

**CPC Red House Farm Solar Power Station – Planning Application [P24/V2489/FUL](#)
Response by Cumnor Parish Council v1 07/04/2025**

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1. Cumnor Parish Council (CPC) wishes to object to this resubmitted planning application for a solar power station.

It does so having taken into account the size and nature of the proposed industrial installation for the production of electricity¹, the location of the proposed development site in the Oxford Green Belt, and the impact of the proposal on the character and appearance of the area.

Effects will be significant and wide ranging, including: permanent industrialisation of the Oxford Green Belt; landscape and visual impacts; loss of amenity; heritage, Public Rights of Way (PROW), agriculture, pollution and nuisance impacts; traffic and road safety impacts during construction and decommissioning; and significant adverse effects on ecology and biodiversity. And, if that were not enough, Thames Valley Police's response to this application states that *'rural crime is increasing'* and that *'domestic organised crime groups continue to target solar farms'*, with a *'high level of repeat victimization'*.

Sections 2-11 of this document set out the detailed reasons for the objection.

CPC would also like to draw Vale of White Horse District Council's (VWHDC) attention to the avoidable fact that our assessment of this resubmission has again been unnecessarily hindered by numerous errors, omissions and repetitions.

This is a repeat of the woeful attention to detail demonstrated in the documentation for the withdrawn application ([P23/V2624/FUL](#)).

That the applicant should expend more time and effort to Photoshopping out a bottle of wine on the picture of a park bench (see section 3), than examining cumulative impacts of the proposed Botley West and National Grid applications in Cumnor Parish (section 10) shows where their priorities lie.

Accordingly, CPC has assessed it has a low, to very low, degree of confidence in the veracity of the information presented by the applicant.

CPC is being expected to take on face value the many statements and uncosted commitments by the applicant spanning an initial 30+ year period: development (including a delay of up to 5 years), operation and decommissioning.

Having assessed the 100+ documents in this application CPC is unable to do so.

No one denies the importance of tackling climate change. Renewable energy has an undisputed role to play. But this application will do nothing to help that.

Instead, it's a speculative application to effectively 'landbank' Green Belt land for 5 years, with consequent severe adverse impacts on landscape, amenity, ecology and habitat, and an uncertain grid connection requiring the Botley Road to be dug up (again).

This is the wrong development, in the wrong place for the wrong reasons.

¹ As defined under the Town and Country Planning Act (TCPA)

Cumnor Parish Council's Grounds for Objection

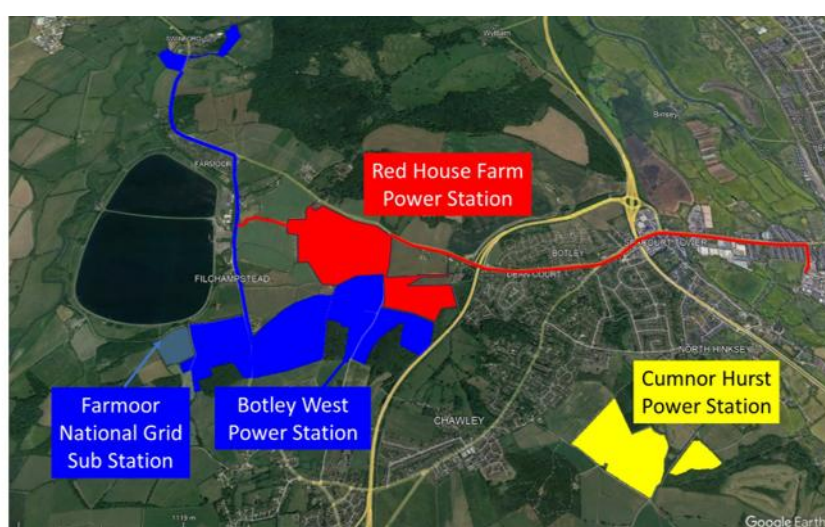
2. The project site lies entirely within the Oxford Green Belt.

2.1. Building the power station on that site would therefore conflict with the basic principle of the Green Belt as set out in paragraph para 142² of the NPPF.

Paragraph 142 of the NPPF reads as follows:

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

'Openness' has been ruled by the Supreme Court not to be merely a matter of the volume of a proposed development but also its visual impact³. The solar power station would clearly have a hugely negative visual impact.



The power station, would, as the map above shows, fill much of the scenic agricultural valley between the [Cumnor Village Conservation Area](#), the world renowned [Wytham Woods](#) and the Farmoor Reservoir recreational area and local wildlife sites, and virtually all that valley when combined with the proposed Botley West power station and the [substation National Grid is proposing](#) to build to serve Botley West.

The valley in which it would lie is visible from the elevated parts of the Parish and Wytham Parish, and the views of it are designated as [Important Views](#) in the policies of the [Cumnor Parish Neighbourhood Plan](#) (CNP).

The developer argues that these impacts can be mitigated in the short term by the use of opaque plastic sheeting affixed to the 2.1m high deer-proof fencing that will surround the site, and at some unspecified time within the next 30+ years by the use of hedges.

² The NPPF was updated in December 2024. This reference, and subsequent ones, is to that updated version.

³ *Samuel Smith Old Brewery (Tadcaster) and others v North Yorkshire Country Council* [2020] UKSC 3

But, given the difference in elevations, that is clearly not the case, unless the opaque sheeting lines the top of the hills and that hedges are also planted at the top of the hills, in which case they will not preserve the view but will simply obliterate it (see also section 3).

Similarly, even though the developer would be obliged to preserve the Public Rights of Way (PROW) within and immediately adjacent to the power station, the amenity value of those rights of ways (which include a section of the [Oxford Greenbelt Way](#)) would be lost, as instead of walking across open fields with views of the surrounding hills, people would be walking along narrow canyons bordered with opaque sheeting and high fences backed by solar arrays taller than any human (see also section 3).

Nor would this industrialisation of the Green Belt be in any meaningful sense temporary.

As a minimum, the power station would be in existence (if not in operation) for 30+ years – in other words, a child currently at Cumnor Primary School would be middle aged before the land returned to its current state. Even then it seems highly improbable that it would actually be demolished and removed at the end of that period.

Realistically, what would happen is that the leases would be extended, with the necessary planning permissions being granted, and so on and so on, effectively for ever.

This would be made still more likely if National Grid were permitted to build a substation in Cumnor, as proposed in connection with the Botley West project, as that would itself be an overtly permanent structure, and the fact of its continuing existence would inevitably be used as an argument for the continuation of any neighbouring power station and battery storage site (BESS).

The only circumstances in which that might cease to be true would be if a new source of low carbon power were employed (the obvious examples being Small Modular Reactors such as proposed at Harwell – 9.5 miles distant, or nuclear fusion being developed at Culham – 7 miles distant, both within the VWHDC designated sustainable growth Science Vale area) which, with their load factors of 9x solar, made subsidised intermittent solar power stations on farmland in the UK no longer economically viable or strategically sensible.

However, such a development cannot be assumed; and even if it did occur, it is doubtful that the agricultural and rural assets lost to this project would actually be restored to their original state.

It may be the case that under current planning policies, they would not be regarded as brownfield sites, and they are not 'grey belt' sites; but considering the projected population growth over the rest of this century and beyond, the likelihood is that they would in fact be used for some other form of development and so lost to agriculture and amenity space for ever.

In practice, therefore, if this development is allowed, the loss of this Oxford Green Belt will be permanent and irretrievable.

2.2. The project would constitute an ‘inappropriate development, harmful to the Green Belt’ within the meaning of paragraphs 153 and 160 of the NPPF. It should therefore only be permitted if the developer can show that it is justified by ‘very special circumstances’. The developer has not shown this.

Paragraph 153 of the NPPF states as follows:

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

With specific reference to ‘renewable energy projects’, paragraph 160 adds:

When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

For the reasons given in section 2.1 above, it is abundantly clear that this project is an inappropriate development within the meaning of both these provisions. Therefore, the onus is on the developer to show that there are ‘very special circumstances’ which would justify it being approved.

CPC note that the final sentence of paragraph 160 recognises that in the case of renewable energy projects, the:

‘very special circumstances may include [emphasis added] the wider environmental benefits associated with increased production of energy from renewable sources.’

Clearly, however, that factor alone will not suffice. If it did suffice, all developments of renewable energy projects within the Green Belt would automatically be allowed, and paragraph 160 would have no effect at all.

In addition, we note that the Government’s target is to increase solar generation capacity five-fold by 2035, from the current 14 GW to 70 GW⁴, an increase of 56 GW, or 56,000 MW. Estimates of the amount of land needed per megawatt of capacity range from four acres⁵ to six acres⁶. Even taking the higher figure, the extra capacity would therefore take up no more than 336,000 acres. That is a little over 0.5% of

⁴ This exceeds the Climate Change Committee’s estimate of what is needed by 16GW.

⁵ <https://solarenergyuk.org/wp-content/uploads/2022/03/Briefing-Fact-Checker-1.pdf>

⁶ <https://www.carbonbrief.org/factcheck-is-solar-power-a-threat-to-uk-farmland/>

the total area of the United Kingdom, and a little over 1% of that of England alone. There is therefore no logical need to build any of it on the Green Belt.

Accordingly, the developer has to show very special circumstances beyond the mere fact that it is developing a renewable energy project.

2.3. The developer has not shown that the project passes the ‘very special circumstances’ threshold (NPPF paras 153 and 160, Local Plan Core Policies 13 and 41, Cumnor Parish Neighbourhood Plan Policy DBC4).

The VWHDC Pre-app (appendix 3.5 re P22/V0143/PEJ) invites the applicant to:

- Provide ‘*Justification for a 40 year period*’
noting that:
‘40 years is a significant period even where the proposal is temporary and reversible, during which the adverse impacts (landscape and visual) would be experienced by many people.’
- Demonstrate: ‘*that the point of connection has capacity and there is no other alternative connection.*’
- Provide ‘*the capacity factor and estimated annual production ... together with the number of residential properties electricity equivalent for UK.*’
- Note that: ‘*There is also no detail currently provided of what alternative sites (outside of the Green Belt) have been considered, however I note that you propose to provide a Site Selection Report to accompany any formal application.*’

Having examined ES Chapters 4 (The Proposed Development) and Chapter 5 (Need and Consideration of Alternatives) as well as the Site Selection report etc., CPC notes that:

- Contrary to the information supplied by the applicant for the pre-app, Para 4.65 states that:

‘Planning permission is sought for a 30-year operational period’

yet para 5.52 states that viability of solar schemes only occurs for leases *‘beyond 30 years’*,

which the applicant advances as a reason for not considering roof top solar.

CPC therefore considers that there is a very high probability that this application for a 30-year operational life is a ‘stalking horse’ for subsequent application(s) for an extended duration.

CPC recalls the case of the [Nuneham Courtney Nineveh Farm application](#) considered by South Oxfordshire District Council (SODC) Councillors and joint SODC/VWHDC planning officers, where planning permission for 35 years was initially granted, with the applicant returning for a 5 year extension, which was refused.

