

CUMNOR PARISH COUNCIL

Secretary of State at DESNZ
BotleyWestSolar@planninginspectorate.gov.uk
15th July 2026

Contact:
[REDACTED] (Clerk)
clerk@cumnorparishcouncil.org.uk

BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147

Dear Secretary of State

In response to your 11th June 2026 invitation to respond to submissions made to your 28th April 2026 Request For Information, Cumnor Parish Council (CPC) as an Interested Party (IP) is today submitting two documents to you by email:

1. Cumnor PC response to 11th June 2026 Invitation to Comment v1 150726.pdf
2. 2026 Cumnor Parish Flood Risk Assessment.pdf

This document is the 1st of the two. Each question addressed comprises an assessment and summary sections.

For brevity this document uses the acronyms established by the Examining Authority (ExA) during the prior Examination Phase in 2025. Where additional acronyms are used they are explained in full on 1st use.

Please note that Cumnor Parish Council's responses are to documents you received by your 23:59 16th June 2026 deadline, although we note that the Applicant subsequently lodged 5 additional documents with you on 26th June 2026, described by the Planning Inspectorate (PINS) as late submissions, to rectify one of the Applicant's typographical errors.

However, Cumnor Parish Council is aware from a media report and other sources that the Applicant intends to send you another substantive submission on or by 16th July, despite your 8th June 2026 letter refusing its 22nd May 2026 request to extend the deadline from 9th June to 25th September.

Given that many of the Applicant's responses to your questions, as to those previously asked by the ExA, are that they will only be answered once DCO consent is obtained, and mindful of your 8th June letter raising your concern about '*undermining confidence in, and the integrity of, the planning process*' we ask you whether the Applicant has provided enough detailed information within your deadlines for the planning balance to be properly assessed, and if not that the application should either be refused or withdrawn and resubmitted?

Cumnor Parish Council
15th July 2026

Secretary of State (SoS) Question Number	Page
Question 6 assessment of Applicant's response	3
Question 6a Northfleet substation	4
Question 6b Cowley NGET substation	5
Question 6c search radius	7
Question 6d Cowley & Farmoor NGET comparisons	8
Question 6e Site selection methodology for Applicant's Farmoor substation	15
Question 7 Site selection BMV, Green Belt and Flood Zone	19
Question 8 Timescale uncertainty & dependencies	21
Question 9 NGET substation planning application status	22
Question 10-11 update on two scenarios for NGET substation delivery	29
Question 12 conflicting information regarding towers and other infrastructure	31
Question 13 Tower structures and Order Limits	33
Question 14 Applicant to provide updated documents	37
Question 19 ICOMOS reviews and lack of Applicant's response	38
Question 23 Mitigation hierarchy	39
Question 24a OHA concerns	40
Question 24b Applicant's response to IP comments at Deadline 7	43
Question 24c Visualisations and viewpoint selection & verification	45
Question 24d Early stage scheme development and mitigation hierarchy	49
Question 26 Updated RVAA	51
Question 27a-c & 28 property-by-property assessment of RVAA	53
Question 33 & 34 Skylarks, breeding and overwintering birds	60
Question 35 Bats and required remedial measures	64
Question 39 Ancient Woodland and Veteran trees	70
Question 40 Horizontal Directional Drilling impacts on ancient woodland	74
Question 41 Applicant's Strategic Arboricultural Impact Assessment etc.	75
Question 54 EA to confirm NPS EN-1 sequential and exception tests met	79
Question 57 efficacy of mitigation measures in Conceptual Drainage Strategy	83
Question 66-69 Without Prejudice Offer	94

Alternatives and Site Selection

- 6 Having consideration for NPS EN-1 paragraphs 4.3.9, 4.3.10 and 4.3.15, the **Applicant** is requested to provide additional and detailed reasons, and considerations in respect of the following:
- a. Discounting of the National Grid Electricity Transmission Limited (“NGET”) substation at Northfleet in East London, briefly referenced in the Environmental Statement Chapter 5 Alternatives considered [APP-042];
 - b. Progress made with regard to securing land in the Cowley NGET substation allocation [APP-042] up to the point of becoming aware of National Grid’s proposals for a preferred site at Farmoor, noting that the search began to find at least 250 hectares (“ha”) of land in the Cowley NGET substation area;
 - c. Details of the search radius applied from the grid connection point at the proposed Farmoor NGET substation, whether this was incrementally extended and how it compared to the search area and approach applied to the Cowley NGET substation search for land;
 - d. The environmental, social and economic considerations and financial viability and technical feasibility considerations in respect of both the initial point of connection at Cowley NGET substation and the proposed Farmoor NGET substation in line with NPS-EN1 paragraphs 4.1.22 and 4.3.15; and
 - e. The site selection methodology used in relation to the proposed development and grid connection at the proposed Farmoor NGET substation.

Question 6: assessment of Applicant’s response

On first impression the Applicant’s 22 page response to SoS questions 6a-e provides an extensive discursive narrative.

Having read the Applicant’s new Decision Phase assertions and tested them against the information available to it including the Applicant’s previous statements in its application and during the Examination phase, this Interested Party has arrived at the following assessments for each part 6a-e below.

Summary

Overall, to this Interested Party the Applicant’s answers to 6a-e, assessed in detail below, demonstrates that it is now seeking to rely on a new narrative for alternatives and site selection in the NSIP decision phase, 7+ months after the conclusion of the Examination phase in which it failed to provide the required information in its Environmental Statement (ES) on numerous occasions prompted by repeated ExA questioning, as obliged to do so in NPS EN-1 paragraphs 4.3.9, 4.3.20 and 4.13.15.

6a Northfleet substation: assessment of Applicant's response

In assessing the Applicant's latest response to this question this Interested Party is minded to refer the SoS back to the ExA's perceptive question/comment some 13 months ago on 13th May 2025 (**EV5-003 EN010147-000804-Transcript ish1 pt 1 at 01:11:35 – 01:12:13:18**):

'it very much reads that you looked at one other alternative, which was Norfleet [sic]. You discounted that quite quickly because it's only mentioned once in one sentence in that document, and then almost immediately you're saying, we've got landowners, we've got land, and that's where we decided to build'

This assessment is supported by the fact that the Applicant has previously stated (**APP-042 para 5.6.7 page 6**) that it

'looked at approximately 19 substations'.

Now (**C1-087 page 3**) we are told that:

'Once a substation was identified as having potential capacity, an application for a pre-application call was made to NGET and the likelihood of success of a connection application'

but also that

'Where the land team were confident that there were landowners near the substation interested in letting their land for a solar farm, a pre-application call was booked.'

So which was it: land first? Substation first? Or a 'look at' 19 substations?

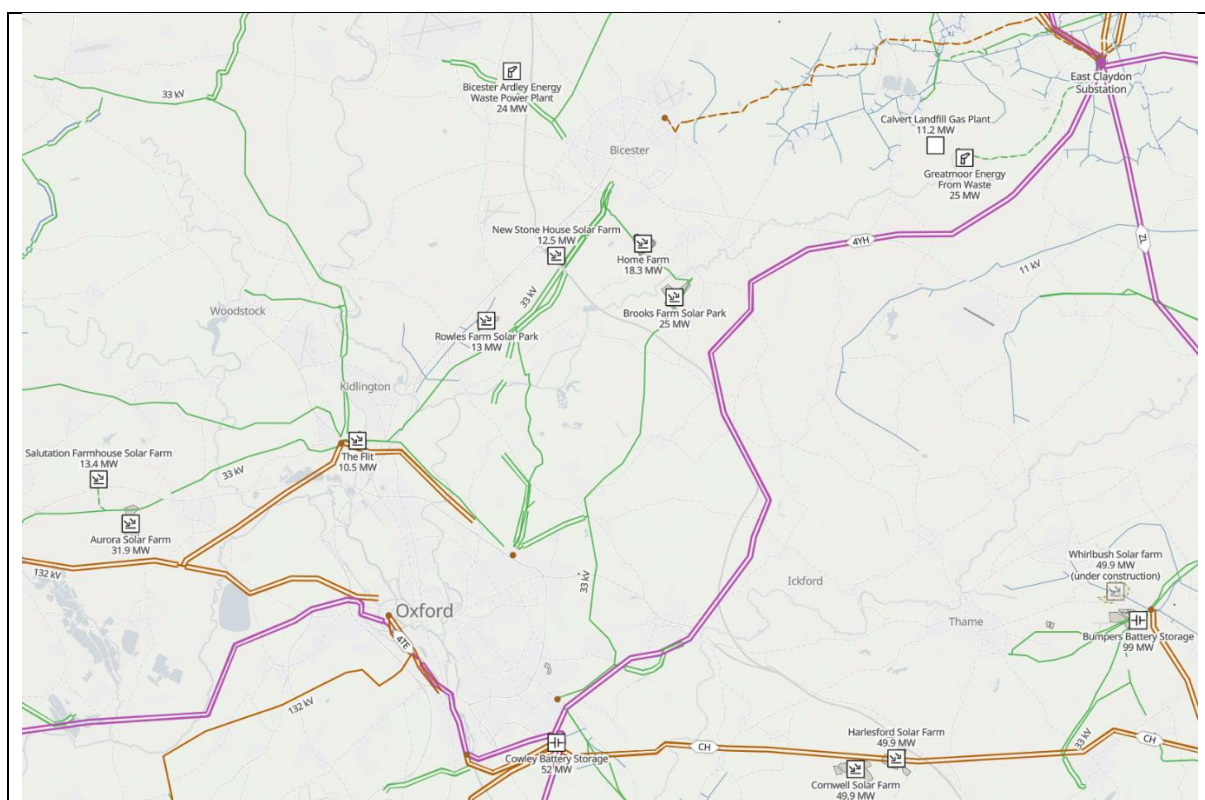
Summary

This Interested Party assesses that the Applicant's evident confusion in C1-087 as it attempts to reconcile its new narrative with previously submitted information (such as in APP-042) has led it to try to convince the SoS of several different things, simultaneously. It has failed to do so.

6b Cowley NGET substation: assessment of Applicant's response

By their own submission (see **APP-063 Figure 5.6: Substation Locations**), the Applicant did not apparently consider all the reasonable options available to it, and has not informed either the ExA or the SoS of this.

With its focus on NGET's Cowley - Seven Springs 400kV line (NGET designation 4TE) and its unavoidable Green Belt harms, the Applicant has not shown that it considered connections to the NGET's Cowley to East Claydon 400kV line (NGET designation 4YH), with the East Claydon substation just over the Oxon/Buck border (see Map 1 below), either to the East Claydon substation itself, or via a new NGET substation on NGET's 4YH line.



Map 1 from [redacted]

Given the Applicant's own timeline (**C1-087** table on page 4) this omission is even more surprising since 3 years and 2 months (June 2020 to August 2023) before the Applicant had apparently secured land in what is now called the southern site, and 2 years and 5 months (June 2020 to November 2022) before it secured Blenheim owned land in the northern and central site, it was prepared to enter into detailed discussion with NGET about connection to Cowley, 15.4km from what is now field 2.112, the southernmost field in that central site.

This omission is even more inexplicable given that the Applicant apparently did not also consider (as it is proposing now for NGET's 4TE 400kV line) to secure land and a DCO boundary for a new NGET substation within it on the NGET 4YH 400kV line.

Had it done so, it could have examined a 400kV line connection on the 4YH line which, at its closest – near Boarstall and adjacent to the M40 motorway - is just 14.3km due East across open country (not Green belt) from Botley West fields 2.10-2.17 (nr Begbroke) in the central site, a shorter distance than the Applicant's sole choice of 15.4km to Cowley.

If it had done so the Applicant would have no need for a High Voltage cable crossing of the River Thames in EA Flood Risk Zone 2 and 3, as now proposed, and no need to build large permanent (not temporary) industrial infrastructure on the Oxford Green Belt.

Why?

This, like so much of the Applicant's proposal smacks of opportunism born out of a desire to present the NSIP planning process with a plausible narrative of site alternatives and evidence led site selection back fitted to a decision already made based on Blenheim Estate land acquisition.

Did that desire for a plausible narrative then also determine the Applicant's apparent requirement to place panels and other infrastructure on north facing steeply sloping shaded and flood prone Green Belt farmland in Cumnor Parish?

Did the Applicant judge that while the southern site would contribute a tiny fraction of Botley West's revenue with a commensurate adverse return on investment, it would provide a plausible reason for cabling and other infrastructure to extend across and to the south of the River Thames in EA Flood Risk Zone 2 and 3 in the Oxford Green Belt?

Summary

This Interested party is minded to return to where this assessment started. As the ExA commented in May 2025 *'you're saying, we've got landowners, we've got land, and that's where we decided to build'*

6c search radius: assessment of Applicant's response

In **C1-087** (page 5) the Applicant references a 25km search radius from an NGET substation.

However, the Applicant's Figure 1 on page 6 of its **C1-087** is of such poor resolution that it is impossible for it to be used to test the Applicant's assertions. This Interested Party asks for it to be withdrawn or replaced with something legible.

Instead this Interested Party has used higher resolution mapping for this response - see 6b above and 6e below.

This higher resolution mapping shows that while the nearest NGET 400kV line to the southern site is the much quoted Cowley - Seven Springs 4TE line, the nearest to the northern site and sections of the central site (all land to be leased to the Applicant by a single landowner: Blenheim) remains the studiously ignored Cowley to East Claydon 4YH line.

The nearest extant substation to the southern site remains Cowley and the nearest to both the north and central sites remains East Claydon.

Summary

Given that the Applicant has repeatedly stated its intention in its proposed DCO to build its permanent main substation and the NGET substation on Green belt land within the southern site if NGET does not proceed, why has the Applicant has not informed either ExA or SoS as to whether it ever, if at all, considered connecting to NGET's 4YH 400kV line, which at its closest lies 17.3km from Blenheim Palace, so well within the Applicant's 25km search radius?

This all the more curious – and unexplained – given that the Applicant has asserted (C1-087 table page 4) that it only signed its first lease for land with Blenheim 1 year and 5 months after it had accepted NGET's Farmoor connection offer (June 2021 to November 2022), having applied for that connection offer 1 year and 9 months (February 2021 to November 2022) before it secured the Blenheim lease.

6d: Cowley & Farmoor NGET comparisons: assessment of Applicant's response

This Interested Party assesses that the Applicant has provided contradictory, contrived and partial (in all senses of the word) information that does not align with the requirements of NPS-EN1 paragraphs 4.1.22 and 4.3.15

As of the date of this submission, and 5 years after the Applicant states that NGET made their connection offer at Farmoor (June 2021 to date, see **C1-087 table page 4**), NGET has not made a planning application for any such substation.

The Applicant has then hedged its position with a DCO application that includes both its own main substation and an alternative site for the NGET substation in its proposed southern site DCO boundary.

But again, rather than fitting the Applicant's preferred narrative of careful site selection and the consideration of alternatives, this timeline indicates a different motive.

It was 2 years and 6 months (February 2021 to August 2023) after it signed its agreement with NGET for a Farmoor grid connection before the Applicant signed its lease for land in Farmoor comprising what it now calls the southern site.

Does it not seem more likely that the Applicant, having committed to Blenheim and NGET, realised that its deficient site selection strategy coupled with a dependence on NGET would be apparent to its funders and the ExA if it did not also secure its own land in or around Farmoor?

Was that not the driving force behind securing land in Farmoor, rather than a requirement for an extra marginal (in all senses of the word) generating capability so far removed from the land leased from Blenheim?

Also, is that only now why the Applicant, in **C1-087 pages 11-12**, has sought to show its supposed economic and other constraints in connecting the southern site to Cowley NGET vs the Farmoor NGET option?

But if those Cowley constraints were apparent to the Applicant when it first '*was introduced*' to the Blenheim estate in January 2020, why did the Applicant continue 5 months later to discuss a Cowley connection with NGET?

Surely, the apparently insurmountable challenges now reported would have caused a re-think in early 2020? Apparently not.

Or is it that the Cowley constraints have been 'back fitted' to a narrative in which all roads lead to the southern site and Farmoor and nowhere else?

Looking at the comparative Farmoor vs Cowley assessment with the benefit of local knowledge this Interested Party is struck just by how contrived the choice is.

Page 15 of C1-087 informs us that the 'Cowley' route would pass:

'directly through the Oxford Historic Core Conservation Area on High Street, Magdalen Bridge, Queen Street, and Park End Street.' passing 'Magdalen College (GI), The Queen's College, All Souls College, University College, and Magdalen Bridge itself (GII).'*

This Interested Party assesses that the Applicant has deliberately chosen as its sole worked example a bizarre choice, reading more like a Baedekers' Guide to Oxford than a rational planning option. It seems as if the Applicant *'doth protesteth too much'*

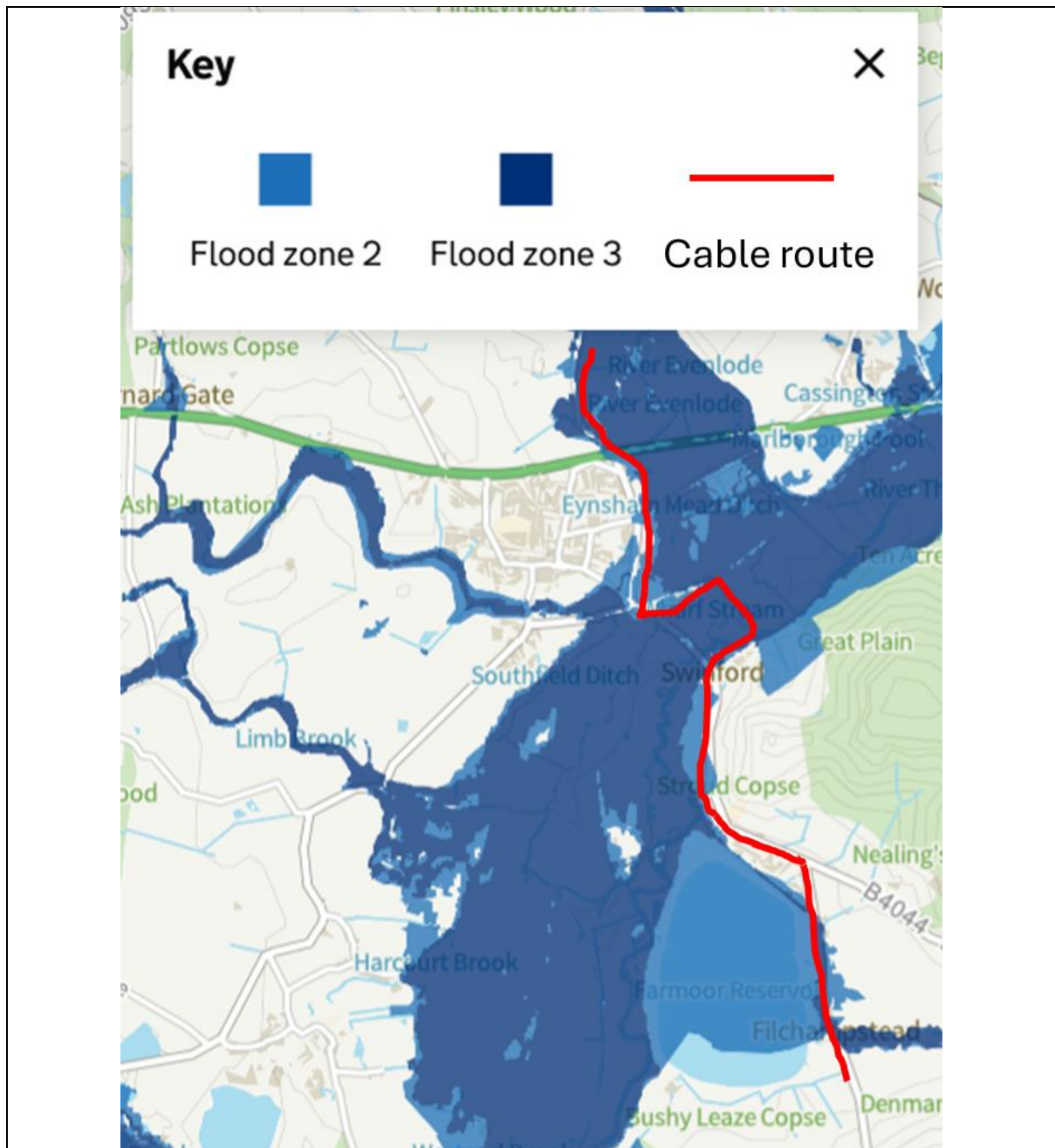
But in doing so it undermines its own decisions made about other sections of their proposed cable route: including between the central and southern sites.

In attempting to explain the insurmountable environmental factors preventing the cable route to Cowley from the Southern site, the Applicant notes on **C1-087 page 16**

- Ecology and nature Conservation
 - Local Nature Reserves are present along the route corridor.
 - Ancient woodland blocks are present in the Wytham / Cumnor Hill area through which the western Green Belt sections of the route pass. Route alignment must maintain appropriate clearance from ancient woodland root protection zones.
- Hydrology and Flood Risk
 - River Cherwell / Magdalen Bridge crossing (~km 7.8): Flood Zones 2 and 3 are present at this crossing Environment Agency consent required.
 - Additional Flood Zone 2 / 3 sections in the Botley / Hinksey areas (~km 2–5).
 - A detailed flood risk assessment is required for all affected sections.

Unfortunately for the Applicant all these impediments are apparently surmountable for their proposed cable connection between the central and southern sites where there are:

- Local Nature Reserves present along the route corridor.
- Ancient woodland blocks (including Wytham woods SSSI)
- River Thames crossing at Swinford: Flood Risk Zones 2 and 3 are present at this crossing - Environment Agency consent required.
- Additional Flood Zone 2 / 3 sections present including the B4044 SW of Swinford (see Map 2 - EA flood risk map - below)



Map 2

EA flood risk zones 2 and 3 for proposed Botley West central site to southern site cable routing

Surprisingly given the Applicant's stated unwillingness to address these impediments for a contrived cable route to Cowley, it is apparently content to cope with them for its central site to southern site cable route.

Except of course it hasn't addressed them in this case either, the prime example being the absence of a '*detailed flood risk assessment*' that satisfies this Interested Party or the OHA for the southern site and the central to southern site cable routing.

Also unexplained is why, if the Applicant is unwilling to bear a cost of c. £10m/km for cabling to Cowley (the Applicant quotes a cost of £150m for 15km to Cowley from the southern site **C1-087 pages 9 and 10**), it is willing to bear that same £10m/km cost, with a total of at least £70m for the c. 7km cable route between the central and southern sites traversing the River Thames near to Swinford Toll bridge in a EA Flood Zone 3 area?

There seems to be a breakdown of both consistency and financial logic here within the Applicant's own figures which the SoS might ask the Applicant to explain, given that by contrast, the northern and central sites are separated by only c 1km of farmland, presumably bridged at a cost of £10m.

There again, there are so many inconsistencies and logic bombs in the application that another one comes, unfortunately, as no surprise to this Interested Party.

This is exemplified on **pages 11 and 12 of C1-087** (Table 1 below) where the Applicant sets out a number of 'key considerations' for the earlier part of the 'Cowley' cable route which it claims renders the option 'unachievable.'

Approx. km	Road / Crossing	Width (m)	Method	Key considerations
~0.8	Denmans Lane	3.5	Open Cut	Minor rural lane; narrow carriageway.
~1.5	Eynsham Road (B4044)	7.5	Open Cut + traffic mgmt	Rural B road; two-way traffic maintained with temporary lane management.
~3.0	A420 (West Way) — possible trenchless crossing	7.5	To be determined	Open cut in verge possible; trenchless may not be needed. National Highways pre-application consultation required.

Approx. km	Road / Crossing	Width (m)	Method	Key considerations
~3.4	West Way (B4044)	11.5	Open Cut + traffic mgmt	Suburban road
~4.4	A34 (Oxford bypass) — possible trenchless crossing	11.5	To be determined	Open cut in verge / slip road may be feasible. National Highways pre-application consultation required. No compound location identified.
~4.9	Botley Road	7.5	Open Cut + traffic mgmt	Radial road into Oxford; OCC Permit Scheme; Oxford City Council co-ordination.

Table 1 from **C1-087** pages 11-12

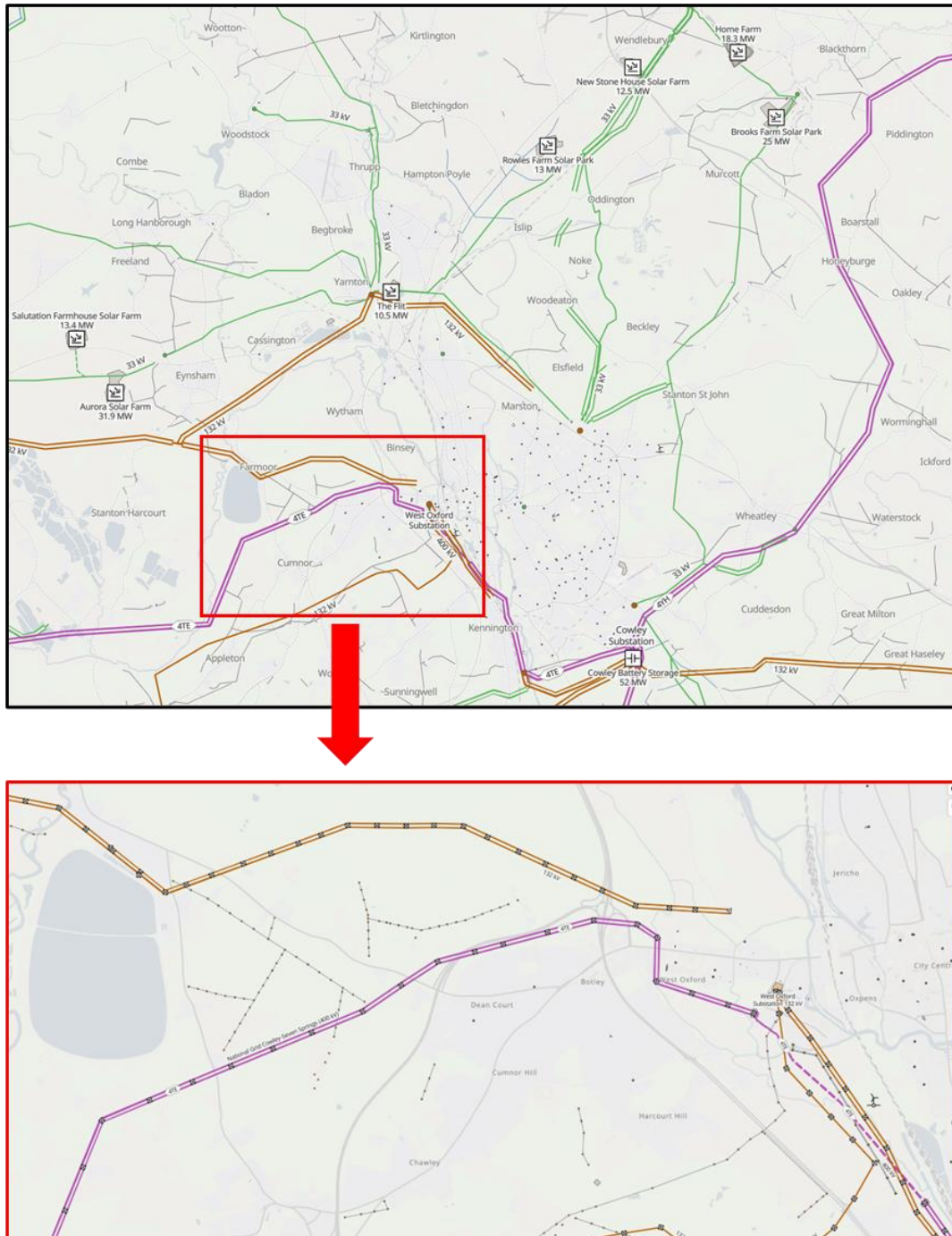
Unfortunately for the Applicant they are very much achievable.

This has been demonstrated by the proposed Red House Farm solar power station (**Vale of White Horse District Council - VWHDC - Planning application P24/V2489/FUL** currently being considered as **PINS appeal reference 6009163** with a 20th October 2026 public inquiry) that would be co-located with Botley West's southern site in the Farmoor valley.

This proposal at only 6% the size of Botley West (49MWe to Botley West's 840MWe) and so, presumably only requiring c. 6% of the capital and generating c 6% of the revenue, has successfully applied for planning permission to Oxford City Council for this very cable route

to the SSEN substation on Ferry Hinksey Road (**Oxford City Council planning application 23/02816/FUL granted on 27th April 2026**).

This substation is only 50m from NGET's Cowley - Seven Springs 4TE 400kV line, both situated on an underutilised brown field site (see Map 3 and Image 1 below).



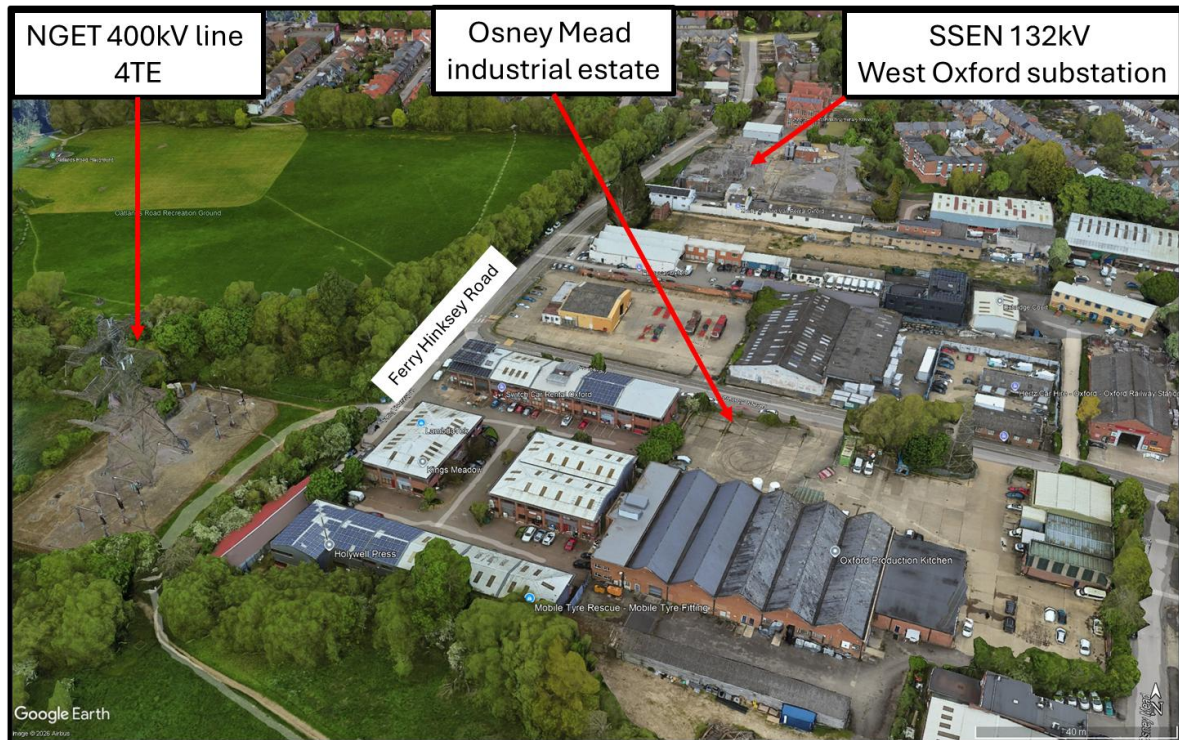


Image 1 centred on w3w location ///hits.logic.obey

The NGET 400kV line '4TE', the adjacent SSSEN 132kV substation, Ferry Hinksey road and the Osney Mead Industrial Estate.

Summary

This Interested Party assesses that the Applicant has provided contradictory, contrived and partial (in all senses of the word) information that does not align with the requirements of NPS-EN1 paragraphs 4.1.22 and 4.3.15

As of the date of this submission, and 5 years after the Applicant states that NGET made their connection offer at Farmoor (June 2021 to date, see C1-087 table page 4), NGET has not made a planning application for any such substation.

Why has the Applicant only now, in C1-087 pages 11-12, sought to show its supposed economic and other constraints in connecting the southern site to Cowley NGET vs the Farmoor NGET option?

If those Cowley constraints were apparent to the Applicant when it first '*was introduced*' to the Blenheim estate in January 2020, why did the Applicant continue 5 months later to discuss a Cowley connection with NGET?

Surely, the apparently insurmountable challenges now reported would have caused a re-think in early 2020? Apparently not.

The Applicant sets out a number of '*key considerations*' for the earlier part of its 'Cowley' cable route which it claims renders the option '*unachievable*.'

Unfortunately for the Applicant they are very much achievable as has been demonstrated by the proposed Red House Farm solar power station (VWHDC Planning application P24/V2489/FUL currently being considered under PINS appeal reference 6009163 with the public inquiry beginning 20th October 2026) that would be co-located with Botley West's southern site in the Farmoor valley.

At only 6% the size of Botley West (49MWe to Botley West's 840MWe) and so, presumably only requiring c. 6% of the capital and generating c 6% of the revenue, Red House Farm has successfully applied for planning permission to Oxford City Council for this very cable route to the SSEN substation on Ferry Hinksey Road (Oxford City Council planning application 23/02816/FUL granted on 27th April 2026).

This substation is only 50m from NGET's Cowley - Seven Springs 4TE 400kV line, both situated on an underutilised brown field site (see Map 3 and Image 1 above).

6e: Site selection methodology for Applicant's Farmoor substation: assessment of Applicant's response

It is instructive to note that some 12 months after the ExA asked, in effect, the same question (ExQ1 1.3.1 in **PD-008**), the SoS is still having to ask it. This is compounded by the ExA having also requested in July 2025 (ExQ2 2.1.8 in **P-012**) that the Applicant explain how the Horlock Rules (**EN-5** para 2.9.18 and 2.9.19) had been applied. As Interested Parties have previously recorded the Applicant's answer (**REP4-037**) showed they hadn't.

It is surprising then that the Applicant, in addressing the SoS's question over 5 pages (**C1-087** pages 21-25), repeats (on p24) its 12 month old **REP2-025** (page 25) response to the ExA's Q1.3.1 in **PD-008**:

The site selected by PVDP for the NGET substation was within the NGET area of search which by that stage had narrowed to an area with approximately six alternative sites along a short stretch of the 400kV OHL corridor, and on land that was within the Applicants Order Limits. To the knowledge of the Applicant none of the shortlisted site areas lay outside of the Oxfordshire Green Belt. The Applicant did not look beyond this corridor as to do so would fetter NGET's own site search criteria.

So, in June 2026 - as in July 2025 - the Applicant is stating that its site selection criteria for the SoS's 'scenario 2' was to take six alternates identified by NGET for them to build the substation, map them to the Applicant's own order limits and find a site that ticked both boxes.

The Applicant then makes the unevidenced and unlikely assertion that it didn't want to look elsewhere as it didn't want to 'fetter' NGET.

How is not explained, and can't be because the Applicant states NGET had already concluded its site search that arrived at the six alternatives the Applicant then chose one from.

Twelve months on the Applicant's sole answer to the SoS question is the clearly unsatisfactory one it gave a year ago to the ExA.

Despite the Applicant's claims, its assertions about NGET's own selection criteria remain untested in planning terms as no planning application has come forward, and according to NGET won't before Q1-Q2 2027 at the earliest (see **C1-028**).

In addition the Applicant freely admits (**C1-087 page 24**) that

NGET applied their own criteria to that site search, and so the Applicant is unaware of how Green Belt factored into their site search criteria.

