

# CUMNOR PARISH COUNCIL

Planning Inspectorate

By email

22<sup>nd</sup> August 2025

Contact:

██████████ (Clerk)

clerk@cumnorparishcouncil.org.uk

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

### **Cumnor Parish Council's Comments on Submissions received at D3 - Consultation on proposed changes**

#### **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 cover note, and its related document (pages 2-5), is copied by Cumnor Parish Council (CPC) to the ExA in addition to its submission to the applicant, as required.
3. CPC's decision to copy ExA into the consultation response reflects its experience with this consultation and prior consultations.

This has resulted in it assessing that it has a zero to very low degree of confidence in the consultation process, and in the applicant's ability to provide the ExA with a complete and accurate account of CPC's response, which includes requests for more information, and for an updated LVIA and a noise envelope assessment be carried out in respect of Change 11.

4. CPC's response to the applicant can be found on pages 2-5, and the applicant's letter to Council, received 9 days after the start of the Consultation, in Appendix 1.

Cumnor Parish Council

22<sup>nd</sup> August 2025

# CUMNOR PARISH COUNCIL

PVDP: info@botleywest.co.uk

Contact:

By email

██████████ (Clerk)

22<sup>nd</sup> August 2025

clerk@cumnorparishcouncil.org.uk

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

### **Cumnor Parish Council's response to the applicant's consultation (23<sup>rd</sup> July 2025-22<sup>nd</sup> August 2025) on proposed changes**

#### **Cumnor Parish Council's comments on the consultation process**

1. Your letter (**Proposed changes to the Botley West Solar farm DCO Application**) dated 23<sup>rd</sup> July – the start date of the consultation - was sent by post (not by email as other communications) to the Cumnor Parish Council (CPC) PO Box, and was received at some point during Friday 1<sup>st</sup> August, 9 days after the start of the consultation period.
2. Therefore, CPC was not in a position to consider the letter until Monday 4<sup>th</sup> August. We can supply minutes of our 4<sup>th</sup> August meeting to confirm this should you so wish. This was some 12 days after the start of the 30-day consultation.
3. This alone is sufficient for CPC to believe that the consultation as described by you to ExA cannot meaningfully take place.
4. CPC further doubts that this consultation can meaningfully take place without the photomontages etc. requested in **Cumnor Parish Council's Comments for Deadline 3 on responses to Examining Authority's 1<sup>st</sup> written questions (ExQ1)** being available.
5. In addition, your 23/07 posted letter to CPC (Appendix 1) includes no details on how consultation responses will be assessed by you.
6. Contrasting with the incomplete information provided by you are your repeated assertions (in **EN010147-001239-Applicant's Change Request 2 Notification (Rev 0).pdf**) that for all three of your proposed changes in this Parish:

*'overall there is unlikely to be any new or materially different significant environmental effects'*

These repeated assertions are unevidenced, a common theme.

7. So, against a background of unsatisfactory prior consultations, CPC has assessed that it has a zero to very low degree of confidence in this new consultation and in your ability to provide the ExA with a complete and accurate account of this response.
8. Given 7. above Cumnor Parish Council agreed at its 4<sup>th</sup> August meeting that it will also copy this consultation response to the ExA, so that there can be no doubt as to the nature and extent of this response.

### **Cumnor Parish Council's comments on the proposed change 3**

9. The proposed position of the main Project substation places it immediately adjacent to PRoW 184/30/40 and 184/29/10 and within a few metres of 184/30/20 (the Oxford Greenbelt Way).

As such, and given its permanent, not 'temporary', nature it will irretrievably change the kinetic experience of walking those PRoW; the setting of Upper Whitley Farm (Grade II) (see also para 9 - **ExA q1.6.29** - in **EN010147-001336-Cumnor Parish Council - Comments on responses to the Examining Authority's First Written Questions (ExQ1)**); will be visible to recreational users of Farmoor Reservoir, and will be completely visible, with no possibility of mitigation given elevation changes, from Cumnor Neighbourhood Plan (CNP) Important Views 3, 7 and 31.

In light of these facts and of para 6. above, CPC does not believe the applicant's conclusion in respect of proposed change 3 (in **EN010147-001239-Applicant's Change Request 2 Notification (Rev 0).pdf**) that:

*'overall there is unlikely to be any new or materially different significant environmental effects compared to those already reported. '*

### **Cumnor Parish Council's comments on the proposed change 6**

10. The applicant's proposed change of an additional 2.41ha of panels would place the panel arrays immediately adjacent to PRoW 184/22/20 to its south and west.

