

CUMNOR PARISH COUNCIL

Secretary of State at DESNZ
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2nd October 2026

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BOTLEY WEST SOLAR FARM (BWSF) REF: EN010147

Dear Secretary of State

In response to your 4th September 2026 invitation to comment on 25 late submissions by the Applicant (**EN010147-002974**), Cumnor Parish Council (CPC) as an Interested Party (IP # 20054739) today submits this document to you by email, comprising this 2-page covering letter, an assessment of the 25 late submissions and a compilation of missing, incomplete or inaccurate information requested from the Applicant by IPs, the ExA and yourself.

Ordinarily CPC would be content for this document to be assessed against the Applicant's 25 late submissions without further comment.

However, CPC in sharing the Secretary of State's (SoS) disappointment '*that this information was not provided by the specified deadline*' also wishes to put on record its concern that the Applicant now seems to be deliberately abusing due process, some 11 months after the end of the formal Examination stage.

That this extra unscheduled and unprecedented extension of the Decision phase is happening at all demonstrates that the Applicant is seeking to set their own agenda and timeline for this NSIP process, making an ever growing number of inconsistent and unevicenced claims in their submissions outside the formal Examination process.

This smacks of desperation on the part of the Applicant, rather than reasoned, considered, evidence led responses to oft repeated questions by yourself, the ExA and IPs.

In addressing one of the Applicant's previous attempts to manipulate the Examination and Decision phases of this process, your predecessor wrote that:

"The Secretary of State considers that maintaining discipline within the statutory framework established by the Planning Act 2008 ("PA 2008") is of fundamental importance to the efficient and fair operation of the development consent regime.

Agreeing to an extension of the duration sought, and at a late stage within the RFI response period, could create an undesirable precedent and risk undermining confidence in, and the

integrity of, the planning process. It may also give rise to concerns of fairness, as other respondents are working to the existing timetable and would not have benefited from an equivalent extension."

That 8th June 2026 statement was in response to the Applicant's attempt to extend the deadline for their submissions into September 2026.

That CPC and all the other Interested Parties are, one month later in October 2026, responding to 25 late submissions made in July 2026 and published in September 2026 confirms the '*concerns of fairness*' raised by the Rt Hon Ed Miliband.

In light of this CPC wishes the SoS to be aware that this response to the Applicant's 25 late submissions should be read as additional to those responses made previously by this IP, those responses over 2+ years culminating in our 16th July response (**C2-169**).

CPC does so having assessed the 25 late submissions both in their own right and also against other submissions made by the Applicant in the Decision phase (for example Masterplan revision 4 **C1-051** dated June 2026) and their prior assertions in the Examination phase.

Our assessment shows a continuation of the pattern of responses set by the Applicant from its very first attempt at 'Community consultation' in 2022.

This pattern starts with ignoring questions whether they be from yourself, the ExA, or IPs, moves through repeatedly refusing to provide the information required (e.g. site selection criteria, mitigation hierarchy, a Grampian condition for the proposed NGET Farmoor substation, decommissioning bonds etc. etc.) and then belatedly, inaccurately and partially (in all senses of the word) attempts to provide evidence free explanations, the vast majority of which seem to be variations of 'we will tell you the answer to that once we've been granted development consent'.

Given that this is still the position you, the ExA and Interested Parties find themselves in; that the Examination Phase for this planning application concluded 11 months ago; and mindful of your Department's concerns back in June of '*undermining confidence in, and the integrity of, the planning process*', we ask you to agree with our considered position:

- That the Applicant has repeatedly failed to provide the required detailed accurate information within the published deadlines.
- Having failed to do so, the applicant has not even met the evidential thresholds for the planning balance to be properly assessed, let alone made an application that can be approved or rejected based on an assessment of evidence meeting those thresholds, and so
- The application should either be refused or withdrawn and resubmitted.

Cumnor Parish Council
2nd October 2026

1. Cumnor Parish Council's Assessment of the Applicant's 25 late submissions

Given this IP's very limited resources it is not possible within the timeframe available to it to comment on all the errors and omissions in every part of every document submitted late by the Applicant.