- The applicant admits it did not carry out a site selection process as required by the NPPF and TCPA, but instead, as ES Chapter 5, Paras 5.38-5.44 records, made a commercial decision at its risk to buy an option to develop a power station on land it knew to be in the Green Belt:

5.39 In this instance, however, Road Night Taylor (RNT) an independent specialist grid consultancy was approached by the tenant of Tilbury Farm and Landowner of Red House Farm (the 'Landowner') to prepare a Grid Feasibility Study.

5.40 The Grid Feasibility Study confirmed a suitable grid connection was available near Tilbury Farm and Red House Farms at Oxford Bulk Supply Point (BSP) operated by SSEN located at Ferry Hinksey Road, Botley.

5.42 A formal grid application for a 49,900kW (49.9 MW) connection and the defined land area was submitted to SSEN in April 2020 by RNT on behalf of the Landowner.

5.44 Having paid the first grid connection instalment payment to SSEN, thus, securing the connection, RNT and the Landowner subsequently entered a tender process to find a suitable developer of a solar farm.

Assessing the information provided by the applicant, CPC concludes that:

- The applicant has not demonstrated there is no alternative connection.

Instead, it has 'doubled down' on its current commercial commitment to a Osney Mead Grid Supply Point (GSP) connection. It's requested planning permission for 5 years⁷ because of uncertainty over the availability of this connection to this applicant; reflecting National Energy System Operator's (NESO) new policy of preferring 'shovel ready projects' rather than 1st come 1st served as this applicant asserts⁸.

CPC assesses that this is the applicant's attempt to achieve the solar equivalent of housebuilder 'land banking'.

- The applicant has not considered any alternative sites outside of the Green Belt.
- The applicant has merely bid in a commercial tender process at their risk for a grid connection being sold on by a landowner, who themselves had – at their own commercial risk – paid for an option on a potential future grid connection.
- The applicant has then attempted to use that purely commercial decision at their risk to justify the 'very special circumstances' required for such a development to be allowed in the Green Belt.
- The applicant has not provided the information VWHDC requested on capacity factor etc. (see also 9.7 below)

⁷ Applicant's 2024-11-21 Covering letter page 5

⁸ [Great Britain's Connections Reform: Overview Document](#)

Therefore, the developer has not shown that the project passes the ‘very special circumstances’ threshold.

2.4. Severe adverse Impacts on the Openness of the Green Belt (VWHDC Core Policy 41 – Renewable Energy, and Cumnor Neighbourhood Plan Important Views Policy DBC7)

Given the proposal’s intention to surround more than 61 hectares of arable Oxford Green Belt in 2.1m high deer-proof fencing, complete with 60x 3.2m tall CCTV camera towers, installing numerous 40’ shipping containers and building a number of additional structures and access roads, CPC objects to this proposal on the grounds of irretrievable loss of openness of the Green Belt.

With Thames Valley Police (28/03/25 response – see also section 9.10 Crime below) addressing the inadequacy of this deer-proof fencing in deterring crime, and proposing instead high security fencing throughout, the impact of the perimeter fence on visual amenity and the openness of the Green Belt will be even more acute.

As examples, from within VWHDC and WODC, see below what existing solar power stations actually look like, as compared to the rural idyll claimed by the developer.



Views from PROW at existing power stations (East Hanney, Steventon and Barnard Gate). Barnard Gate (lower left) illustrating degradation over time.

In addition to what CPC has said on this issue in section 4 below, CPC must point out that not all the infrastructure and other changes to the landscape will be even purportedly temporary.

As just one example, ES para 4.39 states:

'4.39 The cable will be adopted by the Distribution Network Operator (DNO) upon energization of the solar farm and will remain its property after the solar farm is decommissioned.'

The DNO infrastructure therefore will be permanent, the cable terminating at the DNO substation (8m x 6m x 3m high on a concrete plinth set within a 12m x 14m security fence) to be built immediately adjacent to a PROW that leads to the Hill End Outdoor Education Centre (ON|184|16/10 – known locally as Denmans Lane) at its junction with ON|184|22/20.

CPC considers the applicant has failed to provide the information required by VWHDC as set out in their pre-app

The VWHDC pre app states:

'the published landscape character assessments and the important views indicate that the site does form a role in the greenbelt and its openness in this location.'

The VWHDC pre-app (P22/V0143/PEJ) then invites the applicant to complete an:

'analysis as part of any application, as to how much the site currently contributes to the openness of the Green Belt and to what degree the proposed solar farm will affect any such openness in landscape and visual terms'

CPC considers the applicant has failed to do this (see also Landscape and Visual Impact Analysis below).

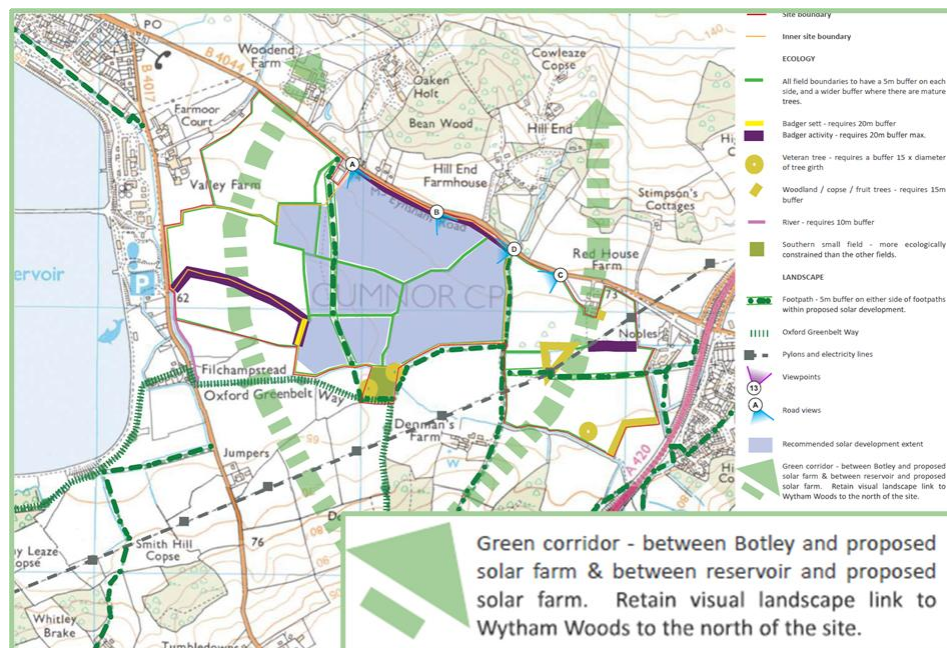
As just one example, the applicant has provided only annotated photos that seek to address this, and so ignoring what the VWHDC pre-app requires, viz:

- *With regards to locations of viewpoints, views from Wytham Woods to the north should also be explored. Although not public rights of way, this area is well used by walkers and accessed by a free permit scheme.*
- *The site is in LM20 – Farmoor to Botley Corallian Limestone Ridge with Woodland Character Area of the Districts Landscape Character Assessment. Key landscape characteristics of this area include being contained by wooded slopes, relatively intact network of hedgerows, mix of post medieval and modern, limited settlement and the route of the Oxford Green Belt Way. It has a keen sense of place and a degree of tranquility. Both the District and Neighbourhood Plan Landscape Character Assessments cover restricting the placement of structures that would be visually intrusive and detract from the expansive views.*
- *The Neighbourhood Plan Important Views Report, clearly illustrate the role the site forms in this area of open countryside and greenbelt. View 5a and 5b covers the foreground of arable fields, mature hedgerows criss-crossing the landscape with expansive views up towards Tumbledown and the wooded backdrop of Wytham. View 16 include preserving the important panoramic views to Wytham Woods to the north.*

CPC considers the applicant has failed to complete an: ‘analysis as part of any application, as to how much the site currently contributes to the openness of the Green Belt’ as required in the VWHDC pre-app.

CPC assesses that ‘the important panoramic views to Wytham Woods to the north’ and the reciprocal ‘views from Wytham Woods’ with ‘expansive views up towards Tumbledown’ would be significantly adversely damaged by the proposal, given that it would involve ‘the placement of structures that would be visually intrusive and detract from the expansive views.’ E.g. panels, CCTV towers, opaque fencing, shipping containers, substations, a ‘welfare’ cabin, etc.

As just one example of this, the developer has ignored the recommendation of their own consultants to retain a ‘green corridor’ at the east of the site to allow a ‘visual landscape link to Wytham Woods to the north of the site’. See figure from SSR Appendix 4 Landscape and Ecology Constraints document below:



In summary, the openness of the Green Belt would not be preserved for all the reasons above, and because the applicant intends to install (ES para 12.59) screening in the form of fencing with ‘an opaque covering to mitigate the impacts’ of glint and glare that would cover the 2.1m high deer-proof fencing surrounding the site.

3. Landscape and Visual Impact & Amenity Impact: CPC considers this proposal to run counter to the provisions of Core Policies 44 and 41 (visual amenity) of LPP1, and Cumnor Neighbourhood Plan policies DBC7 (Important Views) and TI3 (Footpaths and Bridleways)

Cumnor’s Neighbourhood Plan (CNP) Policies DBC7 and TI3 evolved from widespread engagement with parishioners in a number of consultations including the ‘Big Survey’, conducted as part of the Neighbourhood Plan process.

32% of respondents to the Big Survey said that ‘protecting and enhancing local green spaces’ was their top priority for the Cumnor Neighbourhood Plan, with 62% of respondents placing the green spaces option in their top 3 priorities (see extract from CNP Table 1 below)

Priority rank order	Cumnor Parish	Farmoor	Dean Court	Cumnor Hill	Cumnor Village
1st	Green space	Green space	Green space	Green space	Green space

This community response was addressed in the made Neighbourhood Plan by a number of policies, including DBC7 – Important Views, and TI3 – footpaths and bridleways.

In his formal comments, the Plan’s Examiner noted that the accompanying [Important Views Report](#)

‘is an excellent part of the evidence base of the wider Plan. It sets out its methodology and comments about the important views in detail. In general terms the views both describe and celebrate the landscape of the parish.’

Policy TI3 addresses the impact of development proposals on PROW through the Parish, in particular the amenity value of an interconnected set of PROW offering kinetic views across open countryside in the Oxford Green Belt, including from the Oxford Green Belt Way in the Parish adjacent to this proposal’s site:

‘New development proposals should take into account the safety, accessibility and visual amenity of Cumnor’s network of footpaths and bridleways. Development proposals which would have an unacceptable impact on their accessibility and recreational amenity value will not be supported.’

3.1 The VWHDC Pre-app (appendix 3.5 re P22/V0143/PEJ) invites the applicant to provide ‘photomontages, showing the proposed scheme, from selected key viewpoints, at year one of the operational phase and later at year 10 or 15 of the operational phase with mitigation in place.’

CPC can find no evidence that this requirement has been met. Instead, with the exception of a few ‘visualisations’ along the valley floor (e.g. Figures 10.1 and 12.1) the applicant has chosen to present a series of photos (using a 50mm lens not the preferred 80mm) with superimposed red lines showing what it claims to be ‘the extent’ of the development.

The VWHDC pre-app notes that:

‘the published landscape character assessments and the important views indicate that the site does form a role in the greenbelt and its openness in this location.’

