

Submitted by email to:
"botleywestsolar@planninginspectorate.gov.uk"



Secretary of State for Energy Security & Net Zero
Department of Energy Security and Net Zero,
3-8 Whitehall Place,
London
SW1A 2AW

4 October 2026

Dear Secretary of State,

The Infrastructure Planning (Examination Procedure) Rules 2010

*Application for an Order granting Development Consent
for Botley West Solar Farm –(EN-010147)*

Stop Botley West (SBW) regrets the necessity to respond further to the submissions by the Applicant to vary the proposals in the DCO to the Botley West Solar Farm (BWSF) project. We would not want our silence to be interpreted as tacit agreement but for the avoidance of any doubt about our concerns, we are submitting our response which is attached to this letter as Appendices 1 and 2.

Appendix 1

- The NSIP Process timeline slippage.
- Criticism of late submissions.
- Failings in Community Engagement.
- Systemic Failures in the Residential Visual Amenity Assessment (RVAA) and Buffers
- Democratic and Procedural Evasion. The new outline Residential Visual Amenity Plan (oRVAP).
- Irreconcilable Infrastructure Timelines.
- NGET sub-station has no planning consent.
- Change in the planning balance.

Appendix 2

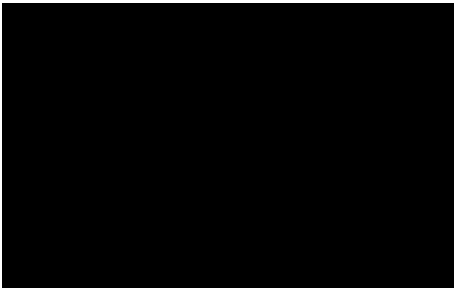
- Response to the Applicant's late submissions of 16 July.
- Missing or incomplete information.
- Unresolved issues.

Conclusion and Request for Refusal

The common thread across all aspects of PVDP's application is a reliance on incomplete, inaccurate, and manipulated data, combined with a strategy of delaying critical assessments until after the DCO is secured. We contend that the SoS has been denied the accurate, reliable information necessary to make a balanced lawful planning judgment.

The Application fails to meet evidentiary thresholds, and time has finally run out for the Applicant, and the required work has simply not been done. We respectfully suggest that any further submissions by the Applicant should be refused as there is no time for IPs to review them as part of the democratic planning process. The application fails to meet basic evidentiary thresholds and relies on active misrepresentations.

We urge the SoS to refuse this application outright.



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Botley West Solar Farm EN010147
Response by Stop Botley West (SBW)



Appendix 1

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The NSIP Process timeline slippage

The NSIP process timeline is set out in the 2008 Planning Act. The Secretary of State for Energy and Net Zero (SoS) has three months since receiving the Examiner's recommendation to accept or refuse the grant of a DCO. The decision was due in May 2026 but in a Request for Information (RFI) the SoS requested answers to a further 72 questions, mainly of the Applicant, giving another deadline of 9 June. On 8 June, the Applicant's request for further time to submit fresh information was refused. Interested Parties (IP) then had until July 16 to submit responses to the published documents. Over 200 did so on time by 2 July. These responses were published on 2 September 2026 and were overwhelmingly critical of the project.

Criticism of late submissions

After being refused an extension beyond 9 June by the former SoS, the Applicant nevertheless appointed a new landscape consultancy to prepare an RVAA assessment. It then submitted a further 25 documents on 16 July, five weeks late! These were published on 4 September. IPs now have until 4 October to respond, yet again, to the Applicant's submissions.

In a letter to all IPs the SoS is critical of the late submissions and makes clear "...she does not expect any further substantive information to be submitted in response to the RFI which concluded 9 June 2026"

So, it appears that, while new SoS has set the rules, the ExA has meticulously implemented them and all IPs have respected and abided by them, the Applicant has not and now appeared to be setting their own timetable.

The Stop Botley West campaign and many others still have concerns.

