

# CUMNOR PARISH COUNCIL

Planning Inspectorate

By email

22<sup>nd</sup> August 2025

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## **BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147**

### **Cumnor Parish Council's Comments on Submissions received at D3**

#### **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 submission, constitutes Cumnor Parish Council's (CPC) comments on Submissions received at D3.

It should be read in combination with CPC's two other Deadline 4 submissions: the first copying in the ExA on CPC's response to PVDP's 30-day consultation on proposed changes (**Cumnor Parish Council D4 Comments on Submissions received at D3 - Consultation on proposed changes Ref EN010147 v1**), the second comprising CPC's comments on the Applicant's draft ASI itinerary (**Cumnor Parish Council D4 Comments on Applicant's draft ASI itinerary Ref EN010147 v1**).

CPC documents submitted to the Planning Inspectorate (PINS) for Deadlines 1, 2 and 3 can be found at the end of this document in Appendices 1, 2 and 3 respectively.

## Cumnor Parish Council's comments

3. The following comments refer to the applicant's submission for D3 '*Applicant's comments on Interested Parties' Responses to ExA's First Written Questions (ExQ1) Submitted at Deadline 2'* (**EN010147-001425-13.3 Applicant's comments on Interested Parties' Responses to ExA's First Written Questions (ExQ1).pdf**)
4. Q1.1.5 page 2: CPC assesses from the applicant's further response, that in July/August 2025 they have decided that they have no intention of undertaking a cumulative assessment of a planning application made on 22<sup>nd</sup> November and registered on 12<sup>th</sup> December 2024<sup>1</sup> for an immediately adjacent solar power station.

### Is this assessment correct?

5. Q1.3.3 pages 3-4: CPC notes that the applicant's answer does not address the fact that the information supplied by NGET and the applicant do not correspond.

The applicant characterises the 19<sup>th</sup> June NGET response to Layla Moran MP as a '*precautionary assumption*' while NGET describe it as their '*indicative project timeline*'. These are not one and the same.

The applicant further refers CPC to '*an agreed position in the Statement of Common Ground*'.

However, this document (Botley West Solar Farm STATEMENT OF COMMON GROUND – NATIONAL GRID ELECTRICITY TRANSMISSION PLC EN010147/APP/11.7/6 July 2025 **EN010147-001380-Botley West\_SoCG\_NGET\_V1.pdf**) states that there is no agreed position on a connection date.

Instead, this document reveals yet another position which is not referenced by the applicant in their response to ExA, namely that (page 11) the connection date is not agreed but is '*in discussion*', with the comment that:

*'October 2027 is the current grid connection offer date. However, this is likely to be varied to a new connection date. This is being discussed between the parties.'*

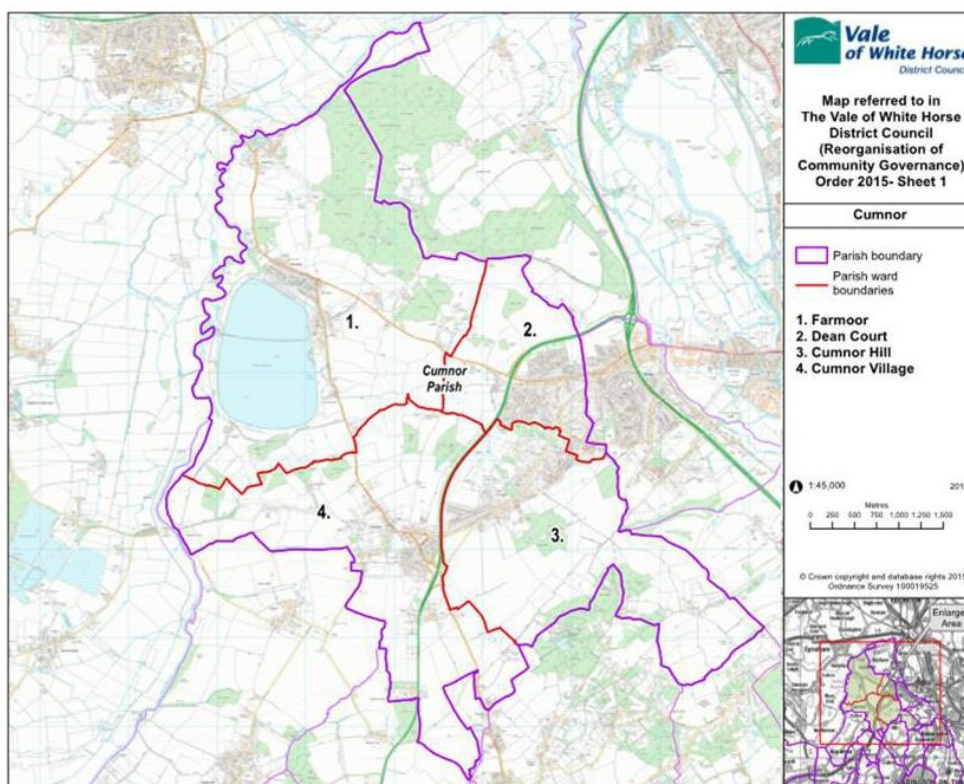
6. Q1.5.8 page 4 issue 1: CPC is disappointed by the dismissive nature of this response which doesn't address the concerns and difficulties expressed by residents.
7. Q1.5.8 page 4 issue 2: at the risk of boring ourselves and the ExA through repetition, CPC would appreciate it if the applicant didn't double down on inaccurate information when challenged.

