

CUMNOR PARISH COUNCIL

Planning Inspectorate

Contact:

By email

██████████ (Clerk)

20th October 2025

clerk@cumnorparishcouncil.org.uk

BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147

Cumnor Parish Council's Submissions at Issue Specific Hearing 2 9th October 2025 for Deadline 6

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 written follow up to Cumnor Parish Council's (CPC) oral submissions, including a response to ExA Action 4 published 13/10/25 as amended by email 14/10/25, at Issue Specific Hearing 2 (ISH2) on 9th October 2025 at the Kings Centre, Osney, Oxford.

Cumnor Parish Council

20th October 2025

This document adopts the numbering system for issues as set out by ExA in the ISH2 agenda.

Issue 3a Development Consent Order: Articles, Requirements

1. CPC is happy to expand on its oral contribution to the OFH2 discussion on the NGET substation connection date/location and BESS issues as required in ExA Action 4 published on 13th October as amended by email 14th October.
2. CPC notes that NGET wasn't present at either CAH1 or ISH2, just as they had been absent in May at ISH1 and other hearings.
3. The ExA ISH2 transcript shows the applicant stating that *'We're waiting for an agreement to vary from National Grid in order to change that date from 2027 to 2029'*¹
4. As the ExA is aware CPC has raised this issue in a number of its submissions:
 - 4.1. REP2-048 (01/07/25) para 3 response to ExQ 1.3.3 quoting NGET's 19/06/25 letter to Layla Moran MP
 - 4.2. REP3-078 (21/07/25) para 6 quoting applicant's REP2-025 answers to ExQ 1.3.2 and 1.3.6 and NGET's REP2-076
 - 4.3. REP4-046 para 5 quoting applicant's REP3-065 response to comments on their answer to ExQ 1.3.3 and the applicant + NGET REP3-053 (06/07/25) Statement of Common Ground
5. In the applicant's REP2-025 answer to ExQ 1.3.2, page 24 asserts that *'The Applicant applied for a connection on 10th February 2021. A Point of Connection Offer (PoC) was granted in June 2021 with a connection date in October 2026.'* while page 28 asserts a *'Point of Connection Offer: June to August 2021'*
6. Taking these two assertions at face value means the applicant knew in the summer of 2021 that it had a NGET connection date of *'October 2026'*
7. But that isn't what the applicant has subsequently published, either in documentation for the ExA or on the homepage of its website – the only source of publicly available information prior to the ExA process.

The changing NGET connection dates claimed by the applicant, as observed by CPC are summarised in Table 1 below:

¹ 00:08:48:26 - 00:09:14:14 in EN010147-001941- Transcript Part 1 Final.pdf

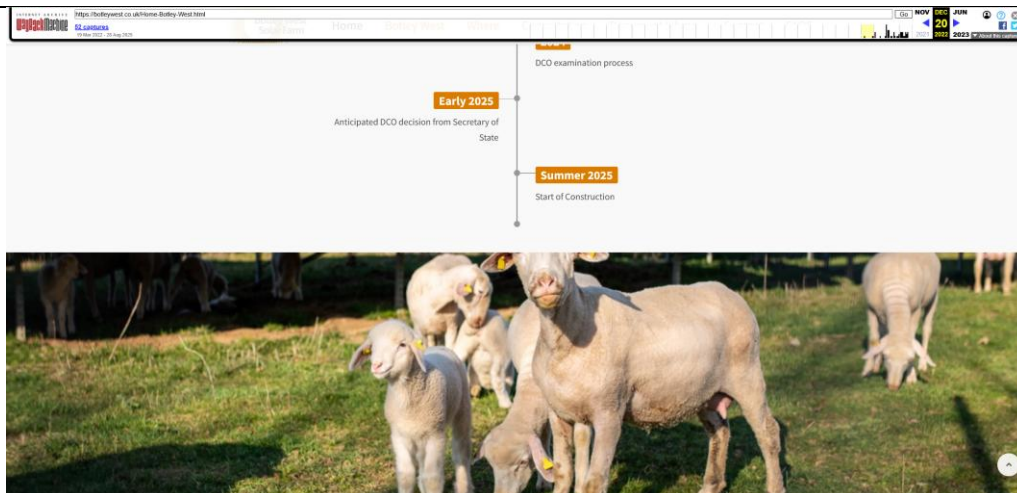
Date	Primary Source	Claimed NGET connection date
19/06/25	NGET letter to Layla Moran MP quoted in CPC's REP2-048	'Construction completed' late 2029
01/07/25	Applicant's REP2-025 answer to ExQ 1.3.2	October 2026 – PoC offer made in 2021
01/07/25	Applicant's REP2-025 answer to ExQ 1.3.6	October 2028
06/07/25	Applicant + NGET SoCG REP3-053	No agreed position on connection date
21/07/25	Applicant's REP3-065 response to comments on their answer to ExQ1.3.3	October 2027
09/10/25	Applicant's oral submissions to ISH2	<i>'We're waiting for an agreement to vary from National Grid in order to change that date from 2027 to 2029'¹</i>