So the Applicant is simultaneously asserting that:

- Its site selection process meets the required planning policies,

but that:

- It relied on a prior process carried out by NGET alone, details of which the Applicant '*is unaware of*'
- It then applied a filter of which NGET options already sat within the Applicant's own Order Limits – a purely commercial decision made at the Applicant's own risk
- It did not do anything else for fear it would '*fetter*' an NGET process already completed and on which it had already relied to make its own decision

This Interested Party assesses that this shows that no site selection process as required by the relevant planning policies ever took place.

In spite of, or maybe because of:

- Immediately adjacent PRoW, including the Oxford Green Belt Way, and Farmoor Reservoir – including its three Local Wildlife Sites - a nationally renowned amenity space open to walkers, ornithologists, fishing and sailing
- Immediately adjacent ancient woodland (see this IP's response to Q39-41)
- Surface and ground water sources (see this IP's responses to Q54-57)
- No attempts to keep effects of terminal towers, equipment and buildings to a reasonably practical minimum

the Applicant has not provided evidence of how it applied the required **EN-5** Horlock Rules, if at all.

This Interested Party requests the SoS to rule that the Applicant has not discharged its responsibilities to either you or the ExA in this case, relying as it does on:

- its own uncorroborated account of what it claims was NGET's process – that process being currently untested in planning terms - while simultaneously;
- being '*unaware*' of the details of NGET's site selection process, with
- further constraints it imposed on itself by its own prior choice of Order Limit, a purely commercial decision made at its own risk.
- No evidence that the Applicant applied the Horlock rules for substation location choice (**EN-5** para 2.9.18 and 2.9.19)

This Interested party therefore requests that the SoS removes Scenario 2 (see also SoS Q11 below) from the DCO should he be minded to approve it, adding a **Grampian requirement (the Grampian clause)** as proposed by the ExA to prevent construction of Botley West until NGET's substation gains planning permission, to prevent unnecessary land take for potentially orphan assets with all the harms and none of the benefits that would result.

The SoS is also asked to note that the Applicant's **REP1-019** (Applicant's written summary of ISH1) page 4 dated June 2025 states

Mr Phillips, on behalf of the Applicant, provided broader context regarding the ongoing engagement with National Grid. He explained that National Grid is actively preparing an application for a substation that would service both the Project and the wider network

If the Applicant's claim about the 'wider network' was true in June 2025 – although the NESO 'Beyond 2030' document from 2024 shows no such plans for any network reinforcements on the 400kV Cowley to Seven Springs 400kV line (NGET designation 4TE) - then NESO's newly published July 2026 updated 'Beyond 2030' assessment: (<https://www.neso.energy/publications/beyond-2030/web-map>) confirms that no 'wider network' reinforcements (substations and/or circuits and upgrades) are recommended before 2045 on the 400kV line identified by the Applicant.

Summary

In July 2025 the Applicant stated that its site selection criteria for the SoS's 'scenario 2' was to take six alternates identified by NGET for them to build the substation, map them to the Applicant's own Order Limits and find a site that ticked both boxes.

Twelve months on in June 2026 the Applicant's sole answer to the SoS question is the clearly unsatisfactory one it gave a year ago to the ExA with the Applicant making the unevidenced and unlikely assertion that it didn't want to look elsewhere as it didn't want to 'fetter' NGET.

This Interested Party therefore requests the SoS to rule that the Applicant has not discharged its responsibilities to either you or the ExA in this case, relying as it does on:

- its own uncorroborated account of what it claims was NGET's process – that process being currently untested in planning terms - while simultaneously;
- being '*unaware*' of the details of NGET's site selection process, with
- further constraints it imposed on itself by its own prior choice of Order Limit, a purely commercial decision made at its own risk.
- No evidence that the Applicant applied the Horlock rules for substation location choice (EN-5 para 2.9.18 and 2.9.19)

This Interested party additionally requests that the SoS removes Scenario 2 (see also SoS Q11 below) from the DCO should s/he be minded to approve it, adding a Grampian requirement (the Grampian clause) as proposed by the ExA to prevent construction of Botley West until NGET's substation gains planning permission, to prevent unnecessary land take for potentially orphan assets with all the harms and none of the benefits that would result.

7 The Secretary of State notes that there is no substantive information in the Environmental Statement Chapter 5 Alternatives regarding how Best and Most Versatile Land ("BMVL"), mineral resources, Blenheim Palace World Heritage Site ("WHS"), London Oxford Airport, land within Flood Zones and the Green Belt influenced the site selection, nor whether these locational disadvantages were factored into the strategic equation. The **Applicant** is requested to provide evidence on how these locational factors were taken into account. In doing so, the **Applicant** is requested to have regard for NPS EN-1 paragraphs 4.3.9, 4.3.10 and 4.3.15.

7. Site selection BMV, Green Belt and Flood Zone: assessment of Applicant's response

On page 28 of **C1-087** the Applicant states:

The assessment of the three farm holdings that contain BMV where the solar infrastructure would be located are all large to substantial arable holdings and these holdings would remain as substantial or large arable holdings following the implementation of the Proposed Development. No commercial enterprises would be comprised by the Proposed Development and the structure of the landholding framework in the area would not be affected.

For Land Holding 3 – which lies entirely within Cumnor Parish – this statement is untrue.

Given that DEFRA class a large arable farm as 250 to 500+ hectares and the totality of land holding 3 is c 160 hectares it is not '*large to substantial*'.

Of its c 160 hectares c. 16ha are ancient woodland, leaving c. 144 hectares.

Not all is arable, fields 3.2, 3.4, 3.12, 3.16 and 3.17 being regularly on rotation for livestock.

With the landowner stating (in **REP1-151**) that he's '*allowed 200 acres (81ha) to go into this solar farm*', that leaves a maximum of just 80 hectares for arable and other farming uses.

From this it is difficult to agree with the Applicant's (misspelled) assertion that '*No commercial enterprises would be comprised [sic] by the Proposed Development*'

This is further amplified by the Applicant continuing to write about Grade 3 land while, in the case of Land Holding 3, seeking to minimise the impact of the new ALCC classification which, despite the Applicant's previous attempts to describe the soil as '*poor*' now shows the presence of BMV land (defined as ALCC 1,2 and 3a) after all.

In respect of flood risk the Applicant (**page 34 of C1-087**) states (this Interested Party's emphasis added)

'The consideration of areas liable to flood had a direct influence over the detailed design and layout of the Project once the broad site location for the Project had initially been identified'

In the case of the Southern Site, this Interested Party assesses, as in section 6 and 10-14, that a prior Landlord site agreements were the Applicant's sole site selection criterion, since the Southern Site contains extensive tracts of EA Flood Risk Zone 2 and 3 land and at no point in the Examination has the Applicant been willing to engage with the flood risk issue, OHA concerns or Cumnor Parish's Neighbourhood Plan Flood Risk policy (**REP1-057** and **REP1-060**), responding that they merely 'note' this IP's concerns (**C1-087**).

This issue is addressed in more detail in this IP's response to SoS Q53-57

The Applicant states (**page 34 of C1-087**) in respect of Green Belt that:

'Green Belt was a factor that influenced the Applicants [sic] approach to design and layout, but not an overriding one'.

This IP assesses that little credence can be given to this single line response to the SoS's question and so to the following 2 pages of explanation.

Why? Because the whole of the Southern Site is in the Green Belt.

Summary

For Land Holding 3 – c. 160 hectares entirely within Cumnor Parish – the Applicant's statement that *'where the solar infrastructure would be located are all large to substantial arable holdings and these holdings would remain as substantial or large arable holdings following the implementation of the Proposed Development'* is untrue.

From this it is difficult to agree with the Applicant's assertion that *'No commercial enterprises would be comprised [sic] by the Proposed Development'*

In respect of flood risk in the Southern Site, this Interested Party assesses, as in section 6 and 10-14, that prior Landlord site agreements were the Applicant's sole site selection criterion, since the Southern Site contains extensive tracts of EA Flood Risk Zone 2 and 3 land and at no point in the Examination has the Applicant been willing to engage with the flood risk issue, OHA concerns or Cumnor Parish's Neighbourhood Plan Flood Risk policy.

Regarding Green Belt, little credence can be given to the Applicant's single line response to the SoS's question and so to the following 2 pages of explanation. Why? Because the whole of the Southern Site is in the Green Belt.

Infrastructure

National Grid Energy Transmission Substation

8. The draft DCO (“dDCO”) makes provision for NGET’s substation within the order limits (“Order Limits”), specifically in the western part of the southern section, as a fallback option, in the event that NGET is unable to secure its preferred site outside the Order Limits. The Secretary of State notes that there is uncertainty regarding the commencement timescales for the Proposed Development and the potential dependency on the construction of a new NGET substation.

8. Timescale uncertainty & dependencies: assessment of Applicant’s response

This Interested Party notes that the Applicant chooses to make no response to paragraph 8 which sets out the SoS’s evident concerns, previously and repeatedly expressed by the Examining Authority, instead choosing to rely on partial answers to SoS Q9-14, many of which differ from its previous responses to the ExA.

This continues the lack of engagement with this issue that has characterised the Applicant’s actions both before and during the Examination Phase.

This contrasts with repeated and extensive contributions made by Interested Parties, including but not limited to:

- Layla Moran MP (**REP4-090, REP7-154 and C1-006**),
- Calum Miller MP (**REP2-093 and REP7-067**),
- the Oxfordshire Host Authorities (**REP2-050, REP3-072, REP4-041, REP4-074, REP5-125, REP6-117 and REP7-190**) and
- Cumnor Parish Council (**REP2-048, REP3-078, REP4-045, REP4-046, REP5-077, REP6-084, REP7-076 and REP7-077**)

Summary

The extensive, detailed and evidence led submissions by many Interested Parties stands in stark contrast to the lack of response from the Applicant; itself a direct cause of the need for repeated questions by the ExA and now the SoS.

9. The Secretary of State is aware that further to the screening request report prepared by WSP on behalf of NGET (ref. UK0028121.4284-003), the Vale of White Horse District Council ("VoWHDC")¹ and the Department for Energy Security and Net Zero ("DESNZ")² have issued screening opinions for the proposed 400 kV substation and other associated development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the Electricity Works (Environmental Impact Assessment) Regulations (England and Wales) Regulations 2017 in respect of NGET's preferred site. **NGET** is requested to provide an update on the status of the planning application for the new NGET substation and associated development, to be submitted to the VoWHDC under the Town and Country Planning Act 1990 on its preferred site. The update should include, as a minimum, an updated timetable from the point of submission of any scoping request to the VoWHDC through to the completion of works and availability for connection for the proposed solar farm, including any public and statutory consultation proposed, and application milestones reached prior to submission of the screening request report to the VoWHDC.

9. NGET substation planning application status: assessment of NGET's response and the Applicant's prior responses

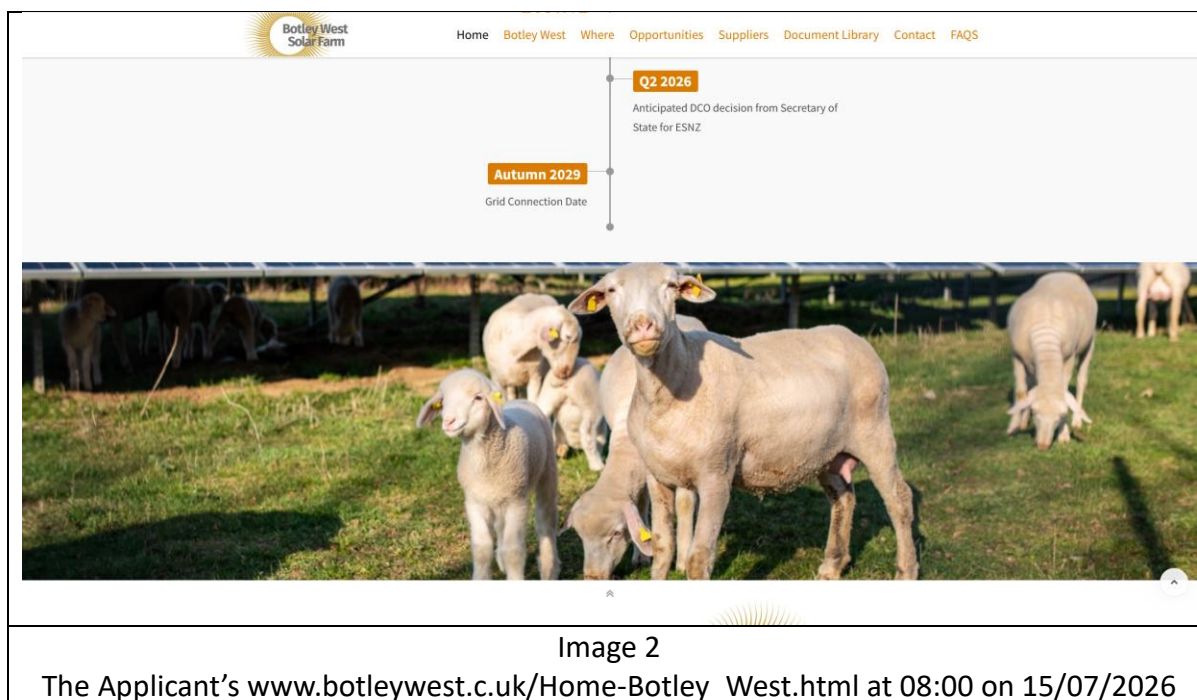
NGET's response (**C1-028**) shows that its grid connection date is no longer Q4 2029 as reported in November 2025 (**REP7-039**), but is now Q4 2031, a slippage of 2 years in the past 7 months, placing doubt on the project's entry into its quoted Contract for Difference (CfD) Scheme.

All the dates now provided by NGET are caveated as being an '*anticipated or 'target' dates*' with the programme described as being '*at an early stage*' with dates '*therefore indicative/subject to change*'

This Interested Party has constructed two timelines (below) showing how every time the ExA (Table 1), and now the SoS (Table 2), has asked these questions the Applicant and/or NGET has given a different answer.

This ever extending timeline is compounded in the Applicant's case by the fact that it has repeatedly failed to update its public facing website (www.botleywest.co.uk) with the most up to date grid connection date, so misleading members of the public, journalists and others who have been repeatedly told by the Applicant to find information there at the formal Consultation stages, the Examination Phase and now the Decision Phase.

Nothing exemplifies this disconnect between reality and hype more than the fact that as of today, more than a month after NGET response **C1-028** was published (and presumably several months since the Applicant was aware of its contents) the Applicant's website continues to claim an '*Autumn 2029 grid connection date*' (see Image 2 below), a date 2+ years earlier than NGET's '*target*' date of Q4 2031.



The timeline for grid connection date claims made during the ExA's Examination phase in 2025 runs as follows (Table 2 below):

Date	Applicant/NGET statement	Interested Party comment
4 th June 2025	REP1-019 Applicant's written summary of ISH1 Page 4: <i>Mr Phillips, on behalf of the Applicant, provided broader context regarding the ongoing engagement with National Grid. He explained that National Grid is actively preparing an application for a substation that would service both the Project and the wider network</i> And page 5: <i>The Applicant also understands that National Grid intend to launch a public consultation on their plans shortly, with an intention of submitting TCPA application in Q4 2025.</i>	No such plan for the 'wider network' exists as claimed by the Applicant (see also this IP's response to SoS Q6e) Neither occurred and the Applicant's dates were contradicted the same day by NGET – see REP1-106 below

4 th June 2025	REP1-106 NGET Written representation para 10 <i>This planning application for the NGET Farmoor Substation has not yet been made and NGET are targeting submission in 2026.</i>	NGET's REP1-106 contradicts Applicant's REP 1-019
19 th June 2025	NGET letter to Layla Moran MP quoted in Cumnor Parish Council's REP2-048 <i>'Construction completed' late 2029</i>	
1 st July 2025	Applicant's REP2-025 answer to ExQ 1.3.2 <i>'October 2026'</i>	Two different answers given by the Applicant in the same document
1 st July 2025	Applicant's REP2-025 answer to ExQ 1.3.6 <i>'October 2028'</i>	
1 st July 2025	REP2-076 NGET's responses re ExA Q 1.3.6 <i>Early 2024 Potential site selection</i> <i>Autumn 2024 onwards Site surveys</i> <i>Early 2026 Public consultation (28 days)</i> <i>Late 2026 Planning submission</i> <i>Summer 2027 Construction starts</i> <i>Late 2029 Construction completed</i>	
6 th July 2025	REP3-053 PVDP's Statement of Common Ground with NGET <i>No statement on dates</i>	
21 st July 2025	Applicant's REP3-065 response to comments on their answer to ExQ1.3.3 <i>'October 2027'</i>	
9 th October 2025	Applicant's oral submissions to ISH2 (00:08:48:26 - 00:09:14:14 in EN010147-001941- Transcript Part 1 Final.pdf) <i>'We're waiting for an agreement to vary from National Grid in order to change that date from 2027 to 2029'</i>	
20 th October 2025	REP6-110 NGET comments on information received at D5 <i>No statement on dates</i>	

10 th November 2025	REP7-039 PVDP Final Statement of Common Ground with NGET NGET position: <i>The grid connection date is to be amended to Q4 2029</i> PVDP position: <i>October 2027 is the current grid connection date. The Environmental Statement assumes a connection assumes a connection date of October 2028 as this was the connection date discussed with NGET at the time of submission. Following recent discussions , the existing grid connection date is expected to be amended to 2029 as this is the construction programme NGET are working to. This does not alter the Applicant's EIA conclusions</i>	These two statements are shown by PVDP as 'Agreed' despite their obvious differences.
10 th November 2025	REP7-179 NGET's Closing statement <i>No statement on dates</i>	

Table 2

NGET substation dates provided during the 2025 Examination Phase

So the Examination phase concluded in November 2025 with the Applicant and NGET both apparently standing by a grid connection date of 'Q4 2029'

Now, some 7 months later, we discover thanks to the SoS's questions that the timeline has already slipped by a further 2 years to 'Q4 2031' (see Table 3 below)

This raises the question of when, or maybe whether, the Applicant would have informed the ExA and the SoS that the date had slipped by two years if it was not for the SoS's April 2026 questions?

When did the Applicant become aware of the new date? If it was before April 2026 and the SoS's questions, why didn't the Applicant make this public knowledge?

11th June 2026 **C1-028** NGET response to the SoS page 2

NGET wishes to emphasise that this programme is at an early stage and is therefore indicative/subject to change. The dates below should all be read as anticipated or 'target' dates.

Activity	Date	Interested Party comment
VOWHDC screening request submission	August 2025	
VOWHDC screening request decision	September 2025	
Oxfordshire County Council Highways Pre-application submission	November 2025	
Oxfordshire County Council Highways Pre-application decision	December 2025	
Secretary of State Screening Direction Request	March 2026	
Secretary of State Screening Direction Decision	Q2 2026	Not in Q2 08/06/2026 decision of EIA required
VOWHDC pre-application submission	Q2 2026	Not received in Q2
Submission of scoping request to VOWHDC (if required)	Q3 2026	This will be required following the SoS direction on the screening request
Public consultation and engagement	Q4 2026	
Submission of planning application to VOWHDC	Q1-2 2027	
Submission of S37 application to DESNZ	Q1-2 2027	
Planning Application Determination	Q3-4 2027	
S37 determination	Q4 2027	
Discharge of pre-commencement planning conditions	Q4 2027 – Q1 2028	
Discharge of pre-commencement S37 conditions (if applicable)	Q1 2028	
Mobilisation for commencement of construction works	Q1-Q2 2028	
Completion of the works and availability for connection for solar farm	Q4 2031	

Table 3

NGET substation dates provided during the 2026 Decision Phase

Adding the components of this assessment together this IP finds that:

- Prior to the Examination phase the Applicant's website was the only source of information on a grid connection date, and it remains the source the Applicant continues to direct members of the public and their elected representatives to.

On 10th November 2024, at the time of the Applicant's NSIP application to PINS, the Applicant's website showed a connection date of **Autumn 2027**, despite the Applicant stating in its **REP2-025** answer to ExA Q 1.3.2 that they had reached agreement with NGET 3 years before (in 2021) for a connection date of **2026**, a position the Applicant continues to maintain (table on page 4 of **C1-087**)

- During the ExA's Examination phase (May to November 2025) the Applicant variously stated the grid connection date to be
 - October 2026
 - October 2027
 - October 2028
 - Autumn 2028
- During the ExA's examination phase, NGET stated the grid connection date to be
 - Late 2029 (construction completed)
 - Q4 2029
- Now, in June/July 2026, NGET is stating an '*indicative/subject to change*' / '*anticipated or target*' dates' of **Q4 2031**

It is patently clear therefore that given the 2 year slippage between NGET's November 2025 evidence to the ExA and its June 2026 evidence to SoS, plus the further slippage already apparent in the NGET programme only just published in June 2026, that a grid connection date of Q4 2031 is the very earliest achievable, with a more likely date of sometime in 2032.

Furthermore, with the Applicant's 'Scenario 2' (see this IP's response to SoS question 10 below) - in which it provides its own grid connection - so lacking in any detail and so with even higher uncertainty, it cannot reasonably be expected to be before 2032-2035 at the earliest.

Under these circumstances this Interested Party requests the SoS to return to the ExA's very sensible proposal of requiring 6 'Grampian' conditions for this NSIP application including one prohibiting the start of construction for this project until NGET gain planning permission for their substation.

Summary

During the ExA's Examination phase (May to November 2025) the Applicant variously stated the grid connection date to be

- October 2026
- October 2027
- October 2028
- Autumn 2028

While publicising different dates on its public facing website throughout.

In the same Examination Phase period NGET stated the grid connection date to be

- Late 2029 (construction completed)
- Q4 2029

NGET's latest response shows that its grid connection date is no longer Q4 2029 as it last reported in November 2025, but is now Q4 2031, a slippage of 2 years in the past 7 months placing doubt on the project's entry into its quoted Contract for Difference (CfD) Scheme.

All the dates now provided by NGET are caveated as being an '*anticipated or 'target' dates*' with the programme described as being '*at an early stage*' with dates '*therefore indicative/subject to change*'

It is patently clear therefore that a grid connection date of Q4 2031 is the very earliest achievable, with a more likely date of sometime in 2032 or later.

Furthermore, with the Applicant's 'Scenario 2' (see this IP's response to SoS question 10 below) - in which it provides its own grid connection - so lacking in any detail and so with even higher uncertainty, it cannot reasonably be expected to be before 2032-2035 at the earliest.

Under these circumstances this Interested Party requests the SoS to return to the ExA's very sensible proposal of requiring 6 'Grampian' conditions for this NSIP application including one prohibiting the start of construction for this project until NGET gain planning permission for their substation.

This Interested party notes the Applicant has repeatedly attempted to ignore this ExA proposal and continues to do so in its latest C1-087, instead seeking to water down the ExA's proposal and push it beyond DCO approval.

10. The Secretary of State notes that the Applicant, and NGET have signed a Connection Agreement [APP-019] which specifies the date of connection to be October 2027, although discussions were taking place for this to be amended to the beginning of Q4 2028. [REP2-025] confirms that the Applicant and NGET have signed a bilateral connection agreement which commits to connect the solar farm to the National Electricity Transmission System in October 2028. However, in [REP2-076] NGET indicate that construction would be completed in late 2029, and in [REP7-039], NGET's Statement of Common Ground ("SoCG"), there is text confirming a connection date of Q4 2029.

11. The Secretary of State therefore requests that NGET and the Applicant provide an update on the NGET substation delivery programme, including timescales for its construction, completion, and availability for connection. The update should make clear whether the delivery programme applies to both scenarios, (1) NGET's preferred site outside of the Order Limits, and (2) the fallback position within the Order Limits. If the programme delivery and connection dates differ between the two scenarios, both should be clearly set out.

10-11 NGET & Applicant update on two scenarios for NGET substation delivery: assessment of Applicant's response to 10 and NGET's and Applicant's 'joint' response submitted by the Applicant to 11

This Interested Party notes that in this response (**C1-087**) the only dates offered by the Applicant are for the SoS's 'scenario 1' and they are a repetition of the dates submitted by NGET in answer to SoS's question 9.

By contrast neither the Applicant nor NGET offer any dates for SoS's scenario 2. Instead the Applicant repeats previously offered statements based on their perception of their need for deliverability and certainty.

So, the Applicant is in essence telling the SoS that 'scenario 2' is both so important for deliverability and certainty that it must be allowed to have the fallback of constructing a NGET substation within its DCO redline, but that 'scenario 2' is simultaneously so unimportant that after 4+ years of preparing planning documentation it cannot share with the SoS any details of any time bounded delivery programme.

This raises the question of whether the Applicant has a time bounded delivery programme for scenario 2 at all, and if it does, why is it not prepared to share it with the SoS and Interested Parties?

This is as illogical as it is unacceptable, and further throws into doubt the Applicant's claimed ability to plan, let alone deliver, SoS's scenario 2.

Finally, in seeking to bolster its case, the Applicant (**C1-087 page 38**) states

In January 2026 Botley West Solar Farm was confirmed by NESO as a Gate 2 Phase 1 protected connection. Therefore, ensuring timely delivery is essential to meeting the targets of this process.

When this Interested Party checked this, using NESO's own 'transmission entry capacity (TEC) register' updated on July 14th 2026, it found no '2' status listed for Botley West (line 242, Column 'O' of the TEC register spreadsheet). Given that NESO state (<https://www.neso.energy/data-portal/transmission-entry-capacity-tec-register>)

NOTE: Following updates to CUSC paragraphs 6.30.3.2 and 6.35.2, the Transmission Entry Capacity (TEC) Registers will include an additional column called "Gate" from 21st November, 2025 indicating whether agreements are classified as Gate 1 or Gate 2. This column will be populated once agreements have been countersigned. Until that point, the field will remain blank.

this Interested Party concludes that as of today's date the Applicant does not have a countersigned agreement with NESO for Gate 2 status.

Summary

This Interested Party notes that in this response (C1-082) the only dates offered by the Applicant are for the SoS's 'scenario 1' and they are a repetition of the dates submitted by NGET in answer to SoS's question 9.

By contrast neither the Applicant nor NGET offer any dates for SoS's scenario 2

This raises the question of whether the Applicant has a time bounded delivery programme for scenario 2 at all, and if it does, why is it not prepared to share it with the SoS and Interested Parties?

This is as illogical as it is unacceptable, and further throws into doubt the Applicant's claimed ability to plan, let alone deliver, SoS's scenario 2.

In seeking to bolster its case, the Applicant states '*In January 2026 Botley West Solar Farm was confirmed by NESO as a Gate 2 Phase 1 protected connection*'

However, when this Interested Party checked this, using NESO's own 'transmission entry capacity (TEC) register' updated on July 14th 2026, it found no '2' status listed for Botley West (line 242, Column 'O' of the TEC register spreadsheet).

As NESO advises that '*This column will be populated once agreements have been countersigned. Until that point, the field will remain blank.*' this Interested Party concludes that the Applicant does not have a countersigned agreement with NESO for Gate 2 status.

12. The Guide to the Application (rev 11) [REP7-002] details that the area set aside for the NGET substation excludes connecting tower structures. The Outline Layout and Design Principles document (rev 6) [REP7-029] includes connection towers within the scope of the NGET substation. The **Applicant** is requested to confirm the scope of the “variety of other electrical infrastructure” none greater than approximately 15m (excluding cable connecting to 400kV overhead lines) included in Work No. 2 referred to in [REP7-029] under the heading Work No. 2, and to clarify the difference between the connecting towers referred to in [REP7-002] and [REP7-029], identifying which towers are included within the Works No. 2 and which ones are not.

12. Applicant’s conflicting information regarding towers and other infrastructure: assessment of Applicant’s response

In asking this perceptive question the SoS has revealed that in the Applicant’s view not all its documents presented to the ExA – and so to the SoS - should be treated equally, and that Interested Parties should somehow know that the conflicts between the Applicant’s statements in **REP7-002** and **REP7-029** should be adjudicated in the latter’s favour.

And, failing all else, as the Applicant chooses not to answer the SoS’s specific question here, all Interested Parties should take comfort from the assertion in **C1-087** that:

The specific location(s) and other final design of the connecting towers, tower structures and other infrastructure will to be subject to the detailed design requirements in the DCO and ongoing engagement with NGET

This Interested Party takes no such comfort as this is yet another example amongst many where the Applicant is asking the ExA, and now the SoS, to be able to work out significant details after planning permission is granted, rather than going through the chore of working them out as part of the evidence base for its application.

Maybe the Applicant’s desire to attempt ‘*detailed design requirements in the DCO*’ helps explain its inability, and/or unwillingness, to provide the dates required by the SoS in Question 10, scenario 2?

Given the above the Applicant’s assurances about infrastructure height being ‘*approximately 15m*’ could cover a multitude of sins.

Previous questioning by the OHA and Cumnor Parish Council elicited that the Applicant didn’t consider the 3m difference between the 12m height assumed in its LVIA (including ZTV analysis) to be materially different from 15m, some 3m more.

So, little confidence that ‘*approximately 15m*’ might not in reality be $15\text{m} + 3\text{m} = 18\text{m}$ can be gained, and with it little comfort from LVIA’s and ZTV’s conducted assuming 12m.

Summary

The Applicant chooses not to answer the SoS's specific question here, instead inviting all Interested Parties to take comfort from its assertion that *'The specific location(s) and other final design of the connecting towers, tower structures and other infrastructure will to be subject to the detailed design requirements in the DCO and ongoing engagement with NGET'*

This Interested Party takes no such comfort, as this is yet another example amongst many where the Applicant is asking the ExA, and now the SoS, to be able to work out significant details after planning permission is granted, rather than going through the chore of working them out as part of the evidence base for its application.

As can be seen from the Screening application to VWHDC (**P25/V1685/SCR**) from NGET, if they were to be consented to build the substation then their redline would extend beyond the Applicant's order limits (Image 4 below).



Image 4

National Grid (NGET): Extract from VWHDC Screening Opinion P25/V1685/SCR

This can be found on the VWHDC's planning portal at

[https://valeofwhitehorse.planning-](https://valeofwhitehorse.planning-register.co.uk/Planning/Display?applicationNumber=P25/V1685/SCR)

[register.co.uk/Planning/Display?applicationNumber=P25/V1685/SCR](https://valeofwhitehorse.planning-register.co.uk/Planning/Display?applicationNumber=P25/V1685/SCR)

The NGET screening application redline not only extends beyond the Botley West DCO redline but also extends within the redline for the proposed immediately adjacent Red House Farm power station (see Image 5 below), previously refused by VWHDC and now subject to an appeal (**PINS reference 6009163** to be heard by PINS at a public inquiry on 20th October 2026).

Summary

Given the Applicant's current Order Limits (Image 3 above) its definitive answer of 'yes' to the question of whether works to tower structures would fall within the Order Limits and that '*No extension to the Order Limits would be required*' is impossible to reconcile with the redline boundary for NGET's own proposed substation (Image 4 above).

The NGET screening application redline not only extends beyond the Botley West DCO redline but also extends within the redline for the proposed immediately adjacent Red House Farm power station (see Image 5 above), previously refused by VWHDC and now subject to an appeal (PINS reference 6009163 to be heard by PINS at a public inquiry on 20th October 2026)

However, this Applicant is asking the SoS to believe the opposite is true, that if they were to build the substation within the DCO boundary they would not need to work outside the Order Limits, unlike NGET.

If the Applicant's assertion to the SoS is however untrue, this raises yet other issues as it would require the Applicant to carry out works not just outside its Order Limits but also within the redline of an immediately adjacent and entirely separate solar power station.

14. The Applicant is also requested to provide an updated Grid Connection Statement, Guide to the Application document and Outline Layout and Design Principles document to align with the responses to the above questions.

14. Applicant to provide updated documents: assessment of Applicant's response

Summary

The Applicant has not provided an updated Grid Connection statement, instead seeking to rely on its November 2024 APP-019. The reason? As in so much else (see 12 above)

'it has not yet been finalised'

That this is the Applicant's stated position in June 2026, 2 months after the SoS requested the information, 7 months since the end of the Examination phase and 19 months after APP-019 was submitted, speaks volumes about the Applicant's disregard for the application and Examination processes and its attitude to scrutiny by both the ExA and the SoS.

Cultural Heritage

Setting

- 19 The Secretary of State notes that the International Council on Monuments and Sites ("ICOMOS") submitted three technical reviews ("TR") via Historic England (as adviser to the State Party) during Examination [RR-0398, REP4-052 and REP7-117]. The Secretary of State notes the Applicant did not provide a response to specific concerns in these TR and therefore requests the **Applicant** to consider and provide a response to all three ICOMOS technical reviews.

19 ICOMOS reviews and lack of Applicant's response: assessment NGET's and Applicant's 'joint' response submitted by the Applicant

Summary

This Interested Party notes that in its reply to SoS Q 15 in C1-087 the Applicant makes no response to ICOMOS submissions RR-0413 and REP1-103 about the proposed southern site:

3. South Solar Farm SE of Farmoor Reservoir: (1 plan) (2km E-W; 0.7 km maximum width; substation with access to overhead power line which crosses this site.) At least half of this proposal is on exposed north facing arable slopes which would be highly visible almost certainly also being obvious from Farmoor Reservoir recreation area. All the area is in an important part of Oxford's Green Belt related to Oxford City and University visible from footpaths above or below useful to the population of the nearby city being accessible by bus. This South site is a totally unsuitable place for a solar farm and should be omitted from the proposal. Care will need to be taken over the siting of and screen planting around the substation connecting to the overhead line.

See also the ICOMOS map 'Areas Unsuitable for Solar Panels - South Omissions' (REP2-074) and its most recent submission to the SoS confirming this position (C1-021 assessment of SoS Q66)

The ICOMOS position on the removal of the southern site is endorsed by the OHA and by Cumnor Parish Council

Landscape

Landscape and Visual Impact Assessment ("LVIA")

- 23 The Secretary of State notes that during Examination there were concerns from Historic England, OHA, Cassington Parish Council, Cumnor Parish Council, ICOMOS, ICOMOS-UK and other Interested Parties, regarding how the Applicant had applied the mitigation hierarchy. With reference to NPS EN-1 paragraphs 4.2.11, 5.9.9, 5.10.6 and 5.10.37, the **Applicant** is requested to explain how the mitigation hierarchy has been applied in regard to landscape and visual, and cultural heritage impacts when developing the scheme.

23. Mitigation hierarchy: assessment NGET's and Applicant's 'joint' response submitted by the Applicant

Summary

The Applicant's 2 page response to SoS Q23 in C1-87 provides no new information, merely reiterating its previous position. Since that position was the one that, as the SoS notes, caused;

'concerns from Historic England, OHA, Cassington Parish Council, Cumnor Parish Council, ICOMOS, ICOMOS-UK and other Interested Parties'

those concerns remain and are amplified, since even after the Examination and despite another opportunity to do so, the Applicant still chooses to do nothing other than to repeat its previous assertions.

In assessing the Applicant's engagement with the mitigation hierarchy, this Interested Party observes that this must surely start with accurate 'baseline' information and data about aspects of the application; be it noise, landscape, ecology, PRoW, land quality, flood risk etc. etc.

As sections 24b and 24c below show, this isn't the case.

Landscape

Landscape and Visual Impact Assessment ("LVIA")

- 24 The Secretary of State notes the conclusions of the LVIA presented in Environmental Statement Chapter 8, and the concerns from Interested Parties regarding the application of guidance, the determination of significance, and the extent to which landscape and visual considerations informed the siting, scale and design of the Proposed Development. The **Applicant** is requested to consider whether an updated LVIA assessment of the landscape and visual impacts of the Proposed Development is required. In doing so, the Applicant is requested to have regard to the requirements of NPS EN-1 paragraphs 5.10.6, 5.10.16, 5.10.19, 5.10.22 and 5.10.24. As part of this, the **Applicant** is requested to:
- a. Consider and respond to the concerns highlighted by the OHA in section 2.3 of their closing statement [REP7-191], in addition to their response to the ExA's Rule 17 Letter including their comments on documents submitted at Deadline 6 [REP7-190];
 - b. Consider and respond to Interested Parties comments received at Deadline 7;
 - c. Confirm whether the visualisations submitted in the Examination are representative and verified in accordance with recognised good practice, including details of viewpoint selection, verification methodology, and any acknowledged limitations;
 - d. With reference to NPS EN-1 paragraphs 5.10.6 and 5.10.19, explain how landscape and visual considerations informed the siting, scale and design of the Proposed Development at the early stages of scheme development, including how the mitigation hierarchy has been applied to avoid, reduce or offset adverse effects. The **Applicant** should identify specific examples of how their findings influenced the layout, design or configuration of the scheme; and
25. If the Applicant decides to update the assessment, the **Applicant** is encouraged to consult with **OHA** when producing this updated assessment.

