

CUMNOR PARISH COUNCIL

Planning Inspectorate

By email

10th November 2025

Contact:

 (Clerk)

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BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147

Cumnor Parish Council - Comments for Deadline 7 on submissions received at 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 comprises Cumnor Parish Council's (CPC) comments on the applicant's Covering letter (**REP6-001**), its Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 2 (ISH2) (**REP6-047**) and the two documents comprising the applicant's belated attempt to provide a coherent and complete Residential Visual Amenity Assessment (RVAA) (**REP6-064** and **REP6-065**).
 3. CPC's comments on the applicant's Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 2 (ISH2) (**REP6-047**) are in respect of:
 - 3.1. ExA Action Points 1-3 (**EV7-002**) – see paragraph 4 below
 - 3.2. ExA Action Point 9 (**EV7-002**) – see paragraph 5 below
 - 3.3. ExA Action Point 10 (**EV7-002**) – see paragraph 6 below
 - 3.4. Page 40 of **REP6-047** bird assemblages & aviation safety – see paragraph 7 below
- CPC's comments on the applicant's Residential Visual Amenity Assessment (RVAA) (**REP6-064** and **REP6-065**), and a reference to it on page 34 of **REP6-047**, are in respect of:
- 3.5. ExA Action Point 18 (**EV7-002**), the applicant's section 1.2 in **REP6-001** and 00:14:37:28 - 00:15:07:08 in **EV7-010** – see paragraph 8 below

Comments on Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 2 (ISH2) (REP6-047)

4. ExA Action Points 1-3 (EV7-002)

4.1. In its response to **EV7-002** the applicant's 20th October **REP6-047** (page 6) states:

The NGET team has indicated that completion in 2029 is a certain date, and the first full year of operation would be 2030. The SoCG prepared with NGET confirms this. This first full year of operation is therefore one year later than was assessed at the point of submission for the application

4.2. Unfortunately, this new statement by PVDP again differs from that offered to the ExA previously (see CPC's **REP6-084**). For example:

4.2.1. The only available SoCG on the ExA project website (**REP3-053**) does not confirm '*the first full year of operation would be 2030*'.

Instead, it states '*no agreed position on connection date*'

4.2.2. The ExA ISH2 (**EV7-004**) transcript shows the applicant stating on 9th October that:

'We're waiting for an agreement to vary from National Grid in order to change that date from 2027 to 2029'¹

4.3. **CPC asks the ExA to consider whether all of the applicant's statements as shown in 4.1 and 4.2 can be true at the same time?**

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

5. ExA Action Point 9 (**EV7-002**)

5.1. As **EV7-066** (00:21:34:04 - 00:22:12:23) shows, CPC asked a very specific question:

‘I think the issue that we find difficulty in understanding is that some three years now into this process, we have still not had any meaningful answer to how the applicant attend, intends to conform with the flood risk policy in our made Neighbourhood Plan.’

The question was asked (again) because in response to CPC’s **REP3-078** submission establishing the applicant had not fulfilled the requirements of Cumnor Neighbourhood Plan (CNP) (**REP1-057**) Flood Risk Policy RNE2, the applicant’s **REP4-038** (page 60) merely states:

‘This is noted’

5.2. In its response to **EV7-002**, the applicant’s **REP6-047** (page 18) states:

██████████, on behalf of Cumnor Parish Council, raised further concerns in relation to flood risk policy and local drainage infrastructure.

Post hearing submission (PINS Action Point No. 9): A response was provided to Cumnor Parish Council at Deadline 1. An updated ES Chapter 10: Hydrology and Flood Risk was submitted to incorporate a specific reference to policy RNE2 [**REP3-020**]. Please see Table 10.3, which references the policy and details how this has been specifically addressed as part of the ES.

██████████, on behalf of Cumnor Parish Council, commented that vegetation alone will not mitigate increased runoff from solar panels and that further measures are required to provide confidence that runoff will be properly managed.

5.3. This response by the applicant fails to answer CPC’s question in all respects because:

5.3.1. The applicant’s response at Deadline 1 did not answer the question; and

5.3.2. There is no ‘Table 10.3’ in the applicant’s **REP3-020** or in **REP6-024**; and

5.3.3. Table 1.3 ‘NPS requirements in relation to the FRA’ on page 9 of the applicant’s **REP3-020**, and repeated with no change in **REP6-024**, does not reference the Cumnor Neighbourhood Plan (CNP) (**REP1-057**) Flood Risk Policy RNE2; and

5.3.4. While Table 1.8 on page 20 of the applicant’s **REP3-020** does selectively quote CNP Policy RNE2, it does not include the policy interpretation paragraphs (para 111-114 in **REP1-057**) that detail what is required for flood risk assessments to be policy compliant. Given their omission and any other evidence to the

contrary it is concluded that a RNE2 flood risk policy assessment has not been carried out.

5.4. **So, as the Examination process draws to a conclusion and some 5 months after first raising the issue in the Examination process, and three years after raising it in prior ‘consultations’, the applicant has still not addressed CNP Policy RNE2 by actively undertaking the assessment requirements of that policy.**

5.5. **The application therefore remains non-compliant with CNP (REP1-057) policy RNE2.**

5.6. Finally, as yet another example of the applicant’s cavalier attitude to evidential challenges by IPs and others, CPC suggests PVDP might choose to more carefully read the ISH2 transcript (**EV7-066**) than it has clearly done so far.

If it did so it would find that its assertion (see 3.2 above) that [REDACTED], *on behalf of Cumnor Parish Council, commented...*’ is incorrect.

As **EV7-006** at 00:25:52:09 - 00:26:02:14 shows this was a separate important contribution made by Cassington Parish Council:

[REDACTED] *Carrington [sic] parish council I would just like to pass to [REDACTED]
[REDACTED], our advisor, for a brief comment’*

5.7. **To summarise, the specific details of this issue remain unresolved and so after three+ years the application is still non-compliant with CNP (REP1-057) policy RNE2, a policy that grew out of the human misery caused to our residents by developments that exacerbate the existing (and growing) flood risks in the Parish.**

More widely this issue provides another insight into the applicant’s preconceived solutions and preordained modus operandi.

An unwillingness/inability to engage with evidential challenge, resorting instead to inaccuracies, unevidenced assertions and oral/written answers that do not address the actual questions raised by IPs and the ExA, seems to be a common pattern, as described so eloquently in REP6-087.

6. ExA Action Point 10 (**EV7-002**)

6.1. In its response to **EV7-002**, the applicant's **REP6-047** (pages 19-20) states:

Post hearing submission (PINS Action Point No. 10): *Since the submission of the application and during the examination process, the Flood Map for Planning (FMP) was updated. In response, the applicant has revised the proposed development areas to ensure development is within Flood Zone 1, consistent with the latest mapping and guidance. This revision includes removal of panels to ensure they are in Flood Zone 1 in line with the latest FMP.*

As part of Change Request 2, an area of land at Denmans previously classified as Flood Zone 2/3 is now shown as Flood Zone 1 on the updated FMP. A question arose regarding the presence of a clear, straight boundary line on this updated map. Upon investigation, it was found that the main river influencing flood risk lies downstream to the west of the site. The watercourse along the northern boundary of the site is classified as an ordinary watercourse. The Environment Agency typically models only main rivers and watercourses with catchment areas exceeding 3 km². Therefore, the previous designation of this area as Flood Zone 2/3 has likely been artificially removed to reflect the fact the risk is not 'fluvial' at this location.