And that

‘The openness of the Green Belt is recognised as having a landscape and visual element to it.’

And invites the applicant as part of the application to provide an analysis:

‘as to how much the site currently contributes to the openness of the Green Belt’

CPC can find no evidence that this requirement has been met, with no response to the VWHDC pre app statement that:

‘The Neighbourhood Plan Important Views Report, clearly illustrate the role the site forms in this area of open countryside and greenbelt.

View 5a and 5b covers the foreground of arable fields, mature hedgerows criss-crossing the landscape with expansive views up towards Tumbledown and the wooded backdrop of Wytham.

View 16 include preserving the important panoramic views to Wytham Woods to the north.’

As just one example, CPC analysis of the Google Earth Pro ‘path’ from CNP Important View 3 to Important View 1 (see below) shows how the proposed site sits some 34m below Important View 3 and 30m below Important View 1 – the site being visible in the foreground from both.

Similar visibility is afforded from Important View 16 and Important View 23.



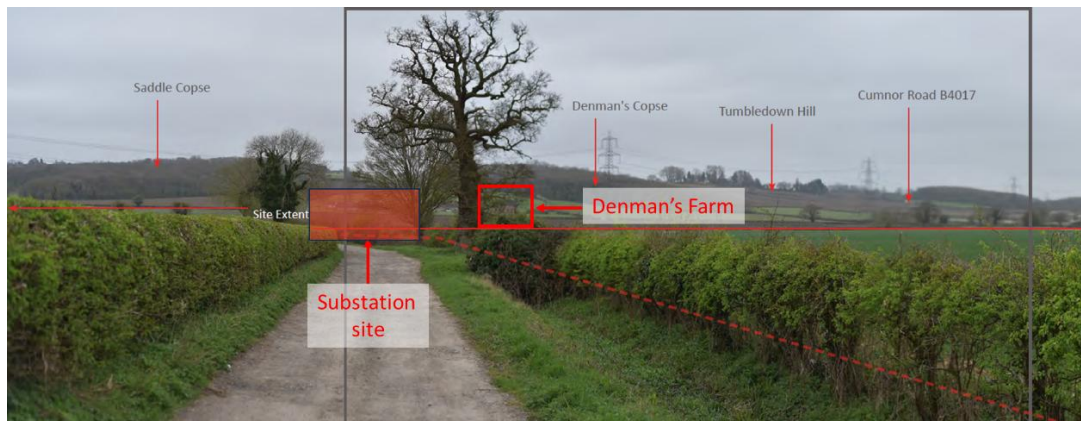
Google Earth Pro path from CNP Important View 3 to Important View 1 – source CPC

In attempting to dismiss the impact on CNP Important View 5b the applicant offers the photo overleaf (representative viewpoint 2 ES Appendix 7.1 page 76 – the same as CNP Important View 5b)



This is not a visualisation – as required in the pre-app – at years 1,5 and 10.

CPC has therefore annotated the applicant's photo (below) to show a visualisation, including the proposed location of the 6m x 8m x 3m substation set in a fenced secure compound of 12m x 14m, and the adjacent location of Denman's Farm.



The 'reverse' view is also shown by the applicant (page 94 of Appendix 7.1) as a photo with a few lines superimposed (below).

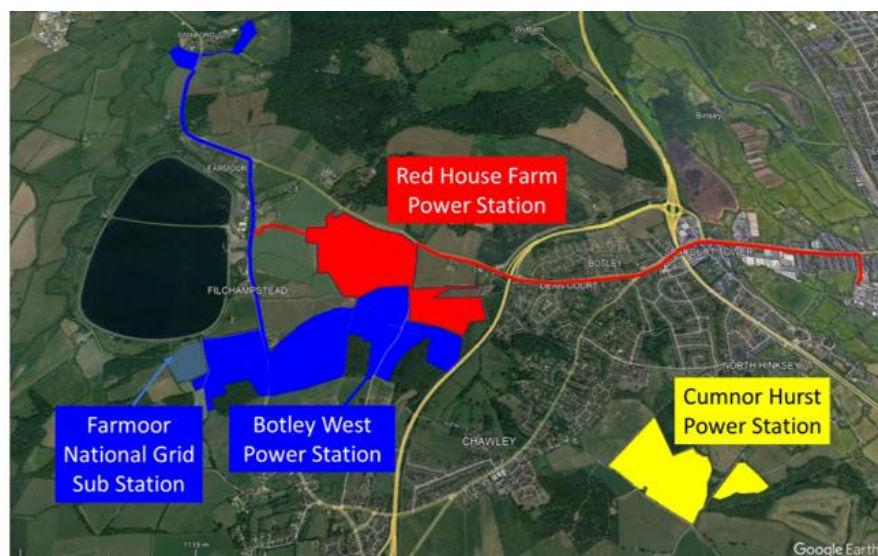


Again, CPC (below) shows instead a visualisation, as requested by VWHDC, showing the extent of the panels and the 2x substations.



Ironically, a visualisation of the impact of a solar power station in that vicinity is provided by documents from the Botley West consortium published in 2023.

That proposal would place solar panels and associated infrastructure in the fields immediately adjacent to the Red House Farm proposal (see below).



CPC map of the Red House Farm and Botley West proposed adjacent sites.



CPC is fortunate in that local residents have volunteered their services to produce the visualisations required by VWHDC in their pre-app.

As examples two sets of before and after visualisations are shown below for PROW that pass through the site and around its proposed perimeter.



Before

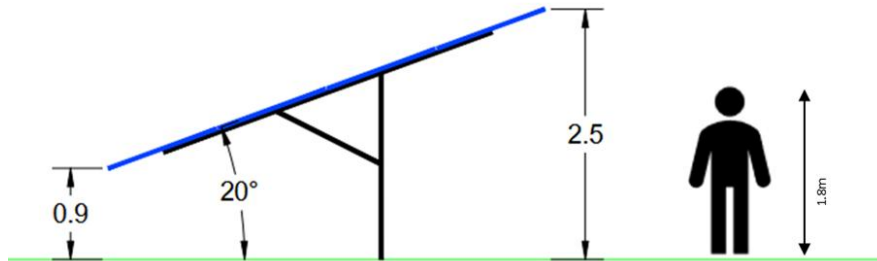
After

ON|184|15/10



Cross Section

4 Modules in Landscape at 20° tilt
Scale 1:50 @A3



CPC visualisation showing how viewpoint of a 1.8m tall person will be impacted by 2.5m high panels

CPC considers the applicant's proposal runs counter to Policy TI3 and LPP1 Core Policy 41, as installing shipping containers, substations and other infrastructure alongside PROW, will severely adversely affect visual amenity.

Similarly, given the noise signatures of the inverters there will also be a significant adverse impact on aural amenity on PROW (see also section 9.1 – pollution and nuisances – below).

In other words, there will no longer be an open, peaceful countryside for residents and visitors to enjoy.

CPC does not consider the proposed mitigations sufficient to outweigh harm.

Taking just two examples:

- As the applicant's artist impression (see below – CPC annotations in black of figure 3 from 3377_ES Appendix 7.1_Appendix J Part 2 to Apx L) of a proposed permissive path between the northern ends of ON|184 15/10 and ON|184 16/10 inadvertently shows, open expansive views of Green belt countryside from existing PROWs will be substituted by a permissive path sandwiched between the traffic of the B4044 on its northern side and an opaque 2.1+m fence topped with CCTV to its southern side.



- The provision of a bench, (with or without a bottle of wine on it as shown in the applicant's photos on p22 of Appendix 7.1 of the 2023 and 2024 applications), next to a 2.1m deer-proof fence and within metres of several CCTV cameras and shipping containers emanating a characteristic noise signature (see also section 9 below) is not a mitigation for the full and free enjoyment of the PROW currently experienced.

Spot the disappearing bottle of wine...



Introduced seating

p22 Appendix 7.1 of P23/V2624/FUL



Introduced seating

p22 Appendix 7.1 of P24/V2489/FUL

Instead, these proposed mitigations suggest either a lack of understanding of the way this landscape is currently experienced from near and afar, or desperation.

CPC notes with dismay the proposal to build the construction compound – including HGV access – immediately adjacent to PROW ON|184|15/10. In addition to the loss of visual amenity for 5+ months the health and safety concerns are clear, but not addressed by the applicant.

4. **Heritage Impacts:** CPC considers that the proposal fails to meet the requirements of Core Policy 39 of LPP1, Development Policies 36, 37, and 38 of LPP2 and NPPF paras 200, 201, 205 and 209.

It also fails to meet the requirements of CNP Policies DBC2 (Cumnor Conservation Area) and DBC6 (Conserving and Enhancing Local Heritage Assets)

- 4.1 **CPC assess that the proposal would diminish the significance of the setting of heritage assets in the area. This includes, but is not limited to the setting of the Cumnor Conservation Area (CNP policy DBC2)**

As one example, Historic England's response to the Scoping request P22/V2581/SCO noted:

'Cumnor Conservation area (the scoping report, 2.1.5, incorrectly identifies no conservation areas within 2km of the development).

A number of Listed Grade II buildings including not only those listed in the scoping report but also those on or near the north edge of the Cumnor Conservation Area.'

Despite this, ES paras 9.73-9.81 of the application attempt to argue (incorrectly) that the site is not within the setting of the Conservation Area (CNP Policy DBC2) and so, by implication, the applicability of Neighbourhood Plan Policies DBC2 and DBC6.

CPC assesses that the proposal is limited in its understanding of the significance of heritage assets and, in particular, of their setting.

By constraining the survey area to 1km (ES para 9.27) the application artificially declines to consider the relevant CNP policies, as evidenced by the *Historic Environment Desk Based Analysis (HEDBA)* that does not even reference CNP policies.

As VWHDC and Neighbourhood Plan Character Assessments make clear, the dispersed farmsteads comprising the site and its setting are inextricably linked historically with their surrounding fields. These remain at present as open Green Belt countryside and are read as such.

Historic England's response to the Scoping request P22/V2581/SCO advises the applicant to involve the relevant Conservation officer.

No evidence that this has been done, or of the officer's response if it has been done, can be found in the application.

Historic England's response to the applicant's Scoping request [P22/V2581/SCO](#) recommended that the proposed Botley West Solar Power station be considered as part of the cumulative impact.

This is not included in Cumulative Effects, ES paras 9.167-9.169.

- 4.2 **CPC disagrees with the level of harm assigned. As the significance of the setting of the heritage assets has not been fully articulated, it follows that the harm to this significance has not been properly assessed. Consequently,**

The application employs a number of stratagems to underplay the impact.

As one example, ES para 9.83 states:

‘the historic landscape is not scoped in as a heritage receptor as it was not identified as part of the Scoping Opinion’

In a second example ES para 9.158 effectively admits harm, with that harm only being mitigated by decommissioning in 30+ years.

These devices, and others, immediately limit assessment of impact, ignoring the fact that covering the fields with solar panels, the erection of the substation, shipping containers, security fencing and CCTV cameras will cumulatively have a significant adverse impact on the setting of the farmsteads.

For example, at Nobles Farm, diminishing the last vestiges of its connection to former agricultural land would cause a high degree of harm.