Failings in Community Engagement

Botley West Solar Farm was first proposed nearly four years ago. The 4 October 2026 deadline for IPs to respond is the 14th such consultation or examination deadline. For 12 of those deadlines, the Applicant refused to make any but a few minor changes to its Application despite the many serious and well justified concerns expressed by one County Council, three District Councils, 15 Parish Councils, around 1,400 local residents and businesses registered as IPs, by Stop Botley West and by the Examiners themselves.

IPs living in this community have prepared detailed responses and submitted them at each deadline on time and in good faith that their concerns would be taken seriously and responded to fairly and in a timely manner. They are disappointed to be asked to respond yet again to so many outstanding issues.

SBW has consequently suggested that supporters who are not willing or able to submit another individual response should send instead a simple endorsement of the comprehensive SBW submission (C2-161) to demonstrate their continuing concerns.

Systemic Failures in the Residential Visual Amenity Assessment (RVAA) and Buffers

This misrepresentation is part of a wider pattern of procedural evasion. Despite clear and repeated instructions from the ExA, the Applicant has continuously failed to produce a satisfactory property-by-property RVAA.

Note: The Applicant has still made no attempt to visit the properties or complete the site-by-site assessment requested by the ExA or the OHA. The most recent RVAA in the 16 July submission was entirely desk based.

Buffers proposed by the Applicant were a derisory 25m when the Application for DCO was submitted in Dec 2024. This position was vigorously defended throughout the examination despite criticisms and requests for justification from ExA and many other IPs. Apart from a few individual minor changes, it was not until D6 of the Examination that the Applicant's position began to shift and, when the SoS also questioned them on buffers (Qu 27-28, letter of 14 April 2026), the Applicant proposed a starting point to buffers at 250m (9 June) then changed it back down to 100m (late submission of 16 July 2026). This late change is unacceptable so late in the process and it is neither explained nor justified other than by the "professional judgement" of their experts.

Note: They "stood down" one set of experts (RPS) and employed another after the Examination ended (Iceni) which speaks volumes about their confidence in advice provided.

Democratic and Procedural Evasion

The Applicant proposes to defer the final decisions on buffer boundaries until after the DCO is granted, leaving them to be finalized privately with local authorities. This is dangerous and undemocratic, as it denies IPs their statutory right to consult on

final site layouts and gives the Applicant freedom to do what suits its business model. Furthermore, delaying these important decisions is entirely impractical - the relevant local authorities have already stated clearly on the record that they lack the time, resources, and technical expertise to handle these complex micro-siting decisions post-consent.

Irreconcilable Infrastructure Timelines

PVDP continues to maintain an unrealistic connection date of late 2029. At the same time, National Grid (NGET) explicitly forecasts that the required substation will not be completed or ready to connect until the final quarter of 2031 at the earliest. Crucially, NGET has not yet decided on a location or submitted a planning application for this substation to the Vale of the White Horse DC.

NGET sub-station has no planning consent.

The ExA suggested a Grampian clause in a Schedule 2 Requirement to prevent the commencement of the project until the NGET sub-station, into which BWSF will connect, has received planning consent. The Applicant has bypassed this safeguard, employing procedural devices to avoid waiting for substation approval. This forces the decision-maker to evaluate a highly speculative project with uncoordinated infrastructure impacts.

Change in the planning balance!

By negotiating to sell some of the generated electricity privately, the Applicant will not be able to supply 275,000 homes as it still claims. The balance is now tipped in favour of the private sphere (the Applicant and Exeter College) to the detriment of the public sphere (household renewable electricity).



Appendix 2

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Response to submissions of 16 July

Sections A to G contain the responses by SBW to the 25 late submissions of 16 July 2026. SBW has already addressed the matter of missing or incomplete information from the Applicant that had been repeatedly requested during the Examination. Multiple examples of this were provided in the SBW submission of 16 July. [C1-161] and almost none of these matters have been fully addressed by the Applicant in the late submissions of 16 July and remain unresolved.

