

CUMNOR PARISH COUNCIL

Planning Inspectorate

By email

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Contact:

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BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147

WRITTEN REPRESENTATION OF CUMNOR PARISH COUNCIL

Introduction

1. Of the 1,418ha of land for the three solar power stations proposed by PVDP, 81ha - comprising the whole of the applicant's southern power station and the applicant's southern part of cable routes between the central and southern power stations - is located in Cumnor Parish, which in turn sits within the administrative area of the Vale of White Horse District Council (VWHDC).
2. This letter, and its related documents, constitutes Cumnor Parish Council's (CPC) Written Representation (WR) to the Planning Inspectorate (PINS).

It updates CPC's position set out in its previous Relevant Representation, and provides the additional information requested by PINS during the 13th-15th May public sessions, that information to be submitted by June 4th 2025 (Deadline 1).

The related documents are identified at the relevant points in the text below. A summary list of all the documents can additionally be found in Appendix 1 below.

3. This document is 1480 words and so no executive summary is provided. However, as referred to in 2. above, it should be read in conjunction with a number of related documents, those documents being provided by CPC to PINS as email attachments, given PINS requirement for original documents, not hyperlinks.

As, with one exception, those documents form part of the made Cumnor Neighbourhood Plan (CNP), they are supplied here as previously provided to the Inspector for that Neighbourhood Plan examination process, and as published on the VWHDC website (hyperlinks can be provided if required).

4. The Cumnor Neighbourhood Plan became part of the VWHDC Development Plan on 6 May 2021 and carries full weight in the determination of planning applications. On 18 May 2021 was agreed to be made (adopted) and that it should continue to be part of the District Council's development plan.

Cumnor Parish Council's position on the PVDP application

5. CPC has concluded that the proposal for the Botley West Power Station is not acceptable and that the substation(s), High Voltage cables and solar arrays etc. proposed for this parish should be removed from the application.

This was set out in CPC's oral contribution to OFH 1 on 13th May, the text of which is one of the related documents described in 2. above (**Cumnor Parish Council - Submission to PINS OFH Session 1 Tuesday 13th May 2025.pdf**).

CPC's position is that the proposed development would have significant adverse impacts on the landscape character of the area, including on the openness and permanence of the Oxford Green Belt, CNP Important Views and PRoW, and its contribution to the understanding of nearby heritage assets, and above all, would negatively impact the lives of an unprecedented number of people.

The proposal will result in a significant change to the local rural context, amounting, in effect, to permanent industrialisation of the Oxford Green Belt with concomitant losses of habitat, ecology and BMV farmland.

6. This position is based on CPC's extensive analysis of the size and nature of the project, the size of the adversely impacted population living adjacent to it, its location in the Oxford Green Belt, the impact of the proposal on the character and appearance of the area, and the loss of access to open countryside it would entail.

Effects will be significant and wide ranging, including: permanent industrialisation of the Oxford Green Belt; landscape and visual impacts (including, at least in Cumnor, the loss of designated Important Views); loss of amenity; heritage, Public Rights of Way (PRoW), agriculture, pollution and nuisance impacts; traffic and road safety impacts during construction and decommissioning; and significant adverse effects on ecology and biodiversity.

Furthermore, CPC considers that as the applicant has failed to adequately assess or attempt to mitigate:

- 6.1. Flood Risk – see section 9. Below, and
- 6.2. Cumulative impacts – see section 10. below, and
- 6.3. Designing out Crime – see section 11. below

the application for the southern power station site should also be refused on those additional grounds.

- 7. In endorsing the VWHDC objection detailed in their Written Representation, CPC objects to the proposed Southern power station and its associated infrastructure as the proposals are contrary to CNP policies:

- 7.1. Design & Built Character policies DBC2, DBC4, DBC 6, DBC7;

- 7.2. Rural & natural Environment policies RNE1, RNE2;

- 7.3. Employment, Business & Community Facilities Policies EBC1, EBC2, and

- 7.4. Transport & Infrastructure Policy TI3.

