

CUMNOR PARISH COUNCIL

Planning Inspectorate

By email

10th November 2025

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BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147

Cumnor Parish Council – Closing Statement for Deadline 7

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) closing statement as an Interested Party (IP) in this NSIP examination.

For brevity we will not repeat our detailed assessments already submitted to the ExA, but this Statement will draw upon those and on our prior submissions to the applicant during its own 'consultations' that preceded this Examination.

3. In summing up CPC's current position, some three years after the applicant's Phase One Community Consultation Leaflet (APP-026) landed on our residents' doormats, we find ourselves focusing on two themes:
 - 3.1. The behaviour of the applicant and their overall attitude to us (and it turns out to others also) and secondly,
 - 3.2. detailed consideration of evidence by us as an IP working in tandem with our residents, contrasting with the applicant's missing evidence and unevidenced assertions.

These two themes are interrelated as we will show.

Behaviour and Attitudes

4. From the Botley West Community webinar on 5th December 2022, through a 'roadshow' in our Village Hall and onto two phases of applicant led consultation, we sensed that, at best, PVDP was merely going through the motions.

Detailed questions by residents went unanswered at both in-person events and by email, and it was never clear to CPC how or whether consultation feedback had been incorporated into any iterations of the project plan; indeed, whether the project plan was ever iterated at all before submission to PINS.

5. As 2023 turned into 2024 we began to realise that the applicant, when it said anything, repeated three memes: all adverse impacts are minimal, all harms can be mitigated, and temporary - actually 4 decades – means everything will be reversed sometime in the 2060's, contradicting their own statements about permanence of some components.
6. For CPC this behaviour was – and remains – exemplified by the applicant's reliance on their intention to plant hedges as 'mitigation'.

As the ExA has seen for itself, the topography of Cumnor's Locally Valued Landscape, with its openness and sweeping views, currently benefits from the hard-won protections of the Important Views policy in the Parish's made Neighbourhood Plan (**REP1-057**).

This allows the Landscape to be kinetically experienced from a network of PROW, including the Oxford Green Belt Way, by walkers - including Hill End Outdoor Education Centre's annual 23,000 visitors - and by residents, including Hill End's 7,000 overnight visitors¹. As the ExA saw and heard, Hill End is a national resource, now at risk.

Let's not pretend, as PVDP continues to do (see October 2025's **REP6-064**), that the adverse impacts of its panels, substations, fencing, and CCTV can be mitigated by planting some hedges. As we stated in **REP1-065**:

'That's risible, unless the hedges are also planted at the top of all the hills, in which case they will not preserve the openness and views but will simply obliterate them.'

And, as the ExA has raised, would they really all be grubbed up in the 2060's?

7. Perhaps the best summary of the applicant's behaviour and attitude to this whole application and NSIP examination process was provided by their own CEO on July 2nd, a day after the ExA's Deadline 2:

*'it's a big change, but people will get used to it'*²

¹ See Hill End's Closing Statement for Deadline 7 for more details on adverse impacts and absence of engagement by the applicant.

² [REDACTED] CEO PVDP quoted in [REDACTED]
[REDACTED]

8. So, the applicant is still deploying this modus operandi after 3 years, including throughout the ExA's formal NSIP examination.

