

Dear Secretary of State

I write to object to the latest of the late submissions made by Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd in relation to the proposed Botley West Solar Farm (Power Station).

Despite repeated requests during the consultation process and further repeated requests by the Planning Inspectorate during the Public Examination, the applicant has failed to conduct the necessary assessments or deliver the required information in a timely manner.

For a Nationally Significant Infrastructure Project, this raises questions of governance and deliverability. For the Secretary of State to have issued a letter stating that no further evidence will be accepted (June 9th) and for the applicant to then submit such large quantities of new evidence has in effect created a completely new proposal compared to the one examined from November 2025 onwards.

For this reason alone the application should be withdrawn and a new one submitted.

The proposal conflicts with the principles of the National Planning Policy Framework (NPPF), the policies laid out in the Vale of White Horse District Council Local Plan 2031 policies and the policies of the Cumnor Neighbourhood Plan, which place significant importance on protecting landscape character, valued views, biodiversity, heritage assets, local distinctiveness, rural character and environmental quality.

I ask the Secretary of State to examine the following concerns carefully:

1. RVAA - Inaccurate and incomplete assessment of Lake View House, Heidersbach, Wetherden, Spring Bank and Applegarth.

The Design Evolution Assessment of the RVAA for is a work of fiction and cannot be relied upon to provide an accurate assessment. **At no point** during the extended consultation periods, including repeated requests from the Planning Inspectorate and the Vale of White Horse DC, has the Applicant attempted contact with homeowners.

No assessment or evidence has been gathered as per Para 2.2 of the RVAA which defines Residential Visual Amenity as “the overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage”. The Revised Masterplan RVAA on pg 66 contains no evidence of any site visits therefore any subsequent judgement is flawed. It is therefore impossible to conclude that the impact in Year 1 and 5 is Low (Submitted Masterplan).

The Revised Masterplan goes on to say that “The small part of the Proposed Development visible would not form a prominent feature in the views obtained.”

This is false.

The elevated location of these properties means that the view will be permanently and irrevocably harmed, with panels and a National Grid sub-station becoming the predominant and domineering features of the landscape.

2. 250m Buffer Zone from Residential Properties

The introduction of a new Masterplan revision 5 with the proposal of a 100m buffer zone to properties. During Examination a default 250m buffer was recommended. The default is now set to be 100m “with additional offsets up to 250m applied where needed”. It’s not clear how this “need” would be assessed post consent when it will be beyond public scrutiny. On past experience with this developer, it is highly unlikely this would be applied.

I would ask that the SoS looks to apply a minimum 250m offset from residential properties as a standard operational layout restriction prior to granting of any permissions.

3. National Grid Sub-Station

Even at this late stage of the planning process the location of the Grid connection remains unresolved. The entire development depends on this critical issue.

No planning application has been submitted by National Grid, and it has been indicated that the earliest connection date may be Winter 2031. In these circumstances, there should be no prospect of substantial construction works commencing before all essential connection infrastructure has received the necessary consents and is demonstrably deliverable.

Until this is defined this proposal should be withdrawn and a new application submitted.

4. Scale and Democratic Accountability

The project extends across approximately 1,400 hectares spanning multiple local authority areas. This extraordinary geographical spread is evidence that a number of physically separate sites have been aggregated into a single Nationally Significant Infrastructure Project.

The scheme is clearly not a single coherent development site, but rather a collection of dispersed installations spread across a very wide area of Oxfordshire. Had many of these areas been promoted independently, they would ordinarily have been subject to more direct local assessment and accountability through the local planning process. By combining them into one uniquely large proposal, the ultimate decision is removed

from locally elected authorities despite the impacts being experienced entirely at the local level.

This sits uneasily with the substantial effort invested by local communities in preparing neighbourhood plans, including the Cumnor Neighbourhood Plan, to guide development in accordance with local priorities and landscape character.

The continuing submission of large volumes of material late in the process compounds these concerns. When considered alongside the dispersed nature of the scheme, it risks undermining public confidence in both the examination process and the ability of affected communities to influence decisions that will fundamentally alter their surroundings for decades.

5. Unresolved Red-Line Boundary

The applicant has acknowledged that approximately 300 hectares of land within the Order Limits will no longer be used for solar panels. Despite this, that land remains within the red-line boundary.

