

Cassington Parish Council Responses to Submissions For Deadline 7 and Closing Statement

Cassington Parish Council's Responses to Botley West Solar Farm Applicant's Responses to other D5 Submissions (REP6-049)

REP5-068 Cassington Parish Council Flood Risk (1,2)

The Applicant admits that no further evidence is to be presented to reassure the residents of Cassington, Jericho Barns or Worten that the Botley West Solar Power Station will not increase flood risk. As we have repeated in submissions throughout the Examination these localities are all at a high risk of pluvial flooding with Cassington being at particular risk as it has flooded twice in the last 20 years (2007 and 2024). The Applicant justifies this by stating that *"the proposed solar panel design, with no anticipated increase in flow rates or adverse flood risk impacts on Cassington"*. Furthermore, the Applicant claims that no further modelling is required because *"the surface water model [APP-172] was developed specifically as an enhancement measure rather than a requirement in line with national or local planning policy, including the NPS and NPPF"*.

Cassington Parish Council refers to the duties of the Examiners and Secretary of State to ensure that developments which may lead to a detrimental increase in flood risk are not approved. Evidence presented by Clive Carpenter of GWP Consultants, acting as a consultant for Cassington Parish Council, has identified that all the recent literature on the topic has been consistent with increased runoff, including, most relevantly, the recent study by Galzki & Mulla (2024). This study undertook observations of solar arrays across a range of climatic conditions and soil types in the USA, including those similar to the U.K. Mr Carpenter also repeated during the Issue Specific Hearing, as with his written submissions, that the mitigations outlined by the Applicant were not modelled in terms of their effectiveness or tested in any other way for the site, including spacing between arrays, vegetation and filter strips, and balancing ponds. Mr Carpenter has detailed these aspects in his previous submissions most notably in REP1-050 but also REP3-074. Overall, whilst the Applicant claimed that the outlined measures would mitigate any foreseeable rainfall events there was no evidence presented that this was the case. The Applicant's contention that flow rates will not be influenced by the solar arrays of the proposed development have been thoroughly rebutted by the evidence we have presented.

Given the extreme vulnerability of Cassington to flooding events (confirmed by the Applicant's own models see our submission REP5-068) we have received no evidence to change our view that the Botley West Solar Power Station poses an increased flood risk to the village of Cassington, and likely Jericho Barns and Worten. Indeed, the evidence presented by our hydrologist suggests the contrary, that the risk is real and the aforementioned settlements are at high risk.

The Applicant relies on the outlined flood mitigation measures they have referred to throughout the Examination and again in REP6-049. As we related in REP3-076 GWP have identified that drainage systems have been developed as far as concept designs, but they have not determined the methods of surface water flow discharge, nor have they determined the locations of off-site discharges, and hence have no site-specific detailed designs, which will be left to a later detailed design stage. Furthermore, despite a 12-month period passing since the PEIR documentation became available and now a further 8/9 months since the proposal was submitted with the ES, the Applicant failed to undertake any infiltration testing on the site, an action that may have provided some confidence in their modelling. We continue to consider the lack of infiltration testing to be a critical issue in that the Applicant has no quantitative understanding of the extent to which they will be able to infiltrate water into the ground and therefore they cannot determine with any confidence, the size of attenuation ponds they require, whether there is room for the required size of ponds or where they will be required to be sited. To be clear, they have not demonstrated the feasibility or viability of their proposed drainage schemes. They have also not modelled the likely effectiveness of any proposed outline flood mitigation measures. No further enlightening details were presented by the Applicants during the Issue Specific Hearing, instead a stubborn reliance on post-consent activities. We note here that infiltration testing and modelling of flood mitigation measures have been repeatedly requested by Cassington Parish Council, the OHAs and the Examiners.