Table 1

8. Using a standard OSINT² technique³ to interrogate the applicant's website since 2022, CPC has discovered that throughout the timeline shown in Table 1 the applicant's public facing website showed a different NGET connection date than it was providing to the ExA – See Figures 1-4 below.
9. On the 7th October 2025 the applicant's website was showing a NGET connection date of October 2028, which corresponded with neither of the dates the applicant orally described two days later at the 9th October ISH2 hearing (see 3 above).
10. Since the ISH2 hearing the applicant has now changed the NGET connection date on the homepage of its website to correspond with the 2nd date given to the ExA on 9th October – see Figure 5 below.
11. It is CPC's contention therefore that the information supplied to the ExA has been constantly changing and that what the applicant knew, and when they knew it, has not been accurately relayed to Cumnor's residents – and others - by their public facing website.

² Open Source Intelligence (OSINT)

³ The 'Wayback machine'



20/12/2022 No connection date quoted at the start of the Phase 1 Community consultation and some 12 months, according to the applicant, after an October 2026 connection date was agreed with NGET in 2021

Source: [REDACTED]

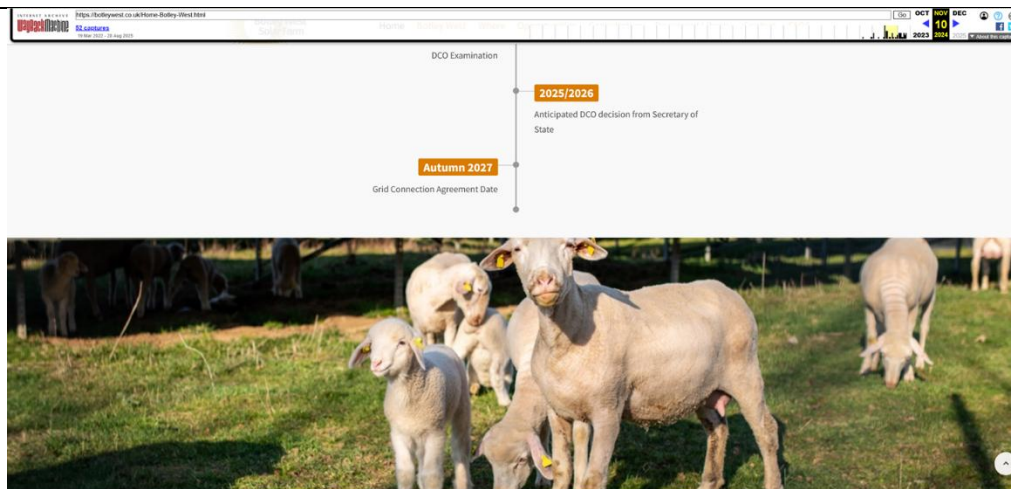
Figure 1



03/12/2023 Connection date of Autumn 2027 claimed some 12 months after the website snap shown above and now 2 years since claimed 2021 agreement with NGET for connection in 2026