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<sup>1</sup> <https://data.whitehorsedc.gov.uk/java/support/Main.jsp?MODULE=ApplicationDetails&REF=P24/V2489/FUL>

As previously stated – and repeated here – there is no such ward in Cumnor Parish as ‘Cumnor ward’ and the proposed NGET substation in any case is proposed to be sited in Farmoor ward.

Please see map from Vale of White Horse District Council (VWHDC) below that also features in Cumnor’s made Neighbourhood Plan on page 7 – a document the applicant claims to have ‘considered’.



This isn’t just a nomenclature issue but illustrative of a more fundamental problem with this application: namely erroneous and partial information being used to ‘evidence’ significant assertions – such as this one on human health.

**CPC draws the ExA’s attention to the fact that there seems to be a theme running here of unevidenced assertions and inaccurate information from the applicant that is simply reiterated when challenged.**

8. Q1.5.8 page 4 issue 3: Another example of ‘doubling down’.

The applicant continues to ignore the question posed, by repeating prior statements about a lack of response from two entities with no remit in this subject: the TVP Police and Crime Commissioner<sup>2</sup> (an elected political post responsible for holding the Chief

<sup>2</sup>

Constable to account for the performance of the force) and the Thames Valley Resilience Forum<sup>3</sup> (a multi-agency body established to respond to emergencies)

This does not inspire trust and confidence.

That level of trust and confidence is further eroded by the applicant's apparent inability (or unwillingness) to engage with the one body that does provide Designing Out Crime advice to the Secured by Design<sup>4</sup> standard that all the local authorities in Oxfordshire seem to be able to successfully engage with; namely Thames Valley Police Designing Out Crime team.

To help the applicant, their contact details are here on the Secured By Design website:

[REDACTED]

**Can the ExA require the applicant to so engage, so that there is an expert opinion on the 100+km of fencing, CCTV etc that the applicant is proposing to install across rural Oxfordshire?**

9. Q1.14.6 page 7: the woeful content of this response by the applicant – mirroring previous equally unevidenced answers – only grows over time, not least because of the proposed changes (numbers 3, 6 and 11) that CPC has responded to in the inadequate consultation running between 23<sup>rd</sup> July and 22<sup>nd</sup> August.

**That the applicant continues to assert the invisibility of the project in a landscape with extensive panoramic views, rather than engaging with interested parties (in this case including CPC, VWHDC and Layla Moran MP) is surprising, and maybe something ExA would want to probe further?**

See also, for example, CPC's proposed Accompanied Site Inspection (**EN010147-001137-Cumnor Parish Council - Nominations for any locations for an Accompanied Site Inspection (ASI), including the information requested in Annex B of the Rule 6 documentation, under 'Site Inspections'.pdf**), its D3 comments on suggested locations for ASI (**EN010147-001334-Cumnor Parish Council - Comments on the suggested locations to be included in any ASI.pdf**) and its D4 submission (**Cumnor Parish Council D4 Comments on Applicant's draft ASI itinerary Ref EN010147 v1.pdf**)

10. End

Cumnor Parish Council  
22<sup>nd</sup> August 2025

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## **Appendix 1**

### **List of relevant documents supplied as email attachments to PINS by Deadline 1 (June 4<sup>th</sup> 2025)**

1. Cumnor Parish Council Written Representation Ref EN010147 30<sup>th</sup> 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

## **Appendix 2**

### **List of relevant documents supplied as email attachments to PINS by Deadline 2 (July 1<sup>st</sup> 2025)**

1. EN010147-001137-Cumnor Parish Council - Nominations for any locations for an Accompanied Site Inspection (ASI), including the information requested in Annex B of the Rule 6 documentation, under 'Site Inspections.pdf
2. EN010147-001136-Cumnor Parish Council - Responses to Examining Authority's First Written Questions (ExQ1).pdf

## **Appendix 3**

### **List of relevant documents supplied as email attachments to PINS by Deadline 3 (July 22<sup>nd</sup> 2025)**

1. EN010147-001336-Cumnor Parish Council - Comments on responses to the Examining Authority's First Written Questions (ExQ1).pdf
2. EN010147-001335-Cumnor Parish Council - Comments on any submissions received at D2.pdf
3. EN010147-001334-Cumnor Parish Council - Comments on the suggested locations to be included in any ASI.pdf