Leaving detailed design of mitigation measures for prevention of increased flood risk to the Detailed Drainage Designs after consent is granted provides no comfort to Cassington Parish Council or the residents of Cassington, Jericho Barns and Worton Farm. People's homes are at increased risk of flooding should this development increase the rate of water runoff from the site even marginally. Post consent, Cassington Parish Council and the residents of Cassington will have no power to influence the design or implementation of flood prevention measures despite the reassurances of the Applicant that they will be consulted. Attributing increased occurrence of flooding to the Solar Power Station will be statistically very difficult and would entail employment of further experts and no doubt legal expertise which would be out of reach financially of the Parish Council and residents. Furthermore, there are concerns regarding flood prevention measures such as balancing ponds as these require continual and ongoing maintenance, something Blenheim Estates have failed to do for a balancing pond

located on the boundary of Cassington Village for two years up until the week before the Issue Specific and Open Hearings, despite numerous requests to do so by the Parish Council.

Cassington Parish Council therefore urges, again, that the precautionary principle is applied here, and areas of the development sited on the hills overlooking Cassington Village to the north and Worton Village to the north are removed as detailed in our letter to West Oxfordshire District Council, August 13th, 2024 (see Appendix 1). This would have the additional benefits of reducing landscape and heritage impacts on the villages of Cassington and Worton and the settlement of Jericho Barns, improving the safety of residents in these villages/settlements with respect to hazards associated with the Solar Power Station, as well as reducing impacts on Public Rights of Way (footpaths 152/6/10 and footpath 152/8/10). We point out that the Examiners and the SoS have a legal duty to refuse any development that imposes an increased flood risk to residential or other properties. Given Cassington is at high risk of flooding already and the Applicant has produced no evidence that their proposed mitigation will be effective the proposal must be reduced or refused.

REP5-068 Field drainage

Cassington Parish Council were astonished to find that the Applicant, even at the late stage of the Issue Specific Hearing had not even requested field drainage plans from the landowner, Blenheim Estates, or even enquired as to whether such plans even existed. The Applicant now undertakes to do this during detailed planning and to repair any damage to land drainage incurred during construction. Cassington Parish Council are highly sceptical as to whether this will be even possible. The forest of pilings supporting solar arrays driven 1-3m into the ground will inevitably severely disrupt land drainage. This risk was identified early in the Examination by an agricultural expert who actually managed this land for more than 20 years (Roderick Craig; see Appendix 2). These drains are typically 0.7m below the soil surface and are emplaced in soil using a trenching tool deployed behind a tractor (AHDB, 2018). Mr Craig has pointed out that: *“A lot of the land is under drained at 22-yard intervals all of which will be severely compromised during construction. This will change water flow and certainly increase surface run off from untapped springs.”* Cassington Parish Council cannot envisage a method to repair such drainage over the very large scale of the fields to the north of the village of Cassington as well as Jericho Barns and Worton. Again, this poses a significant risk of increase of flood risk to offsite locations.

Cassington Parish Council point out that this issue has been raised repeatedly throughout the Examination. It became clear during the Issue Specific Hearing that despite continual requested to investigate this matter the Applicant has done nothing. Again, they have instead effectively kicked this issue into the long grass by undertaking

to look at it post consent and to “repair” damage done post construction, a statement which is simply not credible given the likely scale of damage and obstructions presented by the pilings and other structures of the Solar Power Station. Further evidence of our fears is presented by the repeated flooding of fields between Pinsley Wood and Long Hanborough Station. According to the farmer who worked this land for 47 years, the field pictured in Fig. 1, floods every winter because Blenheim failed to repair a damaged land drain there many years ago.



Figure 1. Field between Lower Road and Pinsley Wood. Photo C/O Rosemary Lewis.

The Examiners should note that rather than pooling in a flat field, such damage would result in excess water moving downhill towards Cassington, Jericho Barns and Worton. We also note that it appears Blenheim Estate have offered up land allocated to Botley West Solar Farm for building development in the area photographed in Fig. 1.