Source: [REDACTED]

Figure 2



10/11/24 Connection date of Autumn 2027 claimed at the time of the NSIP application to PINS and now 3 years since claimed 2021 agreement with NGET for connection in 2026

Source: [REDACTED]
[REDACTED]

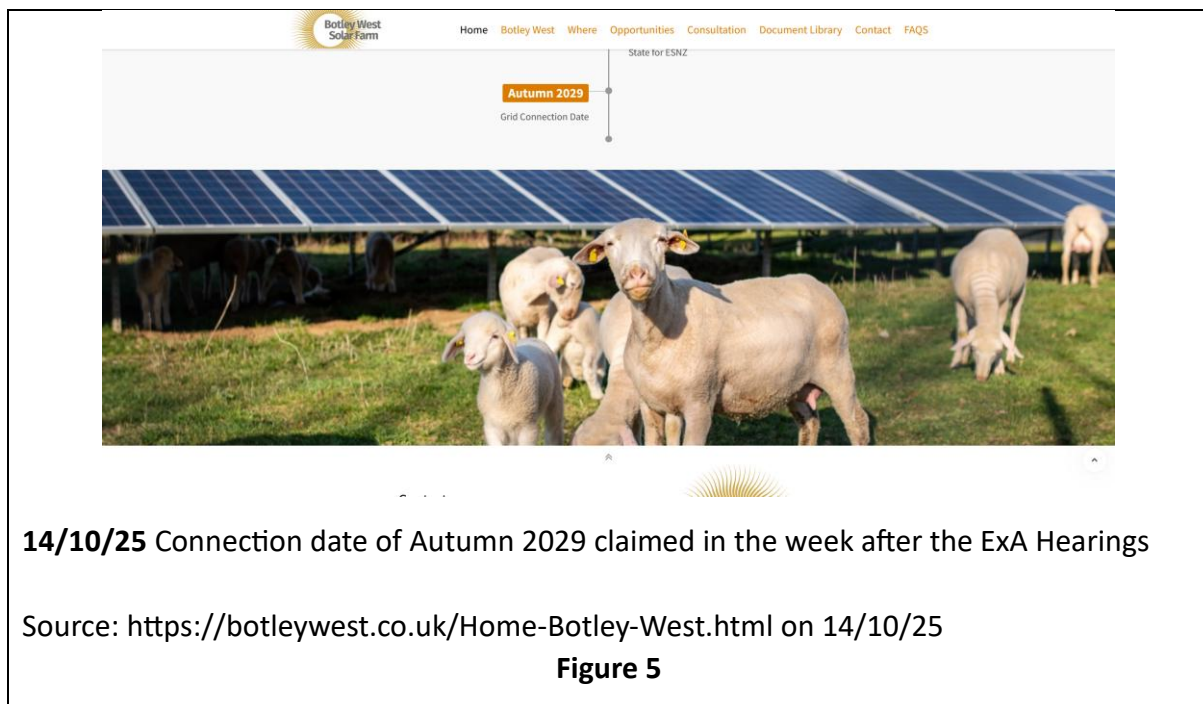
Figure 3



07/10/25 Connection date of Autumn 2028 claimed in the week of the ExA Hearings and now 4 years since claimed 2021 agreement with NGET for connection in 2026

Source: <https://botleywest.co.uk/Home-Botley-West.html> on 07/10/25

Figure 4



12. Given the above, CPC wonders how the applicant would now be describing its relationship with NGET and the NGET connection date, had it not been for Layla Moran MP's direct intervention with NGET and repeated forensic questioning by both the ExA and CPC over more than five months?
13. Turning to considerations of battery storage (BESS), CPC notes that throughout the application process the applicant has stated that BESS forms no part of its application; but:
14. In an oral submission at ISH2 (at c. 13.15 BST), the applicant's CEO described discussions with a third party (Ethos Green) on the provision of solar and BESS on land adjacent to the applicant's DCO boundary and the proposed NGET screening application (Vale of White Horse DC reference P25/V1685/SCR⁴) boundary⁵.
15. NGET's P25/V1685/SCR screening application shows a redline boundary on both the west and east sides of the B4017 spanning the applicant's DCO boundary, including an access road to BESS storage (as previously described by VWHDC to the ExA).
16. From the NESO Transmission Entry Capacity Register⁶ (as published 14th October 2025) it is possible to identify 4 entries containing the word 'Botley' and 0 entries for 'Farmoor'.