This response highlights SBW's concerns about the Applicant's latest responses and about its ability to be trusted to deliver this project if the DCO were to be granted. The remainder of our response lists information still missing or incomplete and summarises the unresolved issues.

It is these deficiencies and unresolved matters, including the many design flaws identified in previous well-evidenced responses, which lead us to ask the SoS to refuse the grant of a DCO.

A. The Introduction of an outline Residential Visual Amenity Plan (oRVAP) and updated RVAA

In the Applicant's latest (16 July) submission [C1-108, C1-109], its newly appointed consultants, Icen, have devised an "outline Residential Visual Amenity Plan" (oRVAP) Ref [C1-108] offering 100m as standard "with additional offsets up to 250m applied where needed". No criteria have been provided to explain how this "need" would be assessed post consent when it will be beyond public scrutiny.

Through this mechanism the Applicant has effectively changed the likely buffer for most properties to the minimum 100m instead of the buffer of 250m recommended by ExA and shown in the 9 June submission. By describing this change as an "improvement" comparing the new Masterplan (rev 5) with Masterplan rev3 of 11 Nov 2023 rather than with Masterplan rev4 of 9 June 2026, the Applicant has disguised the fact that the latest proposal is actually a regression.

The Applicant's answer to SoS [C1-087, para 24(b)] states: "An updated RVAA is to be produced to ensure a comprehensive assessment is undertaken and to inform an appropriate offset as part of the detailed design stage."

It is not clear how the assessments made in this latest updated RVAA can be described as "comprehensive". It appears to be a completely desk-based assessment. Not a single property has been visited, and the report offers no photographs to illustrate the view outwards from any property or the level of existing screening, and no visualisations to illustrate the claims that "new planting would over time further screen available views".

The same errors in the descriptions of existing screening vegetation are present as those previously submitted by the Applicant. Photographic evidence of many erroneous descriptions has been submitted more than once by SBW eg in the SBW Community Impact Report [REP2-081] and the most recent 16 July 2026 response from SBW [C1-161, section 5]. Many residents have responded to refute the description and assessment of their own properties.

SBW visited over 40 of the most impacted properties, took photographs from within the curtilage looking outwards from many and interviewed residents. The Examiners themselves reported on seven visits to the site [EV2-001 to EV2-007] and made an accompanied site visit to residential properties. The Applicant has provided no evidence of any visits.

How is it that in just five weeks, without making a single visit to a property, the Applicant can change its assessment of visual impact and appropriate buffers yet again?

June 9	July 16
Masterplan revision 4 [C1-051]	Masterplan revision 5 [C1-118]
Buffer of 250m shown	Buffer of 100m shown
New requirement 15 in Schedule 2 of dDCO describes a post consent RVAP (newly proposed on 9 June and not formally examined by ExA) which must set out justification for the distance proposed between 100m and 250m and must be approved by the local planning authority.	Amended requirement 15 in Schedule 2 of dDCO says: <i>"The RVAP must be substantially in accordance with the outline RVAP"</i> . Note: this oRVAP [newly proposed on 16 July] has not been formally examined by ExA nor approved by the local planning authority.
In response to the SoS request for information (letter 20/4/2026), the Applicant offered to increase the buffer distances from sensitive receptors [to 250m], as illustrated in the updated Masterplan Rev 4, stating: <i>"It is judged that these updates would result in beneficial effects for a number of individual residential receptors and settlement areas including, but not limited to, the residential visual amenity of Dornford Cottage, properties at Shipton Slade Farm, properties in Bladon, Burleigh House, College Farm and Church Hanborough"</i> .	Masterplan Rev 5. [C1-020] is informed by the new RVAA which repeats the previous errors in assessing whether vegetation already screens the property and consequently underestimates the impact on residential visual amenity for properties such as Dornford Cottage, Shipton Slade, College Farm, Goose Eye Farm and others. The effect of reducing the buffer to 100m would be to reverse the "beneficial effects" described on 9 June.