*However, the absence of Flood Zones 2 and 3 on the map does not imply that there is no flood risk in the area. The Hydrology Technical Note 2 [**CR2-072**] assesses surface water flood risk and proposes appropriate mitigation measures based on this data. The surface water risk is linked to an overland flow pathway rather than the ordinary watercourse itself. This is evident from the fact that the risk is not within the channel or immediately out of bank. Instead, the risk shows a pathway flowing just to the south of the ordinary watercourse. A 10-meter development free buffer zone from the ordinary watercourse has been maintained here.*

Mitigation strategies have been informed by surface water flood depths, include raising the lowest leading edge of the development by 900 mm above the predicted flood level (maximum of 540mm), providing a 300mm freeboard. This is in line with the wider project mitigation approach.

6.2. That the applicant as late as Deadline 6 is asking the ExA to believe '*Upon investigation, it was found that the main river influencing flood risk lies downstream to the west of the site*' is a startling admission.

Is the applicant really asking the ExA to believe that it requires an investigation in October 2025 to find that the River Thames lies 'to the west of the site'?

6.3. If so, then how is that the applicant, in para 4.2.3 of **REP3-020** dated 22nd July 2025, was able to inform the ExA that:

4.2.3 A tributary of the River Thames, classified as a Main River, is located some 200m to the west of the Southern Site Area and conveys flows to the west. The Filchamstead [sic] Brook is a tributary of the River Thames and discharges to the river some 2.1km to the north of the Southern Site Area. Main Rivers within the Southern Site Area are presented within Figure 1.3c.

- 6.4. That the applicant's statements in para 4.2.3 of **REP3-020** and on pages 19-20 of **REP6-047** contradict each other is self-evident, as is yet another error by the applicant in submitting to the ExA (in Figure 1.1 in **CR2-071**) what it subsequently called evidence (in **REP6-047**) 'of a clear, straight boundary line' that is non-existent.
- 6.5. **As in so many other cases this is another example of the applicant's errors and omissions only becoming apparent under repeated forensic questioning by the ExA and IPs, utilising evidence available to the applicant from the beginning.**
- 6.6. The internal contradictions in the applicant's evidence to the ExA is further exemplified by paras 4.4.14 and 4.4.15 on page 52 of **REP3-020**;

Groundwater Flood Risk

4.4.14 Groundwater flood risk mapping included within the Groundsure Enviro and Geo Insight report (2023) shows the Southern Site Area has a 'negligible' risk of groundwater flooding. The majority of the 1km buffer zone of the Southern Site Area is shown to have a 'negligible to low' risk of flooding.

4.4.15 Due to the type of development proposed, the overall risk of flooding from groundwater has been assessed to be low.

Ordinary Watercourse and Surface Water Flood Risk

4.4.26 Based on the above, the Southern Site Area is considered to have a low risk of flooding from this source.

- 6.7. Again, the discrepancies between these assertions by the applicant and the 'on the ground' evidence and Environment Agency evidence set out by CPC in Issue 3b Flood Risk and Drainage management on pages 7-9 of **REP6-084** casts very significant doubts on the applicant's flood risk assessment methodology, its adherence to the mitigation hierarchy and its ability to demonstrate its competence and engagement with this examination process.
- 6.8. **As a consequence, CPC assesses that it has a zero to very low level of confidence in the applicant's flood risk assessment for the Southern site.**

7. Bird assemblages & aviation safety Page 40 of **REP6-047**

7.1. The applicant's **REP6-047** (page 40) states:

██████████, on behalf of Cumnor Parish Council, raised concerns in relation to assemblages of birds at reservoirs

7.2. This assertion by the applicant is incorrect.

As ISH2 transcript **EV7-010** shows at 01:05:33:02 onward in respect of geese, the applicant stated:

'We just didn't find that sort of bird population within the development side [sic]'

7.3. At 01:05:40:16 the ExA asked:

'So just just [sic] to make sure I've understood correctly. So what you're saying is you believe displacement is not going to be an issue and therefore mitigation is not required'

7.4. The applicant replied (**EV7-010** at 01:05:50:27) *'Yes. That's correct'*

7.5. CPC's subsequent question (below) was an attempt to make sure the applicant's prior comments had been accurately heard, as the applicant's Southern site in this Parish lies within 10km of Oxford Airport – less than the 13km referred to in para 5.5.41 of **NPS EN1**:

'Thank you, ██████████, Cumnor Parish Council. Um, can I just make sure I understood that I heard something correctly? Did I hear the applicant say that over two years, I think of assessments that no large assemblages of birds were found in fields within the Red line boundary. That's what I think I heard no large assemblages of birds.'

(transcribed in **EV7-010** at 01:16:32:14)

7.6. The applicant responded by clarifying that was so (**EV7-010** 01:16:52:14 to 01:17:04:18) *'that would be a risk to aircraft'*

7.7. Given the above, the applicant's answer on page 40 of **REP6-070** relating purely to a reservoir is, at best, irrelevant.

7.8. This answer was then used to assert that:

'the Applicant maintains that, on the balance of probability and in line with best practice, the site does not support significant populations relevant to aviation risk.'

7.9. As Oxford Aviation Services Ltd. noted, aircraft safety deals in *'absolutes of safety'* (00:58:17:26 in **EV7-010**), not probabilities.

- 7.10. CPC's evidence from personal observation, the RSPB and ornithologists, and the BBC1 Countryfile of 5th January 2025 (see **REP6-084**), shows the applicant's assertions on bird assemblages to be wrong and so therefore must be their assessment of probability.
- 7.11. Additionally, CPC notes the video evidence of bird assemblages within the red line submitted as **REP6-125** and **REP6-126** at D6.
- 7.12. **From the above, CPC believes it would be appropriate and proportionate for the ExA to require the applicant to withdraw its current assertions, undertake new accurate bird observations and then conduct a new risk assessment, working closely throughout with Oxford Airport Services and other Aps and IPs.**
- 7.13. CPC draws ExA's attention to its observation that, as in sections 4 -6 above, the applicant in this example again seems to be pursuing a preconceived solution with a pre-ordained modus operandi.

Comments on Residential Visual Amenity Assessment Parts 1 & 2 (REP6-064 and REP6-065)

8. ExA Action Point 18 (EV7-002)

8.1. In its response to EV7-002, the applicant's REP6-047 (page 34) states:

Post hearing submission (PINS Action Point No. 18):

An RVAA has been completed [EN010147/APP/17.13]. A total of 330 residential properties have been identified as falling within 250m of the Project and within the ZTV (Figure 1.1 to 1.66 of the RVAA). It should be noted that not all these properties would have views of the Project. Those that would have views available have been identified within the RVAA and assessed accordingly.

