

# CUMNOR PARISH COUNCIL

Planning Inspectorate

By email:

BotleyWestSolar@planninginspectorate.gov.uk

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Contact:

██████████ (Clerk)

clerk@cumnorparishcouncil.org.uk

**EN010147**

## **Cumnor Parish Council submission in response to ExA 1<sup>st</sup> written questions**

### **1. Introduction**

This document contains Cumnor Parish Council's (CPC) responses to 4 questions posed in ExA 1<sup>st</sup> Written Questions.

Specifically, it provides one response to 1.1.5, information shared with CPC by Layla Moran MP relevant to the Examining Authority's question 1.3.3, three responses to question 1.5.8 (one prompted by comments from residents) and one response to 1.14.6.

### **2. Question 1.1.5**

Although Question 1.1.5 is addressed to local authorities, CPC wants to make the ExA fully aware of the applicant's partial response to cumulative solar power station projects in this Parish. This reflects the deep disquiet felt by residents that this issue is in danger of being, at best, ignored.

CPC therefore thanks the ExA for the opportunity to list:

#### **2.1. Proposed co-located National Grid substation**

In the context of the inadequate consideration of cumulative impacts considered by the applicant thus far, CPC thanks ExA for raising questions 1.3.2, 1.3.8, 1.3.14, 1.8.4, 1.11.15, 1.14.7 and 1.18.2.

CPC also draws the ExA's attention to its answer to question 1.3.3 below.

## 2.2. Proposed co-located 49MWe Red House Farm solar power station

This proposed 65Ha solar power station connecting to the Grid at Osney Mead (not Cowley) in West Oxford, is currently a live application to the Vale of White Horse District Council (VWHDC) under the Town and Country Planning Act, and has been since 2022.

Details were included in para 10 of CPC's Written Submission (**EN010147-000887-Cumnor Parish Council Written Representation Ref EN010147 30th May 2025**) and are briefly summarised below, where the VWHDC Planning application references for this proposal can be located at the VWHDC Planning portal on the VWHDC website: <https://www.whitehorsedc.gov.uk/>.

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- P23/V2624/FUL - application date 22/11/2023 withdrawn 31/07/2024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

The inadequacy of the applicant's consideration of this proposed power station is also addressed by CPC in its submission to ExA for Deadline 2 requesting an accompanied site inspection.

## 2.3. Proposed floating solar power station on Farmoor Reservoir

This 2MWe proposal by Thames Water states on its website that *'We hope to be in a position to start building in autumn 2026. Construction is expected to last around 16 weeks.'*

As far as CPC can ascertain, PVDP has failed to consider this proposal at all.

More details can be found on the Thames Water website at [www.thameswater.co.uk/about-us/projects/clean-power-at-farmoor-reservoir](http://www.thameswater.co.uk/about-us/projects/clean-power-at-farmoor-reservoir).

## 3. Question 1.3.3

Although Question 1.3.3 is addressed to the applicant, as CPC is in possession of recent relevant information, it wants to take this opportunity to share it with the ExA.

CPC notes that the ExA's question includes:

*'National Grid have suggested that an application for their substation under the Town and Country Planning Act regime would possibly be made in 2026. No exact timetable is provided and, with the prospect of appeals or judicial reviews as a potential delaying factor, the likelihood of the National Grid substation being constructed fully and ready to receive the proposed development is in doubt.'*

In a letter from National Grid to Layla Moran MP (her constituency includes Cumnor Parish), dated 19<sup>th</sup> June and shared by her with CPC on 23<sup>rd</sup> June, the National Grid Community

Relations Team for the proposed Farmoor substation (i.e. not called Botley West as there is no such place) state:

‘Our indicative project timeline is as follows:

<b>Early 2024</b>	Potential site selection
<b>Autumn 2024 onwards</b>	Site surveys
<b>Early 2026</b>	Public consultation (28 days)
<b>Late 2026</b>	Planning submission
<b>Summer 2027</b>	Construction starts
<b>Late 2029</b>	Construction completed

We will be launching a project website in the coming months, which will display useful information about the project for the public. We will share the link with you when it is live.’

CPC notes that this information doesn’t correspond with that from the applicant, who has referenced a proposed operational date of 2028.<sup>1</sup>

CPC therefore welcomes the ExA question on this matter, and would support the imposition of a Grampian style requirement as described in Question 1.3.3.