4.3 CPC believes NPPF policies (207, 208, 212 and 216) have priority in considering the historic environment. Therefore, the applicant’s conclusion for each heritage asset is that the impact is:

‘Not considered significant under EIA regs’.

is insufficient and incorrect and is not the same as a Heritage Impact Assessment, which VWHDC would have to take into consideration.

4.4 CPC is also concerned about the stated temporary nature of harm. There is no evidence that these sites will be properly reinstated, nor any mechanism suggested to secure this.

Even though the section on Potential Effects: Operation (ES paras 9.112-9.156) is lengthy and repetitive, it still fails to address the repeated impacts of having to replace inverters and other major pieces of infrastructure several times within the proposed operational lifetime, nor the need to replace panels when they fail or lose efficiency, nor the regular operations required to clean the panels (see also section 9.1 – pollution and nuisances – below).

5 Biodiversity & Ecology: CPC considers that the application fails to satisfy the requirements of LPP1 Core Policy 46 (ecological receptors) and LPP2 Development Policy 30 (watercourses) – both these policies being coincident with NPPF paras 187, 192 and 193.

The site either contains, is immediately adjacent to, or is within the context of:

- Sites of Species Scientific Interest (SSSI)
- Local Wildlife Sites (LWS)
- Conservation Target Areas (CTA)
- Ancient Woodland (AW)

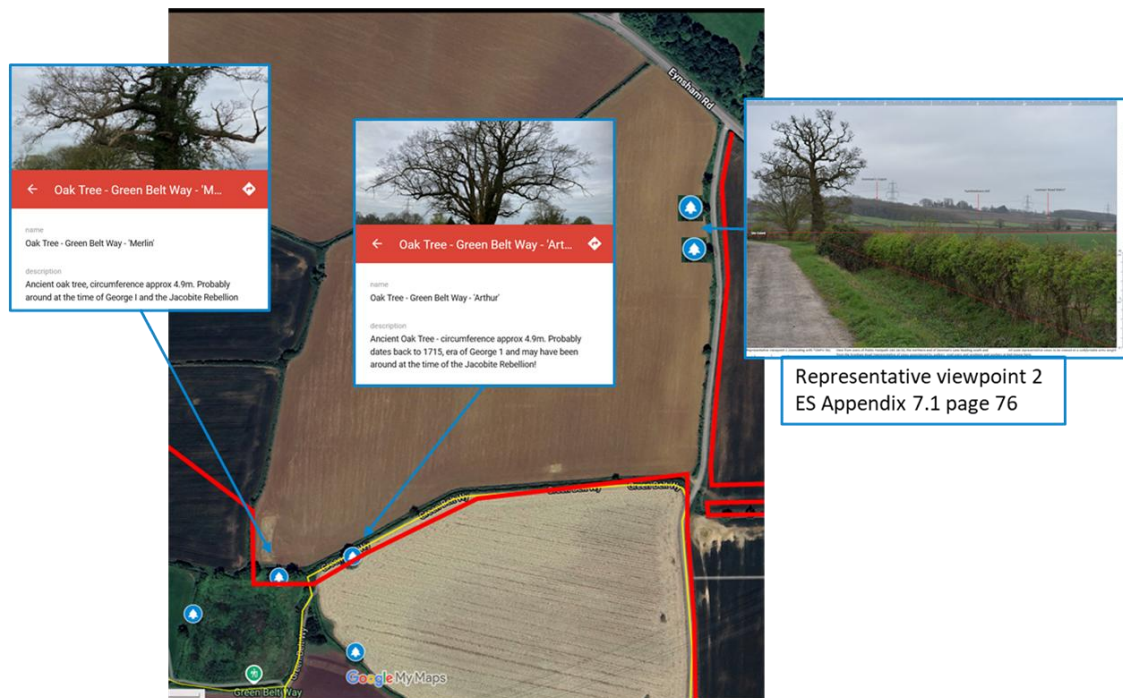
- Priority Habitats (PH)

As such the power station will have adverse impacts on protected and priority species, including those on the [International Union for Conservation of Nature \(IUCN\) Red List](#) – and that’s before cumulative impacts of the National Grid and Botley West proposals are considered – which the applicant actively chooses not to do (see section 11 below).

Characteristic of the applicant’s approach to biodiversity and ecology is ES para 5.13:

There is a single veteran tree within the south-eastern field. This tree is considered to be irreplaceable habitat and has been classified as an individual tree. This tree was assessed as of Good condition.

Compare this to the approach of [CPC’s Cumnor Fit for the Future](#) environmental project that has been identifying ancient oaks in the Parish since 2021. Taking just one small part of the applicant’s site as an example, 2 ancient oaks are present, dating to the early 18th century (see below).



Bizarrely, even the applicant’s own photograph (representative viewpoint 2 ES Appendix 7.1 page 76) shows two more.

This totally inadequate level of accuracy suffuses much of this application, and must throw into doubt many, if not most, of its assertions, including in this case those relied upon by the South and Vale Forestry Officer in the 24/03/25 assessment.

CPC notes that the applicant’s methodology for Biodiversity seems to be limited to translating unevidenced personal value judgements on the biodiversity gain of a length of hedging, or of the retention of a watercourse, to claim a net biodiversity gain.

As one example, Table 5 (para 5.15) asserts that 30.357 hectares of ‘hay meadow grassland’ will be ‘created’ giving a ‘score’ of 203.23 units.

There are also many mentions of sheep grazing. But, to the best of CPC's understanding, sheep eat grass, not hay.

So, whilst this methodology may be a component of the applicant's 'assessment' processes, it seems to CPC to bear little relation to the reality of the site and accepted agricultural practices.

No 'negative' biodiversity 'scores' are attributed to the impacts of many km of deer-proof fencing despite ES para 5.16 stating:

Fields within the application site are bound by hedgerows, which provide connectivity through the landscape, including between areas of higher ecological value such as Wytham woods and other area of woodland.

Where Wytham woods is a SSSI and 'other area' includes adjacent designated Ancient Woodland.

By the applicant's own admission, therefore, the power station's deer-proof fencing will isolate deer populations in scattered adjacent woodland without the ability to sustain their existence by foraging and calving on open fields or to transit between the woodland areas.

With Thames Valley Police (28/03/25 response – see also section 9.10 Crime - below) addressing the inadequacy of this fencing in deterring crime, and proposing instead high security fencing throughout, the impact of the perimeter fence on both visual amenity and biodiversity will be even more acute.

The applicant seems to be relying on separate value judgements of 'biodiversity' (ES Appendix 8.4) and ecology (ES appendix 8.2) without an analysis of the interplay of the two.

As just one example amongst many, ES Chapter 8 para 8.170 records that:

'The scattered trees, scrub and hedgerows provide suitable habitat for breeding birds, whilst the large open arable fields offer suitable habitat for ground nesting birds.'

And ES para 8.172 records that:

*'A total of 52 species were recorded within the survey area during the breeding bird survey. Of these, 36 were considered to be breeding, with a total of 178 territories recorded (see Table 8.16). Eighteen of the species recorded within the survey area are considered notable (BOCC 513 Red list⁹: greenfinch (*Chloris chloris*), house sparrow (*Passer domesticus*), linnet (*Linaria cannabina*), song thrush, skylark, yellowhammer (*Emberiza citronella*), yellow wagtail (*Motacilla flava*); BOCC Amber list: bullfinch (*Pyrrhula pyrrhula*), dunnoek (*Prunella modularis*), kestrel (*Falco tinnunculus*), mallard (*Anas platyrhynchos*), reed bunting (*Emberiza schoeniclus*), sedge warbler (*Acrocephalus schoenobaenus*), stock dove (*Columba oenas*), whitethroat (*Curruca comcmunis*), woodpigeon (*Columba palumbus*), wren; Schedule 1: kingfisher (*Alcedo atthis*)).'*

⁹ CPC assumes this is a reference to the [British Trust for Ornithology – Birds of Concern Report 5](#) Updated September 2024

ES Para 8.181 states:

'Birds recorded incidentally within the survey area include a flock of 40 x fieldfare, a flock of 30 x lapwing, herring gull and black-headed gull. In winter, fieldfare and lapwing flock on ploughed fields'

It then goes on to state:

'the application site therefore offers suitable over-wintering habitat for these species.'

Without providing any evidence of how the 61 hectare site when covered in solar panels, shipping containers and surrounded by a 2.1m fence will be as ecologically attractive to these species as open fields.

ES Para 8.179 asserts (again without evidence) that:

*'Overall, the site is considered to be of **local** value to breeding birds'*

and ES para 8.188 asserts that:

*'Overall, the application site is considered to be of **local** value to wintering birds.'*

How these assertions of local value are arrived at by comparison with the nationally recognized importance of the adjoining Farmoor reservoir, its setting and its associated 3 wildlife sites, is not explained, not least as ES para 8.180 notes:

The data search returned a range of notable bird species, the majority of which are associated with Farmoor Reservoir to the west of the application site.

Farmoor is described by its owners as a *'unique habitat for wildlife'* and by RSPB as:

'one of the top birdwatching venues in Oxfordshire. The combination of open reservoir, woodland, award-winning wetlands and meadows attracts a great variety of birds.'

Regarding Farmoor, and its Local Wildlife Sites (LWS) 95m west of the site, VWHDC's pre-app requires that:

'The proposed development site may contribute to the ecological interest of the LWS, by providing nearby foraging resource within the farmland for birds. It is recommended that bird surveys, including breeding surveys, are undertaken to understand whether the site has a functional ecological connection to the nearby interest of the LWS.'

CPC cannot find any reference in the application to VWHDC's requirements having been met.

CPC concludes that although the application asserts only 'local' value to the east of the B4017, while there's national significance to its west, the applicant provides no evidence that birds recognise the B4017 as a boundary, as the applicant does.

Furthermore, in respect of at least one of the IUCN 'Red List' species present – the skylark – the applicant's proposal of 'skylark plots' is fatally flawed and unacceptable.

The notion that Cumnor's skylarks, the descendants of innumerable generations which have lived in these fields since the advent of agriculture in this area in the Iron Age, will

live and breed in the developer's designated plots, surrounded by solar panels, shipping containers and security fences – all vantage points for their predators – is risible.

Skylark plots are not designed to provide nesting sites, but to open up the grass sward in fields to increase accessibility to their invertebrate prey. Skylarks require long, unbroken sightlines; solar panels reduce the openness of the landscape and therefore reduce the desirability of the area for nesting skylark due to perceived risk of predation.

As noted by both WODC and OCC in their responses to PINS re Botley West, post construction monitoring of over 100 solar farms in England and Wales has found no evidence of nesting skylarks¹⁰.

The proposed field for the skylark plots is not within the applicant's site boundary, is immediately adjacent to fields containing panels, CCTV and shipping containers for this application; is adjacent to the same infrastructure proposed by Botley West, and on the opposite side of the B4017 to the proposed National Grid substation (the applicant deliberately choosing not to assess the cumulative impacts of either – see section 11) and which, in the applicant's own Flood Risk Assessment, is prone to flooding.