24a OHA concerns: assessment of Applicant's response

In its response (page 62 of C1-087) the Applicant states

'The Project does not include any permanent lighting during operation'

This IP assumes this statement is limited to lights emitting in the human visible wavelength spectrum only, since unless the site's proposed CCTV cameras are to be rendered 'blind' during the hours of darkness they will rely on illumination by Infra-Red light to 'see' in the dark, as any other industrial/domestic CCTV system does in the absence of lights operating in the visible part of the spectrum.

Infra-red light is known to cause severe adverse impacts particularly for nocturnal animals, birds and bats and their insect prey so the Applicant's assertion that lighting *'does not contribute to impacts'* cannot be allowed to stand.

In its response (**page 62 of C1-087**) the Applicant states

The assessment of cumulative effects has been covered within section 8.10 / 8.11 of the submitted Landscape and Visual Impact Assessment [REP6-012] and brought together in a concluding summary ES Chapter (Chapter 20). The cumulative schemes have all been identified in the longlist and shortlist of cumulative schemes [REP5-034] and have been considered within the LVIA for relevance on whether cumulative effects could occur.

In the case of the immediately adjacent Red House Farm power station application (**VWHDC Planning application P24/V2489/FUL currently being considered under PINS appeal reference 6009163 with the public inquiry beginning 20th October 2026**) this is untrue.

The Applicant claims they have chosen to rely on a ‘tier’ process (**PINS Planning Advice Note Seventeen: Cumulative Effects Assessment**) which it has not properly applied.

In this case the Applicant has repeatedly ignored the actual status of the proposed Red House Farm power station immediately adjacent to the Southern site (see also this IP’s responses to the Applicant’s assertions in answering SoS Q6 and 10-14) and the voluminous planning application and appeal documentation associated with it, as set out in this IP’s **REP7-076** and other submissions.

In pointing the SoS to its sections 8.10/8.11 of its submitted Landscape and Visual Impact Assessment (**REP6-012**) the Applicant has failed to inform the SoS that it lists everything about Red House Farm power station as ‘*unknown*’ including its ‘*overlap*’ with the Applicant’s own project.

Since the ‘*overlap*’ as been previously identified and assessed by Cumnor Parish Council without the resources available to the Applicant, and is here again (see section 6), it should concern the SoS that the Applicant continues to rely on statements that cannot be true.

Even more concerning for the SoS is the Applicant’s ‘*tiering*’ of this project’s associated NGET provided substation. The Applicant’s **REP5-034** omits this cumulative proposed development entirely.

Summary

This IP assumes that the Applicant’s statement that ‘*The Project does not include any permanent lighting during operation*’ is limited to lights emitting in the human visible wavelength spectrum only. Unless the site’s proposed CCTV cameras are to be rendered ‘*blind*’ during the hours of darkness they will rely on illumination by Infra-Red light to ‘*see*’ in the dark, as any other industrial/domestic CCTV system, where Infra-red light is known to cause severe adverse impacts, particularly for nocturnal mammals , rodents, birds and especially bats and their insect prey.

So the Applicant’s unqualified assertion that lighting ‘*does not contribute to impacts*’ cannot be allowed to stand.

In the case of the immediately adjacent Red House Farm power station application (VWHDC Planning application P24/V2489/FUL currently being considered under PINS appeal reference 6009163 with the public inquiry beginning 20th October 2026) the applicant's statement on page 62 of C1-087 that *'The cumulative schemes have all been identified in the longlist and shortlist of cumulative schemes [REP5-034] and have been considered within the LVIA for relevance on whether cumulative effects could occur'* is untrue.

The Applicant has failed to inform the SoS that it incorrectly lists everything about the Red House Farm power station as *'unknown'* including its *'overlap'* with the Applicant's own project.

Even more concerning for the SoS is the Applicant's *'tiering'* of this project's associated NGET provided substation. The Applicant's REP5-034 omits this cumulative proposed development entirely.

24b. Applicant's response to IP comments at Deadline 7: assessment of Applicant's response

This Applicant's response is essentially a repeat of its previous deficient assertions during the Examination phase. Examples include the Applicant's

consideration of both fixed visual experiences and sequential experiences such as along public rights of way or roads

Except that it hasn't in any of its discussion of the southern site, most notably in its treatment of Cumnor's made Neighbourhood Plan Important Views (**REP1-062**), which by definition must be on publicly accessible land such as PRow.

For the purposes of the LVIA assessment the Project is considered to be fully reversible

Except that it isn't with permanent aspects including, but not limited to, cabling and substations.

this increased buffer to 100 m

Except that it isn't an increase since the previous 'without prejudice offer' was 250m and is now all subject to processes the Applicant would rather occur after it's been granted planning permission – such as its proposed Residential Visual Amenity Plan RVAP - and in turn dependent on any 'agreements' it claims it has already reached with property owners.

The Residential Visual Amenity Assessment (RVAA) [REP7-042] is based on the 'four step' process, as set out in the LI industry standard guidance (LI TGN 02/2019).

Except that it isn't with the Applicant's **REP7-042** building on its Deadline 6 RVAA submissions **REP6-064** and **REP6-065** that were hastily constructed after adverse comments by the ExA at the October Issue Specific hearings (ISH2 transcript part 4 **EV7-010**) with photographs only being taken on 14th October 2025 and with all the maps dated 'OCT 2025'

As this Interested Party shows in its **REP7-077 section 8**, the Applicant's laggardly attempt at an RVAA is woeful: replete with evidential inconsistencies, omissions and errors.

As the ExA stated in **para 10 of its PD-017**

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?

Summary

This Applicant's response is essentially a repeat of its previous deficient Examination phase assertions.

Examples include:

- its treatment of Cumnor's made Neighbourhood Plan Important Views which, by definition, must be on publicly accessible land such as PRow;
- its claim that the project is '*fully reversible*', except that it isn't with permanent aspects including, but not limited to, cabling and substations.
- Its claim of an '*increased buffer to 100 m*' which is actually a decrease from the previous '*without prejudice offer*' of 250m and is now all subject to processes the Applicant would rather occur after its been granted planning permission
- Its claim of a '*four step*' process, as set out in the LI industry standard guidance (LI TGN 02/2019)' for its RVAA not submitted by June 9th 2026, with its prior attempt in October 2025 only coming after adverse comments by the ExA at the October Issue Specific hearings

As the ExA states in its PD-017 '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.'

24c Visualisations and viewpoint selection & verification: assessment of Applicant's response

On **page 66 of C1-087** the Applicant lists six representative viewpoints it has chosen in Cumnor Parish and what it claims are the corresponding Important Views in Cumnor's made Neighbourhood Plan (see **REP1-057** and **REP1-062**).

This list ignores the representation Cumnor Parish Council made at **REP2-048** in its commentary on ExA Q 1.14.6, and representations by the OHA, for additional and more accurate viewpoints, photomontages and visualisations.

So it contains the same errors and omissions as it did when first presented in 2025, such as Representative Viewpoint 55 which is several hundred metres from the ZTV and which presumably remains in the Applicant's submission to bolster its case of 'nothing to see here'.

The Applicant's **page 66 in C1-087** also continues to ignore the Hill End Outdoor Education Centre as a representative viewpoint (it not even appearing on their submitted maps), something Cumnor Parish Council provided in **para 8.5 of its REP7-077** and which the ExA saw for themselves when they visited Hill End in their ASI in October 2025.

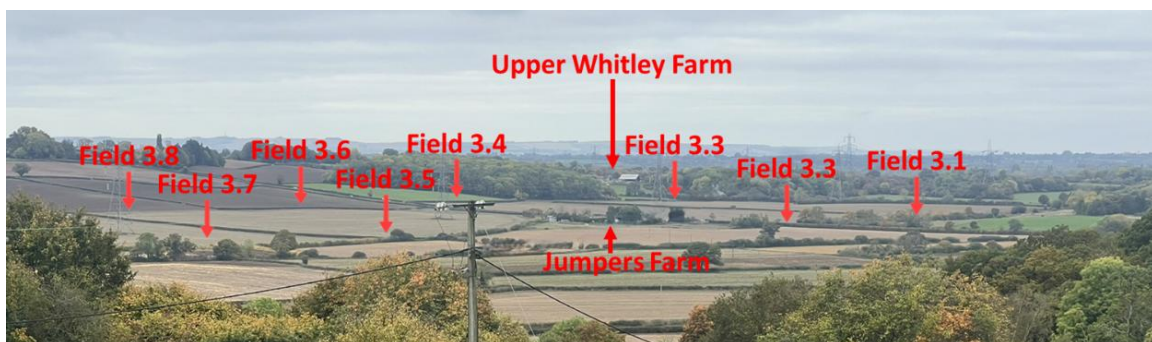


Image 6
From para 8.5 of **REP7-077**

These errors are compounded on **page 65 of C1-087** where the Applicant states that:

Where Important Views are orientated towards the Botley West site, equivalent or nearest publicly accessible locations have been adopted as Representative Viewpoints within the LVIA.

Why the Applicant has chosen this circumlocution when by definition Important Views must be on publicly accessible land such as PRow becomes clear upon examining the photographs and visualisations.

Take the representational viewpoint 53 adopted by the Applicant as 'corresponding' to made Neighbourhood Plan View 3. Except it doesn't correspond.

As previously shown in this Interested party's **REP6-063**, the Applicant's image of Viewpoint 53 in its **REP5-029** (and repeated as a cropped image in the Change Request documentation

at **CR2-032**) provides one example amongst many where inaccurate information provided to the ExA and now to SoS negates any subsequent assessment of harm and thence mitigation.



Image 7

Figure 8.239 on page 239 of **REP5-029**

Cropped version is also Figure 8.367 on page 367 of **CR2-032**

This Interested Party notes that the Applicant has used this photograph to assert the invisibility of the DCO site from Viewpoint 53 and so any need for mitigation.

Elsewhere in **REP5-029** (Figure 8.236 on page 236) the Applicant uses the same methodology for Viewpoint 52 on Tumbledown hill: this time with a photograph evidently taken under a hedge on the edge of the carriageway of the B4017.

For Viewpoint 53, taking the photograph 1.5m from the ground from a position behind a field of fully grown maize does not accurately represent the kinetic viewpoints at and between Cumnor Neighbourhood Plan Important Views 3 and 16 (**REP1-057 and REP1-062**).

As **REP1-062** (a document both approved and positively commented on by the Neighbourhood Plan Examiner) shows on page 9 and page 23 (Images 8 & 9 below), the Important Views do show the DCO site to both the west and east of the B4017 as it descends Tumbledown northwards towards Filchampstead.

View 3

Location: LCA8

Viewpoint: Just above Denman's Copse

Direction of view: North West

Content of View: Key panoramic view of Farmoor Valley. From a stand of mature woodland (Denman's Copse) to the north through to a south-westerly view back to Tumbledown Hill this elevated panorama looks in the foreground down across the valley, from Hill End to the north, across Farmoor Reservoir to the Thames path and Pinkhill nature reserve to the north west with distant views of West Oxfordshire, including Eynsham Hall Park and edge of the Cotswold Hills.

Additional Evidence: The north facing slopes have wide views over the Thames Vale, including Farmoor reservoir, as well as views of rising ground including wooded Wytham Hill on the horizon to the north. There are panoramic views north from the B4017 which is nearby. Cumnor NP landscape Character assessment LCA 12 Para 12.5.2



View 3 From Denman's Copse across Farmoor valley to Reservoir and Cotswold Hills.

Image 8

Page 9 of **REP1-062**

Location: LCA8

Viewpoint: Denman's Farm

Direction of view: NNW

Content of View: Farmoor farmland including reservoir.

Additional Evidence: The north facing slopes have wide views north over the Thames Vale, including Farmoor reservoir, as well views of rising ground including wooded Wytham Hill on the horizon to the north. In its recommendation to plan, manage and protect distinctiveness, actions should be taken to 'preserve the important panoramic views to Wytham Woods to the north'.



View 16 From Denman's Farm across Farmoor valley to Reservoir.

Image 9

Page 23 of REP1-062

Summary

In repeating its 2025 evidence to the ExA in C1-087 listing six viewpoints it has chosen in Cumnor Parish and claiming they correspond to Important Views in Cumnor's made Neighbourhood Plan, the Applicant again ignores the representation this Interested Party and the OHA made in the Examination Phase for additional and more accurate viewpoints, photomontages and visualisations.

Unsurprisingly it contains the same errors and omissions as it did when first presented in 2025.

So, for example the Applicant continues to ignore the Hill End Outdoor Education Centre as a representative viewpoint (it not even appearing on their submitted maps), despite the ExA's visit there in their ASI in October 2025.

As shown above there are many examples for the Southern site where inaccurate information provided to the ExA and now to SoS negates any subsequent assessment by the Applicant of harm and thence mitigation.

- Has not reduced residential visual amenity impact by increasing separation from residential receptors as the image above shows no panel push back from Denmans Farm.

While there is some panel push back from Jumpers Farm their proposed Residential Visual Amenity Impact remains dominated by a 15m high x 75m long building in field 3.1/3.3 at a distance of c 50m for the Applicant's proposed NGET 'scenario 2' substation.

Summary

The Applicant's response combines a more discursive cut and paste of its answer to Q23 with an attempt at the specificity required by the SoS where the accuracy is found wanting.

For the southern site, the Applicant:

- **Has not avoided development in flood risk affected areas (see Q6d above and Q53-57 below)**
- **Has not mitigated impacts on bat habitats and has chosen to ignore cumulative impacts of the immediately adjacent Red House Farm power station**
- **Has not reduced residential visual amenity impact by increasing separation from residential receptors with no panel push back from Denmans Farm and a 15m high x 75m long NGET substation building in field 3.1/3.3 at a distance of c 50m from Jumpers Farm.**

Residential Visual Amenity Assessment (“RVAA”)

26 The Secretary of State notes that the Applicant submitted a RVAA [REP6-064, REP6-065] late in the Examination and revised this further at Deadline 7 [REP7-042]. This late submission did not provide Interested Parties with the opportunity to comment on the updated assessment. The Secretary of State also notes the Applicant did not respond to Interested Parties’ comments on the RVAA (submitted by the Applicant at Deadline 6) in their closing statements at Deadline 8. Therefore, the Secretary of State requests the Applicant to consider whether an updated RVAA is required to consider the relevant comments from Interested Parties provided at Deadline 7, in particular the OHA’s response which highlighted that not all properties that have views available had been identified [REP7-191], for example Upper Whitley Farm, in addition to Cumnor Parish Council’s response [REP7-077] which details the omission of Filchampstead, and additional residential properties from the RVAA. If the Applicant decides to update the assessment, the Applicant is encouraged to consult with the OHA in preparing this updated RVAA.

Q26. Updated RVAA: assessment of Applicant’s response

This Interested Party notes the attempt by the Applicant (**C1-087 page 84**) to place blame for its inability to provide an updated RVAA on the *‘absence of additional time’*

That the Applicant even applied to the SoS for *‘additional time’* its itself extraordinary given that the ExA made repeated requests for an RVAA over more than two years:

- from July 2023 (**APP-126** 6.5 ES – Appendix 4.2 Scoping Opinion in ID3.2.3, table 7.3)
- to June 2025 (**PD-008** Q1.14.4 Residential Visual Amenity Assessment RVAA),
- again in July 2025 (**PD-012** ExQ2.13.15)
- and on 9th October 2025 (**EV7-010** ISH2 transcript part 4 at 00:10:11:26 - 00:10:42:09).

Despite claiming as late as July 2025 that

“Due to the low level of the Project and proposed mitigation, it is anticipated that there is no potential for any private views to be adversely affected to an extent that would result in a level of effect, which would trigger the requirement for RVAA.”

only after the 9th October ISH2 hearing (**EV7-010** ISH2 transcript part 4 at 00:10:11:26 - 00:10:42:09) did the Applicant attempt a rushed, incomplete and inaccurate attempt at a RVAA on 20th October 2025 (**REP6-064** and **REP6-065**).

Within three days (**PD-018** 23rd October 2025) the ExA had pointed out 10 errors and omissions and questioned the Applicant’s methodology.

These concerns were amplified by this Interested Party (**REP7-077**) and the OHA (**REP7-191**) who identified further errors, omissions and methodological flaws.

Aware that Interested Parties would not have the opportunity to comment further, the Applicant attempted another RVAA (**REP7-042**), which subsequent assessment has shown

repeats the errors, omissions and methodological flaws of its predecessors with, for example, pictures taken towards properties, in the case of southern site often from several hundred metres away from the property curtilage.

With the chutzpah this Interested Party has come to associate with this Applicant, and ignoring the deficiencies listed above, the Applicant again concluded, to no one's surprise, that:

"Based on the assessment and professional judgement, it is considered that there are no residential properties that are to be considered for Step 4 of the RVAA".

The Applicant then failed to submit any further update of the RVAA to the SoS on 9 June 2026, with the SoS refusing its request for an extension until September 2026.

This timeline provides evidence that the absence of a complete and accurate RVAA, between July 2023 and October 2025 for the ExA, and now in June 2026 for the SoS, lies entirely at the Applicant's door.

Notwithstanding the fact that we understand that the Applicant is preparing another submission for July 16th, presumably as another 'out of time' attempt to answer the questions posed since 2023, this Interested Party considers the Applicant has failed to meet both the ExA's requirements and those of the SoS, and so the DCO should not be granted on these grounds alone, with the Applicant required to re-submit, given the unmitigated and unassessed harms.

Summary

The June 2026 attempt by the Applicant to place blame for its inability to provide an updated RVAA on the '*absence of additional time*' is extraordinary, not least because the ExA made repeated requests for an RVAA over more than two years.

Despite claiming in July 2025 that there '*is no potential for any private views to be adversely affected to an extent that would result in a level of effect, which would trigger the requirement for RVAA*' the Applicant attempted a rushed, incomplete and inaccurate RVAA on 20th October 2025, an attempt so woeful that just 3 days later the ExA pointed out 10 errors and omissions and questioned the Applicant's methodology.

The Applicant then failed to submit any further update of the RVAA to the SoS on 9 June 2026, with the SoS refusing its request for an extension until September 2026.

The Applicant is now preparing another submission for July 16th, presumably as another 'out of time' attempt to answer the questions posed since 2023,

This Interested Party considers the Applicant has failed to meet both the ExA's requirements and those of the SoS, and so the DCO should not be granted on these grounds alone, with the Applicant required to re-submit, given the unmitigated and unassessed harms.

27. The Secretary of State notes that at Deadline 7, the ExA suggested [PD-018] a new Requirement to be included in the dDCO. This Requirement was for a 250m buffer to be implemented 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. The Applicant is requested to confirm whether it would be feasible to undertake a property-by-property assessment of residential visual amenity for dwellings within 250m of the edge of any part of the proposed operational solar array. If so, the Applicant should:

a. Provide such assessment, identifying the dwellings considered and the criteria used to select them;

b. Explain the likely visual effects of the development on each property; and

c. Identify any mitigation measures (including buffer distances or layout changes) that could reduce those effects.

28. If the Applicant considers that a property-by-property assessment would not be viable or proportionate, the Secretary of State requests that the Applicant provides a clear and evidenced justification of that position with reference to the relevant guidance and evidence already submitted. This should also explain the implications for scheme viability or operational constraints, how these have been assessed, and why they would prevent such an approach being undertaken

Q27a-c& Q 28. Provide property-by-property assessment of residential visual amenity for dwellings within 250m of the edge of any part of the proposed operational solar array and proposed mitigations: assessment of Applicant's response

While the SoS question (from **PD-018**) is about a new DCO requirement for

'a 250m buffer to be implemented 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)'

The Applicant chooses to answer a different question, saying (emphasis added)

'it could accept an increased buffer of between 100 m-250m from residential properties'

and then further qualifies that offer of a maximum of 250m, and a minimum of 100m (so a decrease of 150m from that proposed by the ExA in **PD-018**), by saying

'The precise buffer distance to be determined by the submission of an updated residential and visual amenity plan'

such a RVAP only being produced after the DCO has been approved.

It is unacceptable to this Interested Party to seek to defer a matter unresolved at the end of 2025 Examination phase and still unresolved after SoS's questions and the SoS's refusal of an extension.

RVAA is central to the planning balance and so this Interested Party's assessment is that it must be assessed before the planning balance is struck. OHA make the same point (**C1-024** para 6 on page 5):

"the OHA do not believe that the issue of impacts on Residential Visual Amenity can be left until after the scheme has been consented and instead need to form part of the SoS's weighing and balancing when determining the application."

But, extraordinarily, the Applicant seeks to retreat further from the ExA's **PD-018** with its proposed RVAP 'watered down' with

'the exception to the application of this buffer is where the Applicant may have already agreed a different buffer distance with owners of relevant residential properties.'

Where no details of how or when such 'agreements' have been reached or by whom, even though such buffers are known to be in the 0m-60m range (**C1-087** page 156 shows a 0m buffer for Denman's Farm in the southern site) so well below the 100m minimum in the Applicant's proposed own RVAP.

None of this inspires any kind of confidence in this Interested Party, nor in the residents of this Parish.

Despite its protestations, and statements about what it will do post DCO consent:

- the Applicant had not visited any property for an RVAA assessment prior to its 9th June submission,
- still has not visited any property for an RVAA/RVAP assessment as of the date of this submission
- None of its photographs were taken from within curtilages, looking away from the property as required.
- Several properties less than 50m-100m from the site were ignored altogether, not even listed.
- The Applicant erroneously states (again) on page 72 of **C1-087** (in its response to SoS Q24 when it should be in its answer to Q26) that

'The Hill End Outdoor Education Centre (Hill End Charitable Trust) is not a residential property and is therefore not included within the RVAA.'

As both Hill End (see **REP7-229** for example) and this Interested Party (see **REP7-077** section 8.5 for example) have repeatedly stated this is untrue for 3 reasons:

- Hill End was omitted entirely by the Applicant in its RVAA assessment, not even featuring in the large-scale maps in Figures 1.29 to 1.33 and 1.62 to 1.66 in **REP6-064** on which the subsequent RVAA assessment was purportedly based.
- Hill End, which for a century has provided residential accommodation to students, had 6,525 residential stays in 2025-26
- Hill End is home to a number of members of staff.

In stark contrast to this ineptitude and undertaking a task that seems beyond the Applicant, Stop Botley West and this Interested Party have actually visited and talked with residents.

Stop Botley West's survey of impacted properties in Cumnor Parish shows what can be achieved, and what the Applicant has failed to achieve over more than 4 years.

As an example for 4 of the properties adversely impacted (there are many more), Stop Botley West as compiled the following data (Table 3 below) for the Southern site:

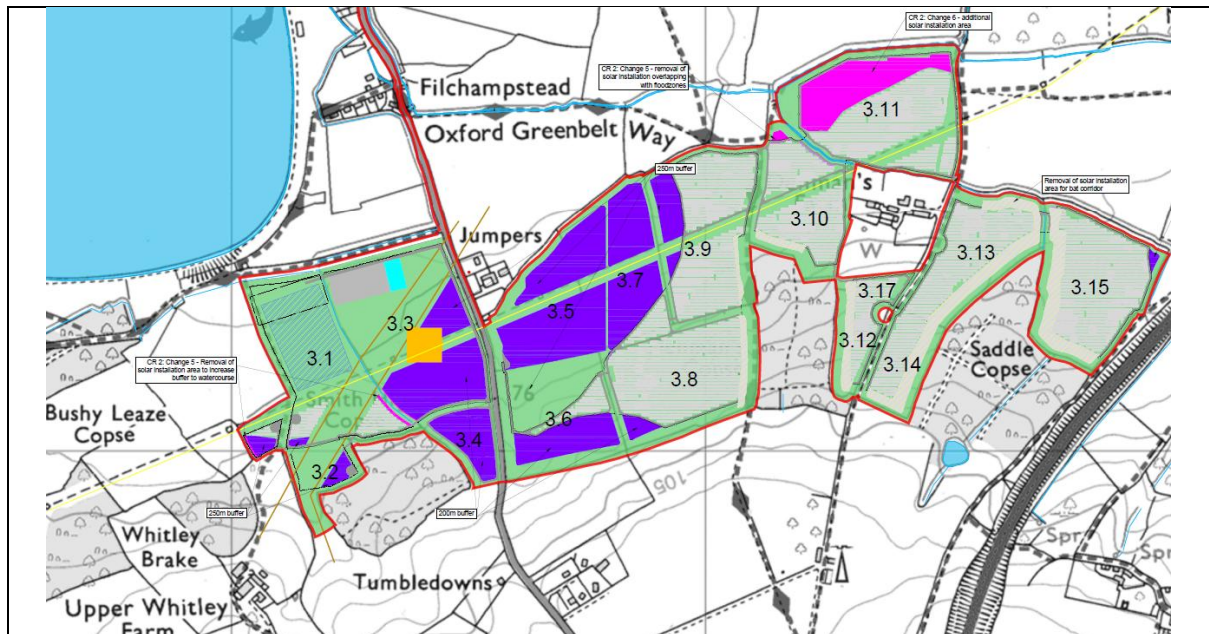
Impacted Properties Survey - South	Lake View House	Heiders - bach	Upper Whitely Farm	Jumpe rs Farm
Village	Cumnor Parish			
Did PVDP visit for an RVAA?	No	No	No	No
Did SBW visit for an RVAA?	Yes	Yes	Yes	Yes
Distance to panels from property	150	160	200	50
Was your property considered for assessment (table 2 RVAA)	Yes	Yes	No	Yes
Was your property assessed (table 4 of RVAA)	Yes	Yes	No	No
If a photograph was taken did it look out from/ in to the house	In	In	None	None
Do you have existing screening above 1.5m	No	Partial	Partial	Partial
Does the assessment claim screening exists now	Partial	Partial	Not assessed	Yes
Are there other factual inaccuracies	Yes	Yes	Not assessed	Yes
Is future mitigation proposed	No	No	Not assessed	No
Do issues remain unresolved.	Yes	Yes	Yes	Yes

Table 3
Impacted Properties survey – courtesy of Stop Botley West

If this wasn't enough to sink the Applicant's last ditch RVAP proposal then its inability to even accurately map its own proposals further erodes any remaining confidence in the veracity of its statements.

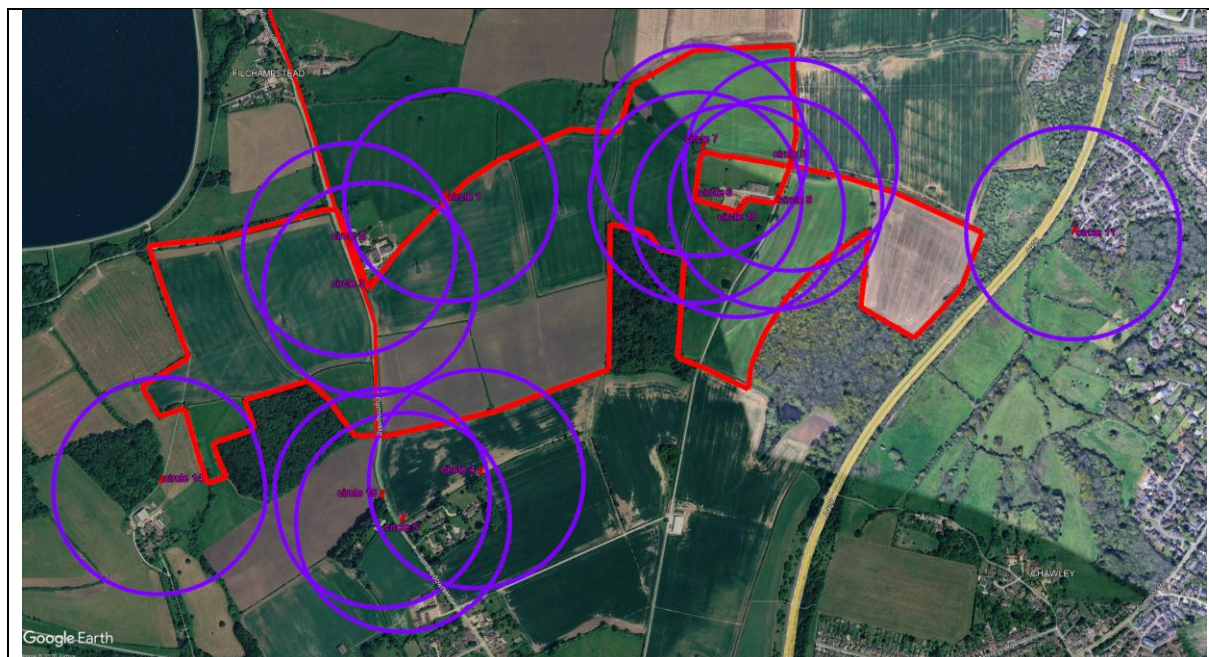
As but one example the map on page 156 of **C1-087** purports to show the southern site with 'indicative 250m buffer' shown as . It doesn't.

Compare the Applicant's map (Map 5 below):



Map 5
page 156 of **C1-087**

with a map produced by this Interested party that depicts the reality for 250m buffers (Map 6 below):



Map 6

Applicant's southern site with DCO redline and 250m buffers drawn in as calculated by this Interested Party

The reality shows that if the Applicant were serious about addressing the ExA's **PD-018** and the **SoS's question Q27** then there would be very little, if any requirement for its southern site, with panels and other infrastructure removed in all of fields 3.1 – 3.17.

This is further evidence supporting the OHA's and this Interested Party's position on the removal of the southern site from the DCO.

The juxtaposition of the Applicant's map (page 156 of **C1-087**) and this Interested Party's map also shows the illogical position of the Applicant only proposing PV panel push back of 250m from Jumpers Farm in Field 3.1 while still proposing the even more visually intrusive 15m high x 75 m long substation in the same field. This is clearly not logical.

Therefore, it is this Interested Party's contention that the ExA/SoS (**PD-018** and **SoS Q27**) phrase of '*the edge of any part of the proposed operational solar array*' has been erroneously interpreted by the Applicant as referring to PV panels alone and not the other infrastructure – such as substations and Power Converter Stations (PCS) - that form part of the overall '*solar array*'.

This Interested Party therefore asks the SOS to rule that 'push back' on the grounds of RVAA – as the Applicant is currently proposing for PV panels alone - should indeed apply to '*the edge of any part of the proposed operational solar array*' as originally intended, so also addressing other visually intrusive elements within the DCO boundary such as substations and PCS.

Summary

While the SoS question is about a new DCO requirement for '*a 250m buffer*', the Applicant chooses to answer a different question, saying '*it could accept an increased buffer of between 100 m-250m from residential properties*' before qualifying even that by saying '*The precise buffer distance to be determined by the submission of an updated residential and visual amenity plan*',

But such a RVAP would only be produced after the DCO has been approved and would be further 'watered down' with yet another exception *where the Applicant may have already agreed a different buffer distance with owners of relevant residential properties.*

Where no details of how or when such 'agreements' have been reached or by whom, even though such buffers are known to be in the 0m-60m range

It is unacceptable to this Interested Party to seek to defer a matter unresolved at the end of 2025 Examination phase and still unresolved after SoS's questions and the SoS's refusal of an extension.

The Applicant has again erroneously stated that '*The Hill End Outdoor Education Centre (Hill End Charitable Trust) is not a residential property and is therefore not included within the RVAA.*', the centre being home to some staff and which for a century has provided residential accommodation to students, with 6,525 residential stays in 2025-26.

The inaccurate information provided to first the ExA and now the SoS is a function of the fact that.

- the Applicant had not visited any property for an RVAA assessment before June 9th 2026,
- still has not visited any property for an RVAA/RVAP assessment
- No photographs were taken from within curtilages, looking out from the property as required.
- Several properties less than 50m-100m from the site were ignored altogether, not even listed

In stark contrast to this ineptitude, and undertaking a task that seems beyond the Applicant, Stop Botley West and this Interested Party have actually visited and talked with residents.

A number of them are making their own submissions for the July 16th deadline, as is Layla Moran MP, to whom they have also written.

If this wasn't enough to sink the Applicant's last ditch RVAP proposal then its inability to even accurately map its own proposals further erodes any remaining confidence.

The applicant's maps shows its illogical position in proposing PV panel push back of 250m from Jumpers Farm in Field 3.1 while still proposing the even more visually intrusive 15m high x 75 m long substation in the same field.

It is this Interested Party's contention that the ExA/SoS phrase of '*the edge of any part of the proposed operational solar array*' has been erroneously interpreted by the Applicant as referring to PV panels alone and not the other infrastructure – such as substations and Power Converter Stations (PCS) - that form part of the overall '*solar array*'.

This Interested Party therefore asks the SoS to rule that 'push back' on the grounds of RVAA – as the Applicant is currently proposing for PV panels alone - should indeed apply to '*the edge of any part of the proposed operational solar array*' as originally intended, so also addressing other visually intrusive elements within the DCO boundary such as substations and PCS.

The reality shows that if the Applicant were serious about addressing the ExA's and SoS's questions then there would be very little, if any requirement for its southern site, with panels and other infrastructure removed in all of fields 3.1 – 3.17.

This is further evidence supporting the OHA's and this Interested Party's position on the removal of the southern site from the DCO.

Ecology and Biodiversity

Skylark

33. The OHA and the Berks Bucks Oxon Wildlife Trust have raised the issue of habitat loss for breeding skylark throughout examination [REP5-125, RR-0098 REP7-191]. The Secretary of State observes that the Skylark Technical Note [REP4-037] indicates that the Proposed Development site could potentially support 33.19 skylark territories. The 2024 surveys (APP-159) record 228 territories. If impacts to breeding skylark cannot be mitigated on site, the Applicant is requested to provide a Skylark Compensation Strategy providing off-site habitat to compensate for the net loss of breeding skylark. The strategy should be developed in collaboration with the OHA, and include details of long-term management, monitoring, reporting, and data-sharing. Compensation should not incorporate areas within the array, or areas owned by third parties unaffiliated with the Project. The Applicant is requested to provide drafting to secure this Strategy within the dDCO and relevant control documents.

34. The Secretary of State requests that the Applicant provides further information regarding the wintering and breeding bird monitoring protocol proposed in the Outline Landscape Ecological Management Plan ("oLEMP"). The Secretary of State requests that the oLEMP be updated to include the wintering and breeding bird survey methods, survey programmes, timescales for the monitoring/monitoring reports to be delivered, and relevant parties to whom the reports will be provided.

Q33 Skylarks and Q34 breeding and overwintering birds: assessment of Applicant's response

Against a background of steep population drops in all farmland birds, as described by DEFRA in September 2025 (see: <https://www.gov.uk/government/statistics/wild-bird-populations-in-the-uk/wild-bird-populations-in-the-uk-and-england-1970-to-2024#breeding-farmland-bird-populations-in-the-uk-and-england>), skylark numbers have declined significantly.

The impact of solar power stations on skylarks is only now starting to be studied, with a 2024 publication showing no skylark nests were identified in 28 solar power stations across the U.K.