There is no explanation for these further changes other than "professional judgment" which apparently differs from the Applicant's judgment on 9 June. By the Applicant's own admission, the project is still viable, albeit marginally, with 250m buffers for most properties - so where is the justification for the turn-around to 100m for most? [C1-087, para 27]

The plan for decisions to be made post consent had already been described unworkable and undemocratic by Oxfordshire Host Authorities (OHA) [C1-024].

In the more recent Botley West Position Statement between Applicant and OHA [C1-109], it is clear that OHA still has serious concerns. A summary of OHA's position on 16 July is as follows;

The OHA retain concerns around the drafting of Requirement 15. These concerns relate to both the effectiveness of the requirement and challenges with the implementation of the requirement.

Whilst the OHA consider the scheme proposed in the Master Plan Development and Rationale document is a betterment from the scheme proposed at the end of the examination, this scheme falls short of addressing the concerns raised by the OHA throughout the examination. In [REP6-118] the OHA outlined the reductions in the scheme that the Host Authorities consider would reduce the landscape and visual impacts below a significant level of impact. The revised scheme proposed by the

*applicant falls short of the reductions required by the OHA as outlined in [REP6-118] and as such **this matter remains unresolved.***

B. Changes to the dDCO, schedule 2, requirement 15 and to the buffers offered.

Schedule 2, requirement 15 was introduced for the first time on 9 June [C1-098, C1-100, C1-103] and, five weeks later, a seemingly minor amendment was introduced that has a significant effect on Residential and Visual Amenity for many residents. In conjunction with the new oRVAP (see section A), it means that very few changes from the 100m buffer defined in the oRVAP can be expected post consent.

Both the RVAP and the oRVAP, introduced to the dDCO since the end of the Examination, are totally new mechanisms. They have been devised by the Applicant to enable the decision on the important matter of Residential Amenity and buffers to be made post consent and beyond the reach of public scrutiny. This is unfair and undemocratic.

June 9	July 16
New requirement 15 in Schedule 2 of dDCO describes a post consent RVAP (newly proposed on 9 June and not formally examined by ExA) which must set out justification for the distance proposed between 100m and 250m and must be approved by the local planning authority.	Amended requirement 15 in Schedule 2 of dDCO says: " <i>The RVAP must be substantially in accordance with the outline RVAP</i> ". Note: this oRVAP [newly proposed on 16 July] has not been formally examined by ExA nor approved by the local planning authority.

C. Masterplans and buffers

In the original DCO Application documents submitted in November 2024, the Applicant states: “Minimum distance between residential property boundary and table areas [panels] is approximately **25m**” Ref [APP-037].

This minimum distance was vigorously defended by the Applicant throughout the Examination despite repeated calls and suggestions for panel omissions from ICOMOS, Historic England, Oxford Airport, Oxfordshire Host Authority, West Oxfordshire District Council, Cassington and Cumnor Parish Councils, Stop Botley West, hundreds of other IPs and from the Examiners themselves. It was not until deadline 6 of the Examination that the Applicant submitted a partial RVAA and made a “without prejudice” offer of **75m**. The ExA sent a rule 17 letter [PD-018] in which they pointed out numerous errors in the attempted RVAA, questioned the justification for the 75m and suggested a 250m buffer:

“The ExA, in light of the omissions and errors in the RVAA listed above, remain concerned about the applicant’s approach to this matter. The ExA note that there is a “without prejudice” sets of plans from the applicant showing greater buffers in respect of some properties, but that the buffer of 75m does not appear based on any guidance or relation to the Landscape Institute Guidance Note 2/19”

There seems to be no landscape design basis for the constantly varying buffer sizes other than an attempt to agree the minimum possible buffers that would get this Application “over the line”.

There is no justification for the most recent reduction of buffer size from 250m to 100m for most properties. Indeed, in its answer [C1-087] to question 27 of SoS 14 April letter, the Applicant admitted that that the project would still be viable, albeit marginally, with 250m buffers for all.