Indeed, as the photos in section 6 (below) show it is not just in a theoretical 1 in 100-year flood zone but has been flooded for much of this winter.

As far as CPC is aware, skylarks are not aquatic birds and their nests do not float.

More recent arrivals – a flock of N. American geese which forage on the site – will apparently be displaced; more than a little ironic since they featured in the BBC 1 Countryfile programme (Tx 5th January 2025, presented by John Craven) from Farmoor as examples of how the location make it a world class habitat for many bird species, both native and migratory.

CPC notes similar inaccurate assertions throughout the application in respect of invertebrates, mammals, amphibians – including Great Crested Newts – and, perhaps, most importantly bats.

CPC has significant concerns about the applicant's Environmental Statement assertions about bats, not least as this seems to be different to that proffered by PVDP for the immediately adjacent [Botley West power station](#).

Accepting that the local Cumnor bat population's range is not yet constrained by the proposed boundaries of these immediately adjacent power stations, the different assertions by PVDP and [Red House Solar Limited](#) are hard to reconcile, and even harder to accept in the light of evidence from peer reviewed studies on the adverse impacts of solar power station sites on bat activity.

For example, no reference in the application could be found to the Bristol University peer reviewed study '[Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity](#)' in Journal of Applied Ecology 60: 1752–1762 by Tinsley et al (2023).

¹⁰ In Practice, CIEEM Issue 117, Sept 22 p47

This paper found that the activity of 6 out of 8 species of bats detected were significantly lower over solar panels than in field and field boundary sites.

For common pipistrelles, activity was reduced by 40% around the boundaries of solar farms and by 86% in the centre. Overall bat activity was reduced by a half at solar power station boundaries and two thirds at their centres.

The surveyed solar farms covered an average of 59 hectares – almost exactly the area of the proposed Red House Farm solar power station.

CPC does not assess the proposed provision of a few bat and bird boxes as suitable or sufficient mitigation. Placing a number of them within the noise envelopes of the installed infrastructure (see section 9 below) is not considered in the applicant's noise assessment.

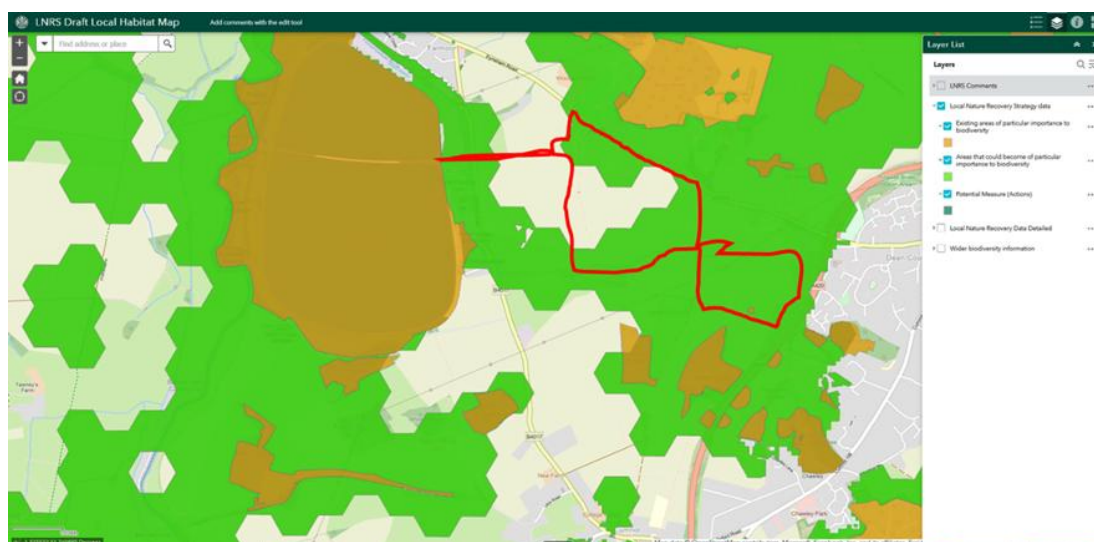
CPC is concerned they have been proposed merely as the bat/bird equivalent of the afore-mentioned wooden bench and bottle of wine for humans.

The applicant's assertion in ES para 5.4 that The [Oxford Local Nature Recovery Strategy](#) (LNRS) considers the site's habitat to be 'of low strategic significance' and that it is 'not considered ecologically important or to provide ecological linkage to strategically significant locations' is untrue.

Not only is this contradicted by the applicant's own ES para 5.16:

Fields within the application site are bound by hedgerows, which provide connectivity through the landscape, including between areas of higher ecological value such as Wytham woods and other area of woodland.

But also, by the details of Landscape Character NCA108 in the LNRS (see below):



Landcover

- Natural (wooded)
- Chalk Downlands
- Clay Vale
- Estate Farmland
- Fensland Hills
- Fensland Slopes
- Industrial/Built-up/terrace
- Fensland Hills
- River Marshlands
- Valley Chalk
- Rolling Farmland
- Settled Ancient Pastures
- Normal Farmland
- Urban Area
- Lake Farmland
- Wooded Downlands
- Wooded Water Slopes
- Wooded Woodlands
- Wooded Farmland
- Wooded Hills
- Wooded Pasture Valleys
- Wooded Plateau

Place Names

- Banbury
- Chipping Norton
- Charlbury
- Woodstock
- Bicester
- Thame
- Wallingford
- Oxford
- Abingdon
- Faringham
- Goring
- Henley

0 5 10 20 Miles

Upper Thames Clay Vales
NCA 108

OXFORDSHIRE
COUNTY COUNCIL

● *This NCA is home to internationally important lowland meadows as well as significant wetland areas.*

'Further West near Eynsham, the Nature Recovery Network was initiated by [Long Mead Wildlife Site](#)'

*‘A prime example of habitat recovery is **Pinkhill Meadow ponds** which was created by Freshwater Habitats Trust on Thames Water land in 1990 on a degraded floodplain. It has now recovered so well that it acts as a demonstration site for how to repair damaged floodplains. Alongside these habitat recovery projects, other local groups like the Farmland Bird Aid Network have been monitoring and increasing farmland bird populations working with farmers.’*

NB. all the above examples are in the Farmoor ward of Cumnor Parish, where the applicant's site is located.

However, given CPC's concerns about the applicant's other assertions about biodiversity and ecology, it has assessed the likelihood of the applicant, or any subsequent developer, undertaking the plan as described as extremely low.

Since no financial costs are listed for the management plan – which would be expected given a 30+ year lifetime – and no sum of money identified to be used to complete it, CPC considers that any conditioning of the plan, or potential enforcement action would be highly unlikely to have any effect on practical ‘on the ground’ outcomes.

- CPC does not consider the application compliant with CNP Policy RNE2 and the associated planning guidance, particularly para 111 that sets out the unsuitability of the Filchampstead area, and because there is no evidence of the applicant having complied with the processes described in CNP para 114.**

As in the rest of this application no cumulative impacts of the proposed immediately adjacent Botley West power station are considered, even though it would sit south of this applicant's site, within the same catchment, at considerably higher elevations.

CPC notes that the applicant's assessment seems to rely entirely on a theoretical assessment of Environment Agency (EA) data¹¹. Even given this constraint, and accepting the applicant's data at face value (which CPC does not) the South and Vale Senior Flood Risk Engineer has registered a holding objection (24/03/2025).

However, as VWHDC and Oxfordshire County Council (OCC) Councillors are aware, there are significant flooding issues in the Parish, more accurately addressed within a specially commissioned CNP [Flood Risk Assessment](#), forming a key part of the underpinning for the Flood Policies within the made CNP.

As this assessment recorded, EA flood zones are calculated using elevation data.

But 'Cumnor Parish is only partially covered by high resolution topographic LiDAR datasets which have a 1m spatial resolution'. Thus, the majority of EA data is reliant on 'coarser- resolution satellite-derived SRTM¹² data which have a 30m spatial resolution'.

'Whilst SRTM data may be fit-for-purpose at the regional scale and for steep areas, it fails to accurately represent flat terrains and local-scale topographic variations.'

The applicant's site sits in just a flat terrain, in the Farmoor valley.

It is of no surprise to CPC therefore (and the reasoning behind this Flood Risk Assessment being part of a made Neighbourhood Plan Policy RNE2) that the applicant's site is in a flood plain and does flood regularly.

The applicant has not addressed this.

Instead, the applicant has chosen to commission for this resubmission a theoretical reassessment of EA information that concludes that part of the site is liable to flooding on a 1 in 100 year basis (see map below), so contradicting its own ES para 2.27.

The applicant's *FRA-RH2 Detailed Hydraulic Modelling J-15316 21/11/2024* states:

following on from the modelling, the planning layout has been amended to remove any infrastructure within areas noted to be within Flood Zone 3 (the 1 in 100yr flood event with climate change).

And refers to Figure 5 below:

¹¹ CPC assumes this the pre March 2025 EA dataset

¹² [Shuttle Radar Topography Mission \(SRTM\) - NASA](#)

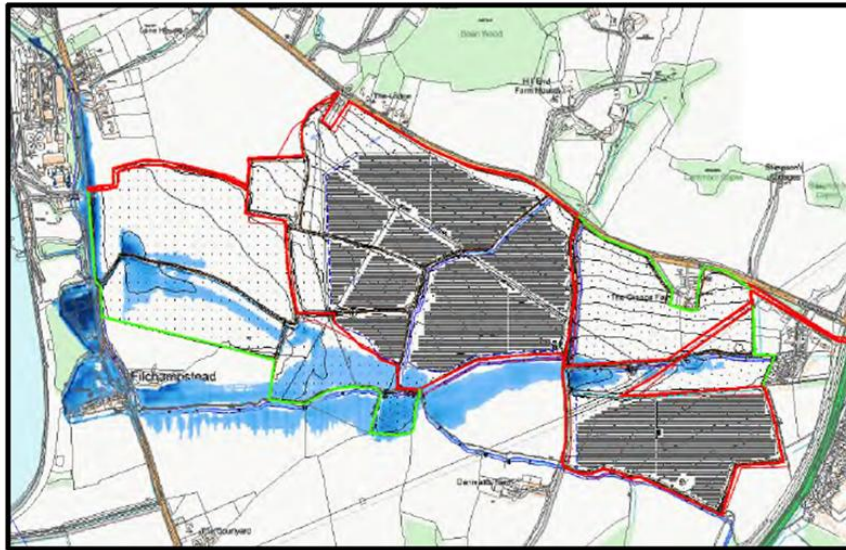


Figure 5. Flood Zone 3 Extents Overlain with the Site Plan

Unfortunately for the applicant the flood risk is not as benign as portrayed.

Overlaying the location of the DNO substation, the high voltage supply cables and the proposed skylark plots onto Figure 5, show all are within the 1 in 100 year flood risk zone.