⁴<https://data.whitehorsedc.gov.uk/java/support/Main.jsp?MODULE=ApplicationDetails&REF=P25/V1685/SCR#exactline>

⁵ 00:00:41:03 - 00:01:21:09 in EN010147-001943-Transcript Part 3 Final.pdf

⁶ [REDACTED]

They are:

Project Name	Customer Name	Connection Site	Stage	MW Connected	MW Increase / Decrease	Cumulative Total Capacity (MW)	MW Effective From	Project Status	Agreement Type	HOST TO	Plant Type
Botley GEC (Ethos Green)	BOTLEY GREEN ENERGY CENTRE LTD	Botley West 400kV Substation	0	800	800	800	31/10/2033	Awaiting Consents	Direct Connection	NGET	Demand; Energy Storage System; PV Array (Photo Voltaic/solar); Reactive Compensation
Botley West - Cote Solar Power	SOLARFIVE LTD	Botley West 400kV Substation	0	840	840	840	30/10/2026	Scoping	Direct Connection	NGET	PV Array (Photo Voltaic/solar)
Buckland Marsh Solar Park	Arise Renewable Energy UK Limited	Botley West 400kV Substation	0	280	280	280	31/10/2033	Scoping	Direct Connection	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
West Botley High Impact Green	TELS ENERGY UK LIMITED	Botley West 400kV Substation	0	100	100	100	31/10/2037	Scoping	Direct Connection	NGET	Demand; Energy Storage System; Nuclear; PV Array (Photo Voltaic/solar); Wind Onshore

Figure 6

17. The 'Botley West' entry is present as 'PV Array (Photo Voltaic/solar)' with 840MW has a project status of 'scoping' and 'MW effective' from 30/10/2026

18. The three remaining entries all state 'Energy Storage system'. They are:

18.1. Botley GEC (Ethos Green) 'Demand; Energy Storage System; PV Array (Photo Voltaic/solar); Reactive Compensation' of 800MW is 'awaiting consents' with MW effective from 31/10/2033

18.2. Buckland Marsh Solar Park 'Energy Storage System; PV Array (Photo Voltaic/solar)' of 280MW is 'scoping' with MW effective from 31/10/2033

18.3. West Botley High Impact Green Energy Hub 'Demand; Energy Storage System; Nuclear; PV Array (Photo Voltaic/solar); Wind Onshore' of 100MW is 'scoping' with MW effective from 31/10/2037

19. So, in addition to Botley West, there are three schemes comprising battery storage; two with MW effective of October 2033 and one with October 2037.

Issue 3b Flood Risk and Drainage management

1. In response to the question ExA posed to the applicant about the apparent north-south axis straight line of modelled flood zone 3 in Figure 1.1 on page 2 of Hydrology and Flood Risk Technical Note 2 in CR2-071, CPC can confirm that there is no topographical feature there to account for this (see Figure 7 below left).

To assist the ExA, CPC shows (Figure 7 below right) the same area as depicted in Oxfordshire County Council's Countryside Access Map⁷, showing the relevant impacted PRoW and watercourses.