The Applicant says:

“The physical effect of imposing up to a 250m buffer is shown on the updated Masterplan (Figure 2.1a - 2.4c, Rev 3, dated 03.06.2026). The Applicant is still able to deliver on its Point of Connection agreement with NESO (of 840 MW), albeit at the expense of a loss of the total amount of KWh as a result of the reduction on solar array areas.”

Note: The Masterplan dated 3 June showing 250m buffers is Rev 4 not Rev 3 as the Applicant states here

Since the last week of the Examination, the Applicant has submitted 3 different Masterplans.

Masterplan revision 3 [REP7-020] of 11 Nov 2025 shows buffers of **75m**.

Masterplan revision 4 [C1-051] of 9 June clearly shows buffers of **250m**.

Masterplan revision 5 [C1-118] submitted on 16 July conversely shows buffers of **100m**.

Most interested parties have relied on the Masterplans to assess the design features of the Botley West site. The conflicting submissions regarding buffers have made it almost impossible for the average resident and interested party to follow what is being proposed, how the plans have changed and how the changes may affect their residential visual amenity.

D. Recent changes in the Applicant's proposals affecting costs/benefits and the planning balance.

The applicant has submitted many different values for the total installed capacity of BWSF which in turn affects the total amount of electricity produced. The planning balance between 'pain' and 'gain' is therefore difficult to determine. Even after the applicant's 16th July 2026 submissions, the applicant's senior representative, in public meetings and to newspapers, has given new values for installation capacity and performance that were never clearly specified as the 'final size' or 'output' for BWSF in any of the applicant's documents formally submitted to PINS. Not only is the applicant now apparently driving the entire examination timetable it also appears to be changing its design parameters outside the formal examination process (pleading a Rochdale envelope submission). PINS documents warn that the Rochdale envelope approach *'should not be treated as a blanket opportunity to allow for insufficient detail in the assessment'*.

In its covering letter of the 16 July submissions the applicant mentions, for the first time on paper, advanced negotiations with Exeter College Oxford, to provide the College's proposed Innovation Quarter (EXOq) with renewable electricity for its High-Performance Computer and Data Centre near Kidlington, Oxford. Calculations suggest this would require about half the total annual output of electricity from an 1100MWp capacity BWSF. This would significantly shift the planning balance away from public to private gain, reducing the number of households that might be supplied by BWSF's electricity from 281,101 to only 137,410 (less than half of Oxfordshire's current household number of c. 288,108, 2021 census). The impact on the livelihoods of local people, the natural environment, the UNESCO Blenheim WHS, the airport, the flood risk to Cassington would all remain the same as before. This is another example of the applicant changing its application significantly, after the end of the formal examination process.

The implications of the above changes are analysed in full in separate 4th October submissions from Cumnor Parish Council and Prof. David Rogers which we fully endorse.

E. Further response to Guide to the Application Rev 13 [C1-096]

In addition to the issues outlined in D, above, we note many other contradictory, exaggerated and unjustified statements, for example regarding grid connection, substation location, choice of site location in the revision 13 of the Guide to the Application.

For further details, please refer to pages 3-6 in the Cassington Parish Council response of 4 October which we fully endorse.

F. Heritage and Landscape. Settings Assessment Rev 5 [C1-113]

Question 19 from the Secretary of State's RFI of April 2026 required the applicant to respond to the three ICOMOS Technical Reviews. [EN010147/APP/20.3] Page 51

There was no response or discussion of the first technical review on the grounds there had been changes to the project. But that Review recommended that no solar panels be put on the southern site, the valley of Tumbledown, close to Cumnor. This was ignored.

In the second Technical Review, submitted by Historic England in August 2025, ICOMOS requested a comprehensive Landscape Character Assessment. In June 2026, the Applicant said that it was unreasonable for the determination of the DCO application to be delayed by

this rather key element of landscape expertise. It was claimed that it was the responsibility of the State Party.