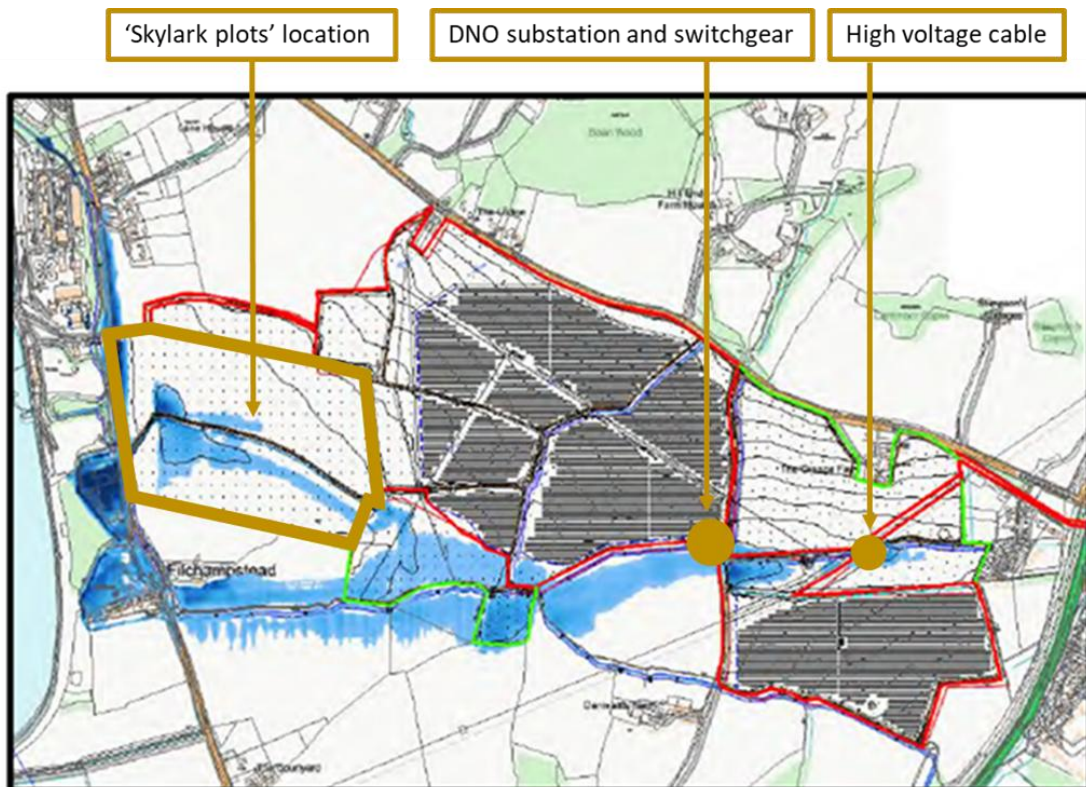


Figure 5. Flood Zone 3 Extents Overlain with the Site Plan

But even the applicant's flawed theoretical assessment, bringing with it the prospect of flooding of a permanently installed high voltage electricity substation, HV cables and a proposed skylark habitat, doesn't fully encompass the flood risk.

Observation by CPC of the site during the autumn/winter 2024/25, anticipating a deficient flood risk assessment by the applicant, has shown that the theoretical 1 in 100 year flood events have already occurred regularly over the past 6 months.

One example was on 25th November 2024, the day after [Met Office](#) named [Storm Bert](#) (see overleaf), with flooding across the site, including beyond EA Zone 3.

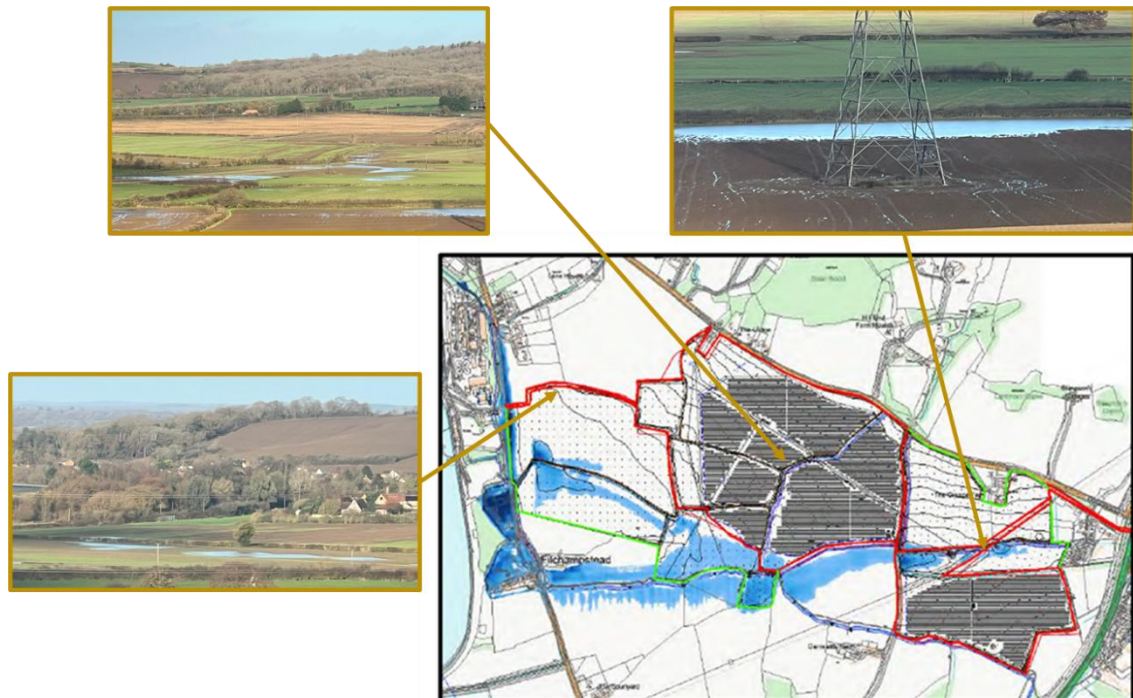


Figure 5. Flood Zone 3 Extents Overlain with the Site Plan

Storm Bert was not a 1 in 100 year event in Oxfordshire. [Met Office](#) data collected in Oxfordshire at South Newington, Banbury, Chipping Norton, Little Rissington, and Minster Lovell showed 3 day rainfall totals of between 88.8% and 111.7% of the 1991-2020 November average.

Even so, 4 days after the storm, the EA was still posting a [Flood Warning](#) across the applicant's site and proposed skylark plots (see below).



In case the applicant is tempted to claim that the November 2024 flooding was a ‘one off’, CPC is happy to provide further photographic evidence covering a period of three years, including another flooding event on January 27th 2025 (see below).



The application is therefore not compliant with either:

- NPPF para 170, as it comprises an inappropriate development in an area at risk of flooding that does not satisfy the NPPF’s para 172 exception test;
- or
- CNP policy RNE2 and the associated planning guidance, particularly para 111 that sets out the unsuitability of the Filchampstead area, and because there is no evidence of the applicant having complied with the processes described in Neighbourhood Plan para 114.
- As elsewhere in this application no cumulative impacts of the proposed immediately adjacent Botley West power station are considered, even though it would sit south of this applicant’s site, within the same catchment, at considerably higher elevations.

- 7 **Best and Most Versatile land (BMV):** CPC observes that the applicant’s designation of the majority of the site to be Agricultural Land Classification (ALC) Grade 3b is dependent on the moisture content (‘wetness’) of the soil as reported.

CPC, by reference to planning challenges elsewhere in England on disputed ALC classifications, has a very low degree of confidence in the application’s assessment, given that for solar power stations, applications on BMV land (categories 1,2 and 3a) is a material planning consideration.

Page 9 of the applicant’s *ALC-RH2 – Agricultural Land Classification Survey v2* states:

The combination of a Wetness Class of II or III for the soils with Field Capacity Days of 136.7 and the clay topsoil textures results in an ALC Grade of 3b for most of the site. A small area in the south east corner had medium clay topsoil with Wetness Class III and hence ALC Grade 3a.

In confirming that the judgement of whether this land is ALC category 3a or 3b is ‘wetness’ (see also Table in para 6.2 of *ALC-RH2 – Agricultural Land Classification Survey v2*), the applicant records a small parcel of the SE corner of the site as Grade 3a. This is immediately adjacent to a watercourse.

Further examination of the *ALC-RH2 – Agricultural Land Classification Survey v2* report shows the only ALC assessment was conducted in July 2022, a period of a record breaking heatwave, and the [driest July on record for southern England](#), according to the Met Office.



© [Met Office](#)

CPC therefore assesses with a high degree of confidence that the ALC categorisation presented by the applicant is inaccurate, the sole measurement having been made in the driest summer on record, so under-recording the amount of BMV land in the site.

It follows that CPC has a low degree of confidence in the applicant’s other assertions on land quality.

As one example, the claims made in ES para10.84-10.105 are just that: claims. This is the conclusion of the Welsh Govt's report into '*the impact of solar voltaic sites on agricultural soils and land quality*' where section 4.2 concludes:

'In summary, further evidence is required to substantiate the benefits of SOM (soil organic matter) at solar PV sites and the claims cited by developers in planning applications.'

- 8 **Highways and Traffic Matters:** CPC is alarmed to read that the developer plans to lay the high voltage cable connecting the power station to the Osney Island substation within the carriageway over a distance of 5+ km along the Eynsham Road (B4044), the West Way and the Botley Road, which will inevitably give rise to that road being at least partially closed for c. 40 weeks (see ES para 4.12, 4.35 and 4.37¹³).

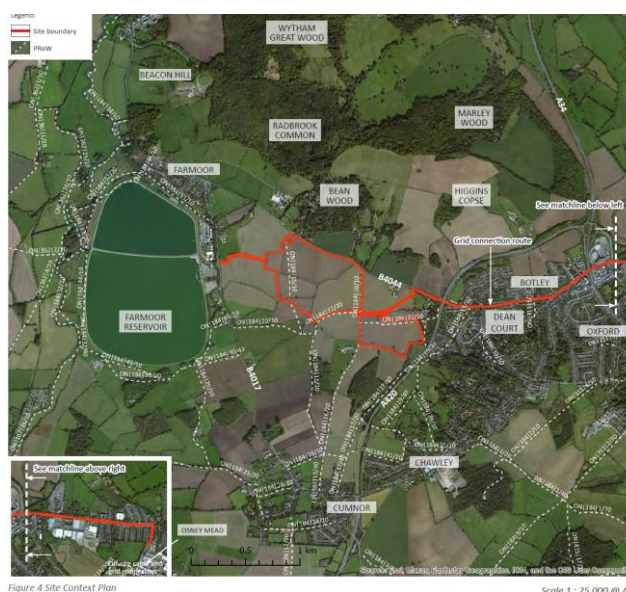


Figure 4 Site Context Plan pp9 of 3377 ES Appendix 7.1 pages 1-63.pdf showing proposed cable route

ES para 7.118 states;

*'Except for the first section of the route, the cable would be installed within the road corridor itself without encountering verges, street trees, footpaths or other parts of the streetscape which contribute to those areas distinctive townscape character.'*¹⁴

As a visual example of the need to disrupt the Botley Road by digging it up, the applicant helpfully provides Representative Viewpoint r4 west and east bound in ES Appendix 7.1 (pp139 and 141) where the superimposed redlines show the extent of the site area, viz the road (below).