CPC also notes the applicant's oral contribution (ISH2 transcript part 4 EV7-010)

00:14:37:28 - 00:15:07:08

Thank you. On behalf of the applicant. Um, we do acknowledge the proximity of the, uh. Uh, some residential properties. Um, and as I say, we have carried out a more detailed assessment which would give further clarification to this. Um, now, of course, this is not in the public domain. Um, but it can be published at deadline six. Thank you.

This oral evidence given to the ExA on 9th October clearly states – in the past tense - *'we have carried out a more detailed assessment'*.

But the applicant's REP6-064 and REP6-065 both show that all the photographs in the applicant's *'more detailed assessment'* were not taken until 14th October, 5 days after the applicant's oral contribution to ISH2, while all the maps in REP6-064 and REP6-065 are dated 'OCT 2025'.

8.2. Notwithstanding the evidential discrepancies described in 8.1, CPC has undertaken an assessment of REP6-064 and REP6-065 in the light of sections 4 and 5 in the ExA's 23rd October Rule 17 letter (PD-018), in particular the 1st bullet of section 4:

All the visualisations in the appendices are from ground level looking at a hedgerow, asserting the hedge does the screening. However, it is evident that first floor windows are over and above the hedge height (for example P16 and P30) that appear to have uninterrupted views. Why are upper floor windows and the views therefrom discounted?

And in section 5 of PD-018, in reference to Landscape Institute Guidance Note 2/19:

It is also unclear why buffers are for some properties and not others when, taking into account paragraph 1.2 of guidance note 2/19: "Residential Visual Amenity means: 'the overall quality, experience and nature of views and outlook available to

*occupants of residential properties, **including** views from gardens and domestic curtilage.” (ExA emphasis).*

- 8.3. CPC shares the ExA’s concerns in **PD-018** about errors and omissions, along with concern about unevidenced proposed changes to panel placement adjacent to some properties but not others.
- 8.4. As evidence of the errors and omissions as they impact Cumnor Parish, CPC offers the following examples:
- Sections 8.5 to 8.7 detail omissions at all points of the compass, while
 - Sections 8.8 and 8.9 detail errors in those properties actually assessed.

These are not exhaustive, but are illustrative of the applicant’s lack of attention to detail, and of it not utilising evidence (such as that in the CPC Neighbourhood Plan and its associated Landscape Character Assessments **REP1-057, REP1-061, REP1-063**) that the applicant has previously claimed to have ‘noted’.

- 8.5. **Omission of the Hill End Outdoor Education Centre (an example of the omission of residencies in elevated positions to the north of the B4044, including the Oakenholt Care Home)**

Hill End has been omitted entirely by the applicant in its RVAA assessment, not even featuring in the large-scale assessment maps in Figures 1.29 to 1.33 and 1.62 to 1.66 in REP6-064.

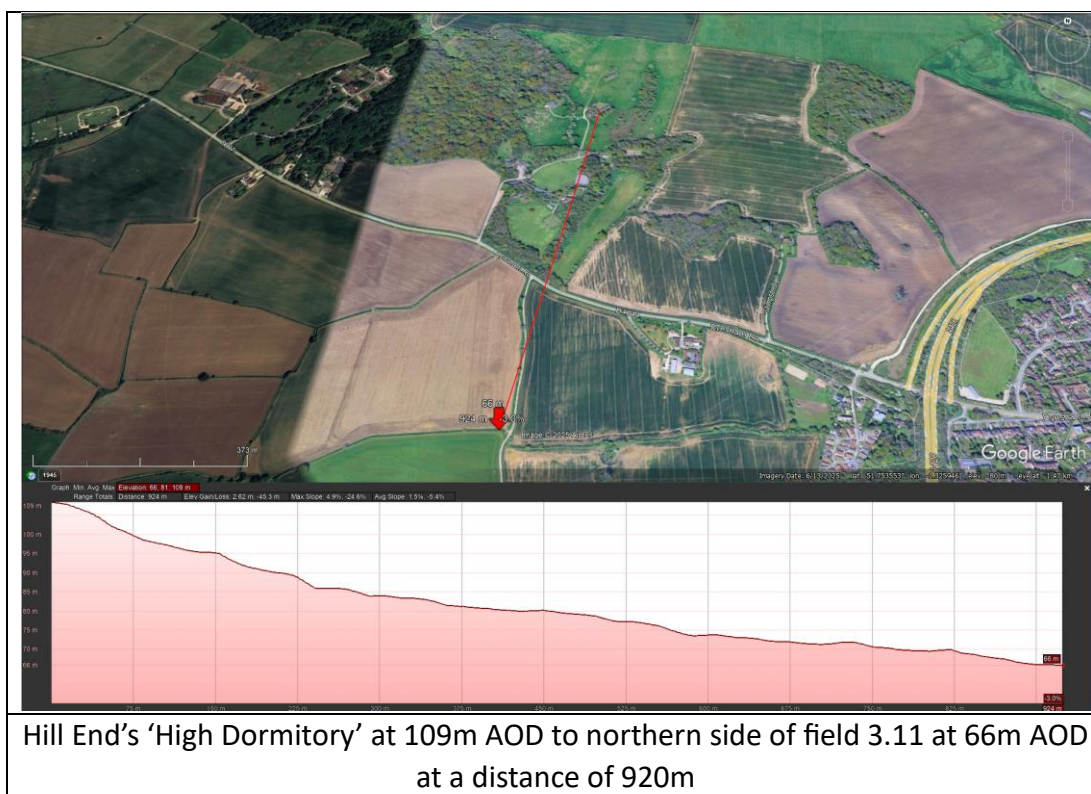
Hill End, which for more than a century has provided residential accommodation to students, is also home to a number of members of staff.

The intervisibility of the applicant’s proposed southern site and the proposed NGET substation to and from Hill End was observed by the ExA during their Accompanied Site Inspection on 7th October and on their Unaccompanied Site Inspections **EV2-001** and **EV2-006**.

As CPC’s analysis of Google Earth (below) shows, the northern side of Field 3.11 sits at 66m AOD, some 43m below the 109m AOD elevation of Hill End’s famous High Dormitory², at a distance of 920m.

At its closest, the southern curtilage of Hill End is 396m from the northern side of Field 3.11.

² <https://hill-end.org/help-us/reimagined/>



CPC notes that in the applicant's **REP1-006** they draw the ExA's attention to the fact that none of their 'representative viewpoints'³ are within Hill End.

To remedy that deficiency CPC offers its own annotated photograph taken from adjacent to Hill End's High Dormitory during the 7th October 2025 ASI.



The applicant's fields visible in just one quadrant of the southern site are labelled for ease of reference, as are the intervisibility with Upper Whitley Farm and Jumpers Farm.

³ Not 'agreed' as stated in **REP1-006** as the LVIA methodology is still, after three years, not the subject of a SoCG with the OHA, nor has the applicant responded positively to CPC's and VWHDC's proposed additional viewpoints and photomontages

8.6. Omission of Filchampstead – a hamlet within the settlement hierarchy in Cumnor Parish

There is no reference to Filchampstead in the text of **REP6-064** and so no assessment of RVAA impacts for either the construction or operation phases.