#### 4. Question 1.5.8

##### 4.1. Issue 1: Scale and accuracy of maps provided

At a recent public meeting in the Parish, and by email, a number of residents have raised an issue of the accuracy of the redlines depicting the DCO boundary in the Land Plans.

Specifically, there is concern that the scale of the maps provided, combined with the thickness of the red line as shown, effectively limits the accuracy of the application’s boundaries to  $\pm$  a few metres (c. 2-3m in some cases).

This level of accuracy is insufficient for landowners, who need to understand the potential impacts on their properties with greater granularity than the applicant is currently providing. This applies, for example, to TPO trees, tree roots, boundary walls, etc.

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<sup>1</sup> CPC is happy to share the National Grid and Layla Moran MP emails with ExA should they wish.

## 4.2. Issue 2: Human Health

CPC remains concerned about the applicant's assertion relating to human health. This was first raised to CPC's knowledge by PINS in the July 2023 Scoping Opinion (**EN010147-000012-EN010145 - Scoping Opinion**) ID 3.15.4 on pp47.

The applicant is now offering its assessment of human health, referred to in the Book of Reference and in more detail in Chapter 16 of the ES (**EN010147-000382-EN010147\_APP\_6.3 - ES Chapter 16 - Human Health**).

CPC understands that the applicant is basing its 'clean bill of health' on the populations considered, these being defined on pp23 of **EN010147-000382-EN010147\_APP\_6.3 - ES Chapter 16 - Human Health**

However, para 16.4.10 of that document:

- fails to list Farmoor and Cumnor Village parishes within the 'site specific' populations for the 'arrays and cable corridor',
- lists the non-existent 'Cumnor' ward as a site specific population for the 'substation' (but which substations?)
- and states that *'the local population is defined using the district areas of... Vale of White Horse (for the substation)'*

This both ignores the fact that within the district area of Vale of White Horse the applicant proposes to locate panels and other built elements and again, fails to specify which substation(s).

Given these basic and regrettable errors, the subsequent assertions on human health impacts must be assessed as having a very low degree of credibility.

As CPC has previously pointed out many times, within its Parish the cable routes, panels and built elements are adjacent to homes (e.g. the cable route being immediately on the boundary of properties along the B4044 and B4017), businesses (including a children's nursery and veterinary hospital on the B4017) and public buildings (e.g. the Farmoor Village Hall).

As far as CPC can ascertain within its limited resources, the applicant has failed to address this despite depicting these receptors on its Land Plans (**EN010147-000642-2.4 Land Plans (Rev 1)**).

## 4.3. Issue 3: Designing Out Crime

A simple search for the word 'crime' returns no matches from either the Book of Reference (**EN010147-001003-4.3 Book of Reference - Tracked Version**), the Statement of Reasons (**EN010147-000624-4.1 Statement of Reasons (Tracked) Rev**

1), nor the Environmental Statement Contents & Glossary (**EN010147-000365-EN010147\_APP\_6.1 - ES Contents and Glossary**)

The word 'crime' features just twice in the Human Health chapter of the ES (**EN010147-000382-EN010147\_APP\_6.3 - ES Chapter 16 - Human Health**), both times in a quote of NPPF Policy 96 ('Summary of NPPF Requirements' Table 16.5 page 12)

CPC notes that Table 16.5 fails to quote NPPF para 135(f) and also fails to address completely the '*crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience*' text of both NPPF paras.

This is another regrettable oversight.

**CPC requests the ExA requires the applicant to undertake the full tests required by paras 96(b) and 135(f) of the NPPF.**

These tests should be performed with especial regard to the document provided by CPC to the ExA at Deadline 1 authored by Thames Valley Police (**EN010147-000885-2025-03-28 Response TVP Designing Out Crime Officer**) at the request of VWHDC for the proposed immediately adjacent Red House Farm solar power station application in this Parish.

This warns about solar power stations increasingly acting as a magnet for organised crime groups, 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.

**Can the ExA require the applicant to engage with Thames Valley Police as VWHDC has proactively done?**

**As a second order effect CPC also requests that the ExA require the applicant to re-assess their assertions on 'openness' and 'mitigations' should their currently proposed open mesh 'deer proof fencing' be substituted by the industrial LPS 1175 Issue 8 Security fencing which Thames Valley Police say is '*the minimum requirement for a Solar Farm.*'**

## **5. Question 1.14.6**

Although 1.14.6 is addressed to local authorities and CPC understands Vale of White Horse District Council (VWHDC) will also be responding to this question, CPC wanted to respond:

- To emphasise the importance CPC places on the applicant providing a comprehensive, representative and accurate set of viewpoints and photomontages, it having failed to do so thus far despite comments made by PINS in 2023 in the EIA Scoping Document (**EN010147-000012-EN010145 - Scoping Opinion**), and

- to illustrate the significance of the made Cumnor Neighbourhood Plan Policy DBC7 on Important Views, these designated Views also featuring in CPC's 2<sup>nd</sup> submission for Deadline 2, inviting the Examiners to an Accompanied Site Inspection.