Instead, CPC draws the SoS's attention to some of the most significant errors and omissions, all of them emblematic of the Applicant's approach to this application.

1.1. C1-108 Outline Residential and Visual Amenity Plan (oRVAP)

This appears to be the Applicant's latest attempt to avoid submitting a complete and accurate RVAA.

Instead, **C1-108** claims to be an 'Outline' of what the Applicant now calls a 'Residential and Visual Amenity Plan'.

It is immediately apparent that even taken on its own, **C1-108's** self-description as an 'outline' requires that word to do some very heavy lifting.

When set against nearly 3 years of obfuscation, during which the ExA/SoS has made repeated requests to the Applicant for an RVAA (see Table 1 below) it is simply not credible.

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| <ul style="list-style-type: none">• July 2023 (APP-126 6.5 ES – Appendix 4.2 Scoping Opinion in ID3.2.3, table 7.3)• June 2025 (PD-008 Q1.14.4 Residential Visual Amenity Assessment RVAA)• July 2025 (PD-012 ExQ2.13.15)• 9th October 2025 (EV7-010 ISH2 transcript part 4 at 00:10:11:26 - 00:10:42:09).• 20th October 2025 Applicant submits REP6-064 and REP6-065 in which all the photographs were taken on 14th October 2025 and where all the maps are dated 'OCT 2025'• 23rd October 2025 in PD-018 the ExA points out 10 errors and omissions in the 20th October submissions and questions the Applicant's methodology.• Applicant issues thinly revised REP7-042 at Deadline 7 which subsequent assessment has shown repeats the errors, omissions and methodological flaws of its predecessors• On 14th April 2026 SoS Q26 (EN010147-002429-Secretary of State First Request for Information dated 14 April 2026) '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' |
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Table 1 Timeline of ExA/SoS requests for an RVAA

CPC observes that the new oRVAP has been produced by Iceni and not by PVDPs previously ubiquitous consultants RPS.

As recently as 3rd August 2026, the CEO of PVDP told CPC (CPC minute 203/26) that both RPS and Icení had advised that they don't need an RVAA but "*we have answered it*"

The CEO of PVDP also informed CPC at its 3rd August 2026 meeting - at which he had asked to speak - that PVDP had "*stood down RPS*" and that PVDP had "*got rid of them*".

That being the case, CPC asks the SoS to consider why the Applicant is still relying for all other aspects of its application on documents authored by RPS?

Against this background of a rapid reverse ferret on the contribution of the Applicant's previous consultancy employed for 3+ years, key evidential deficiencies (methodology, omissions, errors of fact etc.) in **C1-108** include:

- It is a completely desk-based assessment reliant on Google maps.
- No properties have been visited, including the Hill End Outdoor Education Centre.
- No residents have been consulted, including it would seem even the landowner of Denman's Farm, the property on which the Southern site is predicated (see **C2-170**)
- The report provides no photographs of the views outwards from any property or the level of existing screening, and no visualisations to evidence the claims that '*new planting would over time further screen available views*'.
- The Applicant repeats the same errors in the descriptions of existing screening vegetation as it asserted in previous submissions. Photographic evidence of many erroneous descriptions has been submitted more than once both by this IP (e.g. **REP7-077**) and by Stop Botley West (e.g. **C1-161**)
- In applying its own criteria (see para 3.1 of **C1-108**) the Applicant has failed to consider the following properties in this Parish, all of which have curtilages within 250m of the proposed order limits
 - All of the properties on the B4044 in Farmoor
 - All of the properties on the B4017 in Farmoor and Filchampstead
- The Applicant has also continued to ignore the visual impact on the nationally renowned Hill End Outdoor Education Centre, a registered charity, which for more than a century has provided residential accommodation to thousands of students a year (6,525 in 2025-26) and is also home to a number of members of staff (see this IPs **REP 7-077** para 8.5 and Hill End's **REP7-229**).

The intervisibility of the applicant's proposed southern site and the proposed NGET substation to and from Hill End was observed by the ExA during their Accompanied

Site Inspection on 7th October 2025 and on their Unaccompanied Site Inspections **EV2-001** and **EV2-006**.