Figure 1.1 EA Flood Map for Planning – Flood Zones

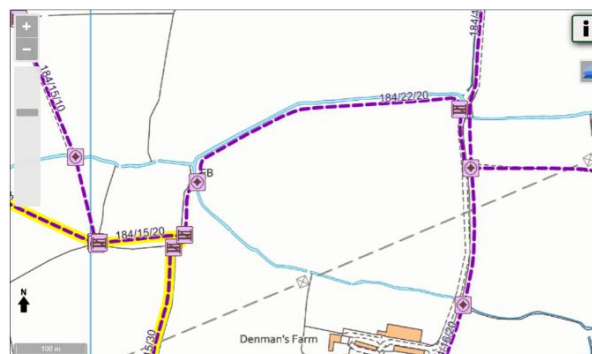


Figure 7

⁷ <https://publicrightsofway.oxfordshire.gov.uk/standardmap.aspx>

2. CPC contends that this inaccuracy, and others, renders the applicant's subsequent assertion (para 1.2.8) that '*further mitigation is not required*' as unevidenced.
3. As additional evidence CPC includes below screenshots from the gov.uk flood website⁸ taken 5 days apart in November and December 2024 when the area in question flooded after rain.



Screenshot of gov.uk flood risk website
taken at 11:50 on 28/11/2024



Screenshot of gov.uk flood risk website
taken at 12:28 on 02/12/2024

Figure 8

Both screenshots show the 'flood warning zone' not following the applicant's claimed north-south straight line but, as expected, following the topography of the ground and the local watercourses

4. CPC contends that had the applicant engaged with the flood risk and mitigation as envisaged by the relevant legislation and had examined evidence such as the above, rather than making unevidenced assertions, it would not now be attempting to place additional panels and other infrastructure in a flood risk area by means of a change request midway through the ExA process.
5. This contention is further supported by a lack of evidence on the impact of piling, support structures etc on run off and infiltration rates, so making the applicant's position that panels and all associated electrical equipment could operate safely in water depths of up to 600mm for 42 years, implausible at best.
6. Given the need to assess 1/100-year conditions, with a climate change addition, CPC does not have confidence in the assertion that galvanised steel structures, such as the applicant proposes, will be able to cope with the inevitable corrosion and support the panels etc for the lifetime of the project⁹.
7. In addition, given that the watercourses shown in Figures 7 and 8 are part of the Filchampstead Brook network, the applicant's dismissal of mitigation further increases

⁸ <https://check-for-flooding.service.gov.uk/location/cumnor-oxford-oxfordshire>

⁹ This raises the additional concern – not addressed by the applicant – of how will they be able to provide the ExA with assurance that they can completely remove rusty steel posts in 42 years' time.

the concern of residents such as that expressed by the residents of Jumpers Farm in RR-0242.

8. This absence of mitigation and the applicant's apparent lack of knowledge of field drainage at ISH2 will inevitably adversely impacts properties such as Jumpers Farm and those on Lower Whitley Road in Cumnor Parish given the applicant's proposal to install panels, and a prior construction compound, on north facing steeply sloping land at higher elevations south of the properties and to the east of the B4017 (Tumbledown).
9. Given that fields immediately to the south of Jumpers Farm (fields 3.5 and 3.6 in REP4-075) are subject to surface water flooding, including water emanating from an assumed spring line at the fields' southern edge which tracks downhill to the north towards Jumpers Farm, CPC assesses that it has a low degree of confidence in the applicant's assertion that the construction compound/panels will not exacerbate the flooding already experienced.
10. For these reasons and others CPC welcomes the ExA's instruction to the applicant (13th October) in point 9 of the ISH2 action points.
11. CPC considers that for the applicant to respond to the queries/concerns we've expressed on three occasions already (and not merely 'note' them as it did in REP4-038) it will need to engage with both national and local plan flood risk policies and the Cumnor Neighbourhood Plan flood risk policy RNE2 (see REP1-057 and REP1-060), with particular reference to that policy's interpretation paragraphs, specifically para 114a-e.

Issue 3c Ecology and Biodiversity

1. While CPC's written submission on this topic relates to farmland birds and bird strike, it builds on its oral contribution that was made under issue 3f Traffic and Transportation – aviation safety. For ease of reference CPC therefore refers the ExA to section 3f below.