There appears to be no compelling planning justification for retaining powers over land that is no longer required for the proposed development. The boundary should therefore be amended and the land returned to unrestricted agricultural use.

6. Heritage and Landscape Harm

The Cumnor Neighbourhood Plan places considerable emphasis on protecting valued landscapes, rural views and the distinctive countryside setting of the parish.

Concerns raised by ICOMOS regarding the effects on heritage assets and their settings remain unresolved. The Landscape Character Assessment requested during the examination process has not been completed. Without such an assessment, it is difficult to conclude that the full impact of the proposal on heritage assets, landscape character and important views has been properly understood.

The NPPF requires decision-makers to conserve and enhance the historic environment and to give great weight to heritage conservation. In my view, that test has not yet been satisfied.

7. Flood Risk Concerns Affecting Cumnor Parish

Flood risk remains a serious concern, particularly in light of the submissions made by Cumnor Parish Council, Cassington Parish Council and independent hydrology experts.

The applicant has declined to provide further panel pull-backs despite detailed technical evidence regarding drainage and surface water impacts. Given increasing concerns regarding extreme weather events and flooding, a precautionary approach should be adopted. Within the evidence presented by the landowner of the Southern

site during the Examination, the landowner acknowledged that parts of the land was flooding so often that he could no longer farm it.

The NPPF requires development to avoid increasing flood risk elsewhere and to ensure that communities are adequately protected. I do not believe it has been demonstrated that these requirements have been met.

The increased flood risk to properties in Farmoor Valley are unacceptable and for this reason the Southern site should be removed from the proposal

8. Ecology and Biodiversity

The absence of a completed arboricultural impact assessment remains concerning. If the Applicant wishes a starting point, they might usefully look to the Cumnor Fit for the Future website with its survey of veteran trees in the Farmoor Valley. There also continues to be significant doubts regarding the practicality and effectiveness of the proposed skylark compensation strategy.

Given these outstanding issues, I do not consider that the claimed biodiversity benefits have been adequately demonstrated or secured.

9. Lack of Financial Security for Restoration

With an upper ceiling of 2.5 million steel posts anticipated to be needed for this project, it is extremely concerning to see no decommissioning fund ringfenced. This was a specific recommendation of the Planning Inspectorate who requested to see details of this prior to any construction beginning.

Local communities should not bear any future risk associated with restoration, removal of infrastructure or site remediation at the end of the project's operational life.

10. Viability & Deliverability

The applicant has not adequately justified its contention that a development on this scale represents the minimum economically viable scheme.

Alternative proposals involving a smaller footprint appear to have been rejected without sufficient justification. Given the substantial environmental, landscape and community impacts, a more proportionate alternative should have been rigorously evaluated before concluding that an 840 MW installation is necessary.

Questions also remain regarding the long-term financial structure and deliverability of the project. Given the scale of the proposal and the outstanding uncertainties regarding grid connection infrastructure, it is important that the Secretary of State is fully satisfied

that the scheme can be delivered, operated and ultimately decommissioned without imposing unacceptable risks on local communities or the public purse.

Additional Outstanding Matters

A number of further issues remain unresolved, including:

- The continuing disagreement with Oxfordshire County Council regarding minerals and waste matters.
- The ongoing disagreement concerning the acquisition of roadside verges.
- Outstanding concerns relating to aviation safety for trainee pilots.
- The continued appearance of the Lower Road cycle route within project documentation despite indications that it would be removed.
- The absence of meaningful progress regarding community food-growing proposals.

Collectively, these matters reinforce the conclusion that key elements of the proposal remain uncertain and insufficiently justified.

Conclusion

The NPPF requires decision-makers to weigh the benefits of development against its adverse impacts. Whilst I acknowledge the importance of renewable energy generation, I do not believe that the applicant has demonstrated that the significant impacts on landscape, heritage, biodiversity, flood risk and local communities have been adequately addressed.

The proposal conflicts with key objectives of the Cumnor Neighbourhood Plan relating to the protection of rural character, valued landscapes, environmental quality and local distinctiveness. It also leaves substantial uncertainty regarding deliverability, mitigation, restoration and long-term stewardship.

For these reasons, and having regard to the cumulative weight of the unresolved issues identified above, I respectfully request that development consent be refused.

It is time to say a straight "no" to Botley West Solar Farm.