Within this context this Interested Party reiterates its previous objections to the Applicant's deficient proposed skylark compensation strategy for the following reasons:

- The Applicant has chosen to baseline its strategy by taking the mean of three years data. Given the national decline in skylarks a more precautionary approach would have been to either use the maximum number or a median number over a longer period.
- As identified in OHA submissions during the 2025 Examination phase (e.g. **REP5-125**), the Applicant has chosen to overestimate the capacity of the DCO site ('onsite provision') to provide uplift by choosing criteria more favourable to its case than the HMG guidance (AHW4: Skylark Plots <https://www.gov.uk/find-funding-for-land-or-farms/ahw4-skylark-plots>) that plots should be more than 5ha in size if they have an open aspect or more than 10ha if bounded by trees to avoid predator attack (OHAs, 2025).

For example the Applicant's Compensation Strategy fails to include the very common case where its 'compensation areas' are bounded by trees, so requiring an area of grassland of >10ha.

- The Applicant has not addressed the OHA point from 2025 (**REP6-117** page 5) that:

'skylarks will not be able to nest within the project site as they do not use solar farms. Any enhancement of habitat onsite will only serve to provide for foraging skylarks, which might give neighbouring pairs a boost in terms of breeding success. But there would still be a loss of suitable habitat for breeding, which would result in a reduction in breeding and therefore a decline in the local population.'

- As of June 2026 the OHAs are still awaiting further information from the Applicant (para 18 of **C1-024**)
- The Applicant also assumes a high density of territories as a result of management measures to enhance skylarks.

Whilst skylark plots or strips are a tried and tested method of maintaining skylark breeding territories within arable fields their use in solar power stations is untested and wider experience shows that predators will utilise the structures present (such as a 15m high substation, PCS, fences, CCTV towers etc) to increase their skylark predation.

- It would be generous to describe the Applicant's approach to estimating the numbers of skylark territories in offsite land as 'approximate'.

By choosing not to conduct surveys and with details of management measures to be left (as with so much else) to after DCO approval, the SoS cannot rely on the Applicant's assertion that it "*can double the skylark territory density*".

Finally, and contrary to the OHA's position during the Examination phase that a comprehensive farmland bird strategy should be developed (e.g. **REP5-125**), not just including skylarks but also the other declining species, the Applicant has chosen not to submit compensation measures for other farmland birds which are in decline.

IUCN Red List birds recorded in the Southern site by the Applicant, such as starling, linnet and yellow hammer require the existing mosaic of habitats within the Farmoor valley's farmland and the adjacent Local Wildlife sites. These and overwintering birds and waterfowl, including migratory species, that graze these fields next to the Farmoor reservoir rely on cropping as a food source. These forms of connectivity between species and habitats have not been addressed by the Applicant.

In considering the impacts of this proposed power station on breeding and wintering bird populations this Interested Party notes with regret that yet again the Applicant is proposing to only provide an Outline Landscape and Environmental Management Plan (oLEMP) for consideration by the SoS, with details of the Landscape and Environmental Management Plan (LEMP) only forthcoming after the DCO is granted.

This, despite Natural England in their response to EXQ1 (Natural England's **REP2-057 Q1.8.7**) stating that in respect of wintering bird assemblage and the proposed 40 year life of the power station:

Natural England agree that for the purposes of impact assessment this should not be considered a temporary impact

As with so much else in this application, work that the Applicant should have been done before the end of the Examination phase, at the latest, it now proposes to do only after DCO consent.

The limits placed by this approach on public scrutiny are clear and with it a challenge to the SoS's position (**EN010147-002472** 8th June 2026) that recognises '*the importance of ensuring that robust information is available to inform the decision-making process*'

Summary

Against a background of steep population drops in all farmland birds, as described by DEFRA in September 2025, skylark numbers have declined significantly.

Yet:

- **The Applicant has chosen to baseline its strategy by choosing a low number for its estimate of skylark population, well below the maximum observed.**
- **the Applicant has then chosen to overestimate the capacity of the DCO site ('onsite provision') to provide uplift by choosing criteria more favourable to its case than the HMG guidance**
- **The Applicant has not addressed the OHA's 2025 point that '*skylarks will not be able to nest within the project site as they do not use solar farms*' with the OHAs still awaiting further information from the Applicant a year later.**
- **The Applicant assumes a high density of territories as a result of its management measures to enhance skylarks and it would be generous to describe the Applicant's approach to estimating the numbers of skylark territories in offsite land as 'approximate'.**

Contrary to the OHA's position during the Examination phase that a comprehensive farmland bird strategy should be developed, not just including skylarks but also the other declining species, the Applicant has chosen not to submit compensation measures for other farmland birds which are in decline.

This, despite Natural England in their response to EXQ1 stated that in respect of wintering bird assemblage and the proposed 40 year life of the power station '*Natural England agree that for the purposes of impact assessment this should not be considered a temporary impact*'

In considering the impacts of this proposed power station on breeding and wintering bird populations, including migratory species, yet again the Applicant is proposing to only provide an Outline Landscape and Environmental Management Plan (oLEMP) for consideration by the SoS, with details of the Landscape and Environmental Management Plan (LEMP) only forthcoming after the DCO is granted.

As with so much else in this application, work that the Applicant should have been done before the end of the Examination phase, at the latest, it now proposes to do only after DCO consent.

The limits placed by this approach on public scrutiny are clear and with it a challenge to the SoS's position that recognises *'the importance of ensuring that robust information is available to inform the decision-making process'*

35. The Secretary of State requests that the Applicant updates Section 17 of oLEMP to ensure that any remedial actions considered necessary will be agreed with the local planning authority. Furthermore, due to the bespoke mitigation developed for bats, the oLEMP should be updated to include Natural England (“NE”) as a consultee in the event that remedial action may be required.

Q.35 Bats and required remedial measures: assessment of Applicant’s response

This Interested Party notes that in its answer to SoS Q.35 the Applicant does not provide any details of what the ‘remedial measures’ might be, nor any constraints on them the Applicant may decide to impose.

For example, if remedial measures required the removal of PV panels or other infrastructure, what would be the Applicant’s position, given that it now maintains it has reached its minimum viable size for the project?

This question is even more pertinent when set against the conflicts within the Applicant’s own submissions.

For example, the Applicant still stands by its unevidenced assertion (**APP-153** updated as **REP5-039 para 5.1.3**) that:

‘the area to be developed comprises species-poor fields, which are of much lower value for bats.’

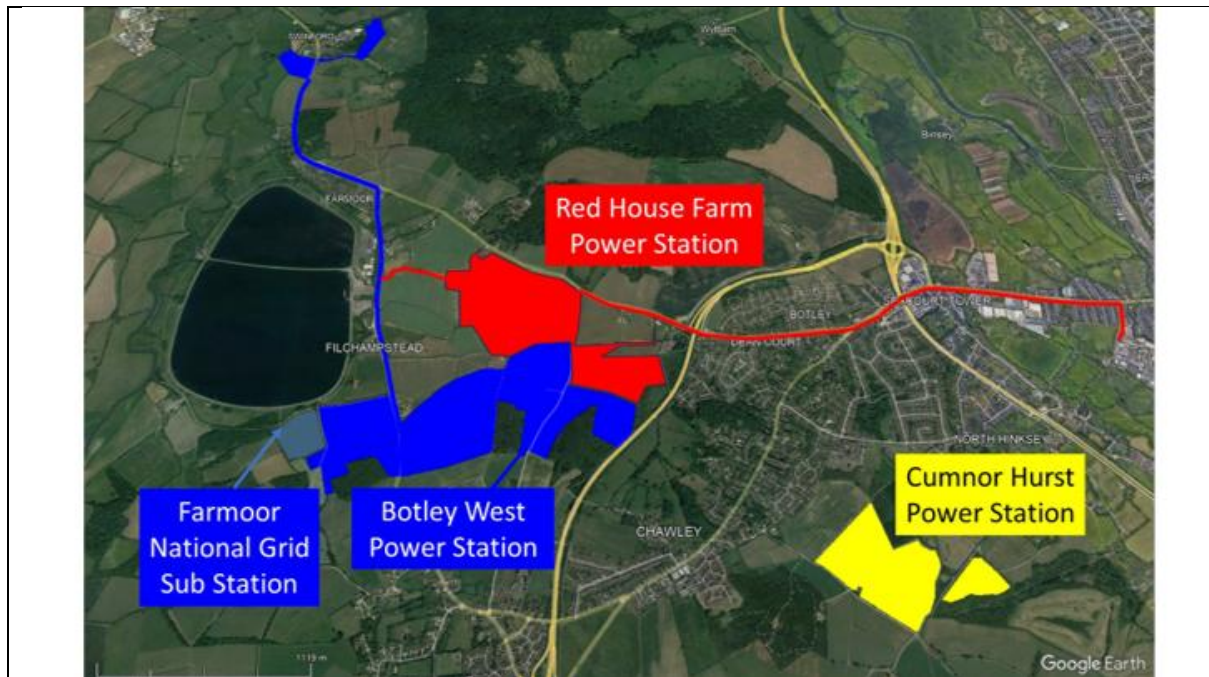
while in its **APP-153** updated as **REP5-039**, and in its **REP5-009** and **REP6-044** the Applicant has confirmed this Interested Party’s prior submissions and those of Cassington Parish Council (**REP1-051** to **REP7-068**) that:

- Solar power stations cause a negative and severe impact on the occurrence of bats.
- The mechanism driving this impact is not understood
- The Project site is important to a high diversity of UK bat species (14 out of 18), including some of the rarest threatened species such as barbastelle
- A number of bat species move and forage over fields.
- Bats in the area are using a mosaic of habitats as part of their daily foraging activities and annual patterns of migration and roosting associated with reproduction and the autumn dispersal.

The Applicant chooses not to explain the evident contradiction.

In the case of the southern site the Applicant has based its assessment on just two static bat location sites comprising just one paired static location (**REP5-009**).

This lack of research is doubly concerning when set against the more extensive surveys conducted by for the immediately adjacent Red House Farm solar power station (VWHDC application **P24/V2489/FUL** at <https://valeofwhitehorse.planning-register.co.uk/Planning/Display?applicationNumber=P24%2FV2489%2FFUL>) – see adjacencies map (Map 7) below.



Map 7

Solar power stations and associated infrastructure currently proposed in Cumnor Parish

The Red House Farm bat survey in contrast to the Botley West survey found 9 species of bats present, including barbastelle, an Annex II species – see annotated map (Map 8) below.



Map 8

VWHDC application **P24/V2489/FUL** at <https://valeofwhitehorse.planning-register.co.uk/Planning/Display?applicationNumber=P24%2FV2489%2FFUL>

The Red House Farm survey also noted that 14 species of bat had been identified in the last decade within a range of 4km, so encompassing this Applicant's DCO boundary for the southern site.

Given the detail provided by the Red House Farm bat survey, in contrast to the lack of detail in the survey conducted by this Applicant, this Interested Party concludes that:

- The Applicant's bat study cannot be relied upon for the southern site.

Had this Applicant done a commensurate amount of onsite studies for the power station's southern site its assessment of bat activity would have been more credible.

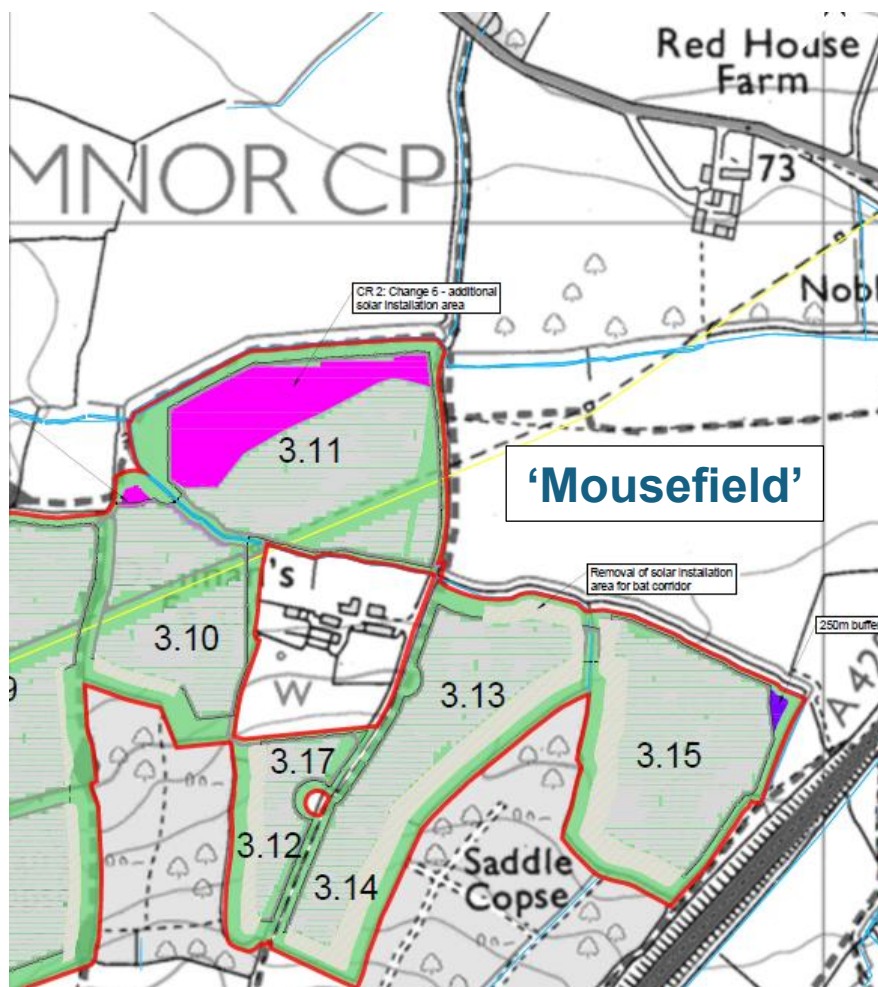
- Given that the redlines for the Red House Farm power station and Botley West's southern site are co-located for much of their East – West alignment in this Parish, the SoS should assume that bats present in the Red House Farm survey will also be present within the Botley West southern site redline.

Unless this Applicant is claiming that bats in this parish do not cross planning application redlines, it would be perverse to insist that bat species recorded within the Red House Farm redline, given those recordings include bats crossing the redline to the south into the area within the Botley West redline, somehow are not present within the Botley West redline, and vice versa.

- That being so, this Applicant's oLEMP describing the southern site is deficient, needs to be withdrawn and resubmitted after it has conducted a more comprehensive – and so representative - bat survey.
- This Applicant should be required to present to the SoS a cumulative impact assessment for bats for its southern site, taking into account both the Red House Farm proposals and the associated NGET substation proposal (including SoS scenario 1 where NGET builds the substation), both of which it has chosen to ignore in its sparse statements on cumulative impacts.

Without such a cumulative impact assessment the current situation where Botley West is proposing 'bat corridors' that point directly north into fields within the Red House Farm redline will become a reality (see also this Interested Party's response to the Applicant's answer to SoS Q24.d mitigation hierarchy) with the inevitable severe adverse impacts on bat populations.

See for example the map below (Map 9) with bat corridors in Fields 3.13, 3.14 and 3.15 pointing directly to the Red House Farm field that application has chosen to call 'Mousefield'.



Map 9

Extract from map on page 156 of **C1-087**

To this Interested Party it's as if the Red House Farm Applicant wishes to claim all will be fine because bats can and do use fields to the south of their red line – but which lies within the Botley West redline – and in any case they will provide a few bat boxes as mitigation.

Simultaneously, the Botley West Applicant claims the converse: that there really aren't any bats to worry about not least because they can and will continue to be able to forage and roost within the Red House Farm redline thanks to Botley West's 'bat corridors'.

To this Interested Party this is cumulatively arrant nonsense.

If it comes to pass, the severe adverse impacts on bat populations will then be self-evident, but too late to do anything about it.

Summary

In its answer to SoS Q.35 the Applicant does not provide any details of what the 'remedial measures' might be, nor any constraints on them the Applicant may decide to impose.

The Applicant still stands by its unevidenced that *'the area to be developed comprises species-poor fields, which are of much lower value for bats.'* while simultaneously confirming this Interested Party's and Cassington Parish Council's prior submissions that:

- **Solar power stations cause a negative and severe impact on the occurrence of bats.**
- **The Project site is important to a high diversity of UK bat species (14 out of 18), including some of the rarest threatened species such as barbastelle**
- **A number of bat species move and forage over fields.**
- **Bats in the area are using a mosaic of habitats as part of their daily foraging activities and annual patterns of migration and roosting associated with reproduction and the autumn dispersal.**

The Applicant chooses not to explain the evident contradiction.

In the case of the southern site the Applicant has based its assessment on just two static bat location sites comprising just one paired static location, a lack of research doubly concerning when set against the more extensive surveys conducted for the immediately adjacent Red House Farm solar power station that found 9 species of bats present, including barbastelle, an Annex II species (see annotated Map 8 above).

The Red House Farm survey also noted that 14 species of bat had been identified in the last decade within a range of 4km, so encompassing this Applicant's DCO boundary for the southern site.

Given the detail provided by the Red House Farm bat survey, in contrast to the lack of detail in the survey conducted by this Applicant, this Interested Party concludes that:

- The Applicant's bat study cannot be relied upon for the southern site.
- Given the redlines for the Red House Farm power station and Botley West's southern site are co-located for much of their East – West alignment, the SoS should assume that bats present in the Red House Farm survey will also be present within the Botley West southern site redline.
- That being so, this Applicant's oLEMP describing the southern site is deficient, needs to be withdrawn and resubmitted after it has conducted a more comprehensive – and so representative - bat survey.
- This Applicant should be required to present to the SoS a cumulative impact assessment for bats for its southern site, taking into account both the Red House Farm proposals and its own associated NGET substation proposal (including SoS scenario 1 where NGET builds the substation), both of which it has chosen to ignore in its sparse statements on cumulative impacts.

To this Interested Party it's as if the Red House Farm Applicant wishes to claim all will be fine because bats can and do use fields to the south of their red line – but which lies within the Botley West redline – and in any case they will provide a few bat boxes as mitigation.

Simultaneously, the Botley West Applicant claims the converse: that there really aren't any bats to worry about not least because they can and will continue to be able to forage and roost within the Red House Farm redline thanks to Botley West's 'bat corridors'.

To this Interested Party this is cumulatively arrant nonsense.

If it comes to pass, the severe adverse impacts on bat populations will then be self-evident, but too late to do anything about.

Ancient Woodland and Veteran Trees

39. The Secretary of State notes that the Strategic Arboricultural Impact Assessment & Method Statement [REP6-014 to REP6-018] intends to use NE's buffer zone recommendations for ancient woodland. The Woodland Trust's Ancient Tree Inventory, and the Applicant's Appendix 9.15: Veteran Tree Survey Report [APP-164], record the presence of multiple veteran trees along the southern perimeter of Worton Heath. The Secretary of State requests that the Applicant update the Strategic Arboricultural Impact Assessment & Method Statement to clearly identify individual veteran trees along the boundary of Ancient Woodland which will require additional buffering in line with NE's guidance. The Applicant is requested to use the Woodland Trust's Ancient Tree Inventory [RR-1057] to inform this assessment.

Q39 Ancient Woodland and Veteran trees: assessment of Applicant's response

In this question the SoS notes that the Applicant's

'Strategic Arboricultural Impact Assessment & Method Statement [REP6-014 to REP6-018] intends to use NE's buffer zone recommendations for ancient woodland'

The Applicant confirms this on **page 101 of their C1-087** noting that:

'Ancient woodlands are shown on the figures within Appendix 8.3 Strategic Arboricultural Impact Assessment & Method Statement (Rev 1) [REP6-014 to REP6-018]'

This statement by the Applicant is not true for their proposed southern site.

There are significant omissions of ancient woodland in the Applicant's **REP6-017** and **REP6-018**.

Instead of ancient woodland labelled as

we find instead only 'Category A' woodland labelled as



Designated Ancient Woodland (as per Natural England ancient woodland inventory, via open data publication)

BS 5837:2012 Tree Quality Categories - Table 1



Category A - High quality

This may account for the Applicant's new June 2026 claim (**C1-069**) that it only need consider 11 veteran trees for its entire southern site and the cable route to it from the central site, with apparently no veteran trees in any of the designated ancient woodland (see also section 41 below).

The Applicant has failed to inform first the ExA and now the SoS of 4 areas of ancient woodland immediately adjacent to their Order Limits with trees growing to the redline boundary with their foliage overhanging it:

- Shadwell Copse (surrounded on 3 sides: north, west and east) by the DCO redline
- Denman's Copse (surrounded on 3 sides: north, west and east) by the DCO redline
- Smith Hill Copse (surrounded on 3 sides: north, west and east) by the DCO redline

- Stroud Copse – mislabelled as ‘Strond’ on the Natural England ancient woodland map (DCO red line following B4044 for underground cable works lies on Copse western boundary)

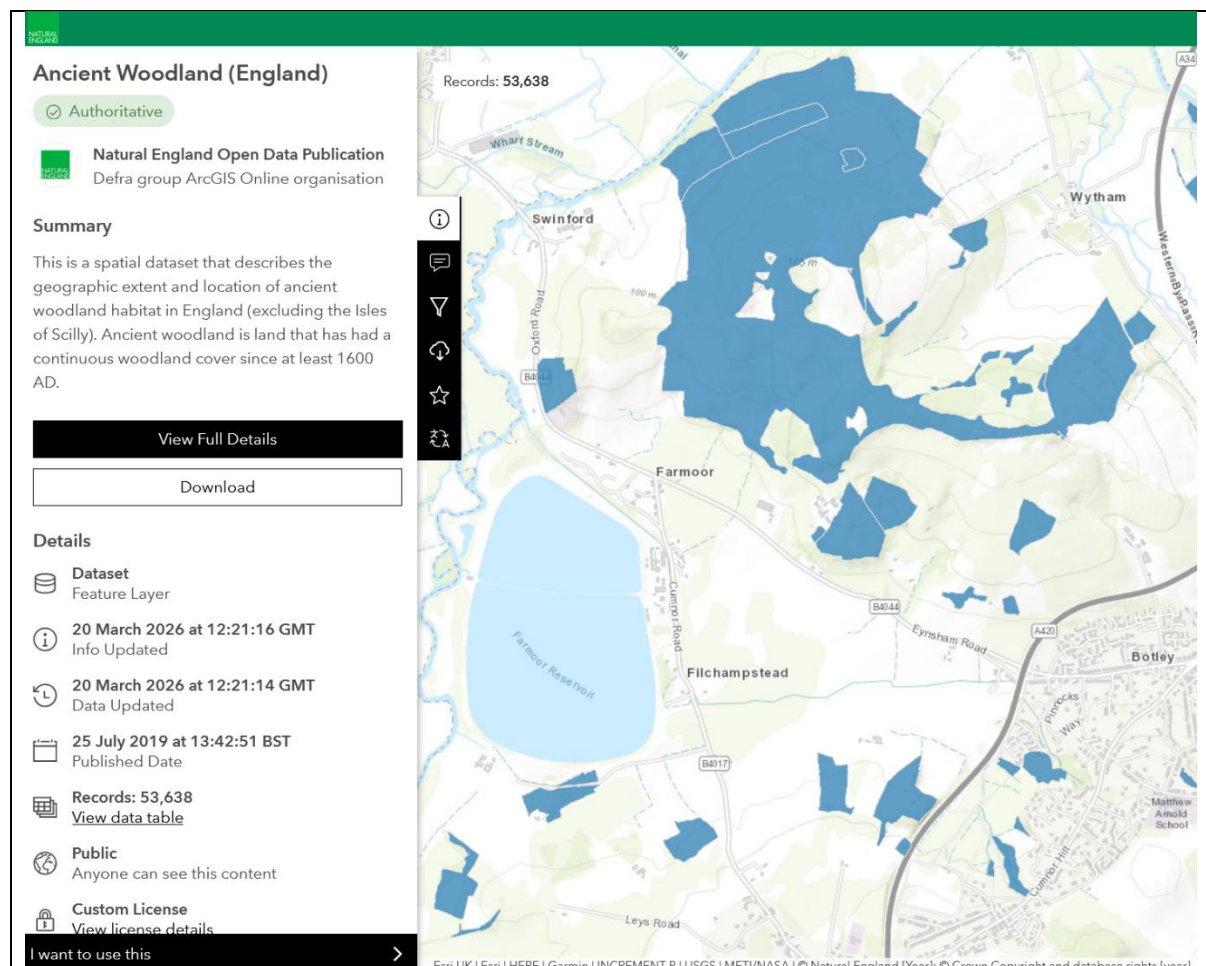
One further area ignored by the Applicant is immediately adjacent to the proposed NGET substation:

- Bushy Leaze Copse (NGET substation redline lies on the Eastern boundary of this copse)

The Applicant also ignores ancient woodland immediately adjacent to its proposed crossing of the River Thames;

- The internationally renowned Wytham Woods SSSI incorporating Hither Hill, Further Clay Hill and Hither Clay Hill

For details see the Natural England open source map below:



Map 10

From Natural England website <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::ancient-woodland-england/explore?location=51.758609%2C-1.305828%2C14>

This is a detailed topographic map of the Farmoor Reservoir area in Oxfordshire, England. The map shows the reservoir in the center-left, surrounded by various farms and woodlands. Key features include the Oxford Greenbelt Way, the Thames Path, and the Oxford Road. The map is labeled with numerous place names, including Swinford, Farmoor, and Wytham. It also shows contour lines, roads, and other geographical features.

OS map extract showing Saddle Copse, Denman's Copse, Smith Hill Copse, Bushy Leaze Copse, Stroud Copse, and Wytham Woods incorporating Hither Hill and Hither Clay Hill

Summary

In confirming the SoS's point that the *'Strategic Arboricultural Impact Assessment & Method Statement [REP6-014 to REP6-018] intends to use NE's buffer zone recommendations for ancient woodland'* the Applicant notes that *'Ancient woodlands are shown on the figures within Appendix 8.3 Strategic Arboricultural Impact Assessment & Method Statement (Rev 1)'*

This statement by the Applicant is not true for their proposed southern site.

The Applicant has failed to inform first the ExA and now the SoS of 4 areas of ancient woodland immediately adjacent to their Order Limits plus a further immediately adjacent to the proposed NGET substation and ancient woodland immediately adjacent to its proposed crossing of the River Thames: the internationally renowned Wytham Woods SSSI incorporating Hither Hill, Further Clay Hill and Hither Clay Hill.

This may account for the Applicant's new June 2026 claim that it only need consider 11 veteran trees for its entire southern site and the cable route to it from the central site, with apparently no veteran trees in any of the designated ancient woodland.

Ancient Woodland and Veteran Trees

40. The Secretary of State notes that Part 5 of the Strategic Arboricultural Impact Assessment & Method Statement provides a methodology for trenching within Root Protection Areas. The Applicant is requested to update the Strategic Arboricultural Impact Assessment & Method Statement to state that there will be no trenching in veteran tree Root Protection Areas. Furthermore, the Applicant is requested to provide further information as to how the potential impacts of Horizontal Directional Drilling on ancient woodland will be managed, given that there are proposed works in close proximity to ancient woodland, in particular crossing points 3 and 11

Q40 Horizontal Directional Drilling impacts on ancient woodland: assessment of Applicant's response

Summary

Since the Applicant has failed after 4+ years to identify the world renowned Wytham Woods SSSI as ancient woodland, and given it is immediately adjacent to the Applicant's proposed crossing of the River Thames north of Swinford, no credence can be given to any statements made by the Applicant in its response to Q40.

Ancient Woodland and Veteran Trees

41. The OHA and Forestry Commission are invited to comment on the Strategic Arboricultural Impact Assessment & Method Statement submitted at Deadline 6.11.

Q41. Commentary on Applicant's Strategic Arboricultural Impact Assessment & Method Statement submitted at Deadline 6.11: assessment of Applicant's response

In assessing the Applicant's updated veteran tree survey (**C1-066**) this Interested Party draws the SoS's attention to the following:

- The Applicant's first attempt at a survey was a mere 12 days during the winter of 2023-2024 (29th January – 9th February) when there would have been no visible leaf canopy, requiring identification by other factors such as shape, structure and bark characteristics.
- The Applicant's second attempt, completed during May 2026, bears all the hallmarks of its attempted RVAA in October 2025: hasty, inaccurate and incomplete.
- The Applicant lists trees based on the measurement of stem diameter only at 1.3m height above ground level. This is not compliant with the stated method of measuring circumference (girth) at 1.5m height above ground level.
- The Applicant has not followed the stated methodology and as a result the survey will likely be incomplete and inaccurate or misleading.

The above leads this Interested Party to assess that it endorses the position taken by the OHA in their response to the SoS (**C1-024 Points 19 to 38**) and in particular the OHA's position (**C1-024 OHA response para 41, point 19**) that:

'there are flaws in the Applicant's methodology for identifying ancient and veteran trees and as a result, there is potential for ancient and veteran trees to have been missed from the assessment'.

The OHA's point about *'flaws in the Applicant's methodology'* can be readily illustrated with this Interested Party's observation of the western side of Denman's Copse from PRoW 84/15/30 (also named the Oxford Greenbelt Way), this being the only ancient woodland in the southern site accessible from an adjacent PRoW.

In addition to showing deep shade cast 30m-40m into fields 3.8 and 3.9 at 0730 on 6th July 2026 (Image 10 below) with the sun at an inclination of 37° (elementary trigonometry showing the oak and ash trees on the western edge of Denman's Copse have a height of 22m-30m), the photographs below (Images 11-13) demonstrate just how easy it should have been for the Applicant to conduct both their claimed tree surveys.



Image 10

Looking NNE to Denman's Copse and PRow 84/15/30 between Cumnor Neighbourhood Plan Important Views 3 and 16 (see also Q24c above) showing deep shade cast even in mid-summer by the ancient woodland

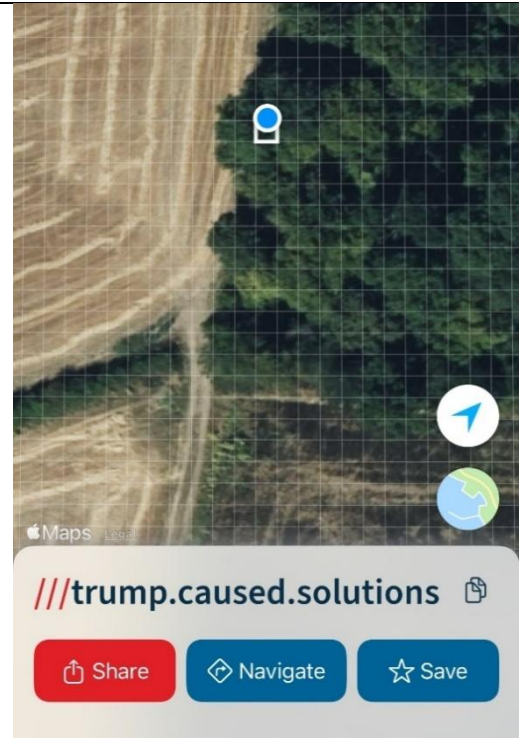


Image 11

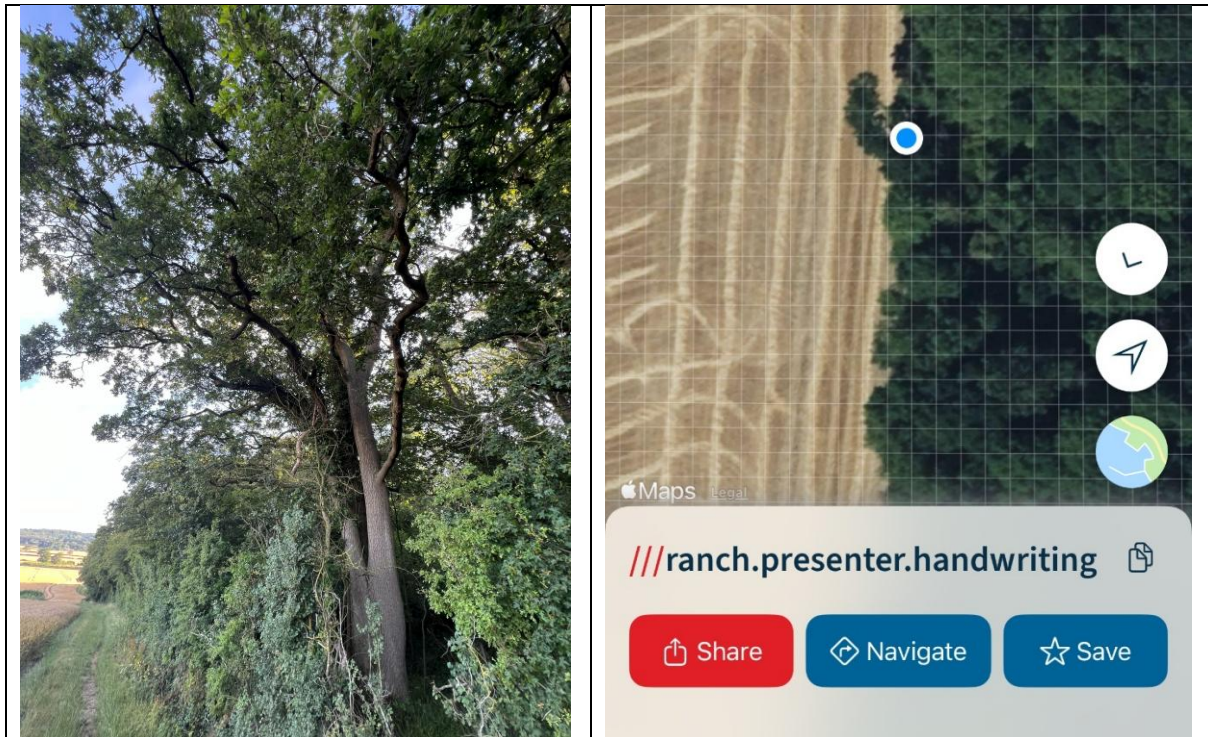


Image 12

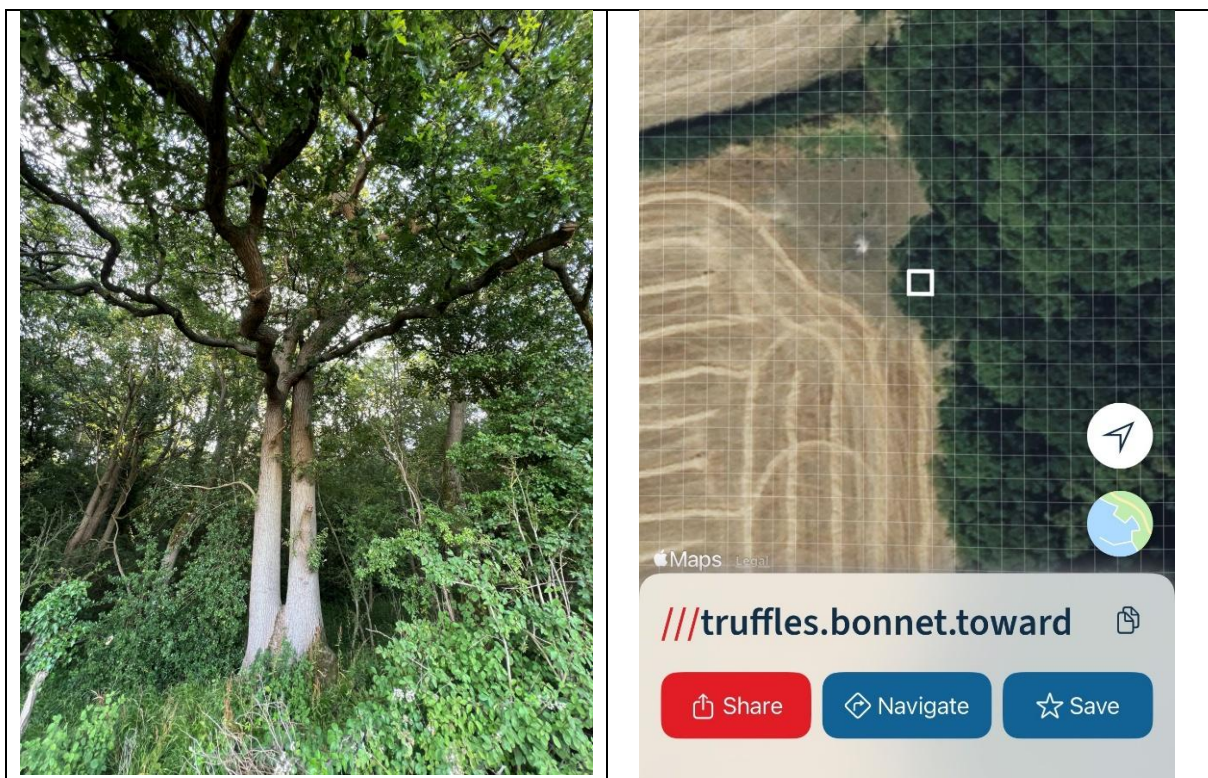


Image 13

Overall, this Interested Party assesses that it is not credible for the Applicant to claim that such a huge site covering in excess of 1,400 hectares of rural Oxfordshire contains so few important trees.