CPC has already submitted its concerns relating to construction in its comments on the applicant's reply to ExQ 2.7.13 on page 3 of **REP5-077**.

Regarding operation, CPC observes that the RVAA Figure 1.62 in **REP6-064** merely describes residences on Lower Whitley Road (junction with B4017 at w3w ///unroll.beads.trades) as '*other residential property*'

Given that all the 8 properties on the south side of Lower Whitley Road contain dwellings and gardens that face south towards Tumbledown, and that, for example, the 17th century Tumbledown Cottage (see list of Local Heritage Assets on page 76 of **REP1-057**) lies only 257m from the applicant's Field 3.3 (see page 52 of **REP6-118**) CPC concludes this is incontrovertible evidence of the scale of errors and omissions in the RVAA, which claims a '1km study area' (para 1.3.4 in **REP6-064**)

These errors and omissions are compounded when one considers the topography viewable by '*occupants of residential properties, including views from gardens and domestic curtilage*' (section 5 of **PD-018**).

As the Google Earth snapshots (below) show, **Tumbledown Cottage** lies 11m below the northern junction of fields 3.6 and 3.8 at a distance of 729m, and 31m below the southern junction of fields 3.6 and 3.8 at a distance of 924m.



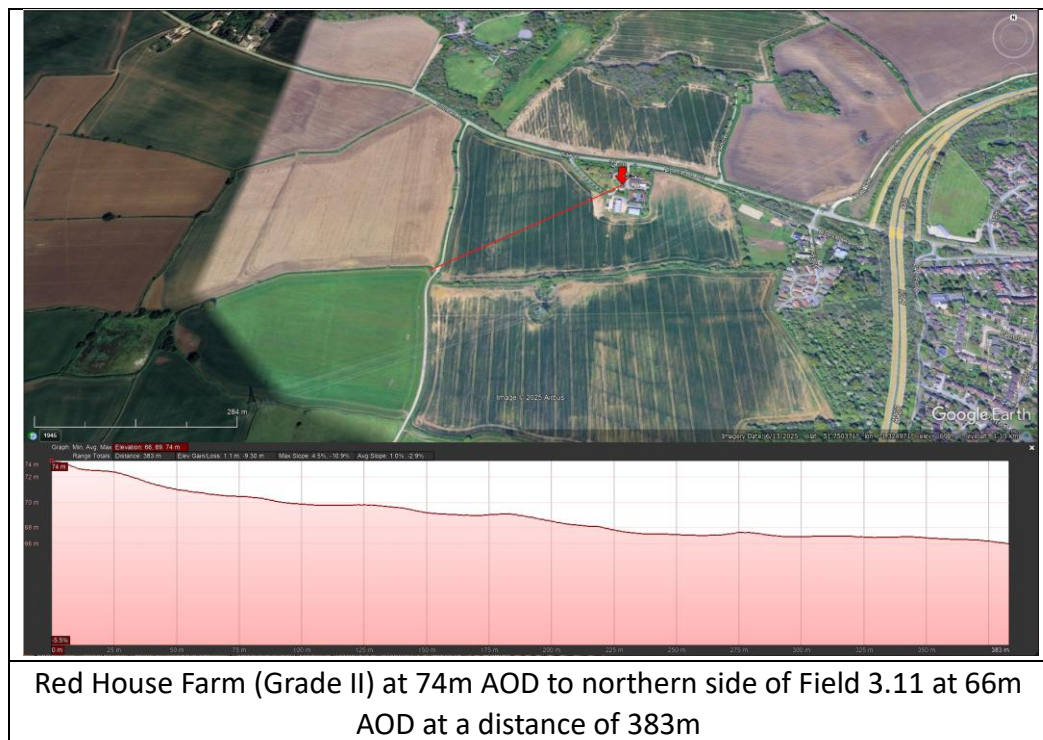


To again claim ‘invisibility’ as the applicant does, stretches CPC’s credulity and leads it to question the methodology actually undertaken during the belated RVAA, since CPC has provided this evidence by using Google, one of the tools listed by the applicant in their RVAA ‘methodology’.

8.7. Additional omissions: Red House Farm and properties on the B4017 at the top of Tumbledown

8.7.1. The Grade II Listed Red House Farm has been omitted entirely by the applicant in its RVAA assessment, not even featuring in the large-scale assessment maps in Figures 1.29 to 1.33 and 1.62 to 1.66 in REP6-064.

As CPC's analysis of Google Earth (below) shows, the northern side of field 3.11 sits at 66m AOD, some 8m below the 74m AOD elevation of Red House Farm, at a distance of 383m.

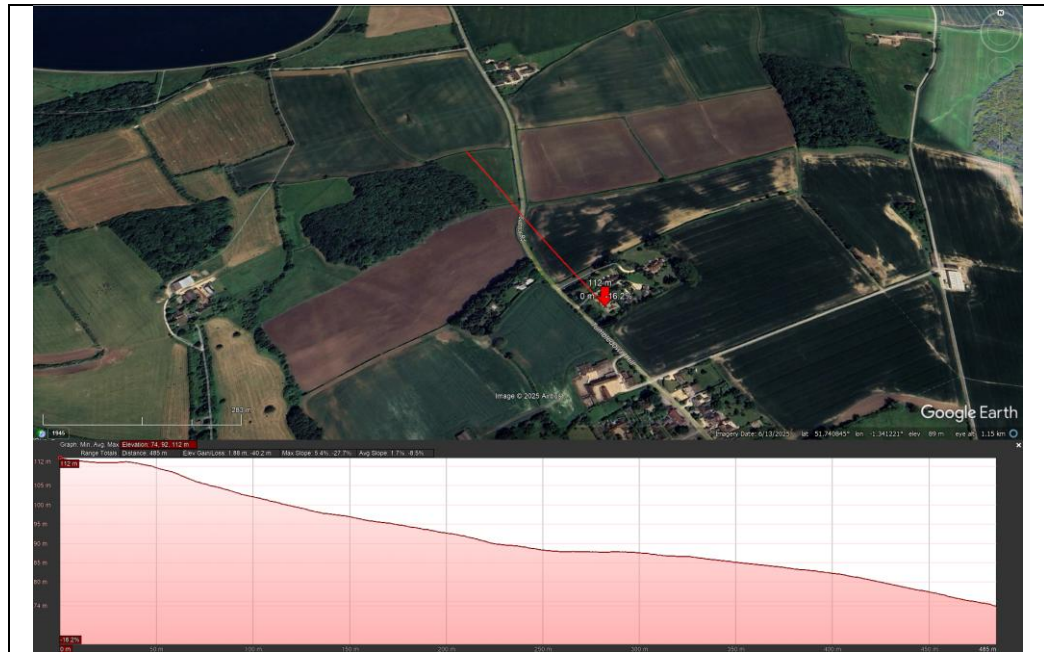


8.7.2. Properties at the top of Tumbledown on the B4017

While the applicant's RVAA errors for properties including Heidersbach and Lake View are covered in section 8.9 below, the applicant has also omitted assessment of other properties in the vicinity that do demonstrably have views of the Southern site.