The proposed immediately adjacent Red House Farm solar power station plans to install panels, fencing, CCTV etc. to the north and east of the same PRoW (see for example para

10 in CPC's Written Representation - **EN010147-000887-Cumnor Parish Council Written Representation Ref EN010147 30th May 2025**).

The cumulative impact, which the applicant has repeatedly failed to address (see for example para 2.2 of **EN010147-001136-Cumnor Parish Council - Responses to Examining Authority's First Written Questions (ExQ1)** and para 10 of **EN010147-000887-Cumnor Parish Council Written Representation Ref EN010147 30th May 2025**), would be to create a canyon for the PRow surrounded by industrial scale equipment, fencing and CCTV, in what is currently open Green Belt farmland.

Given the applicant's lack of attention to such details it's disappointing, but not surprising, that the applicant has already concluded (in **EN010147-001239-Applicant's Change Request 2 Notification (Rev 0).pdf**) that:

*'it is unlikely that this change will lead to new or materially different likely significant environmental effects to those currently reported.'*

As with the applicant's judgement on proposed change 3, CPC does not believe this conclusion.

## **Cumnor Parish Council's comments on the proposed change 11**

11. The applicant's July 2025 Explanatory Note for the Change Request<sup>1</sup> lists on page 12 the following *'approximate design parameters'* *'On an indicative basis only at this stage'* for the proposed NGET substation:

- *Up to 3.8ha site area*
- *93.020m x 16.725m footprint of main GIS building*
- *14.495m height of main GIS building*
- *Gas Insulated substation*
- *95 dB(A) sound power level*
- *105.020m x 10m footprint of adjoining building*
- *4.8m height of adjoining building*

Thus, the main building has grown from 76m x 31m by 14m high (**REP1-014**) to 93.020m x 16.725m by 14.495m high.

In the UK, 95dbA, according to HMG<sup>2</sup>, is considered *'above the permitted exposure level and requires hearing protection. Exposure to 95 dB(A) for 50 minutes is the equivalent of the maximum daily noise dose for unprotected ears'*

---

<sup>1</sup>[https://botleywest.co.uk/files/cto\\_layout/img/documents/072025changes/BWSF%20Change%20Request%20%20Explanatory%20Note%20July%202025%202.pdf](https://botleywest.co.uk/files/cto_layout/img/documents/072025changes/BWSF%20Change%20Request%20%20Explanatory%20Note%20July%202025%202.pdf)

<sup>2</sup>[https://assets.publishing.service.gov.uk/media/67ee592ce9c76fa33048c706/JSP375\\_Vol1\\_Chap25\\_AnnexA.pdf](https://assets.publishing.service.gov.uk/media/67ee592ce9c76fa33048c706/JSP375_Vol1_Chap25_AnnexA.pdf)

This would clearly transform the site, immediately adjacent to the Oxford Green Belt Way and other PRow, into both a visual and noise site typical of a major industrial enterprise, with consequential impacts on humans and wildlife.

And yet you have already concluded (in **EN010147-001239-Applicant's Change Request 2 Notification (Rev 0).pdf**) that:

*'it is considered that there are no new or materially different likely significant environmental effects that would arise as a result of this change.'*

**CPC does not believe this statement to be true, and in light of the above requests that the relevant – and now outdated – LVIA be repeated, and that a noise envelope assessment also be undertaken, the results being overlaid with bat roosts and flightpaths to allow their disruption to be assessed.**

12. End

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

## **Appendix 1**

Applicant's letter to Council, dated 23<sup>rd</sup> July, received 9 days after the start of the Consultation.

23 July 2025

Dear Sir/Madam,

## **Proposed Changes to the Botley West Solar Farm DCO Application**

I am writing to you regarding proposed changes to the Development Consent Order (DCO) application for Botley West Solar Farm (the Project).

The Applicant submitted its application for a DCO on 15 November 2024. This application was accepted for Examination by the Planning Inspectorate on 13 December 2024, and the Examination subsequently commenced on 13 May 2025.

Following the submission and acceptance of the DCO Application, Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd (the Applicant) has continued to engage with affected landowners and key stakeholders. This has informed a series of changes the Applicant is proposing to make to the DCO application. These changes are intended to, amongst other things, alleviate concerns in relation to potential environmental impacts and reduce land take where suitable alternative proposals are available.