Issue 3e Landscape and Visual

1. CPC notes that the applicant repeatedly referred to the application as 'low profile' and that in response to questioning from the ExA acknowledged that sitting above its 'low level' panels would be infrastructure such as 6m high substations and other 3.5m high units.
2. CPC considers that structures 6m high cannot be considered 'low level' and so this designation should not apply to assessments of the impacts and mitigation required.
3. In addition, CPC notes that the applicant failed to draw the ExA's attention to its own change request – change 11 – where the July 2025 Explanatory Note for the Change

Request¹⁰ details its proposed NGET substation including a '*main GIS building*' of '*93.020m x 16.725m*' with a height of '*14.495m*'.

4. CPC contends that 14.495m is not 'low level' so this designation should not apply to assessments of the impacts and mitigation required for this Change Request.
5. CPC welcomes the ExA's action point 18 from ISH2.

As CPC mentioned during ISH2, its concerns about the lack of a Residents Visual Amenity Assessment (RVAA), as requested by the ExA, means that the applicant has conducted insufficient assessment of impacts, with consequent inaccurate classifications of impact and nugatory mitigations.

Examples in Cumnor Parish include, but are not limited to, Jumpers Farm where the DCO boundary lies on its west, south and eastern boundaries, and the Grade 2 Upper Whitley Farm, where intervisibility with the applicant's proposed substation site has thus far been effectively ignored (see for example CPC's REP3-078 para 9)

6. Following on from 5. Above, CPC supports the OHA position at ISH2 that as '*Residential property data sets are very freely available*'¹¹ the applicant should be required to put them on a map together with their zones of theoretical visibility (ZTV).
7. CPC also endorses the Stop Botley West position expressed at ISH1 that despite the applicant's repeated statements of planning policies to the ExA, policy EN1 '*is not a shield against not having done your proper work*'¹¹

Issue 3f Traffic and Transportation

1. At ISH2 CPC responded orally to the applicant's assertion that no '*assemblages of birds that would be a risk to aircraft*'¹¹ were found within the DCO Redline during 2 years of observations.

CPC offered to provide a written version of the details of flocks of geese in Cumnor Parish.

2. This issue was addressed by CPC as far back as its February 2025 Relevant Representation (RR-0205) which stated in section 2.8:

¹⁰

https://botleywest.co.uk/files/cto_layout/img/documents/072025changes/BWSF%20Change%20Request%202%20Explanatory%20Note%20July%202025%202.pdf

¹¹ EN010147-001944-Transcript Part 4 Final.pdf

Even more recent arrivals – a flock of N. American geese which forage on the fields proposed for the substation(s) – will apparently be displaced; more than a little ironic since they featured in the BBC 1 Countryfile programme (Tx 5th January 2025, presented by John Craven) from Farmoor as examples of how the location make it a world class habitat for many bird species, both native and migratory.

The applicant's assessments of 'local' value are at best questionable. Even a cursory examination of published literature would have shown that Farmoor is described by its owners as a '*unique habitat for wildlife*'¹² and by RSPB as:

*'one of the top birdwatching venues in Oxfordshire. The combination of open reservoir, woodland, award-winning wetlands and meadows attracts a great variety of birds.'*¹³

3. The fact that the applicant is still maintaining its Nelsonian position of 'I see no ships' some 8 months later is as disappointing as it is not surprising.
4. The BBC1 Countryfile programme mentioned in RR-0205 in February and orally at ISH2 in October can be found on the BBC iPlayer at [REDACTED] where it will be available until mid-December 2025.

Whilst the ExA may choose to watch the whole programme, the section on the flock of snow geese starts at c 41'45" into the Tx, including images of the geese in flight towards the applicant's DCO area, as confirmed by the picture taken by CPC (below) of the geese in field 3.1 (REP4-075).