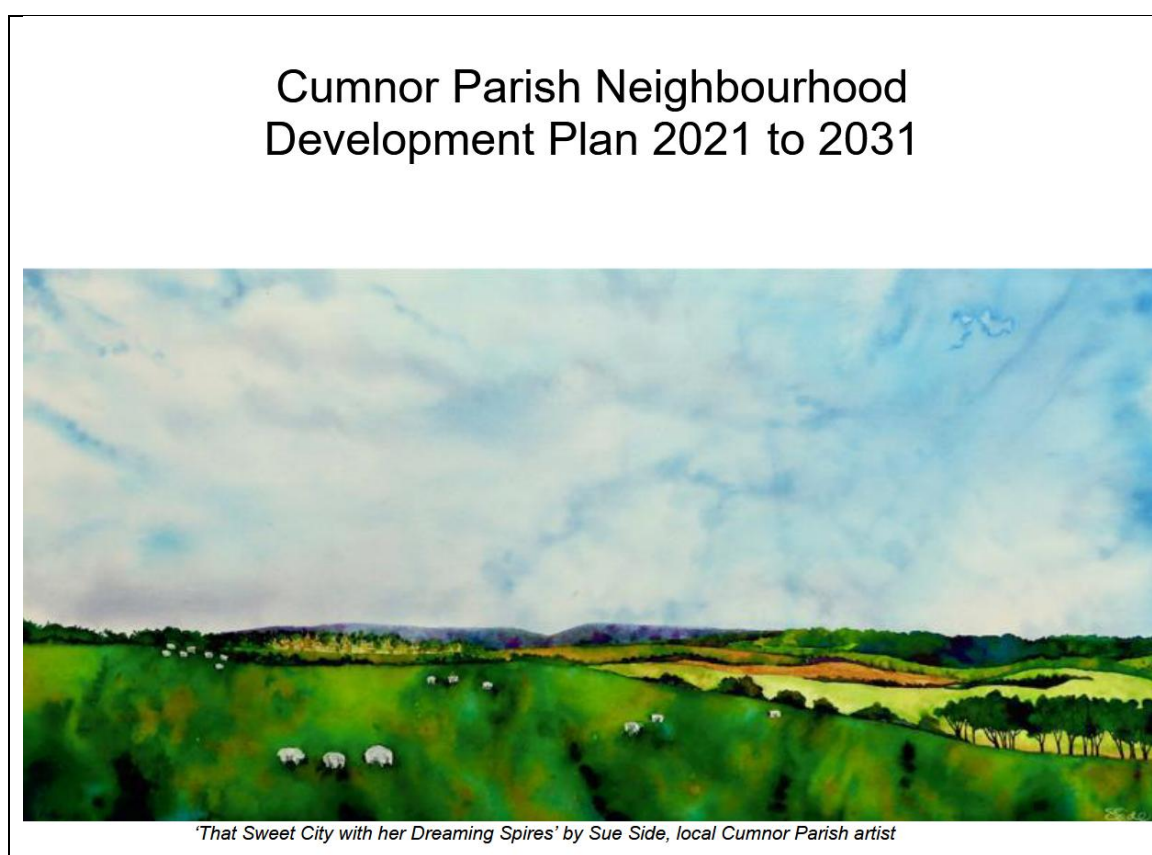
That is why in our **REP6-084** we referred the ExA to this, describing it as

'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'.

Evidence vs assertions

9. For 3 years now CPC has invested its scant resources on behalf of our 7000 residents into assessing the documentation produced by PVDP.

Our evidence-led approach was developed during the iterative development of our Neighbourhood Plan, which relied on the detailed local knowledge of those residents.



Confidence in this approach was demonstrated by praise from the Independent Examiner³, a high turnout in the Plan's Referendum, and a 90% vote in favour. It became a made Plan in June 2021.

³ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2021/08/Cumnor-Neighbourhood-Development-Plan-Examiners-REport.pdf>

10. Applying this evidence-led approach to PVDP's application has been alternately illuminating and depressing.

11. CPC reported to the ExA in **REP1-065** that as PVDP was

'hiring consultants to tell us - and you - things about our Parish that are impossible, leads us to have a very low degree of confidence in their assertions.'

Six months on from that May 2025 assessment, CPC has not seen anything that would reverse it.

On the contrary, our assessments of PVDP's submissions for Deadlines 1 to 6, has further depressed our confidence, to the point where we now have zero confidence in some of their assertions.

12. As examples of the issues that we feel PVDP has not been able to provide evidence we can have confidence in are:

- Permanent industrialisation of the Oxford Green Belt, and PVDP's changing story of the relevant Very Special Circumstances, with an over reliance on the so-called temporary nature when some elements in this parish will be permanent,
- Substantial permanent Landscape and Visual impacts, including on Public Rights of Way such as the Oxford Green Belt Way, given
- A deficient LVIA as noted by CPC and OHA, including PVDP's limited choice of viewpoints and impacts on Zones of Theoretical Visibility (ZTVs) of PVDP's changes to claimed heights and locations of substations etc.,
- Contravention of CPC's made Neighbourhood Plan policy on Important Views (DBC7),
- Contravention of CPC's made Neighbourhood Plan policy on Flood Risk (RNE2),
- PVDP's choices about Change Requests to the application and the removal of land parcels, in turn linked to
- PVDP's deficient application of the mitigation hierarchy in both in its original proposal and the (very few) subsequent changes,
- Lack of assessment of cumulative impacts of other power station projects in the Parish, including the proposed National Grid substation,
- Statements of PVDP's Common Grounds with National Grid on the choice of substation location and timing of substation development and connection, contradicted by the applicant's and National Grid's individual statements,