- 8. The made Cumnor Neighbourhood Plan is supplied here as a related document **(Cumnor-Parish-Neighbourhood-Development-Plan-v7.0-07072021-min.pdf)**.

Additionally, as an aid to PINS, CPC also includes its CNP document explaining and depicting the Parish's Important Views – as referenced in CNP Policy DBC7 **(Cumnor-Parish-Neighbourhood-Plan-Important-Views-v1.5-16022021.pdf)**.

CPC believes this to be relevant for many reasons, not least that the applicant has not shown any evidence that the severe adverse impacts of the proposal on the relevant Important Views (1, 3, 5b, 7, 16, 20b, 23 and 31) has been objectively considered, as explored by the Examining Authority in its oral questioning of the applicant on its choice of visualisations and viewpoints.

Building on this, and as mentioned by CPC in its oral submission to OFH 1, CPC will be separately inviting the Examining Authority to visit the Parish, to walk the impacted PRoW and to see the designated Important Views for themselves.

NB: Since OFH1 and OFH2, where Oxford University made a similar invitation in respect of the Wytham Woods SSSI and the Hill End Outdoor Education Centre situated in this parish, CPC has been in contact with Oxford University and Hill End so that all parties are aware of each other's invitations.

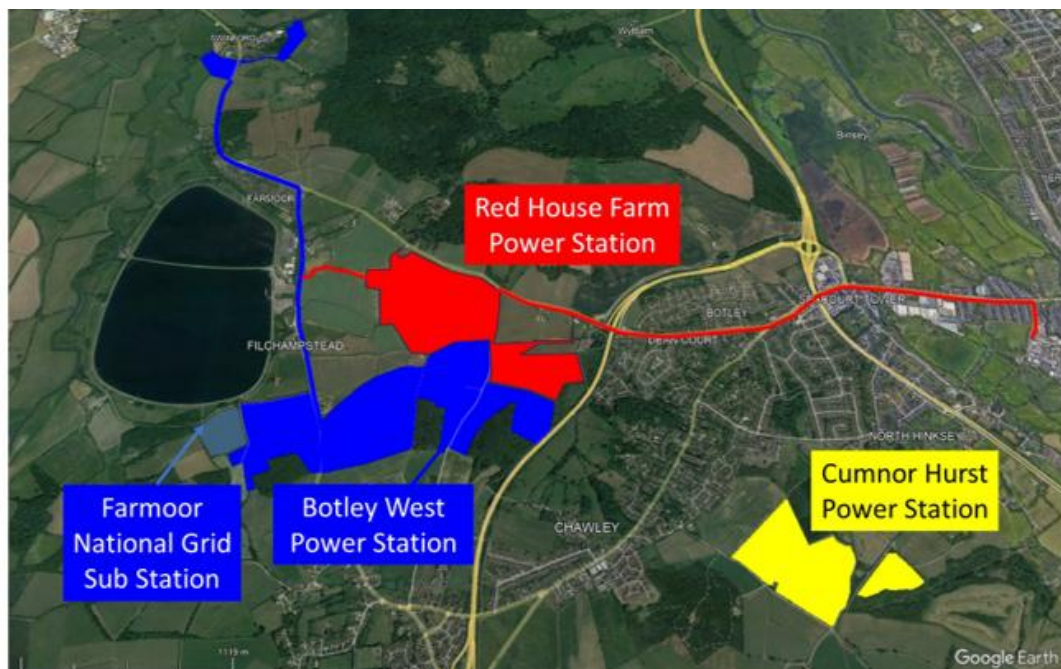
If PINS would find this helpful, CPC would be happy to help coordinate the relevant visits?

9. As CPC raised in its oral submission to the 13th May PINS Preliminary hearing, PVDP seems thus far to have ignored the detailed flood risk assessment commissioned by CPC, forming part of the evidence base for its made Neighbourhood Plan (and its Flood Risk Policies).