Snow geese in Field 3.1 (the site of the applicant's proposed substation) in September 2025. Photo taken at w3w location raven.kennels.editor

Figure 9

That these geese and many others of differing species can be found within the DCO redline is evidenced further by numerous ornithological websites and blogs, including one showing their presence in 2019.¹⁴

¹² Thames Water website [REDACTED]

¹³ RSPB website [REDACTED]

¹⁴ [REDACTED]

Issue 3g Socioeconomics

1. This item was not covered at ISH 2
2. However, CPC wishes the ExA to be aware that the applicant, having only recently made its 1st approach to talk with the Director of the Hill End Outdoor Education Centre, and with a 1st meeting set for 10th October, cancelled the meeting on the grounds that they had to attend the ExA hearing.

Issue 3h Noise and Vibration

1. At ISH2 the applicant asserted that 92dB was the *'maximum decibel limit and the fact that it leads to no significant effects, it's not necessary to impose further requirements into the DCO around noise monitoring'*¹⁵
2. AS CPC noted orally at the time this is incorrect. The applicant's own July 2025 Explanatory Note for the Change Request¹⁰ states the noise level of their proposed NGET substation is 95dB.
3. Given the natural logarithm scale used to express sound pressure in decibels (dB), the 3dB difference between 92dB and 95dB represents a doubling of sound intensity such that at 92dB hearing damage can occur after about 1.5 hours exposure, but at 95dB damage occurs after about 15 minutes.
4. It is for this reason that CPC in REP 5-077 requested that the ExA require the applicant to re-present its assessment of cumulative noise impacts on PRow (ExA Q2.14.1) ***'to include the impact of all noise envelopes from installed equipment in the southern site on PRow.'*** given that the applicant's current assessment for the southern site ***'only consider noise envelopes caused by Power Converter Stations, so underestimating harm because of the omission of the noise envelopes associated with either its proposed 'substation' and/or the NGET substation'***

End

Cumnor Parish Council

20th October 2025

¹⁵ 01:32:16:27 - 01:32:59:21 in EN010147-001944-Transcript Part 4 Final.pdf

CUMNOR PARISH COUNCIL

Planning Inspectorate

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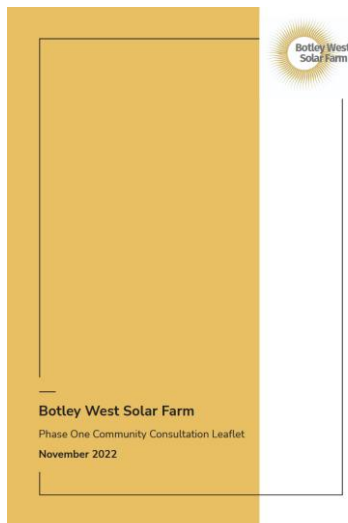
BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147

Cumnor Parish Council's Submission at Open Floor Hearing 3 10th October 2025 for Deadline 6

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 the text of Cumnor Parish Council's (CPC) oral submission at Open Floor Hearing 3 on Friday 10th October at the Kings Centre, Osney, Oxford, annotated with images discussed and references to documents referred to in italics.

Cumnor Parish Council

20th October 2025



Here in May we expressed our thanks to you for the opportunity to explain our concerns about this proposal and its cumulative impacts on our Parish;

our 1st real opportunity to do so since this (see left) landed on our doormats 3 years ago.

(APP-026 Phase One Community Consultation leaflet November 2022)

But frankly, back in May, we were more than a little fearful, a concern growing out of the way the applicant had behaved to us and our residents in the prior, so-called, consultations.

5 months on, our confidence - that what we've been saying for the past 3 years has finally been listened to - has increased substantially.

So, we would like to amplify those thanks to you and your case team, who have been unfailingly swift and helpful in their replies to our questions.

In contrast though, any confidence we might have had in the assertions and claimed capabilities of the applicant has continued to decrease.

A couple of evidential points to illustrate that might be helpful.

We observed you here in May asking the applicant for 'without prejudice' wording for a Grampian Condition. We then observed that you repeated that request in writing not once, but twice, and that you didn't get what you asked for.