¹³ the applicant states in ES para 4.37 that cabling will occur at a rate of 5 days per 100m section of road + 4 days per 100m in arable land. CPC calculates that is c. 275 days or c.40 weeks assuming 7 day working.

¹⁴ See also para 6.10-6.12 on pp 12 of 3377 ES Appendix 7.1 pages 1-63.pdf



This disruption will follow the long period of complete closure during the works on the rail station, the railway bridge and Thames Water's pipes, which themselves were preceded by multiple and prolonged periods of partial closure.

The cumulative effect of these closures on residents of Cumnor, Botley, North Hinksey, West Oxford and the surrounding areas and points beyond, for whom this is the main and most direct route into Oxford (and the sole direct route for bus travel), has already been severe, and will be further aggravated if the route is again obstructed for the purposes of this project.

Moreover, CPC notes that if the proposed traffic filters are proceeded with, **Botley Road will become the only route by which *all* traffic enters West Oxford**, regardless of its point of origin.

Consequently, CPC assesses that the application is not compliant with LPP1 policy CP33 in that it manifestly does not ‘increase safety and improve air quality.’

On the contrary, the proposal to route all construction traffic, including articulated HGVs carrying 40’ shipping containers via the northern section of the B4017 from its narrow, obscured ‘mini roundabout’ junction in Farmoor with the B4044, immediately adjacent to the village hall and opposite a bus stop, south to the proposed site entrance is of great concern to CPC, residents and local businesses (see applicant’s Figure 9 below).

These concerns are exacerbated by the inaccurate description of speed limits, pavements etc. by the applicant in ES Appendix 3.3 paras 2.5 and 2.8.

Routing to the Site

- 4.2. The proposed route, indicated in dark blue below, comprises the B4017 Cumnor Road, B4044 Eynsham Road, the A420 and the A34.



Figure 9: Construction Traffic Routing Plan

Such a routing (with the applicant considering no other from the evidence presented) will adversely impact air quality for residents of properties on the B4017, children, patients and staff at businesses there (there is a children’s nursery, veterinary surgery and audiology clinic along that road).

The routing will pose adverse significant risk for pedestrians and motor vehicles as articulated HGVs attempt to traverse the acute, narrow junction with its very limited visibility (see below).



CPC notes with great concern that alternatives – such as a properly constructed site entrance from the B4044 – have not been considered, and that there’s no evidence of the pollution/health and safety issues described above having been considered either.

Instead, the applicant has chosen to submit in its *Transport Statement CTMP Issue 04* document many pages of text and diagrams about the Ninevah Farm solar power station application near Nuneham Courtney (15km away by the shortest journey), on the spurious grounds that this application by a different developer somehow shows its commitment to considering cumulative effects.

Elsewhere CPC can find no assessment of impacts – including safety or air quality impacts – of the c. 250+ days of traffic disruption caused by digging up the B4044, the Eynsham Road, the West Way and the Botley Road over a total distance of 5.5km – including along the very route they are proposing for site access – to reach the already pre-designated (with no other options investigated or evidenced) grid connection point in Osney.

The applicant’s Transport Statement fails to describe how the impacts of the cabling work will be mitigated, as does the Environment Statement. Thus the applicant has not supplied VWHDC or OCC with sufficient information to determine the application, with the adverse impacts on existing users failing the NPPF ‘agent of change’ principle.

9. Other planning considerations

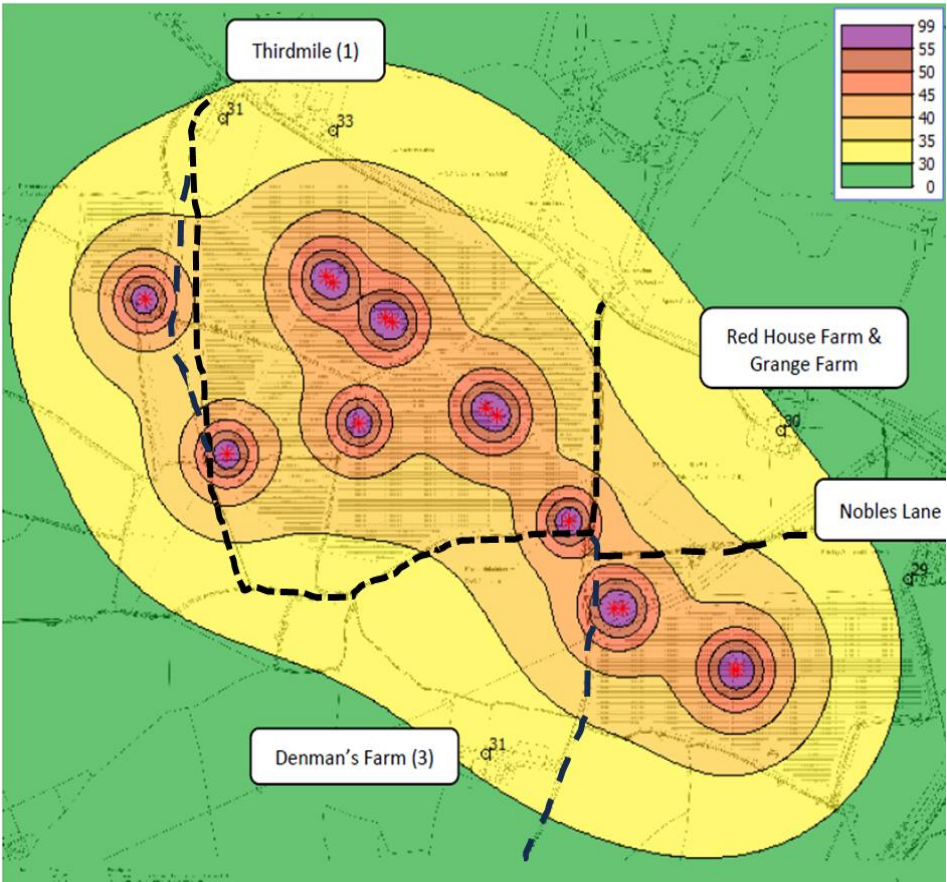
9.1 Pollution and Nuisances

VWHDC scoping opinion 22/V2581/SCO stated:

‘A noise assessment will be required as the development includes infrastructure that has the potential to produce significant noise levels during its operation as well as noise from construction. The noise assessment should consider the potential cumulative effect on a wider area as a result of increasing development in the vicinity of the proposed application area and the approved solar farm adjacent to the site.’

However, in response the applicant seems to have considered cumulative impacts on dwellings (aka receiver locations) – not on PROW.

To remedy this deficiency in the application CPC has superimposed the relevant PROW on Figure 10 (Sound Impact upon Dwellings - below) showing how the noise envelopes of installed infrastructure will impact the PROW.



Applicant’s noise envelope mapping with PROW superimposed as black dashed lines

CPC also invites VWHDC to cross reference proposed locations for bat and bird boxes (*Ecology and Landscape Mitigation and Enhancement Plan drwgn0 3377-TLP-XX-DR-L-10002*) with these noise envelopes, there being significant colocation across the site.

9.2 Noise and vibration impacts on ecology:

No analysis can be found in the application for this topic – considered by PINS in their scoping opinion on the proposed adjacent Botley West solar power station to be required for that development – see below:

3.7.4	Paragraph 7.7.23	Noise and vibration impacts on ecological features	Impacts on ecological features are proposed to be assessed within the ecology aspect chapter of the ES. The Inspectorate is content with this approach. However, the noise and vibration aspect chapter should provide cross-references to the relevant sections of the ecology chapter where appropriate e.g., alignment of the ZOI.
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9.3 CPC cannot find any evidenced reference to the use of herbicides, and their impact on ecology or watercourses, to manage weed growth, including but not limited to

areas not amenable to grazing. CPC notes the widespread literature on this subject and contrasts it with the lack of detail in the application.

9.4 There are references in the application to passive infra-red ‘lighting’. Since passive infra-red is by its very definition ‘passive’, viz it uses an IR detector not an IR illuminator or ‘light’, CPC is concerned that there is no reference to the use of the latter that will be required for CCTV to operate during darkness – a requirement for both health and safety and insurance of solar power stations (See Thames Valley Police’s Designing Out Crime Officer report on VWHDC website).

Given that IR illuminators typically transmit at a wavelength of 850nm the application should include an assessment of the impact of this on nocturnal species, including birds, bats and insects.

9.5 Exposure to radiation. Chapter 4, in respect of the proposal to lay an underground high voltage cable along Eynsham Road, through Dean Court, past the Botley shopping centre and thence along the Botley Road to Osney, states that:

‘4.11 The proposed solar panels will be linked via underground cabling to the associated infrastructure and onwards to the point of connection to the grid network.’

However, no information is provided on the voltage of the underground cable and no assessment of the Health and Safety implications or public exposure guidelines, as laid down by the [International Commission on Non – Ionizing Radiation Protection \(ICNIRP\)](#) – see for example the Planning Inspectorate (PINS) response to the Botley West Scoping Opinion ID 3.15.4 Section 9.4 for their proposed underground HV cable.

9.6 Opaque fencing: The intention of the applicant to install (ES para 12.59) screening

‘in the form of fencing with an opaque covering to mitigate the impacts’

of glint and glare so covering the 2.1m high deer-proof fencing raises many concerns beyond those of openness of the green belt.

No analysis can be found in the application of the impact of this proposal on avian and mammalian species, for example. Also, no details are provided on the maintenance and replacement of this opaque barrier.

9.7 Electrical Output: In its Scoping Report VWHDC notes:

The Applicant’s Scoping Report states the power generation plant will be designed to provide a total output of up to 49.99MW.

And then VWHDC goes on to require that:

The Applicant needs to confirm if there is any operating scenario where total output could be greater than 49.9MW. The Applicant needs to detail the mechanisms the Applicant will put in place to ensure total output will not exceed 49.9MW.

CPC cannot find any evidence that these requirements have been met.

9.8 Major Accidents: on the grounds of the fire risk and proximity to the Farmoor Reservoir (water supply + quality) and RAF Brize Norton’s runway flightpath.

Amongst many deficiencies in the application under this heading **there is no evidence that the points raised by Oxfordshire Fire and Rescue Service (access to all areas, avoidance of smoke plume, on-site information) in their 5th March 2025 response have been addressed.**

9.9 Other matters not considered by the applicant: In [VWHDC's submission to PINS in respect of the Botley West Scoping Opinion](#) it stated that the following should be scoped in:

Waste – *The disposal of materials and plant following decommissioning of the development.*

Electro Magnetic Fields – *on the grounds of the site's proximity to Filchampstead Nursery and the effects on bird navigation and their reproduction at Farmoor Reservoir.*

All of these apply to this application, but none are addressed.

CPC states that they should be, as does VWHDC for a proposed adjacent solar power station.

9.10 Crime: CPC notes with concern the applicant's decision to ignore the recommendations in Thames Valley Police's (TVP) responses to this application, and the prior withdrawn application.

Both TVP responses record that the applicant's Design and Access Statement (DAS) does not adequately address 'crime and disorder' and that the applicant should provide 'an addendum to the DAS that comprehensively addresses crime and disorder, incorporating the principles of Crime Prevention through Environmental Design(CPTED)'

The applicant has chosen not to do this.