The Applicant has also used this as an opportunity to further refine some minor extents of land falling within the Order Limits that, upon further design refinement in relation to the proposed layout of the Project, are no longer considered necessary. The Applicant is also proposing other scheme refinements that have become available as a result of the other refinements which are being sought in response to stakeholder feedback. These refinements will be included in full as part of the Change Application.

The changes will be formally sought by the Applicant by submitting a Change Application to the Examining Authority. The Applicant intends to submit this Change Application in September 2025. At this stage we are seeking feedback from relevant consultees prior to submitting this Change Application.

The purpose of this letter is to notify you of these proposed changes and your opportunity to comment on them ahead of a Change Application being formally submitted to the Examining Authority. This letter explains how you can find out more information about the proposed changes and how to provide any feedback you may have. We are asking for feedback to be submitted on or before Friday 22 August 2025.

## **About the Project**

The Application is for development consent to construct, operate, maintain and decommission a solar photovoltaic (PV) electricity generating facility with a capacity of 840 megawatts (MW) and export connection to the National Grid.

Botley West Solar Farm is considered as a Nationally Significant Infrastructure Project due to the amount of renewable electricity it would generate. This means that – in order to be



Email us at:  
[info@botleywest.co.uk](mailto:info@botleywest.co.uk)



Call our Freephone information line:  
0808 175 3085



Write to us at:  
FREEPOST BWSF



Visit our website at:  
[www.botleywest.co.uk](http://www.botleywest.co.uk)

consented – it will require a DCO from the Secretary of State for the Department of Energy Security and Net Zero, under the Planning Act 2008.

The Project will accommodate ground mounted PV generating stations (incorporating solar arrays); grid connection infrastructure; cable route corridors; accesses and environmental mitigation and enhancement measures. It extends from an area of land in the north, situated between the A4260 and the Dorn River Valley near Tackley and Wootton (Northern Site Area), through a central section, situated broadly between Bladon and Cassington (Central Site Area), and connecting to a section further south near to Farmoor Reservoir and north of Cumnor (Southern Site Area), where the Project will connect to the National Grid transmission network.

### **Proposed changes to the DCO Application**

As set out in the Applicant's Change Request 2 Notification **[REP2-045]**, the proposed changes include:

1. Reduction in Order Limits boundary to reduce the solar installation area south-west of Bladon, and removal of solar arrays on land south-east of Bladon and north of Heath Lane;
2. Reduction in Order Limits boundary to reduce the solar installation area near to Oxford airport;
3. Refinement of Project layout and design to reposition the main Project substation as shown on Sheet 13b of the Works Plans **[AS-005]**;
4. Refinement of Project layout and design to reduce solar installation on land east of Lower Road;
5. Refinement of Project layout and design to remove installation areas overlapping with Flood Zones 2 and 3;
6. Refinement of Project layout and design to include an additional installation area within Southern Site;
7. Reduction in Order Limits boundary to remove small parcels of land owned by Oxfordshire County Council (Estates);
8. Refinement of Project layout and design to reposition the Public Rights of Way currently proposed to be stopped up and diverted back to definitive alignment;
9. Reduction in Order Limits boundary to remove an area of land along Wharf Road;
10. Clarification of the role of the community educational facility; and
11. Refinement of Project layout and design to secure the latest design parameters for the new National Grid substation.

Please find enclosed a Site Location Plan showing the location of the Project and the newly proposed Order Limits that would exist if the Change Application is accepted by the Examining Authority.



## How to find out more information and respond to this consultation

An Explanatory Note has been published to provide more details on these proposed changes, including annotated plans to present their location and scale.

The Explanatory Note can be accessed in the Document Library page of the Botley West Solar Farm Project website: [www.botleywest.co.uk/document\\_library.html](http://www.botleywest.co.uk/document_library.html)

Questions regarding these proposed changes can be asked of the Applicant's Project team using the contact details below.

Any feedback on these proposed changes should be provided to Applicant on or before **Friday 22 August 2025**. Following this period, the Applicant will finalise its proposed changes having regard to comments received. The Applicant will then submit a formal Change Application to the Examining Authority which, if granted, would amend the DCO application in accordance with the changes proposed. The Examination of the DCO application would then proceed with the revised Order Limits (as shown on the enclosed Site Location Plan) and other minor amendments that are proposed.