These evidential deficiencies coupled in turn with the Applicant's deficient judgements has led this IP to make the following assessment:

- The Applicant attempts – wrongly – to present 100m panel buffers as an 'improvement'. It is not. The Masterplan Revision 5 (**C1-118** of 16th July 2026) is in fact a retrograde step from the proposed 250m buffer – as requested by the ExA – in Masterplan Revision 4 (**C1-051** of 9th June 2026) and at which level the Applicant in their answer to Q27 in **C1-087** said the project would still be viable.
- No explanation for this backwards step is offered save '*professional judgement*' with no explanation of how such judgement can change radically in a 5 week period between June and July 2026, some seven months after the end of the Examination phase, unless it is purely attributable to the change of consultancy from RPS to Iceni.

If so, then shouldn't the SoS invite the Applicant to withdraw all RPS's assessments across the whole application for similar reconsideration?

- Notwithstanding the newly proposed 100m buffer, p63 of **C1-108** attempts to justify a 14m buffer for Denman's Farm. Even this strains the envelope of truth since the 14m is not measured from the curtilage as required (Landscape Institute Guidance Note 2/19), but from the outside wall of the residential properties on that site. In fact, the buffer would be effectively zero since the curtilage is surrounded on all sides by Fields 3.10-3.14 and 3.17.
- Page 65 of **C1-108** repeats this flawed evidence and assessment process. The buffer for Jumpers farm is now shown to be 70m – so less than 100m – but again not measured from the curtilage but from a more tightly drawn perimeter.

In addition, the claimed 70m buffer ignores proposed substations in Fields 3.1 & 3.3, the buffer being arbitrarily 'redefined' by the Applicant to panels only, not including the more visually intrusive 75m long x 15m high substation buildings and ancillary equipment which form part of the ExA/SoS definition of '*any part of the proposed operational solar array*' (**PD-018** and **SoS Q27**).

- CPC therefore asks the SoS to refuse the application on these and the other grounds listed below, or if minded to approve to either adopt the OHA position of removing the Southern site in its entirety, or the ExA's stated position of a minimum of 250m pull back for all infrastructure (not just panels as the Applicant has unilaterally redefined the 'ask') from the curtilages of all residencies with special consideration being given to the visual – and hence business – impacts on the Hill End Outdoor Education Centre.

1.2. C1-097/C1-098, C1-099/C1-100 and C1-103 Changes to the dDCO, schedule 2, requirement 15

Schedule 2, requirement 15, was introduced by the Applicant for the first time on 9th June 2026 (C1-082).

It describes a post consent RVAP which must set out justification for a buffer distance between 100m and 250m and must be approved by the Local Planning Authority.

However, the Botley West Position Statement between the Applicant and OHA (C1-109), demonstrated that OHA had serious concerns.

‘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.’

Then, five weeks later in July 2026, the Applicant introduced a seemingly minor amendment to Schedule 2 that would have a significant effect on Residential and Visual Amenity for many residents, by stating:

‘The RVAP must be substantially in accordance with the outline RVAP’

This IP assesses that this proposed amendment, in conjunction with the new oRVAP, means that very few changes from the 100m buffer defined in the oRVAP can be expected post consent.

This IP asks the SoS to acknowledge that both the RVAP and the oRVAP, introduced to the dDCO since the end of the Examination, are totally new mechanisms.

As such 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 so beyond the level of public scrutiny afforded during the Examination Phase.

This IP believes this attempt to push yet more issues beyond the granting of planning permission is another attempt amongst many by this Applicant.

As with its other attempts, this is contrary to both the letter and the spirit of the NSIP Examination and Decision processes, so risking further loss of public confidence in this planning process. It is both unfair and undemocratic.