For example, **Wetherden (at w3w ///clockwork.rate.doses)** despite being categorised by the applicant as an '*other residential property*' is only 240m from the southern edge of Field 3.6.

Furthermore, at 112m AOD, Wetherden is 38m above the 74m AOD elevation of the southern edge of Field 3.3, at a distance of 480m and 45m above the northern edge of Field 3.3, which slopes S to N, at a distance 850m.



Wetherden (at w3w ///clockwork.rate.doses) at 112m AOD, some 38m above the 74m AOD elevation of the southern edge of Field 3.3, at a distance of 480m.



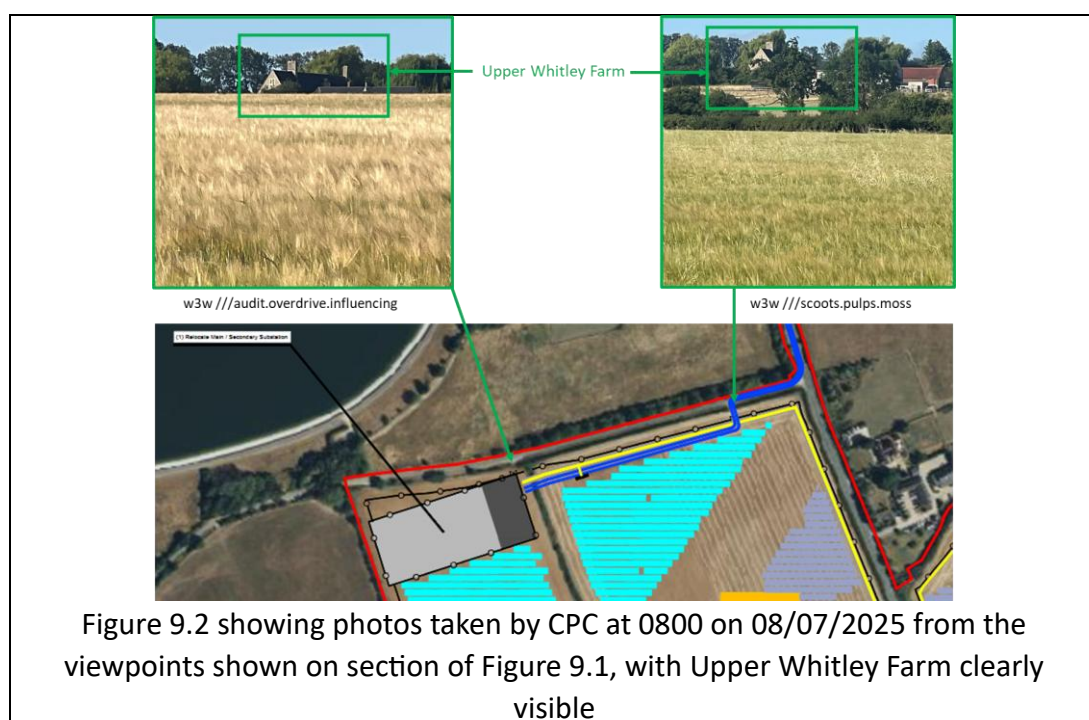
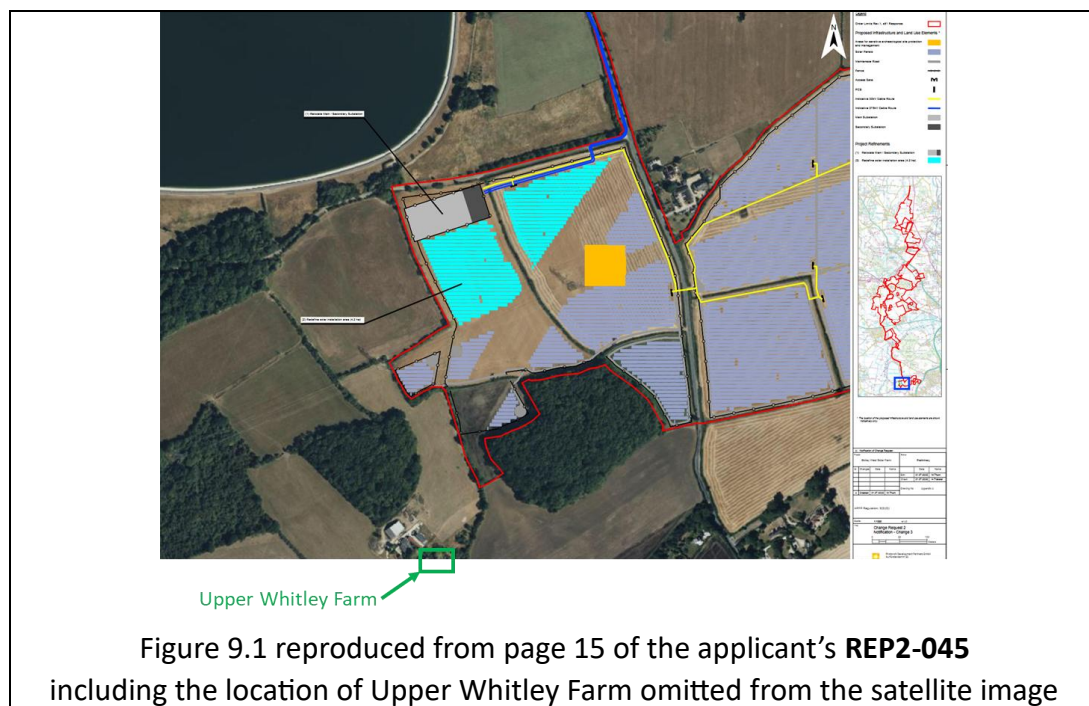
The residents of Wetherden wish the ExA to be aware that:

“The Residential Impact Assessment is at best inaccurate and at worst deliberately misleading. No attempt has been made by PVDP to assess the visual impact from Wetherden. The siting of the National Grid Power Station will have a major and significant impact on the visual amenity of this property. Unlike the solar panel installation, the impact will be permanent not temporary for 42 years. ”