That struck us as odd behaviour if the applicant were truly invested in this process, and not just going through the motions before the inevitable, in their mind, approval by the Secretary of State.

But that behaviour to you has been echoed by our own experience.

In May we said to you that we were being asked to believe the unbelievable; that the applicant was telling us - and you - things about our Parish that are impossible.

We likened this to Lewis Carroll's White Queen, who said that with practice she could believe 6 impossible things before breakfast. We couldn't.

But since May the applicant has gone even further.

They've told you that there are 'substantial areas of newly planted woodland' in our Parish. There aren't. *(see para 9 in REP3-077)*

They've told you the power station in our Parish would be invisible – for example a 75m long 15m high building would be invisible from a Grade II farmhouse that sits on the hill above it;

panels and shipping containers and fences and CCTV masts would be invisible from the similarly elevated Hill End Outdoor Education Centre you visited on Tuesday. (*various – see for example para 4 in REP3-077 and para 9 in REP3-078 in turn referencing page 80 in applicant's REP2-025 containing the applicant's answer to ExAQ1 q1.6.29*)

Harry Potter's Invisibility cloak has clearly spread to Cumnor from the films' locations here in Christ Church and New College.

In its response to your question about panel heights on the steeply sloping and shaded north facing hillsides in our Parish the applicant invoked another Oxford literary genre; their response to you being an exposition on how sheep will safely graze under a panel just 0.8m off the ground – a Tolkien inspired new breed of 'Hobbit' sheep maybe? (*see REP5-076 3rd bullet point in para 3 in turn referencing applicant's statement on p78 in REP 4-038*)

But certainly not the sheep that feature on the home page of the applicant's website.



<https://botleywest.co.uk/Home-Botley-West.html> at 12:00 on 14/10/2025



https://botleywest.co.uk/files/cto_layout/img/pvpanel-sheep-Large.jpeg at 12:00 on 14/10/2025

They are Lacaune (pron Lak-on) sheep, native to southern France and bred for their milk, used to make Roquefort¹.

Now the applicant will surely say that this picture is merely indicative – we agree, it's indicative of their blasé attitude to commitments, evidence and facts that's been apparent throughout.

This 3-year-old document (*APP-026 containing Phase One Community Consultation leaflet November 2022*) set the tone for that, which has continued, as we saw yesterday.

One final example.

As you know, this Parish Council has repeatedly asked about the proposed fencing – its impact on the landscape and visual impact, and its deterrence to criminal activity in isolated rural locations such as ours.

¹ Top return using Google Lens reverse image look up tool () on cropped copy of applicant's pvpanel-sheep-Large.jpeg

All that we've learned can be summed up in this photograph² from 3 years ago, which is the applicant's answer to Mr Wallis' question on Wednesday (CAH on 08/10/25).



Extract of page 18 in
Phase One Community Consultation leaflet November 2022 in APP-026

Either we're expected to forget the 100+km of security fencing and the 'danger of death keep out' notices that will adorn it, or the applicant's asking us to believe that this family is both stupid and criminal; stupid since they have endangered their child, and criminal since they must have come equipped for breaking and entering, as they are clearly inside the applicant's fence.

Back in May we said that this proposal was the wrong answer, in the wrong place for the wrong reasons. We asked you to recommend that the southern site be removed from the application.

We restate that now, as does the Vale of White Horse District Council and ICOMOS. Over the summer that position has gained cross party support from Cumnor's 2 Oxfordshire County Councillors, Cllr James Plumb (Con) and Cllr Judy Roberts (Lib Dem), and our MP, Layla Moran (REP2-117).

They and Cumnor's 7000+ residents look forward to your evidence-based decision and that of the Secretary of State.

Thank you.

² The original of this image is a stock photo available for sale at [REDACTED] However, that image has been transposed left to right in the applicant's document. Google Lens and Tin Eye – 2 standard reverse image look up tools – identify the transposed image is on the European Investment Bank's website at [REDACTED] where it is ascribed to Shutterstock.