[REP5-068 Cassington Parish Council Funding 1 and 2](#)

Cassington Parish Council assert that the business model of PVDP is to obtain permissions for solar projects and then to sell them on. This is apparent from the company history that we have been able to uncover. Information has been extremely difficult to ascertain on PVDP’s past history as well as associated companies. This has been the basis of our concerns about any promised actions post-consent. In short, we

have little confidence in such “promises” as the actual development and operation will likely be undertaken by other parties.

The subsidy Cassington Parish Council refers to is the fixing of renewable energy to UK gas prices. This is in effect a subsidy because the cost of renewables has fallen below that of gas. Both Reform and the Liberal Democratic parties are discussing removing this costing structure because it is leading to extremely high energy costs to the UK public and industry and as such is presenting a constraint to the economy and investment. Cassington Parish Council therefore view this locking of renewable energy to gas prices as unlikely to remain in place in forthcoming years. Inevitably this will be a consideration for anyone investing in large-scale solar.

We note the lengthy explanation about the sources of funding for this project and past company arrangements for PVDP / Solar 5 / Kamisol Ltd. Cassington Parish Council does not have the resources to further investigate these matters, especially at such a late stage of the Examination. However, we do believe that there are still matters that require investigation or clarification in relation to PVDP / Solar 5 and associated companies regarding the viability of financing and sanctions versus Russian investment. These concerns are based on our own investigations and Written Parliamentary Questions tabled by Calum Miller, MP for Bicester and Woodstock on November 5, 2025, namely:

- 88545: To ask the Secretary of State for Energy Security and Net Zero, what assessment he has made of the effectiveness of Planning Inspectorate and Nationally Significant Infrastructure Project processes in evaluating the financial viability of funding commitments made by developers of major energy projects.
- 88546: To ask the Secretary of State for Culture, Media and Sport, what assessment she has made of the adequacy of the (a) financial structure and (b) governance arrangements of (i) Blenheim Estates and (ii) the Blenheim Charitable Foundation.
- 88547: To ask the Secretary of State for Energy Security and Net Zero, what assessment he has made of the financial viability of SolarFive Ltd and Photovolt Development Partners to undertake the development of Botley West Solar Farm.
- 88548: To ask the Secretary of State for Energy Security and Net Zero, whether his Department has sought the advice of the office of the Financial Sanction Implementation on reported Russian-linked funding associated with the proposed Botley West Solar Farm.
- 88549: To ask the Secretary of State for Energy Security and Net Zero, what assessment he has made of the effectiveness of (a) the Planning Inspectorate and (b) Nationally Significant Infrastructure Project processes to safeguard against national security risks from investment by (i) inappropriate or (ii) hostile overseas sources.

The answers to these questions are due to be received by the 12th November.

REP5-068 Cassington Parish Council Socioeconomics

The statement by the Applicant “wind power requires more land area per unit of energy generated than solar” is true in the sense of overall area of footprint but is a deceptive answer. Wind turbines need significant spacing to avoid turbulence and obstacles. However, the direct land impact is minimal, as the area beneath the turbines can often remain in use for activities like arable farming. Therefore, the visual impact of such installations is in fact less compared to solar arrays which carpet the land, regardless of the height of turbines. The Applicant has also neglected to mention the new developments in wind turbine design which can both lessen visual impact and impacts to wildlife, especially birds and bats. These include:

- Vertical Axis Wind Turbines
- Bladeless Turbines
- Blade Painting
- Smart Curtailment Systems: systems which use radar or cameras to detect wildlife and which slow down or pause turbine spin when wildlife is present.

Smart design, in terms of placement of wind turbines can also lessen visual impacts. For many people, including members of Cassington Parish Council, wind turbines are much less visually intrusive than solar arrays and wind farms can, if sensitively designed, enhance the landscape. The fact that this form of renewable energy was not even considered as an alternative to solar emphasises the lack of knowledge-driven consideration of alternatives to the present overbearing development placed on greenbelt land of great heritage and amenity value.