ExA question 1.14.6 states:

***'Viewpoints and Photomontages***

*Notwithstanding any consultations already received, are you happy with the number, range and direction of views provided and also with the number and range of photomontages? If not, please indicate the location and direction of other views that you feel are important, or if already provided at DL1, please signpost these. '*

CPC has examined document **EN010147-000397-EN010147\_APP\_6.4 ES - Figure 8.9-8.11 - Representative Viewpoint and Photomontage Locations**, in particular page 3 of that document which depicts Cumnor Parish<sup>2</sup>.

CPC has then compared that evidence with that in its made Cumnor Neighbourhood Plan (CNP), in particular the Important Views detailed in CNP Policy DBC 7 (page 34-36 of the Neighbourhood Plan submitted to PINS for Deadline 1 as **EN010147-000890-Cumnor-Parish-Neighbourhood-Development-Plan-v7.0-07072021-min**).

These Important Views are additionally mapped, described and photographed in the accompanying Important Views Report (submitted to PINS at Deadline 1 as **EN010147-000892-Cumnor-Parish-Neighbourhood-Plan-Important-Views-v1.5-16022021**).

**Using this evidence CPC requests that the ExA require the applicant to:**

- provide photomontages for additional existing viewpoints, where not yet provided. The table below (Table 1) lists the viewpoints chosen by the applicant (running from West to East) and any relevant adjacent CNP Important View.
- Provide new additional viewpoints and accompanying photomontages. (Table 2)

These new proposed 'applicant viewpoints' are all CNP Policy DBC 7 Important Views.

They have not so far been identified by the applicant as the site for one of their viewpoints, and so not considered at all, let alone for a photomontage.

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<sup>2</sup> CPC notes that the ZTV assumes a National Grid substation height of 12.5m. Other documents list this as 14m

<b>Applicant Viewpoint Number</b>	<b>Relevant Cumnor Neighbourhood Plan Important View W→E</b>	<b>Comments</b>	<b>Has photomontage ?</b>	<b>Requires photomontage ?</b>
45	20b	Location for BBC1 TV Countryfile episode from Farmoor Tx 6/01/25	✗	✓
43	4	Viewpoint pointing north (why?) but Important View looks south	✗	✓
51	31	On PRoW next to Upper Whitley Farm	✗	✓
50		On PRoW	✓	
47		On PRoW (Oxford Green Belt Way)	✗	✓
52		On B4017	✗	✓
46			✓	
53	3		✓	
48	16		✓	
54			✓	
55	24	Several hundred metres from edge of ZTV according to applicant	✗	
49		On PRoW (known locally as Denman's Lane)	✗	✓
44	23	On PRoW	✗	✓

**Table 1**

**Applicant viewpoints, CNP Important Views and photomontages**

<b>Applicant Viewpoint Number</b>	<b>Relevant Cumnor Neighbourhood Plan Important View W→E</b>	<b>Comments</b>	<b>Requires photomontage ?</b>
Viewpoint required	17	View oriented in wide arc centred on SSW direction - see pp24 of <b>Important View report</b> submitted for Deadline 1	✓
Viewpoint required	1	Viewpoint in arc from south to west adjacent to Rough Copse on edge of Wytham Woods SSSI - see pp7 of <b>Important View report</b> submitted for Deadline 1	✓
Viewpoint required	7	View from Leys Road (also a PRoW) oriented in wide arc with northerly centre - see pp13 of <b>Important View report</b> submitted for Deadline 1	✓
Viewpoint required	5b	View looking south from Denman's Lane PRoW at its junction with B4044 and PRoW to Hill End Outdoor Educational Centre - see pp11 of <b>Important View report</b> submitted for Deadline 1	✓