- A hastily produced, inadequate and error strewn assessment of the impacts on visual amenity from domestic properties (RVAA),
- Operational noise impacts on both residential receptors and receptors using PRow,
- No application of Designing Out Crime processes to minimise the risk of theft across 1400+ hectares of remote rural Oxfordshire countryside,
- Reasons offered for requiring Compulsory Acquisition powers over c. 1400 hectares of rural Oxfordshire,
- Many unanswered questions that the applicant has effectively ignored, on everything from:
 - traffic and transport e.g.
 - alterations to roads in the Parish necessary to accommodate Abnormal Indivisible Loads (AIL) up to 150 tons,
 - impacts on residents, businesses and road users (including public transport on the B4044) of cable works on the B4044 and B4017
 - impacts on the proposed B4044 Community Path;
 - through to:
 - adverse heritage impacts
 - adverse impacts on the Hill End Outdoor Education Centre and
 - adverse impacts on farmland birds, such as skylarks.

13. In addition, CPC is struck by the volume of detail that PVDP has yet to address. So many questions by this IP, others and the ExA are, the applicant asserts, only capable of being answered after they have gained planning permission.

To say that CPC is deeply skeptical is an understatement, and a direct result of the interplay between the applicant's behaviour and its assertions thus far.

14. CPC therefore remains concerned that the volume of unanswered questions, combined with the volume of PVDP's unevidenced assertions that CPC has been able to counter with evidence submitted to the ExA, represents only a fraction of those that lie within the application as a whole.

To quote the Rumsfeld paradox⁴, what are the application's '*unknown unknowns*'?

From CPC's experience they are highly unlikely be zero in volume or nugatory in impact.

Is that a risk worth consigning 1400 ha of rural Oxfordshire to a 42-year DCO?

⁴ [REDACTED]
[REDACTED]

Conclusions and Recommendations



Autumn sunrise over the Farmoor valley from Cumnor Neighbourhood Plan Important View 3 (**REP1-062**)

15. Assessing both the applicant's behaviour and its assertions - oral and written - has allowed CPC to arrive at a composite view on its application.

16. It is CPC's conclusion therefore that:

- 16.1. CPC is opposed to this application for the reasons stated in 12. above and in its prior submissions to the ExA.
- 16.2. The southern site should be removed in its entirety from the application if consent is to be granted – this is also the position of ICOMOS(**REP2-074**), the OHA (**REP6-118**) and Layla Moran MP (**REP2-117**).
- 16.3. CPC welcomes all the ExA's proposed changes to the draft Development Consent Order (dDCO) as set out in **PD-015** of 18th September. In particular CPC endorses:

16.3.1. The 'Grampian condition' PC001 in **PD-015** in respect of the proposed NGET substation, given Layla Moran MP's questions to National Grid and CPC's own investigations, as reported in, for example, **REP2-048**, **REP3-078**, **REP4-046** and **REP6-084**.

16.3.2. PC002 in **PD-015** in respect of funding for decommissioning and the OHA's proposal (**REP6-117**) for a bond to provide 'an appropriate financial guarantee'.

This is welcome given widespread concern about the applicant's funding ability as raised by the ExA in and previously by Layla Moran MP in **REP2-117**, referencing her contribution in the 'Repurposing Russian Assets to Rebuild Ukraine' debate held in Parliament on Tuesday 27 June 2023.

16.4. In the light of the hastily produced, error strewn and omission heavy RVAA offered by the applicant at Deadline 6 only after repeated prompting by the ExA, CPC welcomes the ExA's proposed new '250m buffer' requirement as set out in para 5 of **PD-018**.

17. End

Cumnor Parish Council
10th November 2025