We acknowledge the financial information related to finances flowing to the maintenance of Blenheim Estate from the proposed project in REP5-062. We find this income for the Estate rather small compared to the overall rental income from Blenheim Estate’s lands for the Botley West Solar Power Station Project and note that, as pointed out by ICOMOS this is not an acceptable mitigation to the damage incurred on the setting of the Blenheim Estate WHS.

Cassington Parish Council wholly rejects the classification of Oxfordshire as vulnerable in terms of socioeconomics to “shocks”. Using the COVID pandemic, a wholly exceptional occurrence unlikely to be repeated in our lifetimes, as a justification for this classification is unjustified (and remains so) and clearly aimed at casting the Botley West to look more economically significant to Oxfordshire than it will be if successful.

REP5-068 Cassington Parish Council Landscape and Visual

Cassington Parish Council note that the Applicant has provided no response to the contention that the Buffer Zone is far too narrow in respect of the village. Reference to

REP5-068 and REP5-097 with regard to land removals from the proposed scheme are not related to the village of Cassington and therefore have no relevance in mitigation of the visual impacts and overbearing presence on Cassington or Jericho Barns. The RVAA presented for D6 provides extremely weak and contested justification for a 25m buffer zone. We deal with this below.

REP5-068 Cassington Parish Council Glint and Glare

Cassington Parish Council acknowledge the new information provided by the Applicant on the likely effects of non-reflective coatings on solar arrays. As we noted in REP5-068, evidence suggests that whilst non-reflective surfaces are less attractive to certain groups of insects, under overcast conditions they may be more attractive to aquatic insects, a situation known as an ecological trap (Száz et al., 2016). If our supposition is correct, that bats are attracted to solar arrays because of higher densities of insects, and this drives mortality in the former then the application of anti-reflective coatings or use of anti-reflective glass may increase impacts on the local bat communities. Aquatic insects are in abundance across much of the central are of the Botley West proposal because of the high number of water bodies (rivers, streams, ponds and water-filled gravel pits).

Cassington Parish Council also note with interest the Botley West Solar Farm Oxford, UK Thermal Impact Report (REP6-066). This notes that temperatures above the solar arrays will on average be elevated by 06°C and up to 1.1°C over background levels.

- It is not clear from the Report provided whether the Applicant's consultants included the additional absorbance of thermal radiation as a result of anti-reflective coatings on solar arrays and whether this might significantly influence the analysis with respect to Oxford Airport.
- This does indicate that Cassington Parish Council were fully justified in their concerns that the very close proximity of the Solar Power Station to residential properties could increase air temperatures (REP5-068). Even an increase of 1°C is significant given the increasing occurrences of high summertime temperatures in the U.K. as a result of climate change. This is a direct potential health impact to residents of Cassington and Jericho Barns and we reiterate that it could easily be mitigated by a reduction in the scheme to increase buffer distances to these settlements.

REP5-068 Cassington Parish Council Site Selection and Cable Route Alternatives

The Applicant provides no further information that changes our view that this development represents inappropriate and highly impactful development on Green Belt by virtue of its size and intrusive nature. This is not compensated for or justified by the

nature of the project which is not needed to meet government targets for solar renewable energy by 2030 or 2050.

Cassington Parish Council REP5-068 Landscape 1

Again, the Applicant fails to justify the indefensible meagre buffer zone of 25m for the proposed development with the result that it still presents an overbearing visual impact on the village of Cassington and Jericho Barns. The Applicant makes the case that they have reduced the scheme in response to concerns regarding visual impact and heritage, but Cassington Parish Council points out that none of these reductions have been made in proximity to Cassington or Jericho Barns. As pointed out by the Examiners during the Issue-Specific Hearing, the Applicant has continually applied a principle that their consultants “judgement” is superior to that of independent landscape experts and the many IPs, often people who actually live within the landscape of the proposed development and understand potential impacts much better than consultants working mainly from desktops and hasty information-gathering activities in the field (see next section). The Applicant has steadfastly refused to engage with residents on the issues of buffer zones, landscape impacts and heritage because their aim has always been to maximise the size of this Solar Power Station and maximise income for the landowners and operators.