1.3. C1-111 Masterplan Development and rationale

Building on this IPs concern described in 1.2 above the Applicant's late submission 'Masterplan Development and rationale' (C1-111) contains more errors, omissions and elisions relating to Visual Impact and other issues. These include but are not limited to:

- IPs ability to interrogate this document is curtailed by the animations (e.g. on page 16 of C1-111) of existing masterplan/proposed masterplan not working
- The Applicant makes a number of contradictory statements on page 17 in respect of Jumpers Farm.

The sub head after para 4.4 '*Relocation of the proposed substation..*' and para 4.11 asserts that the mitigation hierarchy '*has been achieved through the relocation of the substation*'

These relocation commitments are contradicted in paras 4.5 and 4.8 which in turn state:

Para 4.5 the **potential** relocation of the proposed substation further to the west

Para 4.8 **Potentially** relocating the substation

So, which is it? Is the substation to be relocated or only 'potentially' so?



Image 1 Extract from C1-110 sheet 13a, a late submission on 16th July 2026

The latter of course, as the July 16th late submission of the 'Landscape Parameter Plan' (C1-110) shows on Sheet 13a (see image 1 above) with the substation and its infrastructure (referred to as Works 3a and 2) in situ where the Applicant has always placed them. Quelle surprise!

- Again, on page 17 the Applicant asserts '*increased separation from the Green belt way*' PRoW.

Unfortunately, the map preceding para 4.16 does not show the Oxford Green Belt Way (PRoW 184/15/30, 184/15/20 and 184/22/10) but instead marks out with a hatched line an entirely different PRoW 184/16/20.

That the Applicant can make so many errors, omissions and elisions on just one page of one report shows the issue facing IPs with this application.

After 3+ years of questioning by IPs, the ExA and now the SoS, the uncorrected error rate, the unwillingness to accept local, detailed information and the generally slapdash attitude to documentation and deadlines says it all.

1.4. Ecology and Bio-diversity Net Gain. (C1-102, C1-105, C1-115, C1-116)

In the Applicant's Outline Skylark Compensation Strategy (**C1-105**) on pages 10-12 there's reference to providing off site compensation on land owned by '*Blenheim Palace*'.

Firstly, this IP believes that to ensure credibility in what after 3+ years remains only an 'outline' strategy, there should be a more exact description of the landowner who will provide such off site compensation, since this description does not match that of any landowner mentioned in the Applicant's Masterplan.

Secondly, regarding skylark displacement from the southern site, there is no land owned by any Blenheim entity that we are aware of in Cumnor Parish. 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.

All of which shows that the Applicant has taken no heed of relevant independent experts. Ecologists 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.

While there is no single statutory "maximum distance," ecological guidelines and practical frameworks dictate 'off site' placement be based on two distinct spatial scales:

- The Foraging Limit: Studies on breeding skylark parameters show they rarely fly more than 300 meters between their nests and foraging areas.
- The Exception: In instances where nearby land is unavailable, regional planning strategies sometimes allow plots further away (e.g., up to 5km if managing large, highly optimal blocks of winter cereals), but this is treated as a regional landscape-scale compensation rather than direct local population mitigation.

In this case the 300 meter 'limit' could clearly not apply to the southern site's skylarks and neither could the 'up to 5km' limit.

This is all further complicated, of course, by the cumulative impacts of the immediately adjacent Red House Farm solar power station proposal and their skylark 'off site'

proposal which places their plots immediately adjacent to Botley West's panel filled and substation filled fields.

But of course, PVDP has continued to studiously ignore any cumulative impacts of their proposal, whether they be to skylarks, bats or humans.

PVDP also seems to have ignored the OHAs actual position on skylark mitigation as stated in their **C2-200**:

The OHA do not have any specific comments to make on the Botley West Outline Skylark Compensation Strategy... the OHA are satisfied with the outline skylark mitigation strategy that has been submitted The OHA are conscious that the applicant is proposing further changes to the project design and as such, final skylark and BNG calculations would be dependent on final layout plans.

This OHA position doesn't seem to this IP to be completely aligned with the Applicant's claim (**C1-107** section 9 Ecology para 9.9) that 'a skylark strategy has been agreed with the OHAs'

1.5. New proposals impacting planning balance and costs/benefits

The Applicant's 16th July covering letter (**C1-094**) mentions for the 1st time that

'PVDP is also in advanced negotiations with Exeter College, Oxford, to supply renewable energy to their 100MW Frieze Farm Data Centre development.'