Summary

The Applicant's first attempt at a survey was a mere 12 days during the winter of 2023-2024 (29th January – 9th February) when there would have been no visible leaf canopy, requiring identification by other factors such as shape, structure and bark characteristics.

Its second attempt, completed during May 2026, bears all the hallmarks of its attempted RVAA in October 2025: hasty, inaccurate and incomplete.

The Applicant has not followed the stated methodology and as a result the survey will likely be incomplete and inaccurate or misleading.

This assessment endorses the position taken by the OHA in their response to the SoS that *'there are flaws in the Applicant's methodology for identifying ancient and veteran trees and as a result, there is potential for ancient and veteran trees to have been missed from the assessment'*.

Overall, this Interested Party assesses that it is not credible for the Applicant to claim that such a huge site covering in excess of 1,400 hectares of rural Oxfordshire contains so few important trees.

Hydrology and Flood Risk

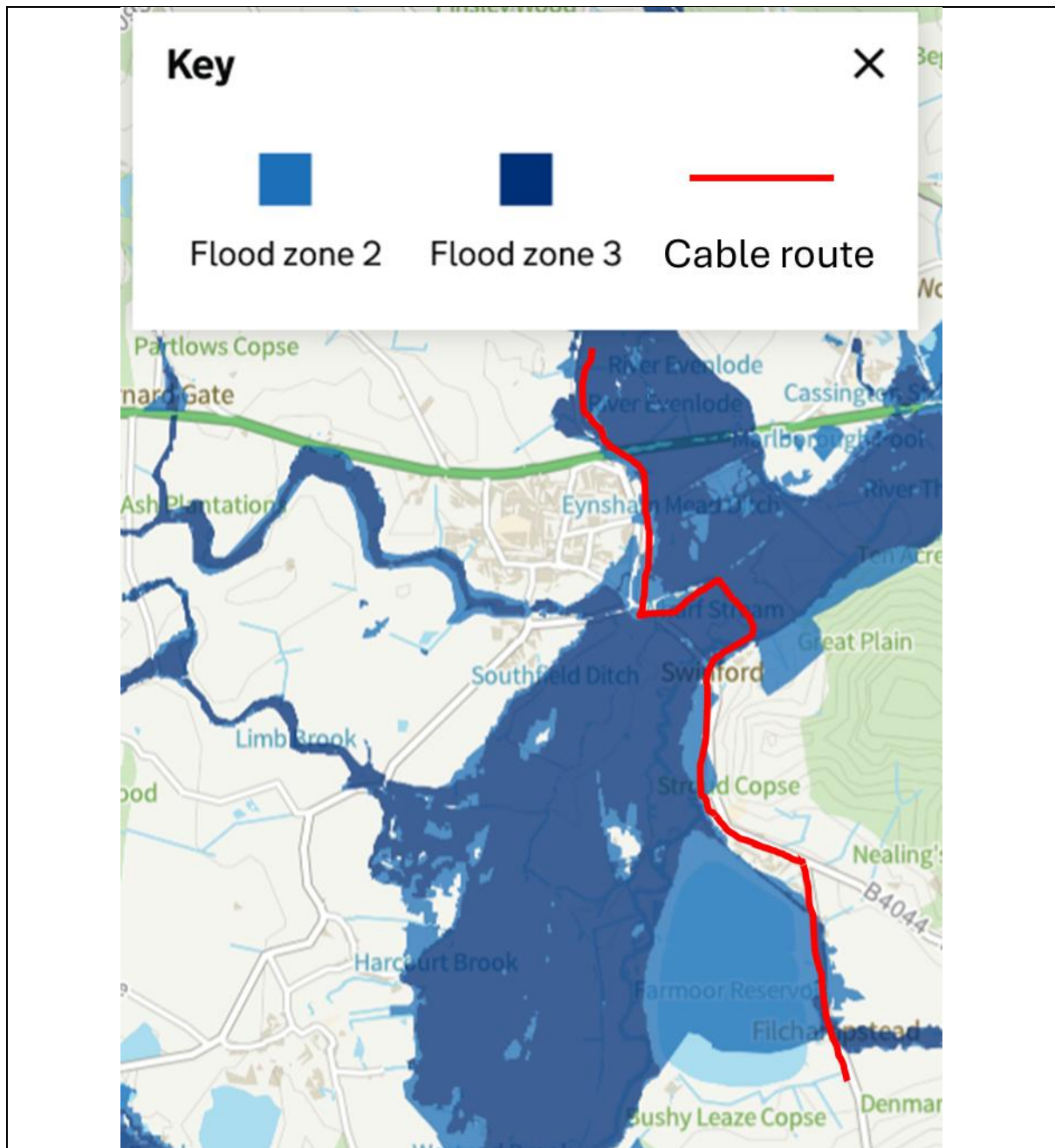
54. In relation to the Flood Risk Assessment ("FRA") [REP6-024], the Secretary of State requests that the Environment Agency provides written confirmation whether the sequential and exception tests within NPS EN-1 regarding fluvial flooding have been met by the Applicant.

Q.54 EA to confirm NPS EN-1 sequential and exception tests have been met by the Applicant: assessment of the EA's response

In its **C1-019** the Environment Agency (EA) explicitly states that:

'With respect to the sequential approach: The Applicant has taken a sequential approach to the proposed development layout by ensuring solar PV modules and more sensitive infrastructure such as transformers are located within Flood Zone 1.'

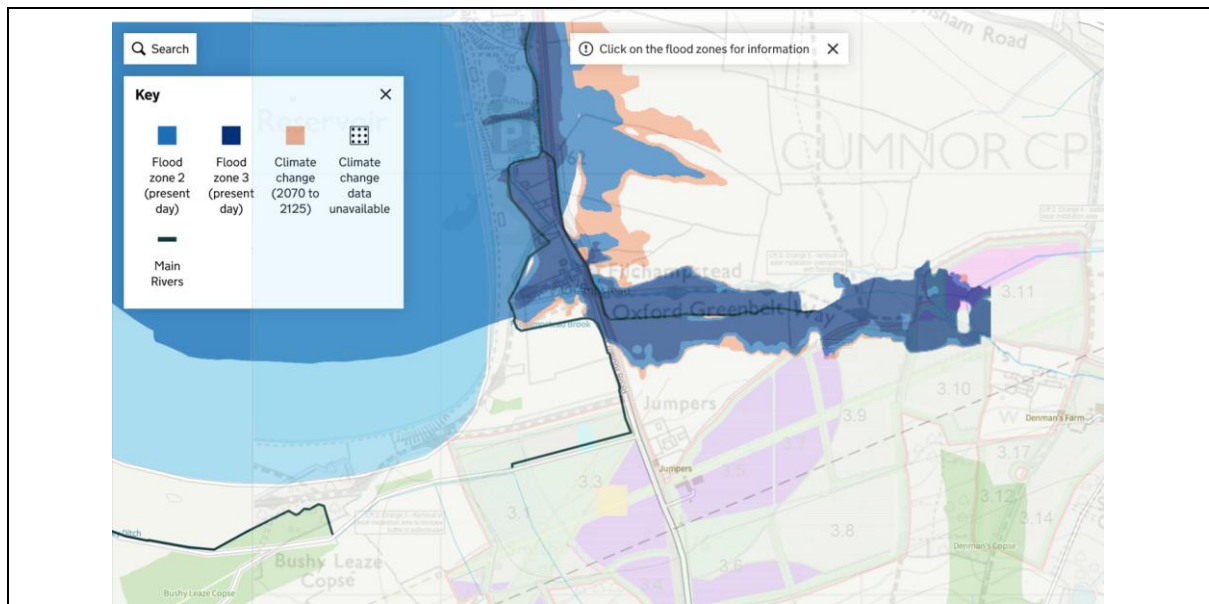
Unfortunately in respect of the proposed southern site this is incorrect if the EA considers 'sensitive infrastructure' to include high voltage (HV) underground cabling, as the EA's own flood risk map shows (Map 12 below):



Map 12

EA flood risk zones 2 and 3 for proposed Botley West central site to southern site cable routing

It would also be untrue if the EA considers the power converter stations (PCS) housing the inverters and medium-voltage 1kV/33kV transformers to be '*sensitive infrastructure*' since the Applicant proposes to place them within the solar PV panel fields. (Map 13 below)



Map 13

EA Flood Risk Zones 2 and 3 within the DCO boundary for the southern site

That being so, and without any details from the Applicant to the contrary, the precautionary principle would state that PCS and other panel array infrastructure should be removed from fields 3.9, 3.10 and 3.11 that are in EA flood zones 2 and 3 – see map 13 above.

Further evidence for this is offered by the Applicant itself in acting on a digital artefact of EA Zone 3 apparently ending in a due N-S line at exactly longitude 446200. This artefact, identified by the ExA in **ISH 2**, has led the Applicant to remove panels from field 3.11 to the west of longitude 446200.

Cumnor Parish Council has raised this artefact with the EA and awaits a response.

But in the meantime, given the Applicant's readiness to remove infrastructure from Zone 2/3 Flood Risk areas, this Interested Party refers the SoS to its **REP6-048** (pages 7 and 8) where it demonstrates that, for example EA data confirmed flood risk (and consequential flood warnings) in field 3.11 on two occasions in November and December 2024 when the area in question flooded, as it has again the 2025-2026 winter.

Given these repeated flood events The SoS is asked to note that the Applicant has also not addressed this issue when raised by the OHA, such as in the OHA response to Change Request 2 (**REP6-119** page 7)

5. Refinement of Project layout and design to remove solar installation areas overlapping with Flood Zones 2 and 3. As established through discussion at the Issues Specific Hearing 2, held 8 October, further clarification is required for those additional panels proposed for the southern site area, as it appears from figure 1.1 Appendix 2: Hydrology and Flood Risk Technical Note 2 [CR2-071] these additional panels will be located within flood zone 2

Given this analysis it is of even greater concern to this Interested Party that the EA is unable to provide the reassurance the SoS requests:

‘whether the sequential and exception tests within NPS EN-1 regarding fluvial flooding have been met by the Applicant’

with the EA responding that **(C1-091)**

The Environment Agency is not the decision maker with respect to whether the Sequential Test or Exception Test has been passed.

In its discussion of NPS EN-1 in **C1-019** the EA states

‘The development is in Flood Zone 1 for the operation phase.’

This is incorrect as shown above with parts of the central and southern site in EA zones 2 and 3

Summary

In its discussion of NPS EN-1 in its June 2026 response to the SoS the EA statement that *‘The development is in Flood Zone 1 for the operation phase.’* is incorrect as shown above in Maps 12 and 13 with parts of the central and southern site in EA zones 2 and 3

If the EA considers for the proposed southern site *‘sensitive infrastructure’* to include high voltage (HV) underground cabling or power converter stations (PCS) housing the inverters and medium-voltage 1kV/33kV transformers then its June 2026 statement that *‘The Applicant has taken a sequential approach to the proposed development layout by ensuring solar PV modules and more sensitive infrastructure such as transformers are located within Flood Zone 1.’* is incorrect as its own Flood Risk maps show Zones 2 and 3 within the DCO redline crossing fields containing panels, PCS and other panel array infrastructure.

Given repeated flood events in this locale the SoS is asked to note that the Applicant has also not addressed this issue when raised by the OHA, such as in the OHA response to Change Request 2

This analysis is of even greater concern to this Interested party as the EA is unable to provide the reassurance the SoS requests *‘whether the sequential and exception tests within NPS EN-1 regarding fluvial flooding have been met by the Applicant’* with the EA responding that *‘The Environment Agency is not the decision maker with respect to whether the Sequential Test or Exception Test has been passed.’*

Hydrology and Flood Risk

57. Noting the concern raised by both Cassington and Cumnor Parish Councils [REP7-068 and REP7-076], and the ExA's second written questions [PD-012, Q 2.10.3] and paragraph 5.8.36 of NPS EN-1, the Applicant is requested to provide further data to evidence the efficacy of the mitigation measures suggested within the Conceptual Drainage Strategy [REP4-018], in particular for the central and southern areas of the Proposed Development. The Applicant is requested to share the results with the Environment Agency for review and comment.

Q.57 Applicant to share data with the EA on efficacy of mitigation measures suggested in Conceptual Drainage Strategy (REP4-018): assessment of the Applicant's response

The EA's response (**C1-019**) is instructive and repeats a comment so often made about the Applicant:

'Whilst we have engaged with the Applicant, we have not received this information to date and would not be able to review prior to the closing date of this consultation.'

Given the above, this Interested Party believes the SoS would be better informed about flood risk in the southern site if the Applicant had chosen to engage with this Interested Party since it first raised the issue in the Consultation phase and then throughout the Examination phase (see for example **RR-0205**, its made Neighbourhood Plan's flood risk policy RNE2 in **REP1-057** and its commissioned flood risk assessment **REP1-060**, through to its closing submission **REP7-076**).

Instead, as during the Examination phase and after 2+ years the Applicant has only been prepared to go as far to say it (**C1-087** page 118)

'notes the response submitted by Cumnor Parish Council regarding flood risk'

Repeatedly *'noting'* this IP's response is not acceptable. This is an issue crucial to this Parish and its 7000 residents.

Before this Interested Party commissioned its 2019 Flood Risk Assessment (**REP1-060**) the parish had no information beyond the EA's then current flood risk map to explain its continuing and regular challenges to property, transport and livelihoods caused by flooding events.

That 2019 Flood Risk Assessment contained extra and higher resolution data than then available from the EA and reflected parish wide issues with flooding (fluvial, pluvial and groundwater) that were not addressed in planning applications relying on EA data alone.

As noted in **RR-0205** and elsewhere this enhanced flood risk extends beyond the previous EA's designated areas referred to by the Applicant in their application; reflecting the $\pm 30\text{m}$ EA spatial resolution of the SRTM data then in use (particularly significant given the 65m AOD contour), the greater accuracy from the additional LIDAR data commissioned by this

Interested Party, and the cumulative impacts from the immediately adjacent Red House Farm power station and NGET substation proposals.

This proposed power station's southern site sits on higher ground to the south of the Red House Farm and NGET applications redlines within the same catchment, developments which this Applicant has continued to ignore when asked to address cumulative impacts.

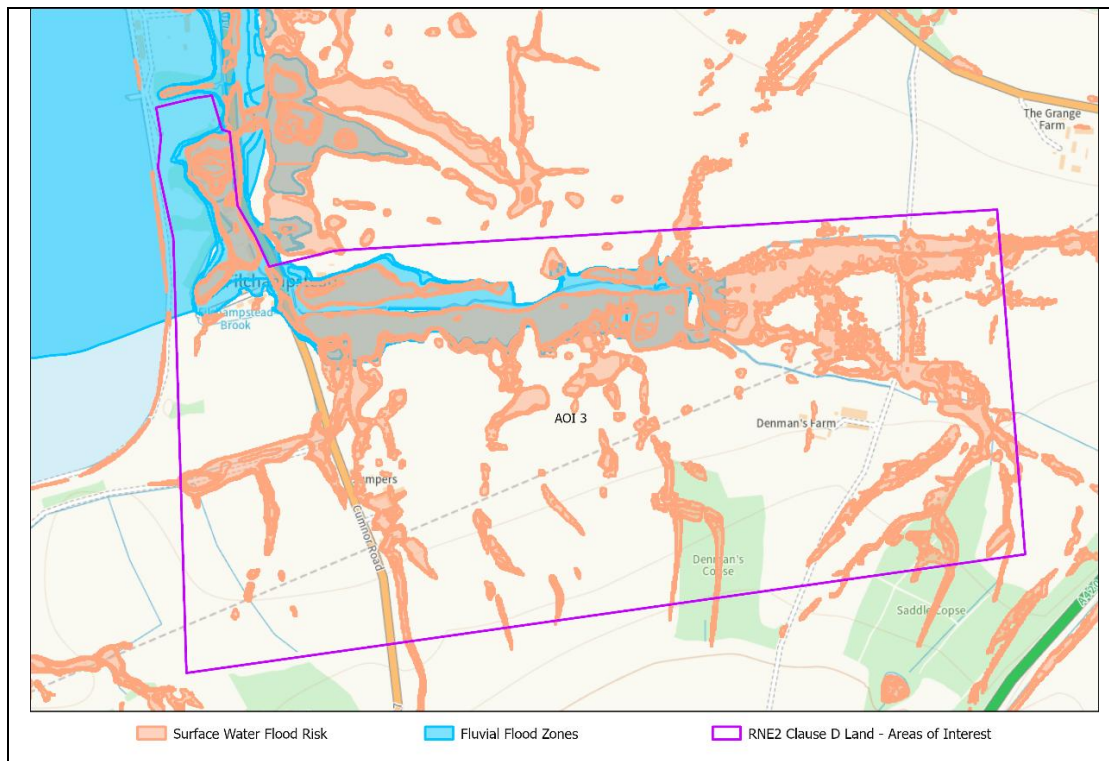
Since 2019 the parish's experience of flooding has worsened, both in frequency and extent.

So, as part of its current refresh of its made Neighbourhood Plan, this Interested Party commissioned an updated Flood Risk assessment – see separate submission to the SoS for the July 16th deadline (**2026 Cumnor Parish Flood Risk Assessment.pdf** - this can also be found on the Cumnor Parish Council website at <https://cumnorparishcouncil.org.uk/cms-data/depot/filedepot/CUMNORFR-Updated-Flood-Risk-Assessment-for-Cumnor-Parish-LR.pdf>)

The objective of the updated parish wide Flood Risk Assessment is to provide an even more detailed evidence base, reflecting both real world experience across the parish and the December 2024 updated EA national flood risk assessment.

It shows – as real world experience has illustrated – that flood risk within and surrounding the Applicant's red line boundary has increased even beyond that recorded in the 2019 assessment.

Within the 2026 Flood Risk Assessment the conclusions for the Filchampstead Area of Interest - AOI 3 - (see map 14 below) which spans all of the Botley West, Red House Farm and National Grid redlines are clear:



Map 14

EA pluvial and fluvial flood risk within the redlines for Botley West, the NGET substation and the Red House Farm power station

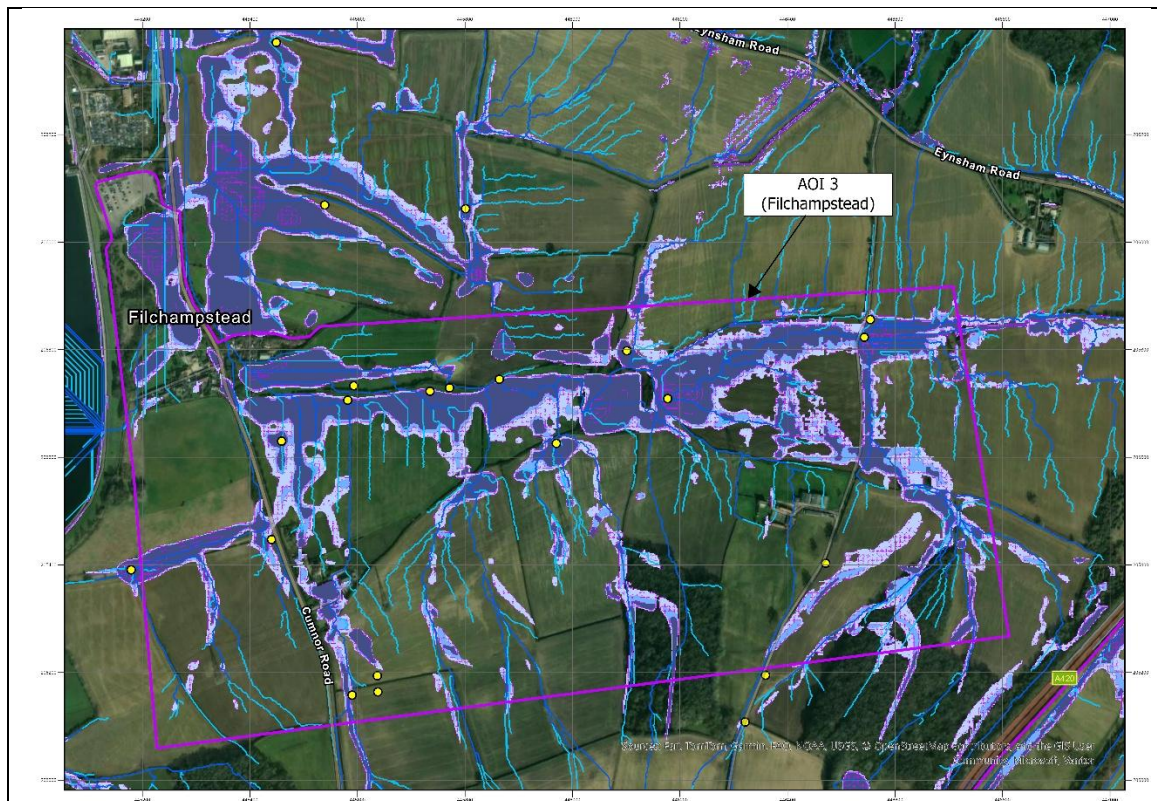
Area of Interest (AOI)	Fluvial Flood Risk	Pluvial Flood Risk
AOI 3- Filchampstead	High	Medium to High

Extract from table 1 section 3.5 page 5 of **2026 Cumnor Parish Flood Risk Assessment**

- New development should not be permitted in those parts of the AOI that fall within high-risk pluvial flood areas, where recurrent surface-water flooding has been identified.
- In the northern extent of the AOI, where significant areas lie within Flood Zone 3, the flat topography makes “like-for-like” floodplain storage compensation difficult to achieve, and the EA is therefore likely to object to development due to the high probability of flooding and the limited scope for mitigation.
- Development proposals must protect existing floodplain functionality and avoid land-use changes that would increase runoff or displace floodwater into adjacent areas.

Extract from section 4.4.3 page 10 of 2026 Flood Risk Assessment

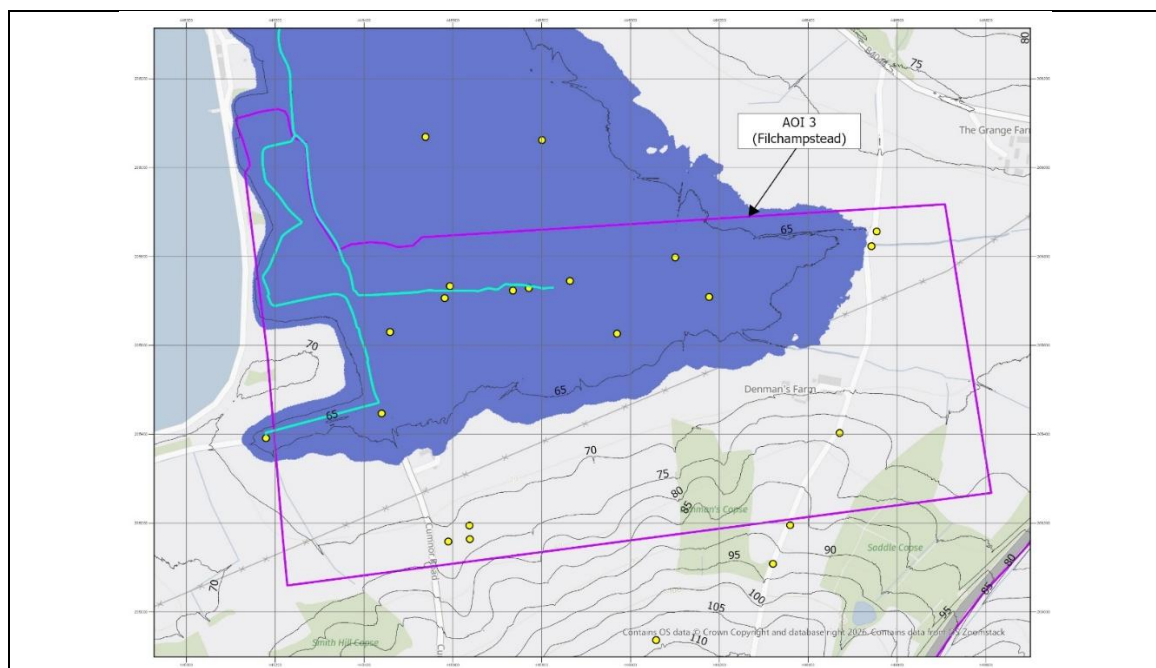
This degree of risk, and the mitigations required, but not considered by this Applicant, is further illustrated by the area’s hydrological run off routing which shows pronounced and extensive south to north, north to south and east to west routings (see Map 15 below) spanning all of the Botley West, Red House Farm and National Grid redlines.



Map 15

Hydrological run off routings – extract from CUMNORFR2603-8

In addition, this Interested Party draws the SoS's attention to the EA's Reservoirs Flood Risk map (CUMNORFR2603-9 in the 2026 Cumnor Parish Flood Risk Assessment) which even for the EA's 'dry day' scenario shows flooding extending across land within all of the Botley West, Red House Farm and National Grid redlines (see Map 16 below).



Map 16

EA's Reservoirs flood risk map (extract from CUMNORFR2603-9)

In the light of such evidence the Applicant's reluctant and piecemeal engagement with the ExA's questions on this, and now their similar behaviour in respect of the SoS, does not inspire confidence.

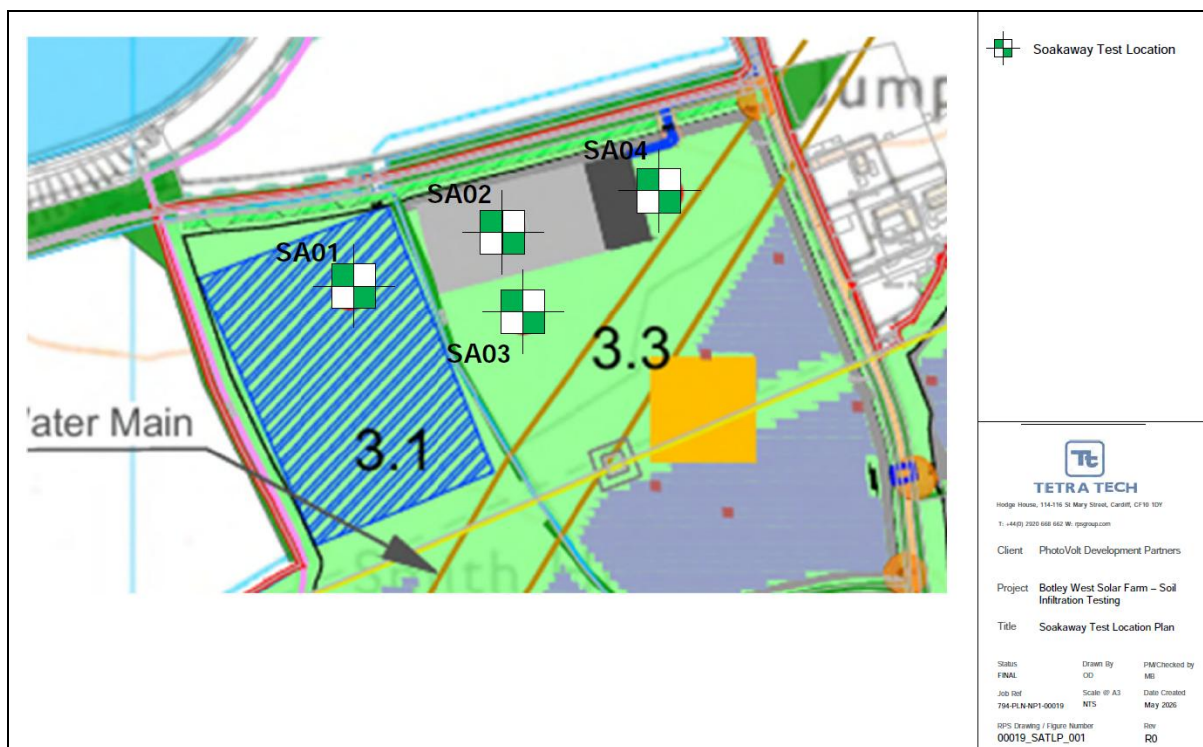
As examples this Interested Party draws the SoS's attention to the Applicant's statement on page 118 of **C1-087** that

'A meeting with the Environment Agency was held on Monday 1st June 2026, regarding the proposed approach in relation to infiltration tests undertaken'

But the Applicant reports just one infiltration test in **C1-087**, only undertaken on 19th and 20th May 2026, in fields 3.1 and 3.3 in the southern site, slated for:

- the Applicant's NGET substation (SoS scenario 2) – Work No 2, 4 and 6 - denoted by a blue hatched area,
- an additional substation – Work no 3a, 3b, 4 and 6 - denoted grey and black,
- PCS and PV panels

see Applicant's map (Map 17 below) and corresponding OHA map (Map 18 below) showing PRow, watercourses etc.



Map 17

Appendix E (starting on page 160 of **C1-087**) showing Applicant's proposed NGET (Scenario 2) and other substations + infiltration test sites



Map 18

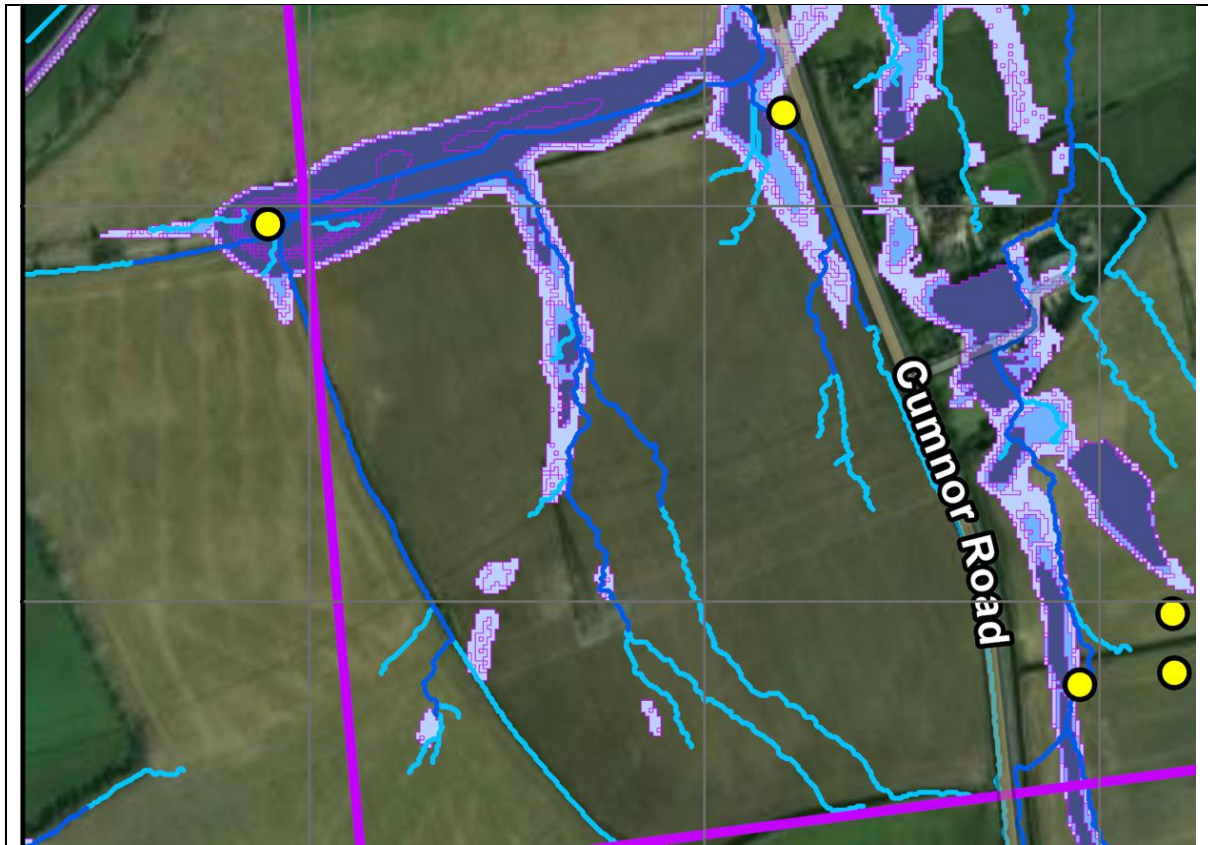
Oxfordshire County Council map showing Jumpers Farm, PRow and watercourses in and surrounding fields 3.1. and 3.3

As Appendix E (starting on page 160 of **C1-087**) shows, water level falls in the test pits of only 1-4mm were recorded in 24 hours. In only one case could an infiltration rate even be estimated – an infinitesimal 2 ten thousandths of a millimetre per second (1.84×10^{-7} m/s) – that's 1/500th the width of a human hair.

This prompted the Applicants' consultants to acknowledge that infiltration:

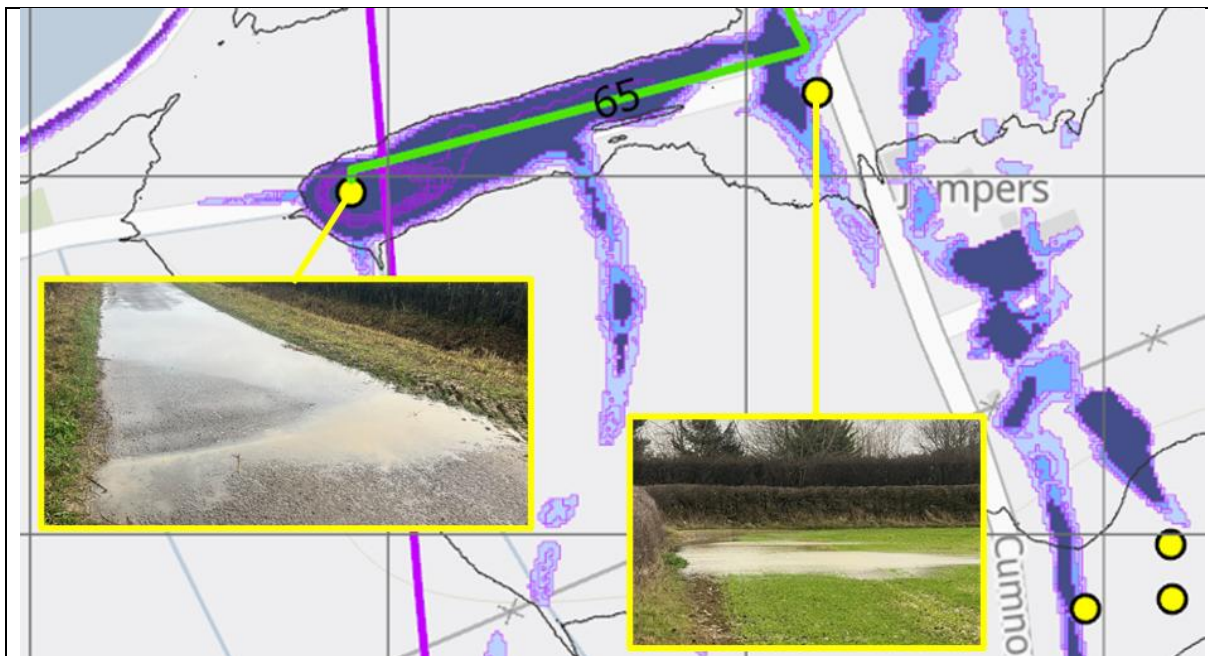
'cannot be considered sufficient for the effective use of soakaways for the disposal of surface water'

This comes as no surprise to this Interested Party, as it shouldn't have to the Applicant, if they had examined EA's pluvial and fluvial flood risk maps which show (see Map 19 below) that fields 3.1 and 3.3 are in the pluvial flood risk zone.