Cassington Parish Council REP5-068 Landscape 2

The Applicant responds by referring to the RVAA PINS Ref: EN010147 Document Ref: EN010147/APP/17.13 (REP6-064). Cassington Parish Council have reviewed this document, and we have the following comments.

Late Appearance of the RVAA

Cassington Parish Council would like to emphasise that the late appearance of the RVAA is highly unsatisfactory. This has only allowed a cursory examination of the RVAA Report and certainly does not allow for the Applicant to respond to criticisms of the methods and approaches used by Interested Parties (IPs), nor allow the IPs to assess any subsequent modifications of the RVAA to improve it. We have consistently requested an RVAA throughout the Examination, as have other IPs and the Examiners, and its failure to appear until after the Issue Specific Hearing can only be interpreted as the result of deliberate decisions by the Applicant.

The Buffer Zone

The Applicant emphasises that the two consultants who participated in the design of the project, including the designation of a 25m buffer zone, together have 70 years of experience. It is explained that there is no rule / guideline as to how wide a buffer zone should be and in the professional opinion of the consultants 25m (initially 20m) from the curtilage of residential properties was “*a good starting point to mitigate any unacceptable adverse effects*”. This statement indicates that the buffer zone distance

imposed by the Applicant, following the advice of two (non-independent) consultants is entirely subjective and, even if based on professional experience, a matter of opinion. Evidence already provided by Cassington Parish Council in REP3-076 that the Buffer Zone of 25m is one of the smallest proposed for a UK Solar Farm. Whilst data on buffer zones are often not available for solar farm developments an examination of other projects in the U.K. shows that 25m is significantly below what other developer's consultants consider a reasonable distance. These include:

- Chimmens Solar Farm, Kent (<https://www.chimmens-solarfarm.co.uk/faq/>) Buffer zone of 100m.
- Ship Meadow, Suffolk (<https://www.shipmeadow-solarfarm.co.uk/>) Solar Panels 100m from residential properties, Inverters, 200m.
- Cottam Solar Farm, Lincolnshire (<https://www.cottamsolar.co.uk/>) Buffer zone of 50m to properties.

Just by U.K. solar industry practice, therefore, it would appear that the judgement of the consultants employed by the Applicant are at significant variance from those in other projects and highly unconservative in comparison to them.

Evidence of what occurs in other countries is also hard to acquire, but one example of information provided by a US solar company, Go Solar Florida (<https://gosolarfloridastate.org/>) recommends a buffer zone of 500m from residential property for large solar and 200m for small projects.

Examination of the academic literature related to planning of solar farms both in the U.K. and in Europe indicates that they also use a standard buffer distance from residential property or towns and villages of 500m (e.g. Castillo et al., 2016; Palmer et al., 2019). The reasoning for this given in Castillo et al. (2016) is:

“Large-scale solar PV installations have relevant implications on near residential areas, such as emission of pollutants and visual intrusion in rural settings. In terms of populated areas, the appropriated site for the solar farm should consider a buffer distance in order to avoid most direct impacts and resistance of the local communities (e.g. Turney and Fthenakis, 2011; Tsoutsos et al., 2005. In this sense, locations at distances greater than 500m from cities/residential areas (more than 1 inhab/ha) were considered more suitable for PV system installations.”

We also point to a recent study in the USA where a preferred buffer distance of 1-5 miles was exhibited by residents for most land types except for land where solar farms were already installed (Carlisle et al., 2016).

Overall, we would suggest based on evidence primarily from the U.K., but also from other countries and academic studies, that the buffer distance proposed by the

Applicant's consultants is highly unconservative and out-of-step with those of other developers.