Those negotiations must be very advanced as **C1-094** goes on to state that:

'The plan is for the project to use its solar generation and connection at Farmoor substation to supply all of Frieze Farm's electricity.'

So where does this leave the statement in the 13th revision of the Guide to the Application (para 1.1.2 of **C1-095**), dated 16th July 2026, that

'it aims to provide secure and clean energy to the equivalent of approximately 330,000 homes.' ?

Is the SoS being asked to believe that '330,000' figure for homes is true, or is it the lower figure of '275,000' in **C1-094**, also dated 16th July 2026?

'landscape improvements come at the cost of reduction in the estimated number of homes to be powered by renewable energy generated by the Project. This is a decrease from approximately 330,000 to 275,000'

But even that can't be a true figure for homes if - by the Applicant's own account – '*the plan*' is for Botley West to supply '*all of Frieze Farm's electricity*'.

Put simply (and CPC refers the SoS to the 4th October submission by IP Professor David Rogers, which it fully endorses) if the '*the plan*' is now for Botley West to supply the 100MW Frieze farm data centre then this would require about half the total annual output of electricity from an 1100MWp capacity BWSF.

This would halve the number of households that might be supplied by BWSF's electricity to only c. 137,000, less than half of Oxfordshire's current household number of c. 288,000.

In doing so it would significantly shift the planning balance away from public to private gain while maintaining the level of public harm: impacts on RVAA, ancient woodland, IUCN Red List species, Blenheim's UNESCO status, Oxford airport pilot safety, flood risk etc. etc.

Furthermore, given that **C1-094** helpfully informs the SoS that the proposed Frieze Farm data centre '*is 2km from the project boundary*' what does this say about the Applicant's other claim that the '*connection at Farmoor substation [is] to supply all of Frieze Farm's electricity*' ?

Is the SoS really being asked to believe that an 8km long (as the crow flies, so more in practice) grid reinforcement project to supply 100MW to a data centre will be constructed between Farmoor and Frieze Farm – including crossing the River Thames – instead of a (currently unspecified) 2km connection from within the Applicant's DCO redline?

If so, what does this say about the Applicant's statements regarding the need for - and location of - a 400kV substation at Farmoor, whether on NGET land (yet to be acquired or for planning permission to be applied for) and/or within the DCO redline?

The Applicant's lack of detail, and the inconsistency between different documents within the same submission let alone between submissions, is again demonstrated here.

This IP believes that this brief analysis is yet another example demonstrating that the Applicant continues to make unheralded major changes to the application, even though we are now in the NSIP Decision phase.

In doing so the Applicant continues to ignore PINS guidance documents which state that the Rochdale envelope approach '*should not be treated as a blanket opportunity to allow for insufficient detail in the assessment*'

2. Information requested by the ExA, SoS and IPs that is still outstanding, incomplete and/or wrong in matters of fact

This IP is not alone in experiencing an NSIP process for the first time. Throughout we have been grateful for the courtesy, assistance and professionalism of the ExA and the PINS staff.

This stands in marked contrast to how the Applicant has behaved towards us and, to our collective amazement, to the ExA, PINS and now it would appear to the SoS.

To say we have been dumbfounded by the Applicant's behaviour over the past four years is to grossly underestimate its cumulative effect.

Throughout all the stages of this application, starting with so-called community consultation in the Autumn of 2022, the Applicant has consistently demonstrated one behaviour: never answer a question if you can avoid doing so; ignore repeated requests no matter who makes them - including by the ExA; and if all else fails attempt to rewrite the question to provide – a still inadequate - response to something else while stating the project must be granted planning permission and all outstanding questions will be dealt with post consent.

So, it will come as no surprise to the ExA and to the SoS that there remain many issues on which the Applicant has not provided information as requested by the ExA and SoS, in some cases at all, and where it has ignored contributions and questions from IPs: including our MPs, the OHA, ICOMOS, the EA, Parish Councils, businesses, residents and the community led Stop Botley West.