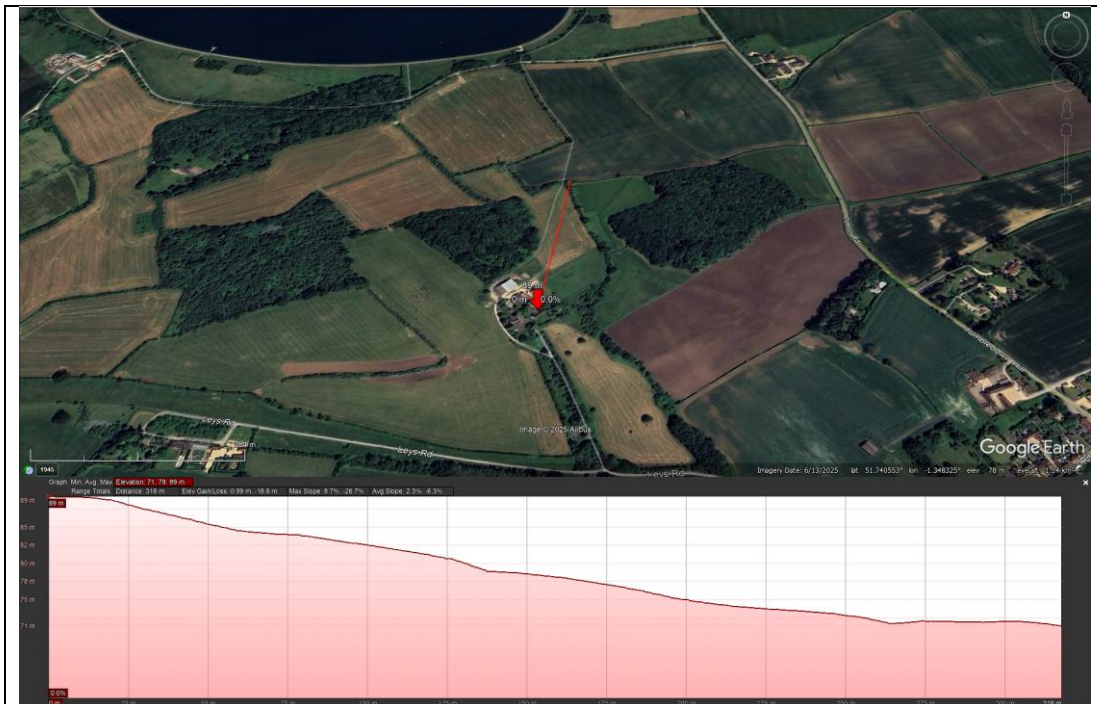
8.8. Errors in applicant's 'assessment' of Upper Whitley Farm and Cedar Barn, Leys Road Cumnor.

Despite the applicant's own Figures 1.32 and 1.65 in **REP6-064** listing both Upper Whitley Farm and Cedar Barn as '*residential property within the study area*' they are not taken forward into any RVAA.

As a reminder to the applicant, CPC demonstrated the visibility of both properties from field 3.3 in section 9 of its **REP3-078**, reproduced below for convenience.



As further evidence of the errors in the recent RVAA, compounding that in **REP2-045**, CPC offers the following Google Earth data.



Upper Whitley Farm/Cedar Barn at 89m AOD to Field 3.1 at 71m AOD at a distance of 315m



Upper Whitley Farm/Cedar Barn at 89m AOD to junction of Fields 3.1 and 3.3 at 64m AOD at a distance of 704m

As this example shows, the applicant continues to fail to apply itself to the 'exam questions' set by ExA or to engage with evidence provided repeatedly by this IP, serving to further demonstrate the accuracy of the ExA statement (para 10 in **PD-017**) that:

The ExA find it extraordinary that you have just repeated your approach and methodology, when this has been questioned on numerous occasions both in writing and in the previous hearings. Many of the IP's as well as the host authorities and Historic England have made valid professional judgements that should be considered as such. Please could you explain why you still consider your approach to be correct and everyone else's approach to simply be subjective opinions that would not materially affect your assessments?

8.9. Errors in applicant's assessment of Jumpers Farm, Denman's Farm, Lake View and Heidersbach.

With the exception of Year1 at **Denman's Farm**⁴, the applicant assesses that in all cases and for all durations these properties will all experience 'low minor not significant' RVAA impacts.

Whatever the reasons behind this assertion for **Denmans Farm**⁴ which would be surrounded on all four points of the compass by panels, given the applicant's modus operandi and CPC's analysis in sections 8.5 -8.8 above, this 'low minor not significant' assertion comes as no surprise to CPC.

However, it is so patently at variance to the lived experience of residents that it warrants some investigation into how the applicant believes it can make such judgements with any integrity.

Taking first the case of **Heidersbach** and **Lake View**, the applicant clearly places great store in its Figure 2.27⁵ of **REP6-065** which depicts the entrances to the properties from the B4017.

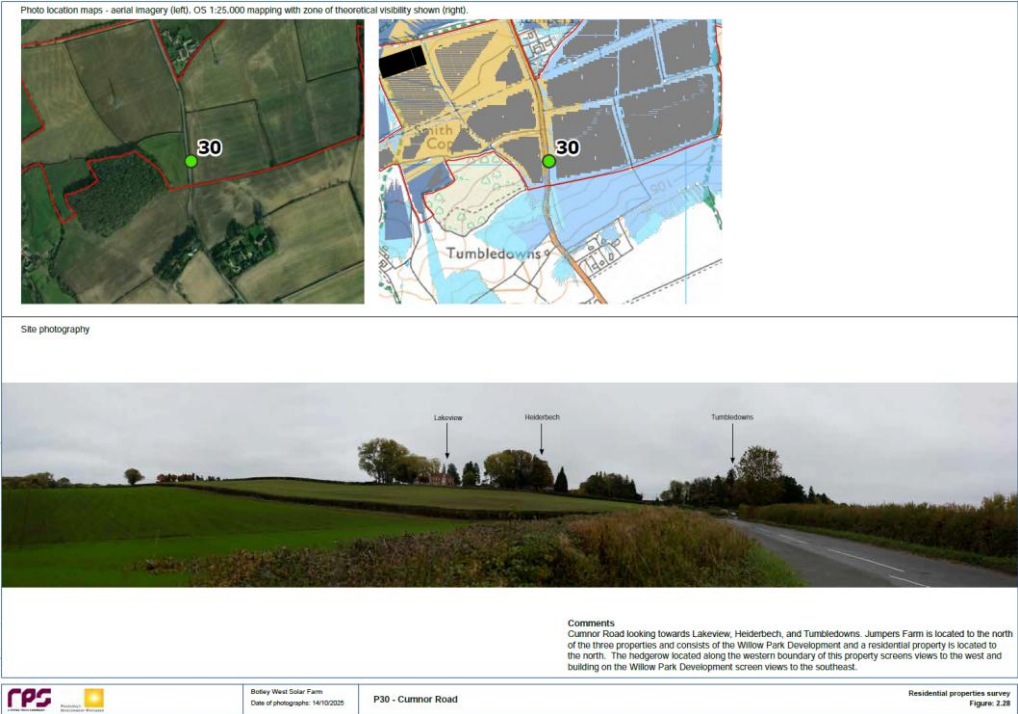


Quite what this is meant to contribute to the RVAA assessment is unclear, save that – and perhaps the applicant hasn't fully appreciated the text of Landscape Institute Guidance Note 2/19 (as reported by the ExA in section 5 of **PD-018**) - it serves to amply illustrate the extensive curtilage of these properties.