Issues with the RVAA

The Applicant explains the principles behind an RVAA as being to establish whether or not a property or group of properties are subject to *“an overbearing effect and/or result in unsatisfactory living conditions, leading to a property being regarded, objectively, as an unattractive (as opposed to a less attractive) place in which to live”*. Thus, the RVAA is not simply undertaken to establish whether a development can be seen from a property but *“allows the assessor and the determining authority to make a judgement as to whether the residents at these properties and communities would be likely to sustain unsatisfactory living conditions which it would not be in the public interest to create.”* Further: *“that significant visual effects or changes to the views available from residential properties and their curtilage are not the decisive consideration, rather it is the residential amenity and, with regard to the Landscape and Visual Impact Assessment (LVIA), visual amenity that is determinate.”* It is also clarified that the *“RVAA focuses on private visual amenity at individual properties whilst LVIA focusses on public amenity and views. TGN2/19 makes it clear that ‘combined effects on a number of residents’, by means of ‘aggregating properties within a settlement’ is a matter of LVIA and not of RVAA”*.

The Applicant has laid out the RVAA methods used as being in four phases or parts, which we will not repeat here. However, we note that as with the determination of appropriate buffer distances the RVAA assessment is somewhat subjective, a matter we will return to at the end of this section. Certainly, for someone living at a property for many years, the view of a consultant employed by the Applicant on residential visual impact may be quite different to the property owner, especially when the outlook from their property is predominantly rural.

RVAA or LVIA?

As Cassington Parish Council related in REP5-068, we reviewed the LVIA(APP-045) and also the Applicants Response to the OHA's Response to the Rule 17 Letter (EN010147/APP/13.4). The bulk of the LVIA Report focused on Public Rights of Way and there is little within this report that refers to groups of houses within Cassington. We also note the comment on P53 that residents were consulted on visual impacts with an example of Purwell Farm, a property belonging to Blenheim Estate. We ask again, can the Applicant provide evidence that properties along the northern margin of Cassington and in the settlement of Jericho Barns had similar consultations and were considered for reduction of Solar Arrays adjacent to the boundary of the Botley West Solar Power Station?

We note that the Applicant should have been aware of the potential and oppressive impacts of the proximity of solar arrays to properties on the northern boundary of the village because WODC stated (recorded in the LVIA) that:

“WODC also suggest that development be restricted from land to the north of Cassington. Although the masterplan indicates that development would be set back from the edge of the settlement in this location, land rises steeply to the north of the settlement making any development in this location prominent and visually exposed. This area is also within the Green Belt, which performs particularly well in this location in terms of protecting the historic character of settlements and safeguarding the countryside from encroachment.”

The applicant noted that this point was “Noted”.

This presents some confusion for Cassington Parish Council, as whilst groups of affected houses along Eynsham Road, Williams Court, Yarnton Road and Barrow Court are potentially visually impacted (as well as impacted through effects on local amenities such as PRow), they are ignored in the LVIA, but treated individually in the RVAA. We are not experts in these matters, but it strikes us that cumulative impacts on multiple residential properties at Cassington, the closest village to the development, should have been considered in the LVIA.

Specific Issues

We note that Salt Cross Village has not been considered in the RVAA. Whilst the village is not constructed as yet, perhaps it should be assessed, at least through Phases 1-2 of the RVAA based on current plans submitted to West Oxfordshire District Council (WODC).

The Applicant’s consultants have strictly imposed the Zone of Theoretical Visibility (ZTV) on the basis of a model implemented through ARCGIS. Even where properties or settlements about the ZTV they have not been included in this assessment. A prime example are the properties at Jericho Barns. These have not even been included in the RVAA despite their distance to solar arrays of 50 – 100m (see Fig. 1.24 of the RVAA Pt 1).

Properties on Eynsham Road were excluded from the RVAA on the basis that existing vegetation screens these properties from the proposed development. This decision appears to be based on satellite imagery, rather unreliable as a guide to visibility as it depends on the density and height of vegetation, and the single very poor photograph (P1) which Cassington Parish Council believe is unrepresentative of the view from all or even the majority of properties along Eynsham Road (both houses and gardens). Indeed, this does not appear to be a view from a garden at all but rather of an access track to the land behind houses on Eynsham Road. We also note that all of the photographs taken in the RVAA are from a single season when vegetation is mostly in

full leaf. This does not represent the worst-case scenario for vegetative screening which occurs during the winter months.