The Applicant has made no further comment in its late submissions on 16 July. The revised Landscape Character Assessment requested by ICOMOS has not been undertaken so the issues raised by ICOMOS remain unresolved. A Heritage Alert for Blenheim WHS has already been submitted to ICOMOS and copied to ExA during the Examination [REP1- 113].

For further concerns on settings, please refer to pages 10-14 in the Cassington Parish Council response of 4 October which we fully endorse.

G. Ecology and Bio-diversity net Gain. [C1-102, C1-105, C1-115, C1-116]

Very little has changed in these documents.

The proposed skylark compensation strategy is incomplete and unworkable.

Regarding skylark displacement from the southern site, there is no land owned by any Blenheim entity. The nearest Blenheim land is more than 5km away in the proposed central site and those fields immediately north of the A40 will be filled with panels.

Ecologists generally recommend that off-site skylark mitigation plots be located within the same agricultural holding or on directly neighbouring farmland to remain effective for the local population.

This is all further complicated by the cumulative impacts of the Red House Solar proposal and its off-site solution which places their plots immediately adjacent to Botley West's panel filled and substation filled fields.

No change in the current mitigation strategy for bats.

For details on this and other Ecology/BNG issues in, please refer to pages 14 -23 in the Cassington Parish Council response of 4 October which we fully endorse.

Information requested during the Examination that is missing or incomplete.

Apart from the issues already responded to above, little has changed in the Applicant's latest submissions. Oxfordshire Host Authorities (OHA), other IPs including SBW, and the ExA itself have identified on multiple occasions a number of deficiencies, including errors and omissions, in the Applicant's previous submissions. Regrettably, the Applicant has continued in its failure to engage fully or to address these deficiencies (see SBW's latest detailed submission of 16 July. [C2-161]).

This list summarises these full or partial omissions:

1. No evidence of Applicant's sound financial background (requested by ExA). No accounts published since 2014
2. No evidence of previous track record in delivering solar farms of any size approaching that of BWSF, as requested by ExA. The claim to have built 480M Ukujima solar farm in Japan has been disproved. Construction did not start until 2024, years after PVDP had sold its interest, and has still not been completed (see REP1-159 and REP3-114). This is one of many points on which the integrity of the Applicant can be called into question.
3. No report on property-by-property visits for the RVAA, as requested by ExA and OHA
4. No plans showing cumulative area suggested for panel removal by IPs, as requested by ExA.
5. Several highly impacted properties including Farways and adjacent properties in Cassington have still been completely omitted from the revised RVAA.
6. Thumbnail maps are offered for each assessed property in the new oRVAP but none of the following is provided:
 1. Photographs to substantiate the claims of "current vegetation screening the property" - many of these claims have already been proved wrong by SBW's own photographic evidence. [REP2-081 Community Impact Report, C1-161, section 5]
 2. No indication on maps as to location of "new hedgerow plantings"
 3. No visualisations of any examples of such planting
7. No consultation with Parish Councils or the community about the need, proposed use or location of "Community Food Growing" areas (see Section 4: Unresolved issues para 7 for further detail)
8. No consultation with Flight Training Schools regarding Pilot Training at London Oxford Airport
9. No evidence to support the Applicant's claim that no further action on flood risk is necessary despite clear Scientific evidence to the contrary (see Unresolved issues para 3 for further detail)
10. Location of sub-station and connection date still under discussion

- 11.** Exact route of cabling near and under the Thames has still not been finalised.
The impact on Siemens of cable trenching/tunnelling on or near the only access road to their MRI scanner manufacturing facility is an ongoing concern.
- 12.** No plans are provided for the decommissioning fund requested by ExA.
- 13.** No proposal to change the red-line boundary (see Section 4: para 1 below for further detail)
- 14.** The Landscape Character Assessment requested by ICOMOS not completed (see Section 2F)

Unresolved issues.

This section deals with particular unresolved issues and provides more detail on some resulting from incomplete information as listed above. No changes have been made to the new submissions published on 4 September or, in many cases, since the end of the Examination in November 2025.