Map 19

EA Hydrological run off routing (yellow dots denote locations of photographs of flooding)



Map 20

EA Pluvial flooding map (yellow dots denote locations of photographs of flooding)

Add to that photos taken by this IP as evidence for the 2026 Parish Flood Risk Assessment, taken from Bushy Leaze Lane (PRoW 184/30/40) which marks the northern boundary of fields 3.1 and 3.3 (see Map 20 above) and you'll see why the Applicant's lack of engagement

in flood risk is so worrying – in this case especially to the residents of Jumpers Farm who live just the other side of the B4017 from the eastern edge of field 3.3

So, what can we conclude from this one example (and there are many others) about the Applicant's flood risk assessments and their flood risk strategy?

- After signing a connection agreement in June 2021 (**C1-087** Q6e page 23) the Applicant identified two fields (3.1 and 3.3) within the DCO boundary of the southern site as their location for their NGET + other substations (SoS scenario 2) despite the location being 5m from the Oxford Green Belt Way (PRoWs 184/50/20 and 184/30/30) and at the intersection of PRoWs 184/29/10 and 184/30/40.
- 5 years later In May 2026, and only after repeated requests by the ExA and OHA, the Applicant undertook infiltration testing in fields 3.1 and 3.3 which showed that there is no infiltration.
- EA data shows hydrological run off routes (from the higher ground to the south) running through and along the boundaries of Fields 3.1 and 3.3.
- EA data and this Interested Party's photos combined with two commissioned Parish wide flood risk assessments show fields 3.1 and 3.3 are already subject to repeated pluvial flooding, extending into the immediately adjacent Jumpers Farm.
- This information and more has been readily available to the Applicant in the ExA's document library for more than a year and on the VWHDC website since 2019. The Applicant has repeatedly said it 'notes' it, most recently in **C1-087** (page 118).
- Notwithstanding the above the Applicant continues to assert that its proposals will not alter run off or exacerbate flooding (fluvial and pluvial) in the Farmoor valley.

In doing so the Applicant has again chosen to ignore not just this Interested Party but also the OHA, who stated in the Examination phase (for example **REP6-117** page 9)

'Applicant substation and NGET substation are proposed to drain via gravel bases to an attenuation basin, whilst these are acceptable methods, they will need to either drain to infiltration or to a surface water outfall which has not been confirmed at this point in time. If infiltration is not possible or there is no appropriate outfall it is not clear how this will drain. We have requested infiltration rates to confirm that this proposal would be viable and not increase runoff. Where a conservative approach to attenuate all flows on site with no infiltration a suitable outfall must be identified and provided'

And what is true for fields 3.1 and 3.3 applies to all the fields in the southern site, with the exception of the tiny land parcel formed by 3.12 and 3.17:

- all the southern site fields are subject to hydrological run off (EA data) from higher ground to the south, this being especially pronounced in fields 3.5 to 3.9 inclusive, 3.11, and 3.13 to 3.15 inclusive.
- all the southern site fields are subject to fluvial and/or pluvial flooding (EA data), this again being especially pronounced in fields 3.5 to 3.9 inclusive, 3.11, and 3.13 to 3.15 inclusive.
- The EA's Reservoir flood risk map shows inundation for fields 3.1 to 3.11 inclusive with the exception of 3.2, 3.4, 3.6 and 3.8

It is not acceptable to this Interested Party that the Applicant (**C1-087** page 115) proposes - as in all other issues it has failed to address – that '*detailed drainage design*' plus '*discharge location and method of surface water flows across the Site*' will only be confirmed after DCO approval.

This Interested Party asks instead that the SoS consider the Applicant's answers thus far – including its scant additional work after the Examination Phase and before June 9th 2026 – when judging the planning balance.

This Interested Party assesses that even taken in isolation, the Applicant's flood risk assessment for its southern site is deficient and should be withdrawn. It follows that its proposed mitigations for the southern site are also deficient and should also be withdrawn.

But even a competent and complete flood risk assessment of this application in isolation is not acceptable to this Interested Party given that cumulatively three solar power station proposals are currently planned for immediately adjacent land in the same catchment, namely:

- This Botley West NSIP proposal (**PINS reference EN010147**)
- The Red House farm application (**VWHDC reference P24/V2489/FUL and PINS appeal 6009163**)
- The National Grid substation proposal (**VWHDC screening reference P25/V1685/SCR**)

where:

- the Red House Farm and Botley West (southern site) redlines are immediately adjacent; and that
- the National Grid redline spans both the Red House Farm and Botley West redlines

No analysis of cumulative impacts has been presented by any of the three Applicants.

Why?

While it may not surprise the ExA or the SoS, this Interested Party is surprised and disappointed that this Applicant's claims of ignorance about the Red House Farm proposal is mirrored by that Applicant's equally untenable claims of ignorance about the Botley West application, while both are silent on the NGET's substation proposal.

It is beyond this Parish Council's knowledge and resources to find further ways of drawing out this self-evident nonsensical stand-off where cumulative impacts (incidentally, not just those due to flood risk) are ignored.

Our 7000+ residents, and impacted businesses such as the 100 year old Hill End Outdoor Education Centre understand the issue, are profoundly concerned about the potential cumulative impacts and, frankly, find it inexplicable why no one, so far, has grasped this issue.

We ask the SoS to do so.

Summary

The EA's June 2026 response to the SoS repeats a comment so often made about the Applicant:

'Whilst we have engaged with the Applicant, we have not received this information to date and would not be able to review prior to the closing date of this consultation.'

Given the above, this Interested Party believes the SoS would be better informed about flood risk in the southern site if the Applicant had chosen to engage with this Interested Party since it first raised the issue in the Consultation phase and then throughout the Examination phase.

Instead, after 2+ years the Applicant has only been prepared to say it *'notes the response submitted by Cumnor Parish Council regarding flood risk'*

Repeatedly *'noting'* this IP's response is not acceptable. This is a crucial issue to this Parish and its 7000 residents as this proposed power station's southern site sits on higher ground to the south of the Red House Farm and NGET applications redlines within the same catchment, both of which this Applicant has continued to ignore when asked to address cumulative impacts.

Before this Interested Party commissioned its 2019 Flood Risk Assessment the parish had no information beyond the EA's then current flood risk map to explain its continuing and regular challenges to property, transport and livelihoods caused by flooding events.

Since 2019 the parish's experience of flooding has worsened, both in frequency, those adverse events exacerbated by planning applications relying on EA data alone.

So, as part of its current refresh of its made Neighbourhood Plan, this Interested Party commissioned an updated 2026 Flood Risk Assessment with the objective of providing an even more detailed evidence base, reflecting both real world experience across the parish and the December 2024 updated EA national flood risk assessment.

It shows – as real world experience has illustrated – that flood risk within and surrounding the Applicant's red line boundary has increased even beyond that recorded in the 2019 assessment with a high fluvial flood risk and a medium to high pluvial flood risk across the Filchampstead Area of Interest - AOI 3 - (see map 14 above) which spans all of the Botley West, Red House Farm and National Grid redlines.

This degree of risk, and the mitigations required, but not considered by this Applicant, is further illustrated by the area's hydrological run off routing which shows pronounced and extensive south to north, north to south and east to west routings (see Map 15 above) spanning all of the Botley West, Red House Farm and National Grid redlines.

In addition the EA's Reservoirs Flood Risk map which shows flooding extending across land within all of the Botley West, Red House Farm and National Grid redlines (see Map 16 above) even for the its 'dry day' scenario.

In the light of such evidence the Applicant's reluctant and piecemeal engagement with the ExA's questions, and now repeated with the SoS, does not inspire confidence.

In response the Applicant reports just one infiltration test, only undertaken on 19th and 20th May 2026, in fields 3.1 and 3.3 in the southern site, slated for the Applicant's NGET substation (SoS scenario 2), an additional substation, and PCS and PV panels.

In only one case could an infiltration rate even be estimated – an infinitesimal 2 ten thousandths of a millimetre per second - prompting the Applicants' consultants to acknowledge that infiltration *'cannot be considered sufficient for the effective use of soakaways for the disposal of surface water'*

Notwithstanding the above the Applicant continues to assert that its proposals will not alter run off or exacerbate flooding (fluvial and pluvial) in the Farmoor valley and that - as in all other issues it has failed to address – *'detailed drainage design'* plus *'discharge location and method of surface water flows across the Site'* will only be confirmed after DCO approval

But even a competent and complete flood risk assessment of this application in isolation is not acceptable to this Interested Party given that cumulatively three solar power station proposals are currently planned for immediately adjacent land in the same catchment.

No analysis of cumulative impacts has yet been presented by any of the three Applicants.

Without Prejudice Offer

66. The Secretary of State notes that towards the end of the Examination, the Applicant made a Without Prejudice Offer [REP6-052] which included the removal of panels from higher slopes in the central and southern areas, and to enhance the buffers for four residential properties from 25, to 75m. In addition, the offer includes two areas in the northern section to be removed in order to provide additional protection to Samson's Platt. The Applicant has stated the total reduction in generating capacity of this offer to be 54MW.

67. The Secretary of State notes that Interested Parties, in particular the OHA, do not consider the Without Prejudice Offer goes far enough to reduce landscape and visual impacts on residential and cultural heritage assets [REP7-190]. The OHA suggested panel removal on a field-by-field [REP4-075] basis during the Examination to further reduce the identified impacts [REP6-118].

68. Without prejudice to his final decision, the Secretary of State requests the Applicant to consider where further reductions to the array layout can be made to address the impacts of the Proposed Development by maximising solar panel removal whilst maintaining a viable development. In providing this information, the Secretary of State encourages the Applicant to consult with the OHA.

69. The Secretary of State notes that during the Examination, the Applicant discounted the OHA's proposals to reduce the size of the Proposed Development citing viability issues, however, no direct evidence of these viability constraints was provided [REP6-052]. If the Applicant is to proceed with a Without Prejudice Offer, then the Applicant is requested to evidence the viability considerations and constraints of any changes to the design of the Proposed Development.

Q66-69 Without prejudice offer and project viability: assessment of Applicant's response

This Interested Party assesses that the Applicant's new without prejudice offer (**C1-087** page 141) meets neither

- the minimum requirement of a uniform project wide 250m buffer as proposed by the ExA at Deadline 7 in **PD-018**, being hedged with caveats and exceptions as described in this Interested Party's response to SoS Q27a-c and Q28; nor
- the reductions proposed by the OHA in **REP6-118** and **REP7-190**

The Applicant's stated reason for the limit on its new without prejudice offer is its claim of lack of financial viability for the project below a stated output of '935MWp'.

However, it is instructive that the Applicant now chooses to address viability in terms of MWp, whereas in all previous submissions it has majored on MWe – often abbreviated to MW - as in its website statement that '*Botley West could deliver 840 megawatts (MW) of clean, affordable power to the National Grid*' (see Image 14 below).



Image 14

The Applicant's public facing website <https://botleywest.co.uk/Home-Botley-West.html> accessed at 1630 on 09/07/26

But MWp and MWe are two different measures of solar power station performance:

- MWp (Megawatts Peak) is the total theoretical maximum direct current (DC) capacity of the solar panels under ideal, standardized test conditions; while
- MWe (Megawatts Electric) is the actual, continuous alternating current (AC) power limit that the inverters (devices that convert DC to AC) can export to the National Grid and for which the power station earns income
- Note that solar power stations are paid according to their MWe output to the National Grid (the number of MWh – megawatt hours per year c.f. consumers are charged by the kilowatt hour - kWh - where 1000kWh = 1MWh) and not their MWp output

The conversion factor between MWp and MWe – known as the Inverter Loading Ratio (ILR) - is typically between 1.10 to 1.3 for a UK solar power station.

Thus to achieve 100MWe, enough panels to produce between 110-130MWp (100 multiplied by 1.1 or 1.3) would need to be installed.

And this is where it gets curious as the Applicant's figures for both MWp and MWe – and the their ratio - have changed both before and during the NSIP Examination process and again now in the SoS decision phase.

Chronologically:

December 2023:	
Source:	PEIR Chapter 0 'non-technical summary para 5.1.2 ¹
Installed capacity	1307 MWp
AC output	840MWe
ILR	1.46 12% above maximum used by other NSIPs

November 2024 as submitted in November 2024	
Source	APP-004 para 1.1.2
Installed capacity	1307 MWp
AC output	840MWe
ILR	1.46 12% above maximum used by other NSIPs

Vs.

November 2024 as submitted in June 2026	
Source	C1-087 (on page 143 and in the Change Process table on page following 157)
Installed capacity	1422 MWp
AC output	840MWe
ILR	1.6 23% above maximum used by other NSIPs

February 2025 S51 response as reported in June 2026	
Source	C1-087 (Change Process table on page following 157)
Installed capacity	1421 MWp
AC output	840MWe
ILR	1.6 23% above maximum used by other NSIPs

September 2025 Change Request 2 as reported in June 2026	
Source	C1-087 (Change Process table on page following 157)
Installed capacity	1270 MWp
AC output	840MWe
ILR	1.43 10% above maximum used by other NSIPs

¹ the Preliminary Environmental Information Report can be found on the Botley West website at https://botleywest.co.uk/files/cto_layout/img/documents/Preliminary%20Environmental%20Information%20Report/Chapter%200%20-%20Non-Technical%20Summary/12426_Botley_NTS%20Final%20Print_30%20Nov.pdf

November 2025 Deadline 7 as reported in June 2026	
Source	C1-087 (Change Process table on page following 157)
Installed capacity	1260 MWp
AC output	840MWe
ILR	1.42 10% above maximum used by other NSIPs

June 2026 New without prejudice offer	
Source	C1-087 (Change Process table on page following 157)
Installed capacity	935 MWp
AC output	840MWe
ILR	1.05 so at NSIP norm

Summarising the table above the Applicant now asks the SoS to accept that in the 30 months between December 2023 – June 2026 it:

- either did or didn't raise its installed capacity from 1307MWp to 1442MWp at the start of the Examination Phase, depending on whether its actual November 2024 figures or its June 2026 reporting of its November 2024 figures is correct;

and then

- successively reduced its installed capacity from 1422MWp to its current figure of 935MWp, while not altering its AC output figure of 840MW at all.

But this contradicts many submissions the Applicant made to the ExA from November 2024 to November 2025 in which successive revisions of its '*The Guide to the Application*' all state that the installed capacity (sometimes inaccurately called the delivered power) is approximately 1307MW (**APP-004** November 2024; **AS-002** – Rev.1, January 2025; **CR1-001** – Rev.2, March 2025; **PDB-002** – Rev.3, May 2025; **REP1-002** – Rev.4, June 2025; **REP2-002** – Rev.5, July 2025; **REP3-002** – Rev.6, July 2025; **REP4-002** – Rev.7, August 2025; **REP5-002** – Rev.8, September 2025; **CR-002** – Rev.9, September 2025; **REP6-002** – Rev.10, October 2025; and **REP7-002** – Rev.11, November 2025),

So which version is the SoS, the OHA and all the Interested Parties being asked to accept?

Is it the 1307MWp installed capacity relied on throughout the Examination, or the new figures of 1422, 1421, 1270 and 1260MWp?

It follows that this raises the question of whether the new figure of 935MWp is either accurate or the actual minimally viable installed capacity, given the Applicant still claims it will deliver an AC output to the grid of 840MW just as it did in November 2023?

To answer this question this Interested Party refers the SoS to the Applicant's table on page 144 of its **C1-087**.

In this table (see extract below) the Applicant attempts to demonstrate that 935MWp is ‘marginally viable’. However, the crucial row in the table (in green) is clearly arithmetical rubbish.

935	554	01	42,824	2.7%	9.3	n/a	Marginally Viable
-----	-----	----	--------	------	-----	-----	-------------------

A CAPEX of ‘01’ £M – really? A Fixed cost share of 2.7% - mmm. A LCOE of £9.3/MWh – don’t think so.

That the Applicant can’t even present meaningful numbers to underpin its marginal viability claim says it all.

This Interested Party further assesses that the Applicant’s claim of minimum viability based on proposed reductions in the project’s MWp obscures the fact that even at 935MWp its income could be still be similar, and maybe exactly the same, given it has assured the SoS that it has maintained its PEIR and DCO and Examination phase figure for AC output of 840MWe.

In other words, in response to the ExA and SoS, the Applicant apparently has given no ground at all (literally as the DCO redline is essentially unchanged too) by simply changing its chosen ILR – its choice for the ratio of DC output from PV panels to AC output to the grid.

Finally in this assessment this Interested Party notes that on page 145 of **C1-087** the Applicant states that if it agreed to the OHAs proposal - which it claims would produce 685MWp – then

‘the Proposed Development would no longer be economically viable; second, the Proposed Development would fail to meet the contractual connection capacity of 840 MWp.’

Unpacking the 2nd part of that statement this IP notes that the Applicant now chooses to describe its oft quoted figure of ‘840MW’ as ‘840MWp’ not 840MWe as it has always previously done, see for example **APP-004** para 1.1.2.

This is odd for two reasons:

- National Grid (and the National Energy System Operator – NESO) assesses NSIP solar farms using MWe to specify the export capacity (AC) to the grid, not MWp; and
- NESO’s answer to a FOI enquiry on Botley West dated 23rd December 2024, (<https://www.neso.energy/document/350586/download> and **REP3-115**) is instructive Image 15 below):

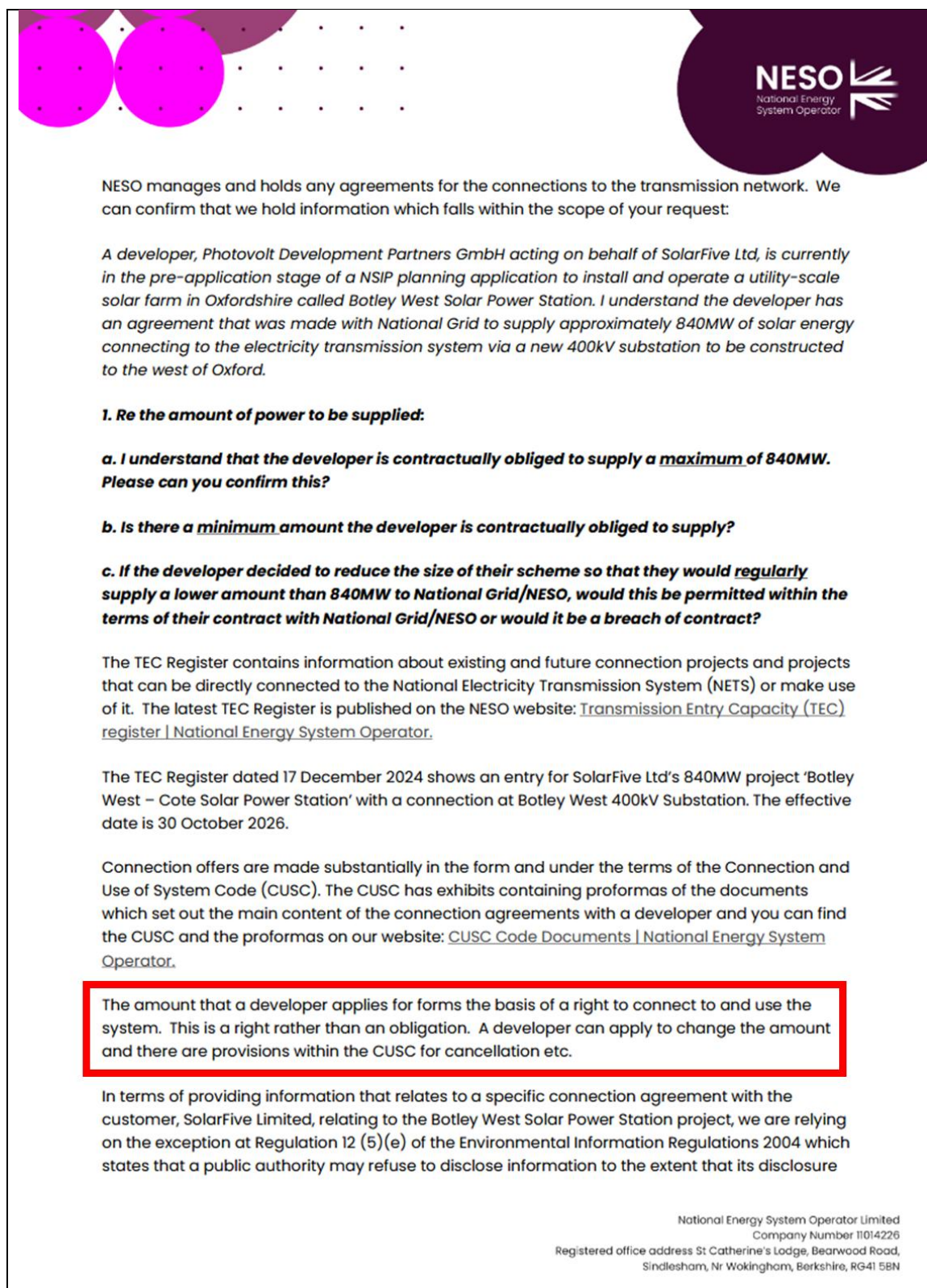


Image 15

NESO's 23rd December 2024 FOI response extract with paragraph highlighted by this Interested Party. Downloaded at 1600 on 090726 from

[REDACTED]

According to NESO, what the Applicant calls a

'contractual connection capacity' that it would *'fail to meet'*

is in fact

'a right rather than an obligation'

and that

'A developer can apply to change the amount and there are provisions within the CUSC for cancellation etc.'

(Where the CUSC is the Connection and Use of System Code).

This assessment is supported by the fact that the Grid Connection Statement the Applicant chooses to rely on (**APP-019** dated November 2024) and agreed by the Applicant and NGET, contains no mention in either section 4 (Contractual Agreements) or in Section 5.1 (Responsibilities of National Grid) of a *'contractual connection capacity'*

There is no reference to 840MW or 840MWe or 840MWp anywhere in **APP-019**.

In conclusion:

Unless the Applicant can show otherwise, this Interested Party assesses that it hasn't demonstrated that it has met either the ExA proposal in **PD-018** or the OHA proposals **REP6-118** and **REP7-190**.

In claiming that, for viability reasons, it can't meet the panel and other infrastructure reductions proposed by the ExA and OHA, the Applicant has relied on an explanation of power station output and contractual obligations that cannot be reconciled with the open source information currently available to this Interested Party.

This Interested Party urges the SoS to make his/her own assessment and draw conclusions accordingly.

For reference, the SoS is invited to note that DESNZ has an NSIP pipeline their Applicants regard as economically viable, ranging from a few tens of megawatts upwards to Botley West's claimed figure, which is the largest.

For example, the top 13 NSIPS by MW includes:

- **Botley West Solar Farm (Oxfordshire):** 840 MW (*Decision stage / In planning*)
- **Springwell Solar Farm (Lincolnshire):** 800 MW (*Development consent granted*)
- **The Tween Bridge Solar Farm (South Yorkshire):** 800 MW (*In planning*)
- **Great North Road Solar Park (Nottinghamshire):** 800 MW (*In planning*)
- **One Earth Solar Farm (Lincolnshire/Nottinghamshire):** 740 MW (*DCO application accepted/in examination*)
- **Cottam Solar Project (Lincolnshire/Nottinghamshire):** 600 MW (*Development consent granted*)
- **Green Hill Solar Farm (Northamptonshire):** 600 MW (*In planning*)
- **Sunnica Energy Farm (Suffolk/Cambridgeshire):** 500 MW (*Development consent granted*)
- **Longfield Solar Farm (Essex):** 500 MW (*Development consent granted*)
- **Lime Down Solar Project (Wiltshire):** 500 MW (*In planning*)
- **Mallard Pass Solar Project (Lincolnshire/Rutland):** 350 MW (*Development consent granted*)
- **Cleve Hill Solar Park (Kent):** 373 MW (*Operational; currently the largest active solar farm in the UK*)
- **Little Crow Solar Park (North Lincolnshire):** 150 MW (*Development consent granted*)

This Interested Party invites the SoS to consider why this Applicant believes its minimum viable project size is 935MWp when other NSIP projects DESNZ has approved can be viable at fractions of that size?

The SoS is also invited to consider the impacts of the Applicant's claims on agricultural land use and on the many tens of thousands of impacted residents and visitors to this area of rural Oxfordshire.

Why, given that in its DCO application the Applicant required a redline area 1418ha to accommodate 843ha of installation (panels, PCS and substations), a ratio of 1.68:1, does it now need a redline area of 1328ha to accommodate 554ha of installation, a ratio of 2.40:1?

If it's for its own planning gain, panel creep, convenience in not requiring another 6 week consultation for a DCO boundary change as in August 2025, or for a subsequent BESS battery planning application within the redline, then the Applicant should say so, giving the SoS more information on which to judge the planning balance.

Conversely, if the Applicant had maintained its initial DCO 1.68:1 ratio for redline area to installation area, then it would only now require 930ha in total, returning 488ha (the DCO redline application area of 1418-930) to its current, vital, agricultural and rural recreational uses – an area twice as large as the SSSI in Blenheim Palace's Park.

That reduction in redline area would then drive reductions in its fixed costs which, by its own data, are very high and a driver of the project size allegedly required to be minimally viable.

Mindful that the ExA's Question 2.5.4 (**PD-012**) asks:

'(1) Government's 'Guidance related to procedures for the compulsory acquisition of land' advises that the SoS needs 'to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development' (paragraph 11).'

and

'4) Would the land not be better served being kept in its current agricultural use?'

the Applicant's own figures show that 488 hectares of farmland could be returned to productive use without impacting power generation.

This Interested Party agrees with the ExA question above and urges the SoS should s/he still be minded to approve the DCO to remove significant areas of productive farmland such as those identified above and by the OHA in their request for field removal - including the whole of the southern site – from the DCO boundary.

Summary

The Applicant's new June 2026 without prejudice offer meets neither the minimum requirement of a uniform project wide 250m buffer, as proposed by the ExA at Deadline 7 in PD-018, being hedged with caveats and exceptions, nor the reductions proposed by the OHA in REP6-118 and REP7-190.

The Applicant's stated reason for the limit on its new without prejudice offer is its claim of lack of financial viability for the project below a stated output of '935MWp' where MWp (Megawatts Peak) is the total theoretical maximum direct current (DC) capacity of the solar panels under ideal, standardized test conditions; while MWe (Megawatts Electric) is the actual, continuous alternating current (AC) power limit that the inverters (devices that convert DC to AC) can export to the National Grid and for which the power station earns income

The conversion factor between MWp and MWe – known as the Inverter Loading Ratio (ILR) - is typically between 1.10 to 1.3 for a UK solar power station.

Curiously the Applicant's figures for both MWp and MWe – and the their ILR - have changed both before and during the NSIP Examination process and again now in the SoS decision phase.

In the 30 months between December 2023 – June 2026 the Applicant asks the SoS to accept it:

- either did or didn't raise its installed capacity from 1307MWp to 1442MWp at the start of the Examination Phase, depending on whether its actual November 2024 figures or its June 2026 reporting of its November 2024 figures is correct;

and then

- successively reduced its installed capacity from 1422MWp to its current figure of 935MWp, while not altering its AC output figure of 840MW at all.

But this contradicts many submissions the Applicant made to the ExA from November 2024 to November 2025 in which successive revisions of its '*The Guide to the Application*' all state that the installed capacity (sometimes inaccurately called the delivered power) is approximately 1307MW.

So which version is the SoS, the OHA and all the Interested Parties being asked to accept?

Is it the 1307MWp installed capacity relied on throughout the Examination, or the new figures of 1422, 1421, 1270 and 1260MWp?

It follows that this raises the question of whether the new figure of 935MWp is either accurate or the actual minimally viable installed capacity, given the Applicant still claims it will deliver an AC output to the grid of 840MW just as it did in November 2023?

To answer this question this Interested Party refers the SoS to the Applicant's table on page 144 of its C1-087. However, the crucial row in the table (in green) is clearly arithmetical rubbish.

935	554	01	42,824	2.7%	9.3	n/a	Marginally Viable
-----	-----	----	--------	------	-----	-----	-------------------

That the Applicant can't even present meaningful numbers to underpin its marginal viability claim says it all.

This Interested Party further assesses that the Applicant's claim of minimum viability based on proposed reductions in the project's MWp obscures the fact that even at 935MWp its income could be still be similar, and maybe exactly the same, given it has assured the SoS that it has maintained its PEIR and DCO and Examination phase figure for AC output of 840MWe.

In other words, in response to the ExA and SoS, the Applicant apparently has given no ground at all (literally as the DCO redline is essentially unchanged too) by simply changing its chosen ILR – its choice for the ratio of DC output from PV panels to AC output to the grid.

On page 145 of C1-087 the Applicant states that if it agreed to the OHAs panel reduction proposal - which it claims would produce 685MWp – then '*the Proposed Development would no longer be economically viable; second, the Proposed Development would fail to meet the contractual connection capacity of 840 MWp.*'

This is odd for two reasons:

- National Grid (and the National Energy System Operator – NESO) assesses NSIP solar farms using MWe to specify the export capacity (AC) to the grid, not MWp; and
- NESO's answer to a FOI enquiry on Botley West dated 23rd December 2024, states that what the Applicant calls a '*contractual connection capacity*' that it would '*fail to meet*' is in fact '*a right rather than an obligation*' and that '*A developer can apply to change the amount and there are provisions within the CUSC for cancellation etc.*'

This assessment is supported by the fact that the APP-019 (dated November 2024) Grid Connection Statement the Applicant still chooses to rely on, agreed by the Applicant and NGET, contains no mention in either section 4 (Contractual Agreements) or in Section 5.1 (Responsibilities of National Grid) of a '*contractual connection capacity*' and no reference to 840MW or 840MWe or 840MWp anywhere.

So:

- Unless the Applicant can show otherwise, this Interested Party assesses that it hasn't demonstrated that it has met either the ExA proposal in PD-018 or the OHA proposals REP6-118 and REP7-190.
- In claiming that, for viability reasons, it can't meet the panel and other infrastructure reductions proposed by the ExA and OHA, the Applicant has relied on an explanation of power station output and contractual obligations that cannot be reconciled with the open source information currently available to this Interested Party.

This Interested Party urges the SoS to make his/her own assessment and draw conclusions accordingly.

The SoS is encouraged to consider why this Applicant believes its minimum viable project size is 935MWp when other NSIP projects DESNZ has approved can be viable at fractions of that size?

The SoS is also invited to consider the impacts of the Applicant's claims on agricultural land use and on the many tens of thousands of impacted residents and visitors to this area of rural Oxfordshire.

Why, given that in its DCO application the Applicant required a redline area 1418ha to accommodate 843ha of installation (panels, PCS and substations), a ratio of 1.68:1, does it now need a redline area of 1328ha to accommodate 554ha of installation, a ratio of 2.40:1?

If it's for its own planning gain, panel creep, convenience in not requiring another 6 week consultation for a DCO boundary change as in August 2025, or for a subsequent BESS battery planning application within the redline, then the Applicant should say so, giving the SoS more information on which to judge the planning balance.

Conversely, if the Applicant had maintained its initial DCO 1.68:1 ratio for redline area to installation area, then it would only now require 930ha in total, returning 488ha (the DCO redline application area of 1418-930) to its current, vital, agricultural and rural recreational uses – an area twice as large as the SSSI in Blenheim Palace's Park.

That reduction in redline area would then drive reductions in its fixed costs which, by its own data, are very high and a driver of the project size allegedly required to be minimally viable.

This Interested Party urges the SoS, should s/he still be minded to approve the DCO, to remove significant areas of productive farmland such as those identified above and by the OHA in their request for field removal - including the whole of the southern site – from the DCO boundary.

END

CUMNOR PARISH COUNCIL

Secretary of State at DESNZ
BotleyWestSolar@planninginspectorate.gov.uk
15th July 2026

Contact:
[REDACTED] (Clerk)
clerk@cumnorparishcouncil.org.uk

BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147

Dear Secretary of State

In response to your 11th June 2026 invitation to respond to submissions made to your 28th April 2026 Request For Information, Cumnor Parish Council (CPC) as an Interested Party (IP) is today submitting two documents to you by email:

1. Cumnor PC response to 11th June 2026 Invitation to Comment v1 150726.pdf
2. 2026 Cumnor Parish Flood Risk Assessment.pdf

This document is the 2nd of the two. It is heavily compressed to stay within your 10Mb file size limit so please do contact us if you require a larger, higher resolution version.

Please note that Cumnor Parish Council's responses are to documents you received by your 23:59 16th June 2026 deadline, although we note that the Applicant subsequently lodged 5 additional documents with you on 26th June 2026, described by the Planning Inspectorate (PINS) as late submissions, to rectify a typographical error.

However, Cumnor Parish Council is aware from media reports and other sources that the Applicant intends to send you another substantive submission on or by 16th July, despite your 8th June 2026 letter refusing its 22nd May 2026 request to extend the deadline from 9th June to 25th September.

Given that many of the Applicant's responses to your questions, as to those previously asked by the ExA, are still that they will be answered once DCO consent is obtained, and mindful of your 8th June letter raising your concern about '*undermining confidence in, and the integrity of, the planning process*' we ask you whether the Applicant has provided enough detailed information within your deadlines for the planning balance to be properly assessed, and if not that the application should either be refused or withdrawn and resubmitted?

Cumnor Parish Council
15th July 2026

**UPDATED FLOOD RISK ASSESSMENT FOR CUMNOR
PARISH**
For
CUMNOR PARISH COUNCIL

April 2026

Report Title: Updated Flood Risk Assessment for Cumnor Parish
Client: Cumnor Parish Council

Job: CUMNORFR
Report Number: 260304
Version: v.01
Issue Status: Draft
Prepared by: [REDACTED]
Issue Date: 24th April 2026

Issue History:

Issue No	Date	Description	Admin Review	Technical Review	Approver
v.01	24.04.26	Issued to Client	CL	CC	CC

Approver Signature:

[REDACTED]

This document is based on GWP report template v.1.10 and Normal template v3.10 17/04/19

This report has been prepared by GWP Consultants LLP (GWP) on the specific instructions of our Client. It is solely for our Client's use for the purpose for which it is intended in accordance with the agreed scope of work. Any use or reliance by any person contrary to the above, to which GWP has not given its prior written consent, is at that person's own risk and may be an infringement of GWP's copyright. Furthermore, the report is issued on the understanding that GWP's general terms and conditions of engagement are accepted, copies of which are available on request.