The list below is of unresolved issues impacting the Parish this IP represents that have not already been covered in Section 1 above.

It doesn't include unresolved issues that lie only outside this Parish (such as the Applicant failing to consult with pilot training companies at Oxford Airport) but does include issues (such as flooding) where impacts are clear in this parish and beyond.

- No assessment – indeed not even any recognition – of cumulative impacts of the proposed NGET Farmoor substation and the immediately adjacent Red House Farm solar power station
- No evidential responses to any points made by this IP regarding the application's compliance with Cumnor's made Neighbourhood Plan policies, including but not limited to Flood Risk policies, Important Views policies and Green Belt policies.

Instead, the Applicant repeatedly chose to state they had been 'noted' – an essentially meaningless comment.

- No evidence to support the Applicant's assertion that no further action on flood risk is necessary despite clear evidence to the contrary (e.g. see Cassington Parish Council's submissions and the Parish wide Flood Risk Assessment commissioned by this IP included in **C2-169**).

Ironically this includes evidence provided by the Applicant itself, whose consultants failed to demonstrate any successful infiltration tests within the DCO redline in this parish (page 118 of **C1-087** as assessed by this IP on page 87-88 of **C2-169**).

- Applicant has ignored EA Flood Risk Zones 2 and 3 areas within the DCO redline.
- Applicant has failed to share data with the EA (**C1-109**) on efficacy of its proposed flood mitigation measures suggested in its Conceptual Drainage Strategy (**REP4-018**)
- No evidence provided by the Applicant as to their need to retain within the DCO boundary the c. 300 ha they have conditionally offered to remove panels from, save their unevidenced view that *'it would not be better served in its current agricultural use'*.

This contrasts with the ExA request for the Applicant to justify retention of just 17 ha (2.5.4 in ExA 2nd Written Questions **PD-012**) within the DCO redline given the PINS guidance that retention should be *'no more than is reasonably required for the purposes of the development'*

Without direction from the SoS to remove the 300 ha from the DCO redline, or an invitation for the Applicant to withdraw this application and resubmit with a new more tightly drawn redline, the current position leaves open post development consent opportunities for the Applicant that have not been tested in the Examination phase, including but not limited to 'panel creep', BESS and/or private wire and additional substation connections to data centres (see section 1.5 above) etc.

Additionally, any entity (PVDP, or whoever they sell to or seek finance from) exercising their post consent ability for compulsory land acquisition within the redline, for whatever reason, would also benefit from this additional land without any further opportunity for IPs to be consulted.

- No evidential response to the OHA's position that a comprehensive farmland bird strategy should be developed (e.g. **REP5-125**)
- No response to this IP and others providing photographic evidence of assemblages of large foraging birds (Snow Geese) on fields within the DCO redline so contradicting the Applicant's assertion that they do not exist.

- No evidential response to questions and concerns over the incomplete and inaccurate bat survey, including mitigation for the rarest threatened species such as barbastelle, rendering the Applicant's oLEMP deficient at best.
- No identification of, and so no assessment of impacts on, 4 areas of designated Ancient Woodland in this parish immediately adjacent to the Order Limits and on the internationally renowned Wytham Woods SSSI immediately adjacent to the Applicant's proposed site(s) for cable crossing of the River Thames
- The applicant claims to have been only able to identify 11 veteran trees that require consideration in the parish.

This a woeful dereliction of due diligence. If deliberate, it's shameful. If by accident it's another example of the Applicant's lack of interest in evidence.

- No evidence that the Applicant applied the Horlock rules for substation location choice (**EN-5** para 2.9.18 and 2.9.19)
- No consistent, agreed grid connection date. Every time the question is asked, the answer changes, and NGET's answers don't agree with those of the Applicant.

NGETs **C1-028** states an '*anticipated*' or '*target*' date of Q4 2031, a slippage of 2 years since NGET's November 2025 submission (**REP7-039**). Even Q4 2031 must now (October 2026) be questioned as NGET has not applied for a scoping opinion to VWHDC within Q3 2026 as it stated on 9th June 2026 it would do (p2 of its **C1-028**).

