any size in Europe and active engagement in Japanese projects is unclear.
- d) The aim is to sell on and replace the Russian sourced funds from the proceeds.

2. Alternative cable sites:

- a) It is clear that alternative connections were not considered given the ludicrous subsequent claim that connecting to Cowley would involve digging under historic central Oxford when cables already run around the ring road, there was a possible connection at Tackley and the 400 kV line does a nice swoop round the south of Oxford on open countryside.
- b) The extended cable route, going under the Thames will cause months of chaos on a busy narrow road that is the only alternative when the A34 is blocked between Botley and Pear Tree.
- c) The unforgivable idea of panels on Tumbledown is perhaps to get the substation in this beautiful valley too.

3. Standard of Application

- a) No professional-standard Landscape Character, Heritage Impact, WHS Settings or Residential Visual Amenity assessments were undertaken before seeking approval from PINS. Requests were routinely ignored or in the case of RVAA denied.
- b) The poor quality of the submission is illustrated by the fact that landscape mitigation was limited to hedges to hide views of panels - and everything else, except of course panels on slopes. Impact on heritage is consistently undervalued.
- c) Impact on the WHS was limited purely to visual lines of sight, nothing about character, setting or experience.
- d) The setting was not considered for its own history, character and culture and the impact of size simply not addressed.
- e) Residential impact is measured only by distance from the panels without regard to topography or seasonal effects on vegetation.
- f) Inadequate consultation with householders, even with those within the unsupported argument for 250 metres, perhaps the work was largely desk based. Many not visited.
- g) Buffer zones initially offered as 20 metres with no justification for the distance. Some householders negotiated more; they need to be included in any more generous settlement but this is all unresolved.
- h) Impact on landscape ignored panoramic views in some of the most beautiful areas of the site perhaps because desk based. Comment from ICOMOS about the southern site ignored.
- i) The character of historic landscapes, the inter-relationship of ancient tracks, fields and farmhouses, grade 1 churches and monuments and the long-term impact of the loss of tenant farmers all ignored in the application to PINS.
- j) The remarks of ICOMOS in technical reviews shouldered off to the State Party. A landscape character assessment not seen as the developer's responsibility.

4. Interaction with the community

- a) Proposals for benefits for the community were set out without any consultation with local communities.
- b) Large areas allocated for growing vegetables were offered to Oxford based charities with no connection to the adjacent village, no plan for access, parking or toilets. No local consultation.

- c) Education centre proposed with access up a single-track road and then unfinished track, past a primary school, that could not be accessed safely by a coach. Again, no consultation.
- d) Vegetable growing area offered to a commercial grower in lieu of high yielding arable crops currently grown. No consultation with the adjacent village.
- e) Vast number of allotments 'for locals' who have more than enough already, with no consultation.
- f) No response to the concerns and proposals from Cassington Parish Council about flooding after the first inadequate proposals

5. Ecology

- a) Skylarks are abundant on the site. Applicant to arrange alternative sites suitable for skylarks. Presumably the current population on those sites will relocate.
- b) Applicants own documents point to the existence of numerous species of bats, some of which are on the international endangered species list. Insufficient research undertaken to allow appropriate mitigation for the differing needs of each species.

6. Flying Schools

How can an applicant responsible for such a vast site not contact the flying schools? The airport does not want to lose the flying schools but to quote the CEO, 'an accident is not a case of if but when'. The airport is responsible for 70,000+ movements a year, largely trainees from across the country.

The new documents now set out some of what still needs to be done, but few of these requirements have been realised, changes do not read across all the documents and some requirements are pushed into the DCO and onto the LPA.

How can anyone have confidence that this project will comply with regulations and the conditions of a DCO with the lack of compliance and competence demonstrated to date. What are the safeguards for the local community and the implications for Local Councils if a large firm with a powerful political lobby buys this half-baked scheme?