There is no reference in the RVAA to the properties (houses and gardens) between the centre of Cassington and Barrow's Court. These include:

- Yew Tree House
- Finis Griston
- The Chase
- The Laurels
- Chaplain
- End House
- Lindum Cottage
- Silver Birches
- Coalville
- Netley
- Farways
- Willow Cottage
- Birch Cottage

The curtilage of all of these properties is within 150m of the solar arrays.

Photographs P2 and P3 (and all ground-based photos) of the RVAA are very unhelpful in providing the Examiners with a good understanding of the visibility of the development from properties in Williams Court and Barrow Court. Viewing the photographs used to illustrate the RVAA, overall, it is apparent that none of them give an accurate appraisal of visual impacts on properties because (a) they are taken from outside of properties, often at distance, and (b) they are all taken on the 14th October, 2025 in autumn (with leaves on deciduous vegetation). We note that this date was the week after the Issue-Specific Hearing clearly in response to the Examiner's repeated request for the RVAA. These photographs give no indication of likely views of the proposed development from properties, including views from upper storey windows, or their gardens.

Construction Impacts of the Proposed Substations and Solar Panels (1.4.7). Cassington Parish Council regard the omission of this part of the proposed development on the grounds that impacts will be no higher than during operation as very ill-considered. The visual disturbance from construction may well be significantly higher than during operation. For example, disruption and disturbance of views from motorised vehicles, including heavy plant, people wearing high viz, pile drivers and other equipment with a high elevation. This omission should be rectified and a full RVAA Assessment of the construction phase of the project, which may last many months in any locality should be carried out.

We note that the assessment on Table 4 is based on distances measured from the houses to the Project (1.4.19). However, an RVAA, as the Applicant states in their own documents should consider impacts from the curtilage of the property. Residents use both the main residences, outbuildings (should they be present) and gardens of their properties. This contradiction in methodology requires clarification.

Overall assessment for Cassington (Table 4). We note that many of the properties along the northern margin of Cassington Village have a line of sight to the proposed project. It is not merely “a dozen of the properties”. The assessment of Medium-low magnitude and Moderate effect deemed as not significant by PVDP following installation and Low/Minor not significant in terms of residual effects are not justified and the evidence to justify such a judgement not presented / incomplete given our comments about the photographic evidence above. Furthermore, we refer to the comments by ICOMOS in REP2-069 with specific comments made by Hal Moggridge OBE VMH PPLI FIHort RIBA AADip, a landscape expert commissioned by ICOMOS, with respect to the proximity of Botley West to villages.

“ICOMOS-UK’s Cultural Landscapes and Historic Gardens Committee recommend omission of those areas which would be especially oppressive to local villages or particularly harmful to this attractive landscape.”

And

“Solar arrays should be kept apart from all villages by a significant landscape breathing space and never be closer than a 3-minute leisurely walk (200m) from houses on the edges of villages - Shipton Slade, Bladon, Begbroke, Cassington, Church Hanborough.”

And

“However, solar arrays are proposed far too close to Cassington village. There should be wide open fields between the NW edge of Cassington village with dense new hedges planted along the solar array boundary. The fields NW of Cassington village should be excluded from development to provide the village with breathing space.”

It is apparent that the consultant’s employed by PVDP to complete the RVAA judgement on this issue is challenged by the views of an independent landscape consultant as they have been by the OHAs and other IPs. Given the very poor quality of evidence presented in the RVAA we refute the assessment presented. We also challenge the assessments for Barrow Court and Williams Court, also presented on Table 4, as underestimating the visual impact of the proposed development on these properties.