⁴ a residence that has ownership in common with fields 3.1-3.15

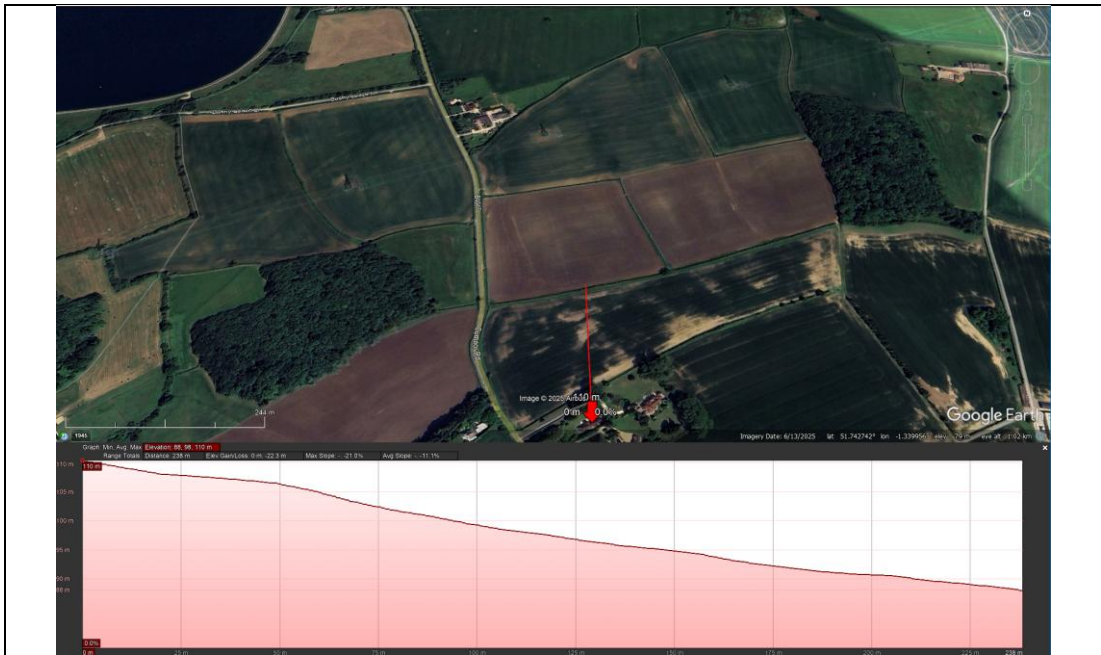
⁵ CPC notes all the applicant's photos in **REP6-064** and **REP6-065** were taken on '14/10/2025' – so in the week after the ExA's hearings and only 6 days before the RVAA had to be submitted – see section 8.1 above

The applicant then doubles down on this bizarre methodology by offering Figure 2.28⁵ of **REP6-065**, a poor badly lit photo pointing towards the residences and away from the applicant’s site – surely the opposite view to the one that needs to be assessed?



In contrast CPC offers the ExA a more methodologically sound way of accumulating evidence, using Google Earth data and photographs taken from the properties towards the applicant’s site.

Heidersbach is at 110m AOD, 22m above the 88m AOD elevation of the southern edge of Field 3.6, at a distance of 236m.



View from Heidersbach towards Fields 3.3, 3.4, 3.5 and 3.6



View from Heidersbach towards Fields 3.3, 3.5, 3.7 and 3.8

The owner of Heidersbach wish the ExA to be aware that:

"I was disappointed and a bit shocked that after year of consultation and examination, the developers had not managed to find the time and make the effort to visit the properties that are most affected by the proposed solar power station development in the Farmoor valley.

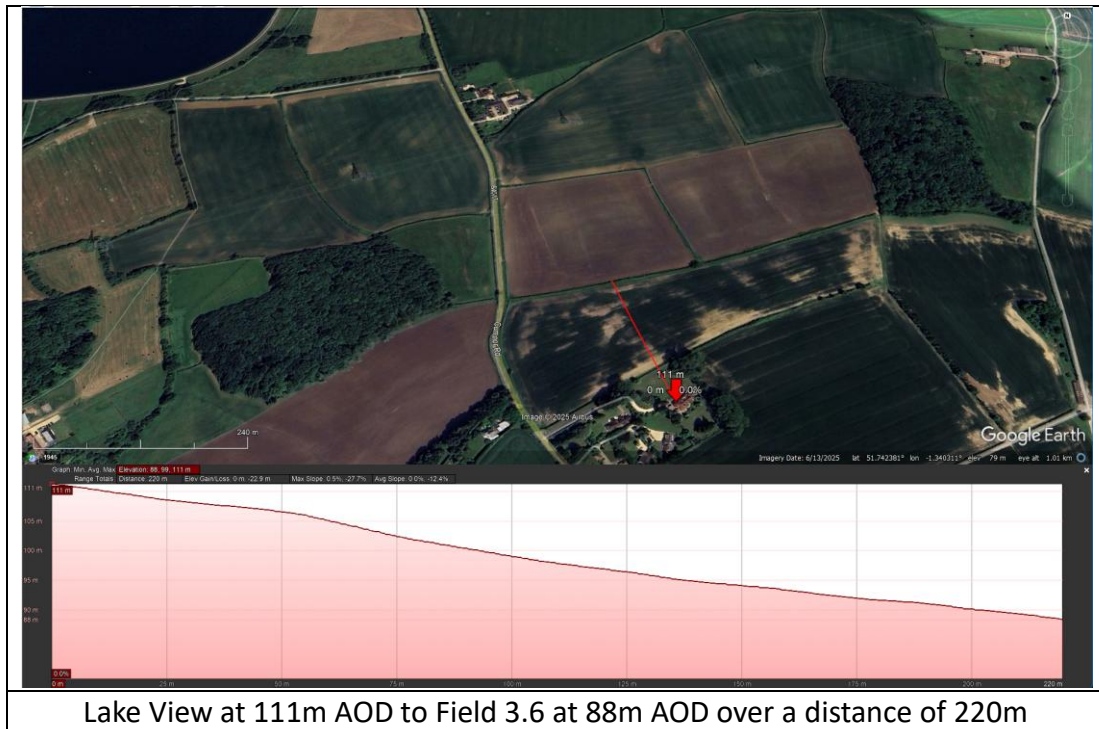
I can't see how they could possibly have carried out any meaningful impact assessment without having done a site visit and spoken to the owners.

Being on the rim of valley about fifty metres higher than the proposed development, our house, like others, was built and orientated facing West of North to take best advantage of its commanding view over those areas where the development will take place. If this development were to proceed, the visual impact would be enormous, as can be clearly seen by anyone visiting the property. There would also be the problems of glint and glare, and noise.

Could you please insist on our behalf that a proper, full and accurate impact assessment of all properties affected by this proposal is carried out.

The solar panels, they claim, will be 'temporary' but certainly much longer than my lifetime and possibly those of our children. The substation would be there forever. The loss of the amenity value of our Greenbelt will greatly degrade the quality of life for all of us who live in this part of Oxfordshire."

Lake View is at 111m AOD, 23m above the 88m AOD elevation of the southern edge of Field 3.6, at a distance of 220m.





View from back door of Lake View to fields 3.1, 3.3, 3.5 and 3.6

The residents of Lake View wish the ExA to be aware that:

"The Applicant's description is demonstrably false. The north boundary of Lake View House has minimal mature tree planting, and the proposed works will industrialise 50% of the land view currently enjoyed by the property. The fall of the land in front of the property will not hide the proposed works in any meaningful way. All of the proposed works will be plainly prominent from each part of Lake View House and its garden. The impact on the property's view will be materially detrimental."