Simultaneously, the Applicant is asking the SoS to believe the grid connection date '*is expected to be amended to 2029 as this is the construction programme NGET are working to*' (**REP7-039**), members of the public are being informed by the Applicant's website that grid connection will occur in Autumn 2029 (image 2 below)

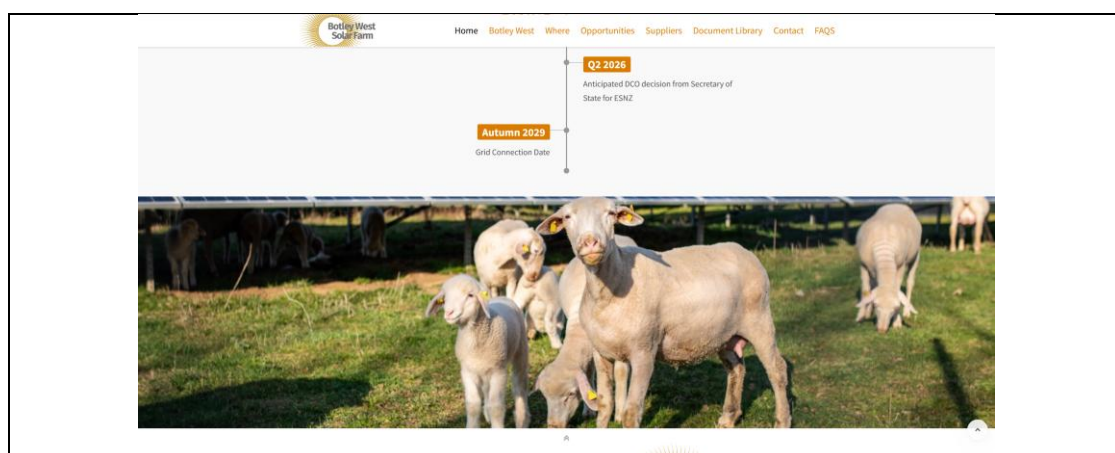


Image 1

The Applicant's www.botleywest.c.uk/Home-Botley_West.html at 08:00 on 02/10/2026

and at Cumnor Parish Council's August 3rd meeting, the CEO of PVDP stated that (CPC minute 203/26) NGET would *"connect us in 2030 with a one year fallback"*

So, the question remains unanswered. What is the proposed grid connection date?

Every time this IP, the ExA, the SoS and Layla Moran MP has asked the question, there's been a different answer. Who should IPs, the ExA and the SoS believe and why?

This is why this IP, the OHA and others endorse the ExA's request for the Applicant to draft a Grampian condition in Schedule 2 for the construction of the so-called NGET substation, but...

- The Applicant has repeatedly failed to draft a Grampian clause for the construction of the Farmoor substation as requested by the ExA.
- The Applicant has failed to respond to the SoS April 2026 RFI Q19 requiring it to respond to three ICOMOS Technical Reviews, the first of which recommended that no solar power station infrastructure be put on the southern site, a position also taken by the OHA.
- The Applicant has not completed the Landscape Character Assessment requested by ICOMOS in August 2025.
- The Applicant has not provided the financial details requested by ExA. No accounts have been published since 2014.
- No evidential response by the Applicant to challenges on sources of funding and ownership of PVDP GmbH and other entities as raised by Layla Moran MP and others in the House of Commons.
- No plans provided for a decommissioning fund as requested by ExA.
- No evidence of any track record of PVDP delivering solar power stations of any size approaching that of BWSF, as requested by ExA – and certainly not in Japan as claimed.
- No consultation with Parish Councils or the community about the need, proposed use or location of 'Community Food Growing' or 'Educational' sites.
- No agreement between OHA (specifically Oxfordshire County Council) on minerals and waste, or on compulsory acquisition of roadside verges.
- No economic assessment of adverse impacts on the Hill End Outdoor Education Centre. Indeed, the 100-year-old centre did not even feature on the Applicant's maps.