1. Red line Boundary.

No attempt has been made to address this issue despite significant areas of land now proposed to be without panels.

- The total proposed reduction of panel area is currently at least 300ha but could increase post consent if larger buffers are agreed. During the Examination the ExA asked the Applicant to justify the retention of just 17.6ha where panels were to be removed near Bladon
- In Question 2.5.4 in ExA 2nd Written Questions [PD-012] the Applicant was asked to justify why 17ha, removed from the panel area, are still retained within the red line. It was pointed out that, in line with Government guidance, 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”**
- The Applicant’s answer concluded: “In addition to the provision of BNG, the Applicant’s view is that the land is necessary to reduce adverse impacts to birds from habitat loss and, as such, it would not be better served in its current agricultural use”
- While this could be argued for 17ha, it cannot be justified for 300ha - or more. **The red line boundary should be redrawn**, and land returned to agricultural use.
- This would require a change request to be submitted for consultation. As the SoS’s letter of 4 Sept makes clear: “no further substantive information should be submitted by the Applicant”, **so the current Application should be withdrawn and resubmitted with these changes.**

2. Requirements and Protective Provisions (Schedule 2)

- I. **National Grid Substation.** ExA recommended a Grampian Clause relating to National Grid substation - that construction of BWSF should not start until the substation has been granted planning permission.
- II. **Decommissioning fund.** ExA recommended an amendment to the DCO to ensure that a decommissioning fund (as well as a plan) is in place before construction starts.
- III. Neither of these clauses has been added to the dDCO as required by the ExA.

3. Trainee pilot safety.

This is a major risk with the current panel layout. Further significant panel removal to avoid glint and glare near the airport is required. See C2-210 and C2-176.

4. Flooding.

No panel pull-back to mitigate flood risk despite well evidenced responses from Cassington and Cumnor Parish Councils and their Hydrology Experts. Scientific evidence cited by SBW [C2-161 section 11] massively supports the view that solar arrays can lead to increased rates of runoff as a result of the drip-line effect. In some cases, this can be a substantial increase. (See also REP7-068, REP7-077, C2-162 and C2-169).

Please refer to pages 29 -40 in the Cassington Parish Council response of 4 October which we fully endorse.

5. Site of Special Scientific Interest (SSSI)

A large part of the central site is now on the list for proposed SSSI designation, to be named the Three Rivers SSSI based on the presence of the rivers and river valleys in the region. This needs to be considered by the Secretary of State in weighing up the planning balance. See: C2-161 section 7

6. Ecology/BNG.

Many issues are still unresolved (see section 2G above and 4 Oct Cassington PC submission pp14-23)

7. Community food growing

The misleading name implies allotments which are not needed (enough exist already in each village location) and could not be effectively used or managed at the scale proposed. These areas should be removed from the red-line boundary and returned to the former productive agricultural use as already requested by SBW and others. See: REP5-072, REP5-093, REP6-076 and C2-161 section 10.

8. Proposed cycle path along Lower Road.

This is still showing on the Masterplan. This path should have been removed from the Application - as had been verbally agreed during an Accompanied Site Inspection on 7 October 2025. It is dangerous (it crosses the busy Lower Rd twice) and adversely affects the privacy of two properties it passes within a few metres. Oxfordshire County Council has proposed a safer cycle path for Lower Road in its Local Plan.

9. Minerals and Waste.

Oxfordshire County Council (OCC) still disagrees with the Applicant regarding these issues.

10. Compulsory Acquisition of roadside verges.

This is another unresolved disagreement between the Applicant and OCC.

11. Siting of Panels near residential areas

The size of buffers still remains unresolved. The Residential Visual Amenity Plan (RVAP) and the new Outline Residential Visual Amenity Plan (oRVAP) attempt to circumvent public scrutiny and deny the public's right to consult or comment on the final site design. These issues are dealt with in detail in Appendix 2 A-C above.

September 2026