Feedback can be provided by:

- Emailing: [info@botleywest.co.uk](mailto:info@botleywest.co.uk)
- Writing to: FREEPOST BWSF

Feedback is requested in writing, however you can also contact the Applicant's Project team to discuss any questions by calling 0808 175 3085.

We look forward to hearing from you.

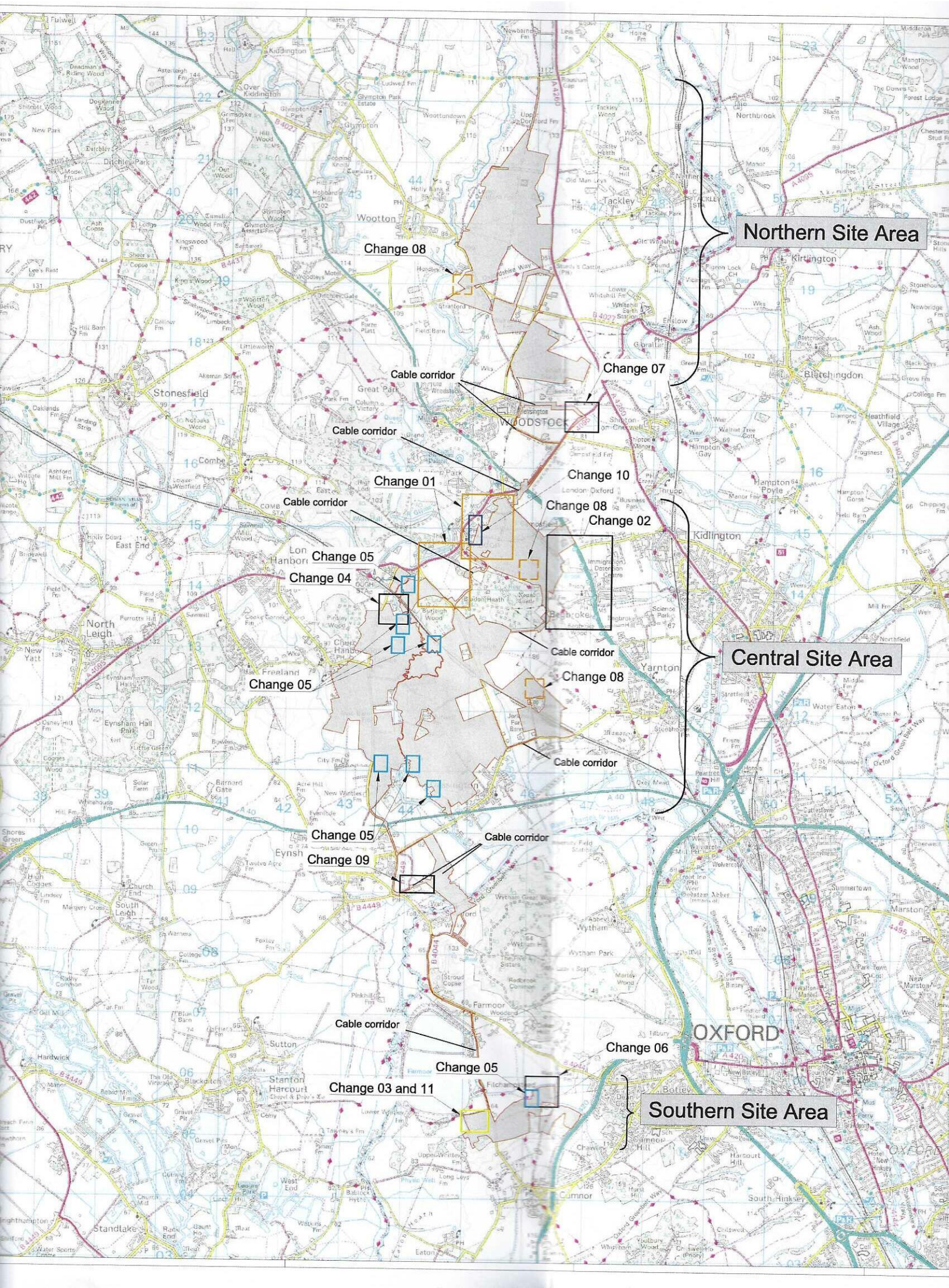
Yours faithfully,

[Redacted Signature]

(On behalf of the Applicant)

Photovolt Development Partners GmbH (PVDP) on behalf of SolarFive Ltd.





**Northern Site Area**

**Central Site Area**

**Southern Site Area**