CPC proposes to the ExA that this RVAA evidence from residents makes a nonsense of the applicant's claim that *'with the land falling away from these properties, the Project southern section would be below the eyeline of views available from them'*

CPC further proposes that this is a truly desperate circumlocution by the applicant required to fit its pre-ordained assessment of *'low minor not significant'* impacts.

Moving onto Jumpers Farm, a familiar pattern of the applicant's ill evidenced assertions is again apparent.

As CPC informed the ExA at ISH2 (EV7-066), the applicant's 'red line' boundary sits on the western (field 3.3), southern and eastern (field 3.5) boundaries of this property.

Situated on opposite sides of the B4017, the western curtilage of Jumpers Farm is just 15m from Field 3.3.

On page 19-20 of REP6-064 the applicant claims:

'The western perimeter of the property screens any potential views of the development.'

.....

'Therefore, no views of the Project are expected, including from first floor windows.'

.....

'Views to the east would be retained'

These claims are unevidenced and untrue.

Taking first the claim about views to the west, it is demonstrably false as the images taken from Jumper's first floor windows looking west to Fields 3.1 and 3.3 (below) shows.



Turning to the applicant's claims about views to the East and its notable lack of claim about views to the south.

Jumpers Farm is at 66m AOD, 8m below the 74m AOD elevation of the northern junction of Fields 3.6 and 3.8 at a distance of 309m, and 28m below the 94m AOD elevation of the fields' southern junction.



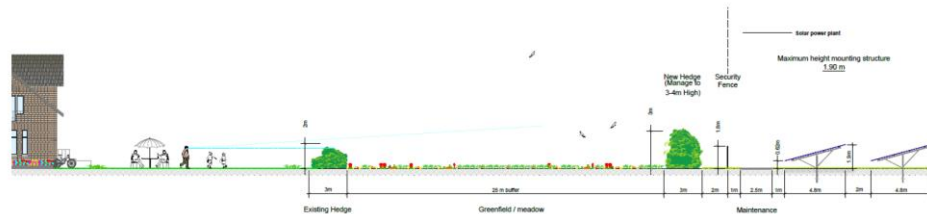
Jumpers Farm at 66m AOD to northern junction of Fields 3.6 and 3.8 at 74m AOD over a distance of 309m (southern junction of 3.6 and 3.8 at 94m)



Aerial View from Jumpers Farm (bottom RH corner) looking SE over Fields 3.3 – 3.10

Jumpers Farm also illustrates the futility of the applicant's proposed mitigation method when applied real topographies that allow wide sweeping views.

1. Mitigation Method

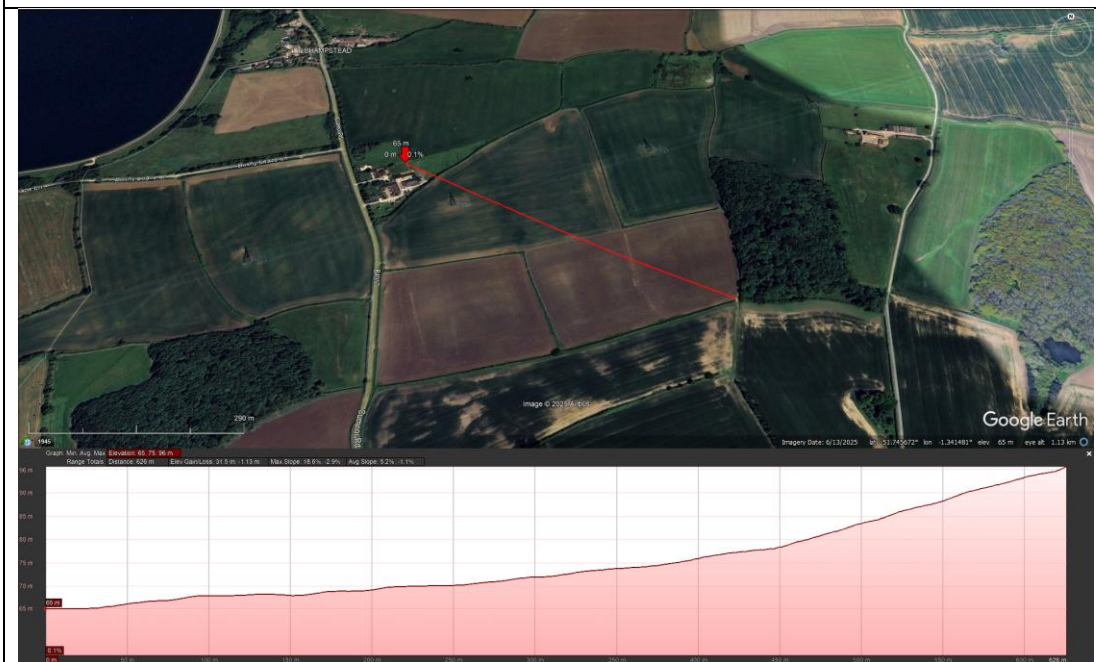


3m-width-hedges **row (r1)** by the house's fence and **25m** of meadow between the next **row (r2)** of 3m-width-hedges followed by **2m** to the security **fence (f)**.

Mitigation Method Rule: $r1 + 25m + r2 + 2m + f$

2

Applicant's proposed mitigation method (above) vs real topography (bottom): Jumpers Farm curtilage at 66m AOD to Oxford Green Belt Way (184/15/30) at 96m AOD at a distance of 626m across Fields 3.5, 3.7 and 3.8



Unless the applicant is asserting that this property's '*dense vegetation*' (page 19-page 20 of **REP6-064**) is between 8m (74m AOD – 66m AOD) and 30m (96m – 66m) tall, and so obliterating all views from every part of the property and its curtilage, it is impossible to understand how it is possible to conclude '*minor not significant*' impacts.

- 8.10. **CPC’s evidence-based assessments in paras 8.5-8.9 above demonstrate that the applicant has made numerous errors and omissions in its hastily produced⁵ RVAA.**
- 8.11. **CPC assesses that these numerous errors and omissions in the data set shown in REP 6-064 and REP6-065 renders them unreliable and so unusable.**
- 8.12. **It therefore follows that the applicant’s assessments of impact are inaccurate and so cannot be relied upon at all.**
- 8.13. **CPC therefore invites the ExA to disregard the evidently hastily produced and error strewn RVAA with its many omissions.**
- 8.14. **As a consequence of the above CPC supports the ExA’s proposed new requirement (para 5 of PD-018)**

There shall be a distance of no less than 250 metres between the edge of any part of the proposed operational solar array and any residential dwellinghouse (as measured from the curtilage of any private residential property or address), unless otherwise demonstrated to be acceptable in writing to the satisfaction of the relevant local authority, such satisfaction to be given formally in writing subject to Schedule 16 of this Order.

9. End

Cumnor Parish Council
10th November 2025