CONTENTS

1.	INTRODUCTION	1
2.	STUDY AREA	1
2.1	Location and site topography	1
2.2	Areas of Interest	1
2.3	Geology.....	1
2.3.1	<i>Superficial deposits</i>	1
2.3.2	<i>Bedrock geology</i>	1
2.4	Hydrology.....	2
2.5	Hydrogeology	2
3.	FLOOD RISK ASSESSMENT	3
3.1	Fluvial Flood Risk	3
3.2	Pluvial Flood Risk (surface water).....	3
3.3	Flood Risk from Reservoirs and Other Artificial Sources	4
3.4	Groundwater Flood Risk	4
3.5	Areas of Interest	5
3.6	Assessment of reported flooding locations	5
3.6.1	<i>Rainfall Analysis</i>	5
4.	RECOMMENDATIONS	7
4.1	Fluvial Flooding.....	7
4.2	Pluvial Flooding (Surface Water)	8
4.3	Groundwater Flooding	9
4.4	Areas of Interest – Recommendations for Future Development	9
4.4.1	<i>Area of Interest 1: Cumnor Hill and Dean Court</i>	9
4.4.2	<i>Area of Interest 2: Farmoor</i>	9
4.4.3	<i>Area of Interest 3: Filchampstead</i>	10
4.4.4	<i>Area of Interest 4: Catchment area draining to Wootton</i>	10
4.4.5	<i>Area of Interest 5: Cumnor Conservation Area</i>	10
5.	SUMMARY AND CONCLUSIONS	10

TABLES

Table 1	Risk of flooding for the Areas of Interest
Table 2	Peak rainfall analysis and Annual Exceedance Probability – Environment Agency Eynsham rain gauge
Table 3	Peak daily rainfall on reported flood dates

FIGURES

Figure 1	Peak daily rainfall analysis and Annual Exceedance Probability analysis- Eynsham rain gauge (1982-2026)
----------	---

DRAWINGS

Drawing Number	Drawing Title	Version
CUMNORFR2603-1	Site location	a
CUMNORFR2603-2	Topography and Areas of Interest	a
CUMNORFR2603-3	Superficial geology	a
CUMNORFR2603-4	Bedrock geology	a
CUMNORFR2603-5	Hydrogeological setting	a
CUMNORFR2603-6	Environment Agency fluvial flood risk map	a
CUMNORFR2603-7	Environment Agency pluvial flood risk map	a
CUMNORFR2603-8	Hydrological runoff routing	a
CUMNORFR2603-9	Environment Agency reservoirs flood risk map	a
CUMNORFR2603-10	Zone of potential groundwater flooding	a

UPDATED FLOOD RISK ASSESSMENT FOR CUMNOR PARISH

1. **INTRODUCTION**

GWP Consultants LLP (GWP) has been appointed by Cumnor Parish Council to update the Flood Risk Assessment (FRA) for the Cumnor Neighbourhood Plan and to provide recommendations for future development in relation to flood risk.

A previous assessment of groundwater and surface water flood risk in the parish was completed in 2019 (GWP Report No. 181017, issued 22nd February 2019).

2. **STUDY AREA**

2.1 **Location and site topography**

The study area, as shown on Drawing No. CUMNORFR2603-1, is defined by the administrative boundaries of Cumnor Parish. Cumnor Parish is located immediately west of Oxford in Oxfordshire and covers approximately 2296 ha. The parish is predominantly rural, with suburban development concentrated at Dean Court and Cumnor Hill on the eastern side.

Existing ground surface contours in the vicinity of the parish and the surrounding area are shown on Drawing No. CUMNORFR2603-2, using available Environment Agency (EA) Light Detection and Ranging (LiDAR) topographic elevation data. The existing site landform falls generally from east to west. Elevations decrease from approximately c. 160mAOD at the higher ground of Cumnor Hill and Wytham Hill to approximately c. 60mAOD at the River Thames along the western and northwestern edges of the Cumnor Parish boundary.

To the west of the A420 and south of the B4044 (Eynsham Road), the ground is relatively flat, varying between c. 60mAOD and 70mAOD. However, ground elevations rise significantly: north of the B4044; east of the A420; and towards the southern extents of Cumnor Parish.

2.2 **Areas of Interest**

As requested by the Client, this report focusses on 5 No. Areas of Interest (AOI) located within Cumnor Parish (see Drawing No. CUMNORFR2603-2); these are:

1. Cumnor Hill and Dean Court;
2. Farmoor;
3. Filchampstead;
4. Catchment area draining to Wootton; and the
5. Cumnor conservation area.

Recent flooding locations provided by the Client are also included on Drawing No. CUMNORFR2603-2.

2.3 **Geology**

The geological setting of the site has been determined based on a review of published information from the British Geological Survey (BGS).

Drawing Nos. CUMNORFR2603-3 and 4 show the geological setting of the site.

2.3.1 **Superficial deposits**

Drawing No. CUMNORFR2603-3 shows that the majority of Cumnor Parish is not underlain by any superficial deposits. At Farmoor, and surrounding Farmoor Reservoir, there is superficial river alluvium deposit comprising of clay, silts, sands and gravels. Other localised areas within the Parish are also underlain by sand and gravel deposits of fluvial origin (*i.e.* Northern Drift Formation and Northmoor Sand and Gravel Member).

2.3.2 **Bedrock geology**

The low-lying areas to the north and west of Cumnor Parish are underlain by the Oxford Clay Formation and the West Walton Formation (mudstones) (see Drawing No. CUMNORFR2603-4). These clay formations form the base of the geological succession.

As ground levels rise to the southeast at Hurst Hill and to the north, at Wytham Hill, the bedrock geology changes from clay to the Hazelbury Bryan Formation. The Hazelbury Bryan Formation outcrops between approximately c. 94mAOD to 103mAOD and is described by the BGS as a sandy mudstone, which comprises of sandstone, siltstone and mudstone.

Above this, the Kingston Formation overlies the Hazelbury Bryan Formation. The Kingston Formation outcrops between approximately c. 103mAOD to 121mAOD. The BGS characterise this formation as a "medium-grained quartzose sand, locally fine and coarse grained, with carbonate cemented beds and doggers which are sandy limestone or calcareous sandstone".

Overlying the Kingston Formation is the Stanford Formation, typically present between c. 110mAOD to 133mAOD. BGS describes this unit as consisting of interbedded limestone, marl and mudstone. The Stanford Formation forms the top of Wytham Hill to the north of the Parish.

At the top of the sequence, the Ampthill Clay Formation, a mudstone unit, overlies the Stanford Formation. This formation represents the uppermost geology across much of Cumnor Parish and is part of the Corallian Group. Within the boundary of development that may impact neighbouring Wootton, the Lower Greenstone Group can be found. This formation can be found at the top of the Cumnor Hill and is comprised of sandstone.

Several mapped slope failures, including landslides and other mass-movement features, occur on the western slopes of Wytham Hill and in the northern parts of the parish. These instabilities generally coincide with the geological contact between the Kingston and/or Hazelbury Bryan Formations and the underlying Oxford Clay Formation. In some of the areas where mass movement events have occurred, slump debris sediments consisting of Hazelbury Bryan and/or Kingston Formations overlay the Oxford Clay Formation some distance (c. 200m) downgradient of the contact (see Drawing No. CUMNORFR2603-4).

2.4 Hydrology

The River Thames, a designated Main River, defines the western boundary of Cumnor Parish and is the primary receiving watercourse for drainage from the area.

Several unnamed minor tributaries drain the parish's higher ground toward the River Thames, following natural topographic flow paths. Farmoor Reservoir, located in the parish's northwestern corner, is a major hydrological feature, with Filchampstead Brook flowing adjacent to it before discharging into the River Thames (see Drawing No. CUMNORFR2603-2).

According to the EA's Catchment Data Explorer, the parish lies within the Cotswolds Management Catchment and the Windrush Operational Catchment.

The hydrological setting of the parish is controlled by its topography and underlying geology. Rainfall falling on the elevated areas of Cumnor Hill and Wytham Hill drains downslope through both surface runoff and shallow groundwater pathways, converging in the lower-lying clay-dominated valleys before discharging to the River Thames.

Surface runoff rates vary significantly according to the permeability of the underlying formations. High runoff occurs over impermeable clay formations, including the Ampthill Clay Formation on Cumnor Hill and the Oxford Clay Formation across valley floors (see Drawing No. CUMNORFR2603-4). Greater infiltration occurs on more permeable strata such as the Stanford, Kingston, and Hazelbury Bryan Formations, which facilitate shallow groundwater recharge and lateral subsurface flow downslope.

Runoff from the hillside areas drains towards the surrounding lowlands along natural flow paths that have eroded the underlying sediments over time, forming valleys that cut through the overlying formations into the Oxford Clay Formation (see Drawing No. CUMNORFR2603-4).

2.5 Hydrogeology

The Oxford Clay and Ampthill Clay Formations comprise impermeable mudstones that act as aquicludes, restricting groundwater flow. In contrast, the Kingston, Stanford and Hazelbury Bryan Formations are more permeable. Downward groundwater movement within these units is impeded by the underlying Oxford Clay Formation, causing groundwater to move laterally along the geological contact and discharge at the surface as "contact springs".

The BGS indicates a regional southeast groundwater flow direction within the Kingston and Stanford Formations of the Corallian Group (see Drawing No. CUMNORFR2603-5). Locally, however,

groundwater may also flow northwards along the northern edge of the Corallian strata, supporting springs where the permeable formations meet the underlying Oxford Clay.

Evidence of shallow groundwater has been reported by residents of Third Acre Rise, near Eynsham Road (B4044) on the eastern edge of Cumnor Parish. The recent flooding locations, particularly those clustered immediately downslope of the Kingston Formation where it meets the Oxford Clay Formation, correspond with areas of persistent ground saturation, suggesting the presence of "contact springs" (see Drawing No. CUMNORFR2603-4).

Furthermore, the presence of mass movement slumping along the contact of the Kingston and Oxford Clay Formations also suggests the "contact springs" present along the contact reduce friction, encouraging and promoting mass movement events to occur.

3. FLOOD RISK ASSESSMENT

The following sections outline the risk of flooding to the site from multiple sources, based on available data.

3.1 Fluvial Flood Risk

The EA's Flood Map for Planning has been consulted for the determination of the Fluvial (river and sea flooding) Flood Zone(s) which the parish is situated within.

The EA map of Fluvial flood risk shows that the northern and western boundary extent of Cumnor Parish, which runs parallel to the River Thames, lies within the river floodplain and is located within Flood Zone 3 (see Drawing No. CUMNORFR2603-6). Flood Zone 3 represents a high risk area with a 1% or greater annual probability of river flooding (i.e. a 1 in 100 year event or greater).

Further to the east and north of Farmoor Reservoir, parts of the parish fall within Flood Zone 2. The Annual Exceedance Probability (AEP) for river flooding within Flood Zone 2 is defined as land having between a 1% (1-100 years) and 0.1% (1 in 1000-years) annual probability of river flooding (>1 in 100 years).

In particular, the EA-mapped flood extents partially intersect with (or are immediately adjacent to) AOI 2 (Farmoor) and 3 (Filchampstead).

3.2 Pluvial Flood Risk (surface water)

According to the EA Pluvial (rainfall runoff) flood risk map, there are various areas within Cumnor Parish that are at high risk of surface water flooding (see Drawing No. CUMNORFR2603-7).

Additional hydrological routing analysis, based on the LiDAR topography data, has been undertaken to illustrate surface water flow routes local to the AOI.

This analysis indicates that the overland flow routes within the 5 AOI are mapped as having a high risk of pluvial (surface water) flooding (see Drawing No. CUMNORFR2603-8).

All five AOI, including their main access roads, contain locations identified as being at high risk of surface water flooding.

Flooding locations reported by residents within AOI 1 (Cumnor Hill and Dean Court), 2 (Farmoor), and 3 (Filchampstead) are situated in zones classified as 'high risk' of surface water flooding, with an AEP >3.3% (1 in 30 year) chance of experiencing flash flooding from intense rainfall in any given year. Part of Area of Interest 4 (Catchment to Wootton) also shows a mapped surface water flow route draining southwards towards Wootton, Vale of White Horse.

Access roads within AOI 5 (Cumnor conservation area) such as the B4017 (High Street) and Appleton Road, show areas at high risk of surface water flooding. These locations generally follow natural surface water drainage pathways across the flat, low-lying ground.

Drawing No. CUMNORFR2603-8 illustrates the runoff paths and flooding locations within and near the AOI 1 to 5.

The EA's surface water flood risk map via the long-term flood risk service also shows anticipated climate change related future surface water flood risk extents for 2040 to 2060¹. The pluvial flood

¹ [EA Surface water map - long term flood risk](#)

risk maps for 2040 to 2060 predict that there are minor increases in the extents of pluvial flood risk within Cumnor Parish, when compared with the present-day flood risk extents. No significant new areas of flood risk are predicted within the parish for 2040 to 2060, based on the EA data. Therefore, the parish is not expected to experience a significant increase in pluvial flood risk in the future based on current projections. However, in accordance with National Policy, any future developments within the AOIs would need to be assessed on an individual property/site basis for present and future flood risk, both to the development and resulting from the development.

3.3 Flood Risk from Reservoirs and Other Artificial Sources

The risk of reservoir flooding has been determined based on consultation with the EA's reservoirs flood risk map *via* the long-term flood risk.

The EA provide two flooding scenarios for the reservoir flood maps: a 'dry-day' and a 'wet-day'. The 'dry day' scenario shows the predicted flooding which would occur if the reservoir fails when rivers are at normal levels. The 'wet day' scenario shows the predicted worsening of the flooding which would be expected if a river is already experiencing an extreme natural flood. These datasets indicate consequences only and do not provide the likelihood of reservoir failure.

Farmoor Reservoir is the only reservoir within the parish boundary and forms part of the local flood-defence system.

Under the EA wet-day scenario, flooding would be more severe and extensive due to elevated water levels in Farmoor Reservoir and the River Thames. Drawing No. CUMNORFR2603-9 identifies a high flood-risk area extending east of Farmoor Reservoir, affecting AOI2 (Farmoor) and AOI3 (Filchampstead).

3.4 Groundwater Flood Risk

A Level 1 Strategic Flood Risk Assessment (SFRA) report was produced by JBA Consulting for South Oxfordshire District Council and Vale of White Horse District Council in September 2024. Cumnor Parish is located within Vale of White Horse District Council.

The SFRA summarises that within the parish there is generally a low susceptibility to groundwater flooding. Figure 5-3 of the SFRA shows that groundwater levels are typically more than 5m below ground level during a 1 in 100-year event, indicating that groundwater flooding is unlikely across most of the parish.

Information presented in Section 2.5 above indicates that regional groundwater within the Corallian Group generally flows south-east, with evidence also suggesting localised northerly flow paths. As groundwater moves through these formations, it emerges above the boundary with the underlying Oxford Clay Formation, creating 'contact springs' where permeable and impermeable strata meet.

Using 1m-resolution LiDAR data for the parish, the extent of the Zone of Potential Groundwater Flooding has been mapped on or above the inferred geological contact (see Drawing No. CUMNORFR2603-10). This results in a Zone of Potential Groundwater Flooding located along, and immediately above, the geological contact between the Kingston Formation (and/or Hazelbury Bryan Formation) and the underlying Oxford Clay Formation. The upper limit of this zone is defined as 10m above the contact, which allows for a potential 5m to 7m rise in groundwater levels within the Corallian Group and a 3m deep basement excavation (see Drawing No. CUMNORFR2603-10).

Although the geological contact is mapped by the BGS, its actual position may vary locally. This uncertainty arises from the limited availability of outcrops for geological mapping and from the presence of mass-movement deposits that extend downslope beyond the expected contact position. For this reason, the lower limit of the zone is assumed to be 10m below the mapped contact, consistent with the mapped zone of uncertainty (see Drawing No. CUMNORFR2603-10).

It is important to note that this zone has been delineated without direct groundwater level monitoring data. The definition should therefore be reviewed and refined as groundwater information becomes available through future site investigations or planning applications.

A zone of groundwater flood risk has therefore been estimated based upon a 20m vertical height range; it centres on the Oxford Clay contact with the overlying Kingston Formation. The width of this zone on the ground varies depending on the ground topographic gradient. It is, on average, 200m to 250m wide but can range from 150m to 650m. The width of this zone immediately north of Cumnor Village can range from 100m to 300m.

3.5 Areas of Interest

5 No. Areas of Interest (AOIs) have been defined based on the findings of the previous FRA, updated mapping, and locations reported by residents where flooding has occurred. A summary of the flood risk from all relevant sources for each AOI is provided in Table 1.

Table 1. Risk of flooding for the Areas of Interest

Area of Interest (AOI)	Fluvial Flood Risk	Pluvial Flood Risk	Groundwater Flood Risk
AOI 1- Cumnor Hill and Dean Court	No risk	Medium to High	High
AOI 2- Farmoor	Low	Medium to High	Very low
AOI 3- Filchampstead	High	Medium to High	Very low
AOI 4- Catchment area draining to Wootton	No risk	Medium to High	Low
AOI 5- Cumnor Conservation Area	No risk	Medium to High	High

3.6 Assessment of reported flooding locations

Flooding locations reported by residents supported by dates and photographs were assessed against the fluvial, pluvial (surface water), and groundwater flood-risk datasets. Each point was mapped within its corresponding AOI to identify the most likely flood source.

Most reported locations fall within areas mapped as high pluvial (surface water) flood risk, defined by the EA as having an AEP greater than 3.3%, equivalent to a 1 in 30 year chance per year of experiencing flash flooding during intense rainfall. Because the observed flooding coincides with these high-risk pluvial zones, an assessment of rainfall conditions at the time of each reported incident was carried out.

This is further supported by hydrological runoff routing, which demonstrates that overland flow from elevated ground across the parish naturally converges toward local low-lying areas, drainage pinch points, and constricted conveyance routes (see Drawing No. CUMNORFR2603-8).

3.6.1 Rainfall Analysis

Flood dates and photographs obtained from the flooding locations reported by residents were compared with daily rainfall from the EA Eynsham rain gauge (station ID: 254336TP), located approximately 4km north of the parish. Records were validated and used for the period 1982 to 2025.

A frequency analysis of annual maximum daily rainfall was undertaken to estimate the return period (AEP) associated with each recorded event. Annual peak-daily rainfall (1982 to 2025) was fitted to several probability distributions; the Log-Pearson Type III² provided the best fit. Results are illustrated in Figure 1 below, and the derived rainfall frequency values used for classification are summarised in Table 2.

² Root of Mean Squares = 0.75

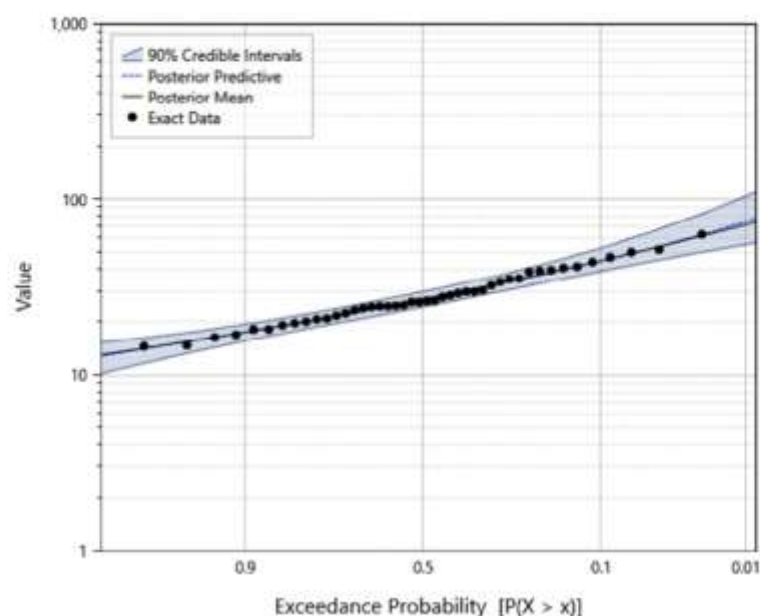


Figure 1. Peak daily rainfall analysis and Annual Exceedance Probability analysis- Eynsham rain gauge (1982-2026)

Table 2. Peak rainfall analysis and Annual Exceedance Probability – Environment Agency Eynsham rain gauge

Annual Exceedance Probability (AEP)	Return Period	Peak daily rainfall (mm)
0.01	100	74.6
0.02	50	64.1
0.05	20	52.4
0.2	5	37.2
0.5	2	26.9
0.99	1	12.74

Daily rainfall totals for each reported flood date were extracted and compared against the derived rainfall frequency curve. The results indicate that all events correspond to approximately a 1-year return period rainfall, demonstrating that the recorded flooding occurred during relatively common rainfall conditions. Peak rainfall recorded on the reported flood dates is shown in Table 3.

Table 3. Peak daily rainfall on reported flood dates

Flooding date	Peak Rainfall (mm/day)
31/03/2023	26.5
15/01/2026	21.15
05/02/2026	18.49
06/02/2026	13.10

Areas mapped as high pluvial (surface water) flood risk closely align with overland flow routes defined by local topography. During short-duration rainfall events, runoff rapidly concentrates along these pathways and low-lying areas.

Where drainage capacity is limited, even relatively low magnitude events (approximately 1-year return period events) can exceed available conveyance, resulting in surface water accumulation, exceedance flows, and localised ponding affecting properties and access roads situated along these routes (see Drawing No. CUMNORFR2603-8). Consideration should be given to liaising with the relevant road drainage authorities at these locations to ensure timely maintenance of their drainage infrastructure in these locations.

4. RECOMMENDATIONS

4.1 Fluvial Flooding

Any future development within the parish must consider potential impacts on all sources of flooding, and where required, must be supported by a site-specific FRA prepared in accordance with:

- the [National Planning Policy Framework \(NPPF\)](#), including the revised Sequential Test requirements (2024 update).
- the EA's guidance ["Flood risk assessments: applying for planning permission"](#) (last updated 22 October 2025)
- Oxfordshire County Council (Lead Local Flood Authority) requirements for drainage and local flood risk management.

The NPPF sets out the Government's planning policies and how these should be applied.

Paragraphs 170 to 182 in Chapter 14 of the NPPF apply to planning and flood risk policy in relation to *"meeting the challenge of climate change, flooding and coastal change"*.

Paragraph 170 of the NPPF states:

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere".

Paragraphs 172 to 180 of the NPPF relate to the application of the Sequential Test and Exception Test, where appropriate.

Paragraph 174 of the NPPF states:

"Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test."

Accordingly, areas within Flood Zone 1 should be prioritised (over areas at Flood Zones 2 and 3) for new developments.

The updated NPPF and Planning Practice Guidance (PPG) clarify that the Sequential Test now applies to all sources of flooding, not just river or tidal flooding. This includes surface water, groundwater, sewer and reservoir flooding.

Not all forms of development are permitted in Flood Zones 2 and 3. The EA will only support development in Flood Zone 3 where the proposed use is classified as 'water compatible' and results in no net loss of floodplain storage, by providing "like for like" (i.e., level for level and volume for volume) flood storage compensation.

Any proposed changes to ground levels must be assessed through a detailed FRA. Raising land above flood levels can reduce site-specific flood risk where the land is not part of floodwater conveyance. However, it may reduce floodplain storage, alter flow paths, and increase risk to neighbouring or downstream areas. Therefore, analysis is required to ensure no adverse third-party impacts. Compensatory flood storage should be provided on a level-for-level, volume-for-volume basis, located adjacent to the floodplain, within or near the site boundary. Guidance is provided in Appendix A3 of the CIRIA C624³.

4.2 Pluvial Flooding (Surface Water)

Cumnor Parish experiences recurring surface water flooding, and any future development must demonstrate that it will not increase runoff generation or surface-water flood risk. In line with the EA's guidance on FRA's for planning applications (updated October 2025), developments in areas at risk of surface water flooding must provide appropriate drainage mitigation and, where relevant, a Sustainable Drainage Systems⁴ (SuDS) strategy.

Paragraph 182 in Chapter 14 of the NPPF states:

"Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:

- a) take account of advice from the Lead Local Flood Authority;*
- b) have appropriate proposed minimum operational standards; and*
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development".*

Where ground conditions permit, infiltration-based SuDS (e.g., soakaways, infiltration basins) are typically preferred because they reduce off-site runoff. However, in Cumnor Parish, infiltration may be inappropriate in areas underlain by permeable strata located close to "contact springs" along the Oxford Clay boundary (see Section 2.5 and 3.4), as this could increase groundwater or surface water emergence downslope.

Therefore, and in general terms, the following actions are recommended prior to choosing, designing and sizing SuDS and/or other drainage systems:

- Estimating runoff generated within (and/or flowing into) the proposed development;
- Excavating trial pits to gain information regarding soils and geological (superficial and bedrock) layers underlying the site;
- Assessing the ground infiltration capacity by undertaking ground permeability tests (using the excavated trial pits); and

Understanding the hydrogeological (groundwater) regime within and around the site area.

Ultimately, any future developments must ensure that the additional runoff generated within the site is managed in such a way so that the overall runoff discharge from the site does not increase compared to the pre-development (greenfield or brownfield) site condition. This has to be ensured for all rainfall events up to the 1:100 year design rainfall event, including appropriate climate change allowances (as per [EA Climate Change Allowances](#)).

The risk posed to new developments from overland flow routes should also be avoided. Therefore, it is recommended that new developments are not located within areas of identified surface water

³ CIRIA (C624 [REDACTED])

⁴ The SuDS Manual (C753):

https://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx

flood risk of 1 in 30 and 1 in 100 year return periods. In addition, new developments should ideally be excluded from areas of 1 in 1000 year return periods unless the risk is fully mitigated.

4.3 Groundwater Flooding

It is advised that any future planning applications located within the "Zone of Potential Groundwater Flooding" undertake a rigorous groundwater assessment to confirm groundwater conditions beneath the development. Where a development excavation is proposed, the assessment should include:

- A minimum of 3 No. groundwater monitoring boreholes within the planning application boundary to confirm groundwater depths and establish groundwater flow directions;
- A minimum of 3 to 6 months of groundwater level monitoring, preferably monitoring annual seasonal groundwater fluctuations during the dry and wet season. Where project lead-in times allow, groundwater monitoring should be repeated over multiple years to confirm seasonal groundwater level fluctuations;
- Groundwater monitoring information can be augmented or replaced by local Environment Agency groundwater level monitoring information if found to exist;
- Furthermore, an assessment of any post-construction groundwater flow truncation and subsequent groundwater rise effects should be evaluated and mitigation measures proposed if necessary to prevent flooding or damage to adjacent properties.

There is no national or regional modelling available to assess climate-change impacts on groundwater. The significance of future groundwater flooding depends on the local flooding mechanism, historic evidence, and geological conditions (*e.g.*, prolonged rainfall in permeable sandstone or other aquifers). Where groundwater is already shallow or emerging at the surface, flood risk may increase due to the contributions of groundwater to overland flow or persistent ponding. In such areas, infiltration-based SuDS may be inappropriate, and groundwater monitoring is recommended to confirm safe design levels.

4.4 Areas of Interest – Recommendations for Future Development

Recommendations for future development and flood-risk management within the identified AOIs are summarised below. These recommendations reflect the updated flood-risk assessment, reported flood incidents, and the underlying hydrological and geological conditions in each area.

4.4.1 Area of Interest 1: Cumnor Hill and Dean Court

- Limit new development along or immediately above the geological contact between the Kingston/Hazelbury Bryans Formations and the Oxford Clay Formation, *i.e.*, where 'contact springs' occur, to reduce the risk of groundwater emergence into basements or lower floors.
- In terms of surface water flooding, ensure frequent maintenance of road drainage systems and gullies, particularly in steeply sloping residential areas prone to rapid runoff.
- Improve surface water management east of the A420 embankment, where residents have reported high-depth, high-velocity surface water flooding.
- Review and maintain (or upgrade) the Eynsham road drainage system, as the embankment has significantly altered natural runoff pathways, forcing flows along the embankment toward a single culverted crossing point, increasing surface water flood hazard.

4.4.2 Area of Interest 2: Farmoor

- This area is influenced by combined fluvial, surface water runoff from higher elevations (Wytham Hill catchment), and reservoir flood risk, including interaction with River Thames and Farmoor Reservoir.
- Limit new development in reservoir risk areas unless safety, breach modelling, and emergency planning are fully addressed.
- If development is proposed downstream of Farmoor Reservoir, a site-specific assessment will be needed to determine whether improvements to the reservoir's design, operation or maintenance are required. The Local Planning Authority (LPA) (in consultation with the reservoir operator), should avoid intensifying development within mapped reservoir-risk areas unless safety implications are fully understood. The LPA should also evaluate potential consequences

of reservoir failure, its interaction with catchment flooding and emergency planning requirements.

- Recognise that extreme rainfall events pose an additional residual risk due to the potential for reservoir failure under EA wet-day scenario modelling; development in this AOI should therefore remain restricted.
- Integrate SuDS features to improve water quality, reduce overland flow velocities, and provide amenity and ecological benefits.

Ensure no increase in runoff from Wytham Hill catchment. New hardstanding built on these slopes has the potential to increase surface water runoff towards this AOI – all developments must ensure pre-development run-off rates are maintained or reduced.

4.4.3 Area of Interest 3: Filchampstead

- New development should not be permitted in those parts of the AOI that fall within high-risk pluvial flood areas, where recurrent surface-water flooding has been identified.
- In the northern extent of the AOI, where significant areas lie within Flood Zone 3, the flat topography makes "like-for-like" floodplain storage compensation difficult to achieve, and the EA is therefore likely to object to development due to the high probability of flooding and the limited scope for mitigation.
- Development proposals must protect existing floodplain functionality and avoid land-use changes that would increase runoff or displace floodwater into adjacent areas.

4.4.4 Area of Interest 4: Catchment area draining to Wootton

- New development should not be permitted in those parts of the AOI that fall within high-risk pluvial flood areas, where recurrent surface-water flooding has been identified.
- Any future proposals must incorporate robust runoff attenuation, ensuring post-development discharge does not exceed greenfield runoff rates.
- Runoff-routing analysis shows that overland flow from high topographical areas, including Hurst Hill and Picketts Heath, drains through this AOI. It is also essential to consider the cumulative impact of multiple developments, given the downstream surface water flood risk to Wootton.

4.4.5 Area of Interest 5: Cumnor Conservation Area

- The roads within this AOI (Leys Road, Appleton Road, and Tumbledown Hill) contain sections identified as being at high risk of surface water flooding, which coincide with the local topographic low points of the area.
- Limit new development along or immediately above the geological contact between the Kingston/Hazelbury Bryans Formations and the Oxford Clay Formation, *i.e.*, where 'contact springs'. For example, reported flooding approximately 650m to the northeast of this AOI has taken place in areas underlain by permeable strata and identified as lying within a Zone of Potential Groundwater Flooding.
- It is considered that groundwater-flood risk can be managed through appropriate design of development plot site levels; however, the character of the local groundwater regime is particularly important for the design of the site's drainage strategy. The reported flooding to the northeast of this AOI aligns with the mapped zone of potential groundwater emergence.

5. SUMMARY AND CONCLUSIONS

This report is an update on the 2019 flood risk assessment. It incorporates changes in data available in publicly available topography, local resident flood observations, and changes to national policy and guidance.

Publicly available topographic, geological, hydrogeological and flood risk data, combined with reported flooding locations, have been used to assess the risk of flooding from different sources within Cumnor Parish, with specific attention paid to the 5 No. AOIs.

The alignment of (i) mapped pluvial flood-risk extents, (ii) recorded flooding locations and associated daily rainfall events, and (iii) runoff routing towards local pinch points confirms that surface water is the dominant flood mechanism at the reported locations, and indicates that frequent, relatively

low-intensity rainfall events (1 in 1-year events) are sufficient to trigger flooding within these high-risk areas (Drawing No. CUMNORFR2603-8).

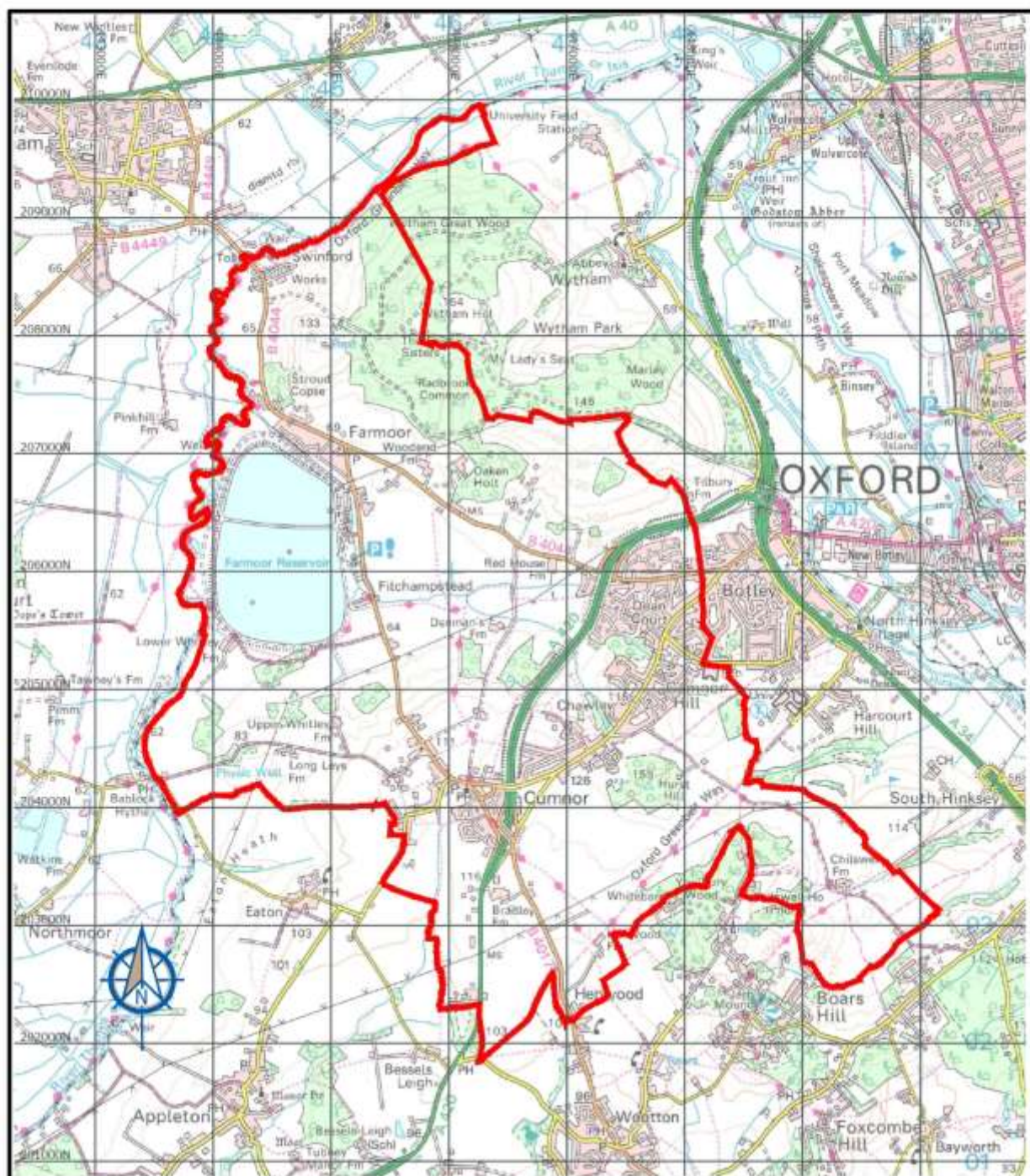
Some (low-lying) areas of Cumnor Parish (e.g., Farmoor and Filchampstead) sit within Flood Zones 2 and 3 (see Drawing No. CUMNORFR2603-6), thus are at medium to very high risk of fluvial (river) flooding. Future developments should avoid, as much as reasonably practicable, Flood Zones 2 and 3. In this regard, any new developments proposed within Flood Zones 2 and 3 should be able to justify the need for such a location, demonstrating no alternative (suitable) locations exist within Flood Zone 1 (i.e., following the Sequential Test approach), and ensure these will result in no increase of fluvial flood risk elsewhere.