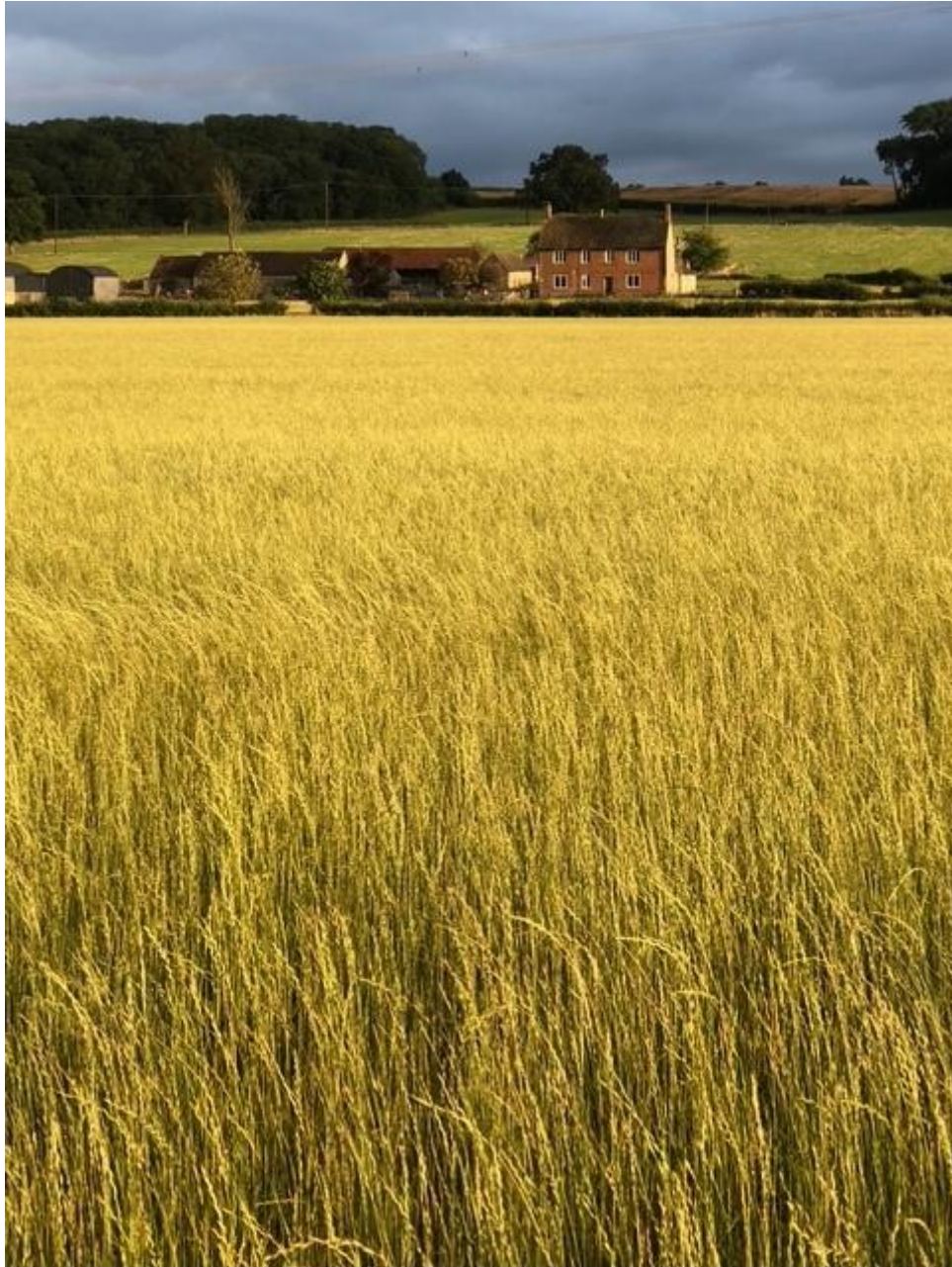
**Table 2**  
**Additional proposed applicant viewpoints and photomontages**

**CPC also requests the ExA to require the applicant to confirm that all depictions of viewpoints and photomontages conform to the requirements (focal length etc.) for such applications.**

Feedback from local residents following prior PVDP consultation events and CPC's experience examining documents submitted by the applicant cast doubt on the accuracy and fidelity of those photos and photomontages so far provided. In essence the views as depicted don't look like that!



As one example of what they do look like, please see below the view looking north from the PRow 184/22/20 to Denman's Farm, a building that would be surrounded on 3 sides by panels and other built elements, including a security fence and CCTV.



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Cumnor Parish Council

26<sup>th</sup> June 2025