As requested in the 13th May Preliminary Hearing, CPC is here supplying that Flood Risk Assessment (**Cumnor-Parish-Neighbourhood-Plan-Flood-Risk-Assessment-September-2020**)

10. As CPC raised in its oral submission to the 13th May PINS Preliminary hearing, given the applicant's inadequate submissions, it remains concerned about how cumulative impacts of the Botley West power station, the Red House Farm power station (an immediately adjacent site with a current planning application to Vale of White Horse District Council under the Town and Country Planning Act) and the National Grid substation proposals will be assessed.

CPC notes that, to the best of its knowledge it is still the only entity to have mapped these cumulative impacts (see CPC Relevant Representation), and map below.



Furthermore, PVDP's application documents include only a partial account of the proposed Red House Farm Solar Power Station, whose site lies immediately adjacent to the applicant's proposed southern site.

Again, as requested on 13th May, CPC here provides the up-to-date VWHDC Planning application references for this proposal (these can be located at the VWHDC Planning portal on the VWHDC website: <https://www.whitehorsedc.gov.uk/>).

- 10.1. P22/V0144/SCR, P22/V2051/SCR and P22/V2581/SCO, these preceding
- 10.2. P23/V2624/FUL - application date 22/11/2023 withdrawn 31/07/2024
- 10.3. P24/V2489/FUL - application date 12/12/2024 currently under consideration

11. Since CPC submitted its Relevant Representation, it has further examined the PVDP application for evidence that 'designing out crime' has been addressed as required by NPPF policies 96(b) and 135(f).

Not finding that evidence (and no evidence being provided orally by the applicant at the May public hearings), CPC – as it did at the Preliminary Hearing – draws PINS attention to the published Thames Valley Police response to both the Red House Farm power station applications (P23/V2624/FUL and P24/V2489/FUL).

This warns about solar power stations increasingly acting as a magnet for organised crime, and the inadequacy of that applicant's proposed 'deer proof' fencing, the same fencing as currently proposed by PVDP for their sites, also situated within Thames Valley Police's area. **(2025-03-28 Response TVP Designing Out Crime Officer.pdf)**

12. CPC noted in OFH Session 2 that the Examining Authority asked Hanborough Parish Council whether it had any character assessments related to that council's oral submissions about impacts on landscape and the setting of the Church Hanborough Conservation Area.

CPC does have such character assessments, published by VWHDC on their website as part of the made Neighbourhood Plan, and so assessed by the Inspector during his plan examination. These relevant documents are attached to this letter:

Cumnor-Village-Character-Assessments-Final-v2-Jan-2019.pdf,
Farmoor-Character-Assessment-Final.pdf,
Cumnor-Parish-Character-Assessment-September-2020.pdf,
Cumnor-Neighbourhood-Plan-Landscape-Character-Assessment-September-2020.pdf

Appendix 1

List of relevant documents supplied as email attachments to PINS by Deadline 1 (June 4th 2025)

1. This document (Cumnor Parish Council Written Representation Ref EN010147 30th May 2025.pdf)
2. Cumnor Parish Council - Submission to PINS OFH Session 1 Tuesday 13th May 2025.pdf
3. Cumnor-Parish-Neighbourhood-Development-Plan-v7.0-07072021-min.pdf
4. Cumnor-Parish-Neighbourhood-Plan-Important-Views-v1.5-16022021.pdf
5. Cumnor-Parish-Neighbourhood-Plan-Flood-Risk-Assessment-September-2020.pdf
6. 2025-03-28 Response TVP Designing Out Crime Officer.pdf
7. Farmoor-Character-Assessment-Final.pdf
8. Cumnor-Village-Character-Assessments-Final-v2-Jan-2019.pdf
9. Cumnor-Parish-Character-Assessment-September-2020.pdf
10. Cumnor-Neighbourhood-Plan-Landscape-Character-Assessment-September-2020.pdf