Several areas within Cumnor Parish, particularly Cumnor Hill and Dean Court, Farmoor, Filchampstead, the Wootton catchment, and the Cumnor conservation area are at recognised risk of surface water flooding (see Drawing No. CUMNORFR2603-7). Future planning applications should therefore incorporate SuDS and adopt a holistic approach to managing surface water runoff. To do so, and as part of the FRA, a set of recommended actions to be undertaken prior to choosing, designing and sizing the proposed SuDS or drainage systems— has been provided.

In terms of groundwater flooding, information suggests that the areas along and upgradient of the geological contact between the Oxford Clay Formation and Kingston Formation (e.g., Cumnor Hill, Dean Court and locations reported north of Cumnor Conservation Area) are most prone to groundwater flooding as a result of groundwater egress along “contact springs”.

Geological and topographic modelling techniques have been used to estimate the extent of a groundwater flood risk zone within Cumnor Parish. It should be noted this zone has been estimated without the availability of groundwater level data. The zone definition should therefore be periodically reviewed, based upon available groundwater level monitoring data from future planning applications.

GWP CONSULTANTS
APRIL 2026



LEGEND



Cumnor Parish Boundary

© Crown copyright Ordnance Survey
2016
OS Licence No AL100018321

Version	Revision and compilation notes	Date
a	Issued	24.04.2026

Client

Cumnor Parish Council

Project

Updated Flood Risk Assessment in Cumnor Parish

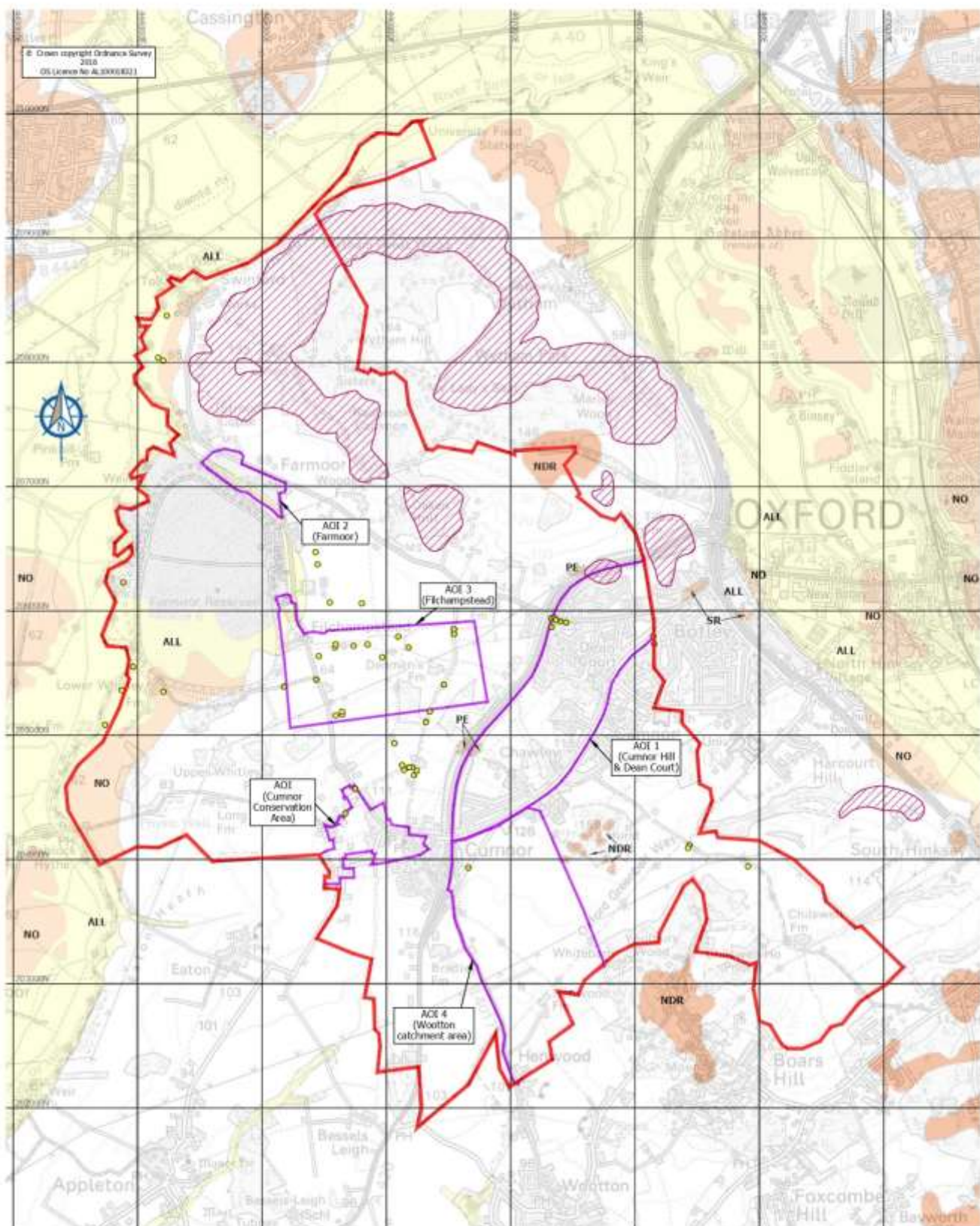
Site location

Date 24.04.2026	Drawn PAM/EMB	Checked CC	Scale 1:50,000 at A4
Drawing Ref CUMNORFR2603	Drawing No 1	Version a	

GWP
CONSULTANTS

Upton House
Market Street, Charlbury
Oxfordshire OX7 3PJ
United Kingdom
Tel: +44 (0)1608 810374
e-mail: info@gwp.uk.com
www.gwp.uk.com

GWP Consultants LLP. Registered No. OC326183.
Registered Office: Upton House, Market Street, Charlbury,
Oxfordshire OX7 3PJ, United Kingdom



LEGEND

- Cumnor Parish Boundary
- Flooding locations reported by residents
- Areas of Interest (AOI)
- Areas of Mass movement

SUPERFICIAL DEPOSITS

- ALL** Alluvium
- NDR** Northern Drift Formation
- NO** Northmoor Sand and Gravel Member
- SR** Summerdown-Radley Sand and Gravel Member
- PE** Peat

Version

Revision and compilation notes

a Issued

Date

24.04.2026

Client

Cumnor Parish Council

Project

Updated Flood Risk Assessment in Cumnor Parish

Superficial geology

Date

24.04.2026

Drawn

PAM/EMB

Checked

CC

Scale

1:30,000 at A3

Drawing Ref

CUMNORFR2603

Drawing No

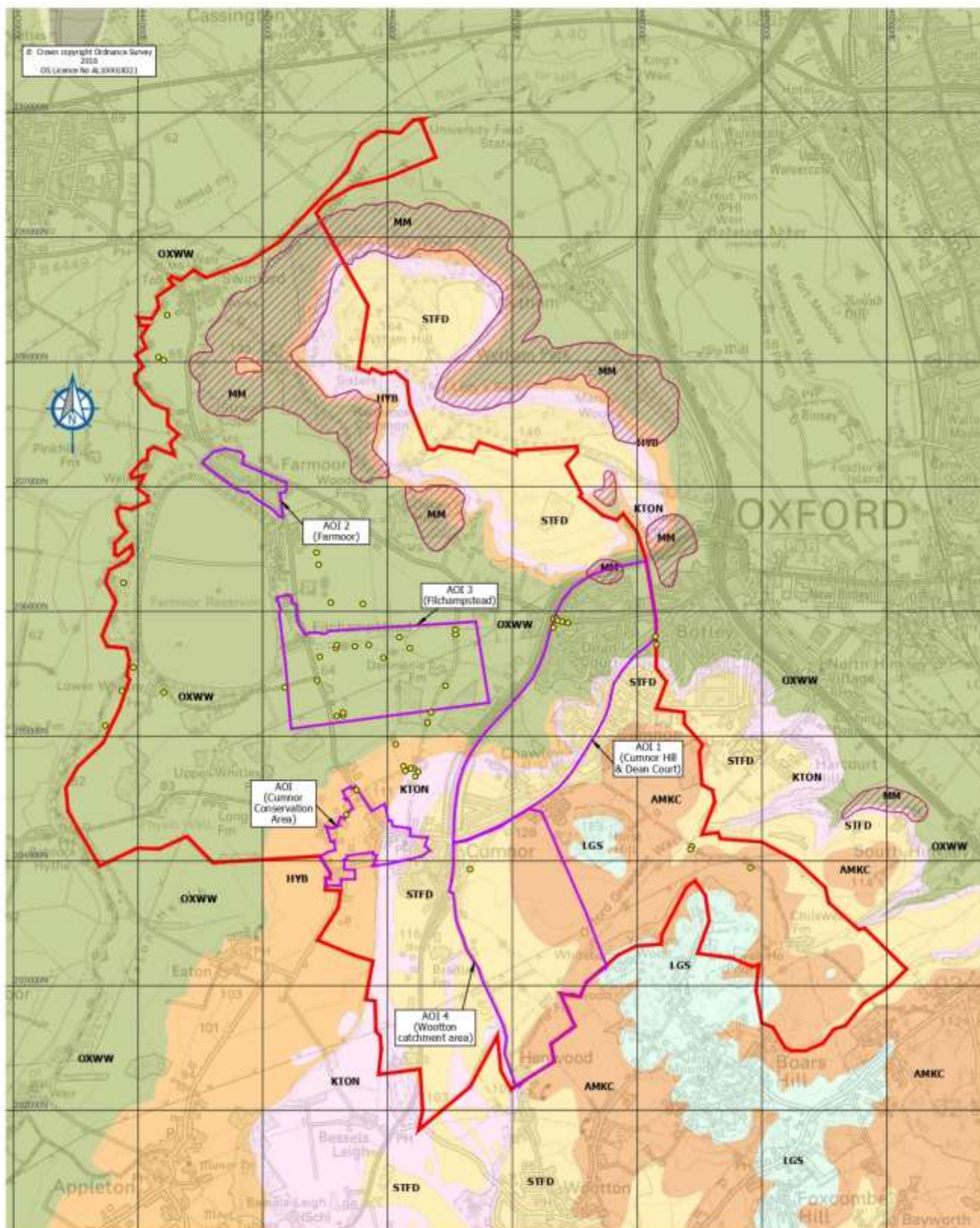
3

Version

a



GWP
CONSULTANTS
1 Local Street, Chesham
Chesham CH1 3JF
United Kingdom
Tel: +44 (0)1494 501111
Email: info@gwp.co.uk
www.gwp.co.uk
GWP is a registered company in England
Registered Office: 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000



LEGEND

	Cumnor Parish Boundary		Flooding locations reported by residents
	Areas of Interest (AOI)		Areas of Mass movement
BEDROCK		STFD	Stanford Formation
LGS	Lower Greensand Formation	KTON	Kingston Formation
AMKC	Amphill Clay Formation and Kimmeridge Formation	HYB	Hazebury Bryan Formation
		OXWW	Oxford Clay Formation and West Walton Formation

Version a

Revision and compilation notes

Date

24.04.2026

Client

Cumnor Parish Council

Project

Updated Flood Risk Assessment in Cumnor Parish

Bedrock geology

Date

24.04.2026

Drawn

PAM/EMB

Checked

CC

Scale

1:30,000 at A3

Drawing No

CUMNORFR2603

Drawing No

4

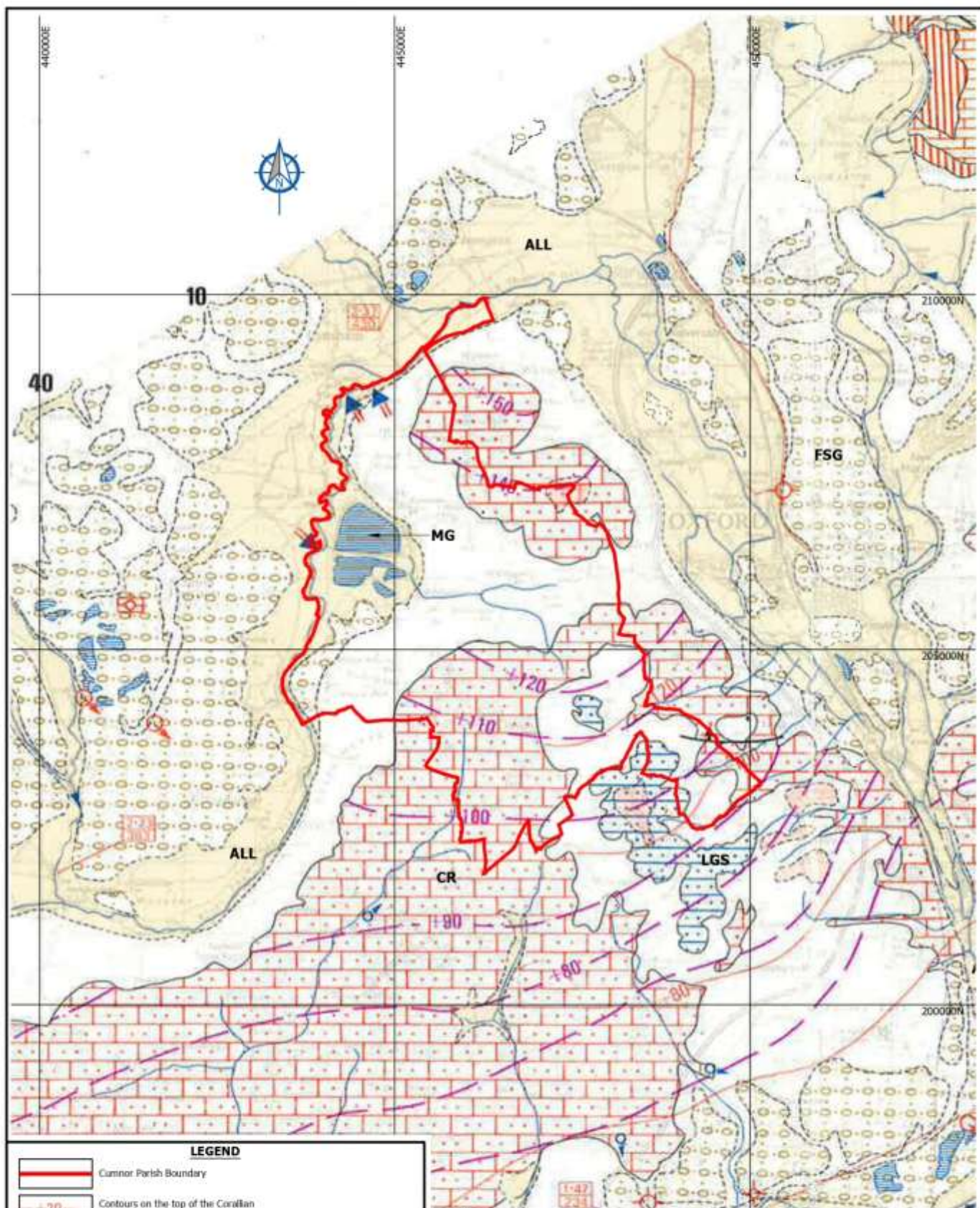
Version

a

GWP
CONSULTANTS

London House
1 Local Street, Chesham
Chesham, Bucks HP8 4JF
United Kingdom
Tel: +44 (0)1494 500174
Email: info@gwp.co.uk
www.gwp.co.uk

Not a contract. For information only. Not to be used for legal purposes. For information only. Not to be used for legal purposes.



LEGEND

- Cumnor Parish Boundary
- +20 Contours on the top of the Corallian (Inferred in areas of sparse data)
- +70 Contours on the minimum potentiometric surface of the Corallian in metres relative to Ordnance Datum (Inferred in areas of sparse data)

Geological Abbreviations

MG Made or worked ground
ALL Alluvium
FSG Fluvial sands and gravels
LGS Lower Greensand
CR Corallian

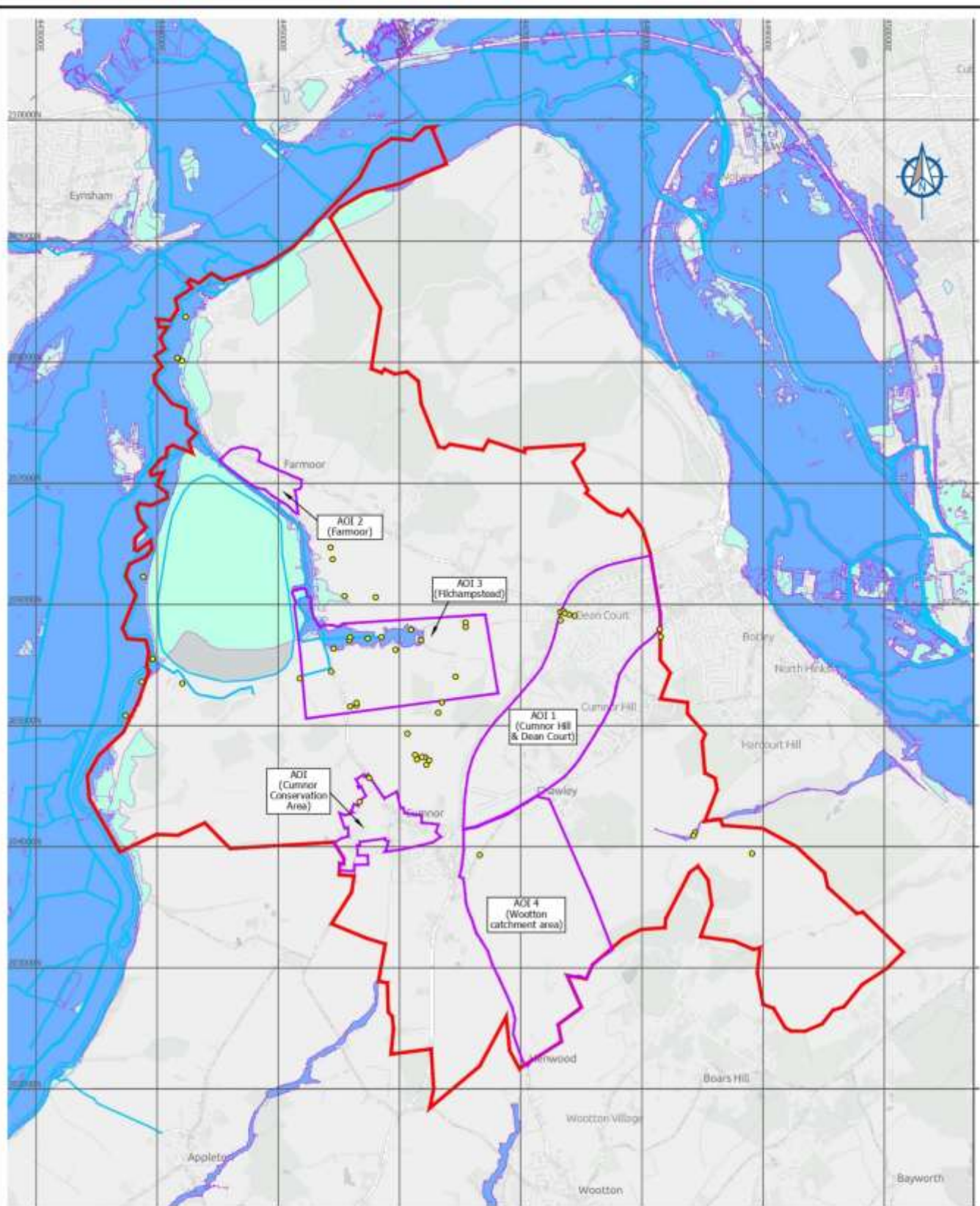
Based on 1:100,000 Hydrogeological Map
 by permission of the British Geological
 Survey © NERC. All rights reserved.
 Licence No C06/101-CSL

Version a	Revision and compilation notes Issued	Date 24.04.2026	Client Cumnor Parish Council
			Project Updated Flood Risk Assessment in Cumnor Parish
			Hydrogeological setting
Date 24.04.2026	Drawn PAM/EMB	Checked CC	Scale 1:50,000 at A3
Drawing Ref CUMNORFR2603	Drawing No 5	Version a	

GWP
 CONSULTANTS

Lymington House
 1 Lyndal Street, Chichester
 Chichester PO19 1JF
 United Kingdom
 Tel: +44 (0) 1243 800174
 Email: info@gwp.co.uk
 www.gwp.co.uk

GWP is a registered company in England
 Registered Office: Lyndal House, Lyndal Street, Chichester,
 PO19 1JF, United Kingdom



LEGEND

	Cumnor Parish Boundary		EA Flood Zone 1
	Flood defences		EA Flood Zone 2
	Areas of Interest (AOI)		EA Flood Zone 3
	Flooding locations reported by residents		

Version a
Revision and compilation notes
Issued

Date
24.04.2026

Client
Cumnor Parish Council

Project
Updated Flood Risk Assessment in Cumnor Parish

Environment Agency fluvial flood risk map

Date
24.04.2026
Drawing Ref
CUMNORFR2603

Drawn
PAM/EMB
Checked
CC

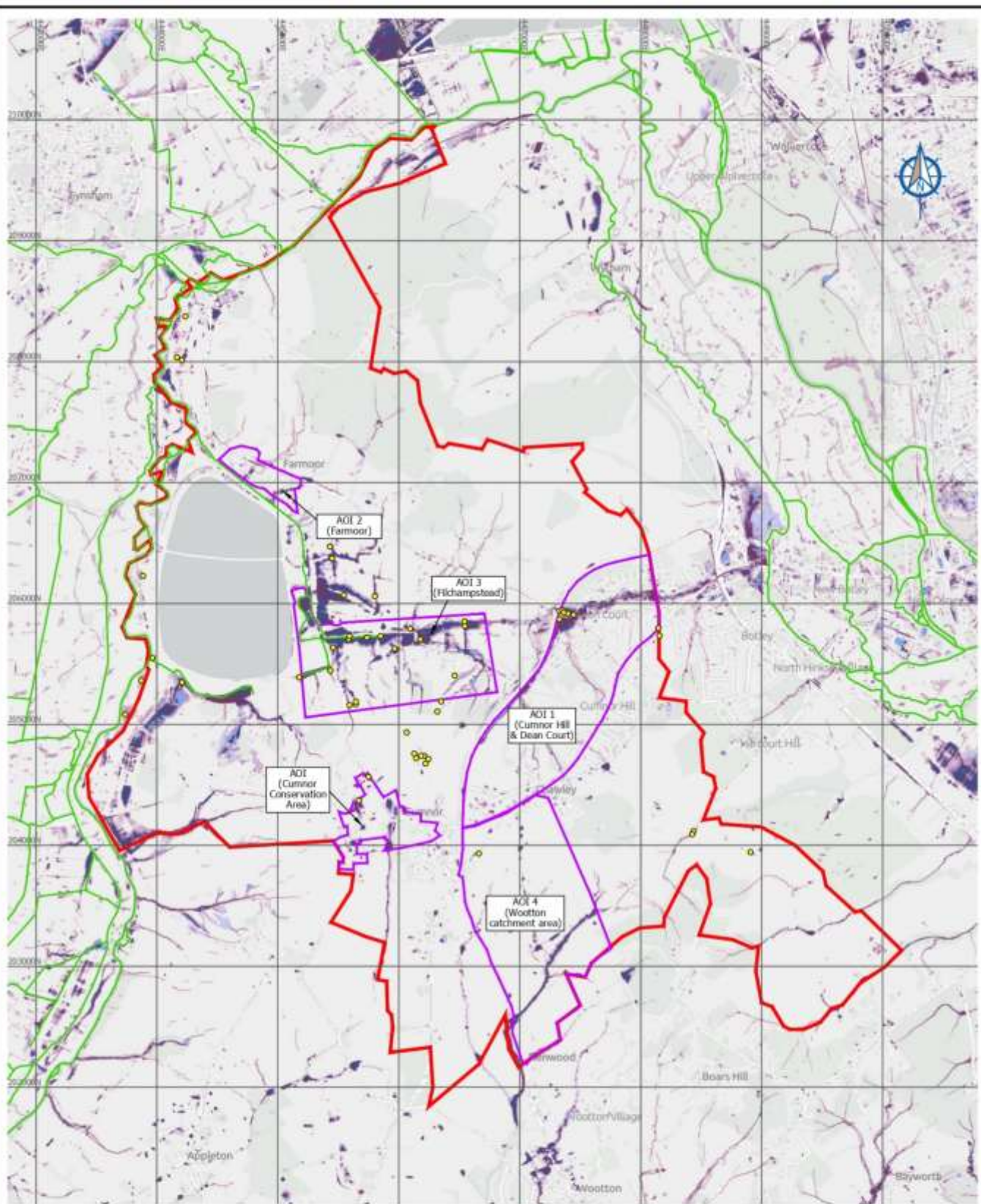
Scale
1:30,000 at A3
Drawing No
6

Version
a

GWP
CONSULTANTS

London Head Office
1 Royal Street, Chesham
Chesham Bucks HP8 3JF
United Kingdom
Tel: +44 (0)1494 602174
Email: info@gwp.co.uk
www.gwp.co.uk

South West Office
100 High Street, Exeter
Exeter EX1 1AA
United Kingdom
Tel: +44 (0)1392 266111
Email: info@gwp.co.uk
www.gwp.co.uk



LEGEND

	Cumnor Parish Boundary		High flood risk (Extent of 1 in 30 year flood event)
	Areas of Interest (AOI)		Medium flood risk (Extent of 1 in 100 year flood event)
	Flooding locations reported by residents		Low flood risk (Extent of 1 in 1000 year flood event)
	Main rivers (statutory)		Very low flood risk

Version a Revision and compilation notes

Date 24.04.2026

Client Cumnor Parish Council

Project Updated Flood Risk Assessment in Cumnor Parish

Environment Agency pluvial flood risk map



Upton House
1 Local Street, Chertsey
Surrey TW20 3JF
United Kingdom
Tel: +44 (0)1889 820174
Email: info@gwp.co.uk
www.gwp.co.uk
GWP is a registered company in England.
Registered Office: 1000 High Street, Chertsey,
Surrey TW20 3JF, United Kingdom.

Date 24.04.2026
Drawing Ref CUMNORFR2603

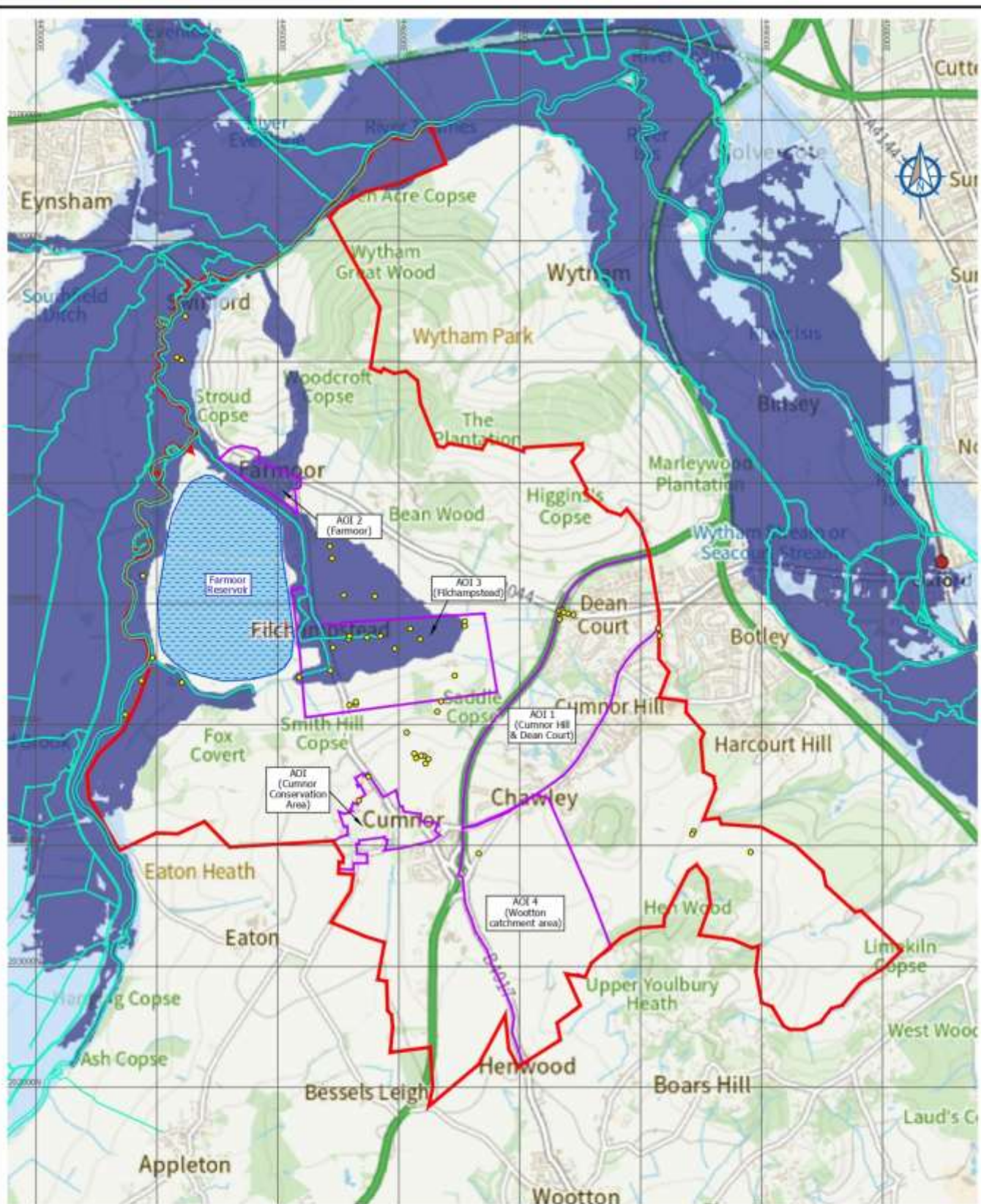
Drawn PAM/EMB
Checked CC

Scale 1:30,000 at A3
Drawing No 7

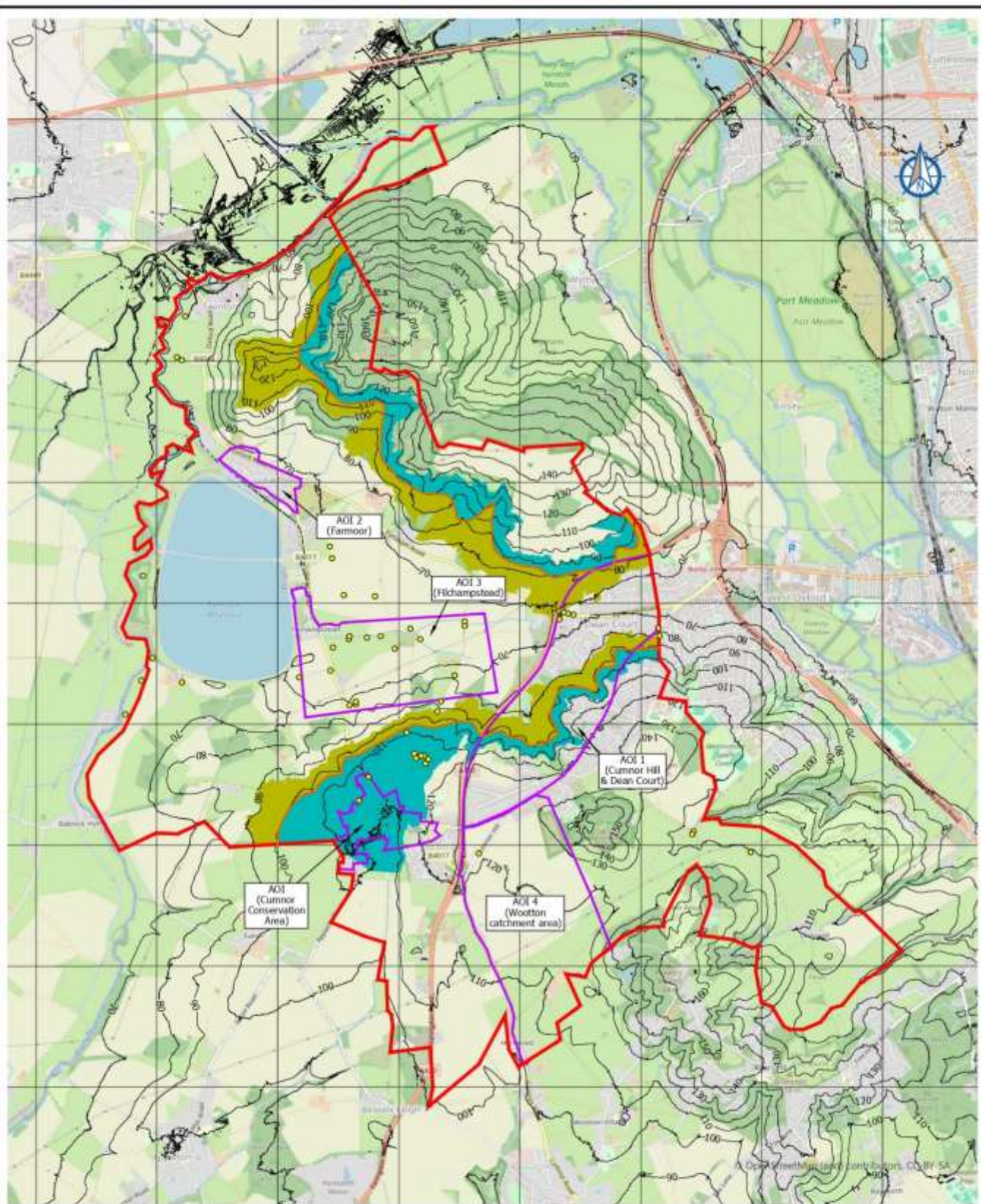
Version a



Version	Revision and compilation notes	Date	Client
a	Broad	24.04.2026	Cumnor Parish Council
			Project
			Updated Flood Risk Assessment in Cumnor Parish
			Hydrological runoff routing
		Date	Drawn
		24.04.2026	PAM/EMB
		Checked	CC
		Scale	1:17,500 at A3
		Drawing Ref	Version
		CUMNORFR2603	a



LEGEND		Version	Revision and compilation notes	Date	Client
	Cumnor Parish Boundary	a	Issued	24.04.2026	Cumnor Parish Council
	Areas of Interest (AOI)				Project
	Flood defences				Updated Flood Risk Assessment in Cumnor Parish
	Flooding locations reported by residents				Environment Agency reservoirs flood risk map
				Date: 24.04.2026 Drawn: PAM/EMB Checked: CC Scale: 1:30,000 at A3 Drawing No: CUMNORFR2603 Version: a	



LEGEND

	Cumnor Parish Boundary		Contact between the Kingston (and/or the Hazelbury Bryan) Formation and the underlying Oxford Clay Formation
	Areas of Interest (AOI)		Zone of potential groundwater flooding
	Ground surface contour derived from 1m LIDAR DTM (data.gov.uk), 10m interval (mAOI)		Groundwater bearing strata 10m above Oxford Clay Formation
	Flooding locations reported by residents		Oxford Clay geological contact - zone of uncertainty (10m vertical)

Version a Revision and compilation notes

Date 24.04.2026

Client Cumnor Parish Council

Project Updated Flood Risk Assessment in Cumnor Parish

Zone of potential groundwater flooding

Date 24.04.2026	Drawn PAM/EMB	Checked CC	Scale 1:30,000 at A3
Drawing Ref CUMNORFR2603	Drawing No 10	Version a	



Upton House, 1 Local Street, Chardbury, Oxfordshire SN7 3PQ, United Kingdom
 Tel: +44 (0)1285 802174
 Email: info@gwp.co.uk
 www.gwp.co.uk
 GWP is a trading name of GWP Group Ltd, registered in England. Registered Office: 100, The Quadrant, Chardbury, Oxfordshire SN7 3PQ, United Kingdom.