Given that TVP has a specialist [Rural Crime Taskforce](#) and a [Rural Crime Strategy](#) the applicant's silence on the matter would be of concern even before TVP drew the applicant's attention to the relevant parts of the NPPF (Para 96b and 135f) and that:

'Domestic organised crime groups continue to target solar farms,'

'DeterTech's Crime Intelligence unit revealed that over 750 kilometres of cable were stolen from solar farms in the UK between January and August 2024, with many sites being repeatedly targeted by organised criminals soon after cables are replaced.'

TVP assess that:

'The proposal for this installation is a 2.1m high stock proof boundary treatment which will provide little deterrence value at all.'

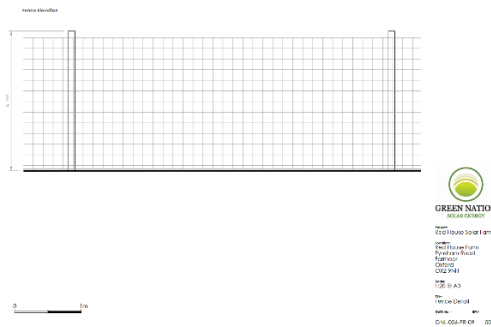
'Security fencing, rather than post and rail is the minimum requirement for a Solar Farm. The purpose of security fencing is to Deter, Delay and Detect. LPS 1175 Issue 8 Security fencing is tested to withstand attack over certain periods of time against a progressive and more inclusive array of tools.'

TVP further states that:

'We have considered the risk profile of a number of solar arrays planned for the Thames Valley Police Area and have determined that remote sites should be

protected by perimeter security fencing specified to LPS 1175 issue 8.1:D10 when the site is remotely situated.'

Applicant's proposal



Source: Fence Detail drwgn GNL-006-PR-09.pdf

Reality: LPS 1175 issue 8.1:D10 fencing



Source: [GBSG](#) 'The UK's leading provider of solar farm security'

10 Cumulative Impacts: Lastly CPC is disappointed, but not surprised, to be able to find no reference in the application to the requirements set out by VWHDC in their EIA Scoping Opinion (P22/V2581/SCO) regarding cumulative planning issues caused by the proposed Botley West solar power station, immediately adjacent to the proposed site.

Specifically, P22/V2581/SCO required:

'The following types of projects should be included in an assessment of cumulative impact (subject to available information):

- a. existing completed projects;*
- b. approved but uncompleted projects;*
- c. ongoing activities;*
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and*
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.'*

And

Consideration should also be given to the cumulative impact of the proposed development and other permitted large-scale solar PV developments on landscape and visual impacts within the local area.

And

Consideration should also be given to the cumulative impact of the proposed development and other permitted large-scale solar PV developments on the supply of agricultural land within the same classification across the local area.

And

Consideration should also be given to the cumulative impact of the proposed development and other permitted large-scale solar PV developments on ecology and biodiversity impacts within the local area. In particular, the cumulative impacts together with the recently published proposals for the Botley West Solar Farm should be evaluated. Cumulatively the two developments would create a vast array of solar panels in very close proximity to Farmoor Reservoir LWS and Wytham Woods SSSI.

Despite these requirements (dating from 2022) the applicant has instead chosen to claim in ES para 14.17 (dated November 2024) that because:

‘no documents for Botley West are currently available for public view’

‘Botley West has therefore been excluded from this cumulative assessment due to lack of available information’

This is untrue.

In November 2024 the following documents (amongst many more) detailing the Botley West proposal and its cumulative impacts in Cumnor Parish were available:

- [Scoping Report submitted to the Secretary of State on 15 June 2023](#)
A 140 page report published on the Planning Inspectorate website
- [Scoping Opinion adopted by the Secretary of State on 24 July 2023](#)
A 222 page report published on the Planning Inspectorate website
- [Botley West Preliminary Environmental Information Report 30th November 2023](#)
A 20 chapter report, including Chapter 19 – Cumulative effects – that refers to this application, see for example Figure 19.3

That the applicant is denying the existence of the fact that VWHDC raised the cumulative issue in their public response to the Botley West EIA screening opinion consultation (see below), that pre-dates this application by 18 months, is extraordinary.

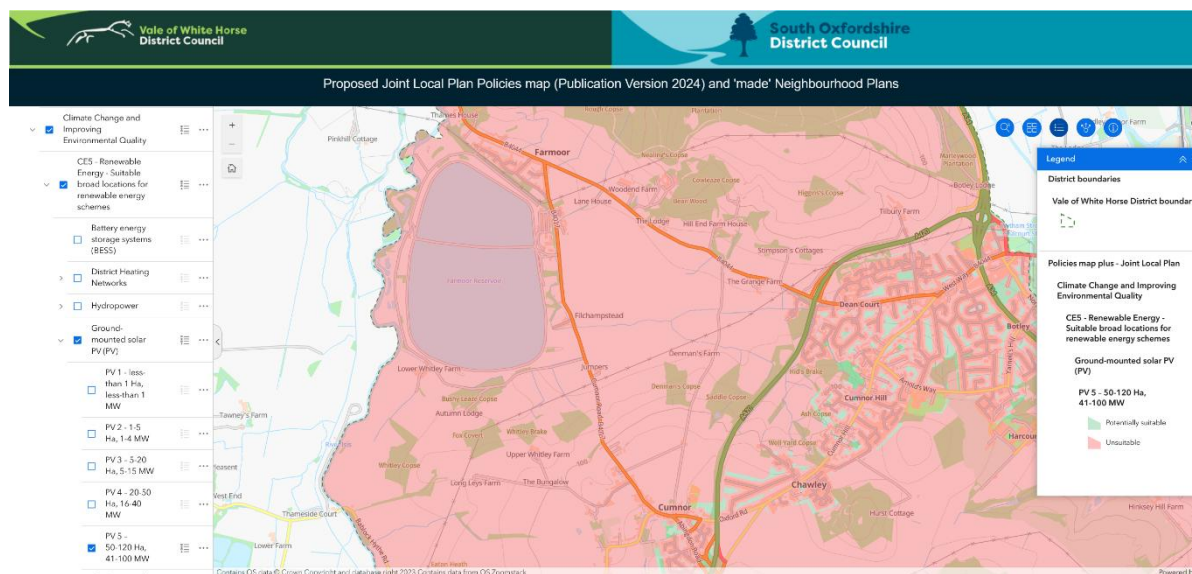
‘7.2.35 refers to ‘large’ but doesn’t define what this may be. There are also potential sequential Cumulative Impact with other existing and proposed solar and other development in the Oxford Green Belt, especially those sites that the Oxford Green Belt Way passes. This area of the Oxford Green Belt contains numerous rights of way with limited detractors and is a key recreational resource to Oxford and surrounding urban areas.’

CPC considers that the applicant’s cavalier approach to Cumulative impacts is emblematic of its approach to the whole application, undermining any confidence 3rd parties may have in the information commissioned by the applicant in support of its application, and the application itself.

11 VWHDC Emerging Joint Local Plan 2041 Reg 19 – Policy CE5 Renewable Energy

CPC notes that this application does not conform to Policy CE5 in the published Reg 19 Joint Local Plan 2041. Specifically, it does not comply with policy CE5 parts 3, 5, 10, 13 and 14.

The map below shows how the application is sited in an area ‘unsuitable’ for solar PV (part 5 of policy CE5) both by virtue of its land use (60+ Ha) and proposed energy production (49.99MW).



For the avoidance of doubt the application remains sited in an ‘unsuitable’ area (part 5 Policy CE5) if its land use and/or power output fell into the next lower category (20-50Ha, 16-40MW).

For context: VWHDC has prepared a Joint Local Plan (JLP) for South Oxfordshire and Vale of White Horse, which, once adopted, will replace the existing local plans.

The JLP was submitted to the Secretary of State on Monday 9 December 2024 (so before this application was registered) for independent examination.

In line with paragraph 49 of the National Planning Policy Framework (NPPF), decision-makers may give weight to relevant policies in emerging plans depending on several factors: the stage of preparation, the extent of unresolved objections, and the degree of consistency with the NPPF.

The starting point for decision taking remains with the policies in the current adopted plan.

The JLP is at an advanced stage of preparation and carries some weight. Where unresolved objections have been received on policies, limited weight should be applied, but where there are no unresolved objections, moderate weight can be applied. Full weight should only be applied, where relevant, following the outcome of the independent examination and adoption of the JLP.

Acknowledgements

Cumnor Parish Council would like to thank the many contributors who have helped in the preparation of this document.

Your expertise and detailed local knowledge are much appreciated and greatly valued by Council.

Appendix 1

Community Benefit

While it is not formally a planning matter, CPC wishes to comment on the references to community benefit within the applicant's planning application.

ES para 9.71 states:

Red House Solar Ltd has reached out to Cumnor Parish Council (C.P.C.) regarding the offer of a wider 'Community Fund' of £10,000 per annum on the commissioning of the solar array. These discussions are ongoing.

To put the record straight, CPC's publicly available documentation shows that the applicant last 'reached out' to CPC via its PR company on 2nd October 2023, some 18 months ago.

CPC's minutes show that Council then invited the applicant to its 6th November 2023 meeting (2023-11-06CPC mins.docx) where, during an extensive discussion and Q&A, the applicant did not mention Community Benefit.

That was the final communication CPC has had with the applicant until 13th March 2025 when its PR company requested details of CPC's next Planning Cttee meeting.

CPC invited Alpaca Communications to its 7th April full Council meeting. Neither the applicant nor its PR company attended.

Therefore, it is untrue that 'discussions are ongoing' with CPC about Community benefit for this application.

In the applicant's 2nd October 2023 letter to CPC, and in this resubmitted application, there are a number of 'offers', couched as Community Benefit to assuage the impact on Cumnor's residents, employees and visitors.

As with the remainder of this application they are inadequate.

Given Cumnor's 7000 residents, 'A community benefit contribution of £10,000' a year represents £1.42 per capita per year. The applicant makes no reference to index linking, making this inadequate sum even more so.

By way of comparison, we estimate that in the case of the Longfield solar project in Essex, the Community Benefit figure would come to £87 per capita per year – over 60 times as much.

In the case of the Viking Wind Farm in Shetland, we arrive at a figure of £125 per capita per year, or 90 times as much as is on offer to Cumnor.

The offer of a 'Community Energy project – 5-10MW allocated for the local community' is equally risible.

Even given the debatable ability of the applicant's PR company's ability to recognise the difference between a rate of power delivery ('5-10MW' viz 5000-10000kW) and the unit of electricity that consumers buy (the kilowatt hour - kWh), the notion that up to 20% of the electrons (10MW of 49.99MW) from this scheme can be allocated to Cumnor Parish would seem to defy both how electricity supply works in the UK and the laws of physics.

The strange cases of the Photoshopped park bench and a permissive path sandwiched between the B4044 and an opaque 2.1m security fence topped by CCTV, have already been addressed above, so suffice to conclude that 20 saplings planted on previous arable land, with no management plan for irrigation, pruning or cropping, does not a community orchard make.

As ever, CPC stands ready to engage in meaningful discussions on real Community Benefit.