RVAA Conclusions

We also challenge the conclusions based on “assessment and professional judgement” that no residential properties should be included in Phase 4 of the RVAA. The RVAA is clearly seriously deficient, no doubt partially because it has been completed in a rush

following the Examiners request to see it at the Issue Specific Hearing. Evidence on which the assessments have been carried out and “judgement” applied is highly deficient and defective. Given some properties are virtually surrounded by the proposed development, the very definition of giving an overwhelming or oppressive impact on residents by the Applicants own standards outlined in the RVAA, these conclusions are ridiculous.

As a result of the defects in the RVAA identified by both Cassington Parish Council and the Examiners, as outlined in their Rule 17 Letter of 23rd October 2025 to the Applicant, Defence Infrastructure Organisation, Oxfordshire Host Authorities, and Historic England we fully support the Examiner’s proposal:

“There shall be a distance of no less than 250 metres between the edge of any part of the proposed operational solar array and any residential dwellinghouse (as measured from the curtilage of any private residential property or address), unless otherwise demonstrated to be acceptable in writing to the satisfaction of the relevant local authority, such satisfaction to be given formally in writing subject to Schedule 16 of this Order.”

The measure proposed by the Examiners would also go some way to mitigate the oppressive impact of the development, as currently proposed, identified by independent landscape experts and many IPs. It would also partially or wholly mitigate risks related to temperature elevation and of flying debris in the case of a catastrophic storm or tornado damaging the solar arrays and associated infrastructure.

REP5-068 Cassington Parish Council Human Health

Cassington Parish Council note with gratification that the Applicant agrees with their analyses of one of the Exceptional Circumstances justifying this project in terms of human health. This project will not have a significant human health benefit. They also agree with us that societal benefits may arise through energy security. However, as we have pointed out previously, there is now an overwhelming queue of solar projects at various stages for connection to the grid. This means that the SoS can be selective as to the most sustainable projects to approve. Botley West is not sustainable with respect to impacts on people and wildlife.

REP5-068 Cassington Parish Council Local Ecology and Nature

The Applicant has not provided any further evidence with respect to mitigation of the impact of this project on birds or bats. As it stands, Botley West Solar Power Station will result in a loss of sky lark breeding territories, even with the mitigation identified in terms of providing some land managed to produce favourable conditions for sky lark nesting. We now consider that the compensatory measures outlined by the Applicant will be even less effective given the comments by the OHAs related to Government guidance AHW4: Skylark Plots (<https://www.gov.uk/find-funding-for-land-or->

farms/ahw4-skyllark-plots) which indicate that plots should be on land more than 5ha in size if they have an open aspect or >10ha if bounded by trees to avoid predator attack (OHAs, 2025). A large proportion of the land parcels listed by PVDP are less than 5ha in size and further detail is needed to understand if these areas are bounded by trees or woodland before it can be assumed they will be suitable to support skylark. Other issues are identified with the set-aside areas by the OHA.

We also note that no such compensatory measures are developed by the Applicant for other farmland birds which are in decline, especially including grey partridge, yellow hammer, linnet and starling. Overall, we agree with the OHAs in that a comprehensive farmland bird strategy should be developed, not just including skylarks but also the other declining species of farmland birds (OHAs, 2025). The Applicant's ecologist seemed to be disparaging of the numbers of these other species for the area of the Botley West proposal during the Issue Specific Hearing, but we note that substantial numbers of breeding pairs of Red Listed species other than skylark were identified (e.g. linnet 37, yellow hammer 78; figures from the 2024 survey APP 158). Overall, 107 species of birds were identified during the breeding birds survey indicating a diverse assemblage of species. For the wintering bird surveys, the peak counts of some Red Listed species across the entire site are also impressive, although of only County Importance (e.g. linnet 3,074 peak mean count, starling 3,112 peak count, yellow hammer 692 mean peak count; APP-159).

We point out again, that since Deadline 5 the UK Government, specifically DEFRA, has published the Accredited Official Statistics Wild bird populations in the UK and England, 1970 to 2024 (Updated 23 September 2025); see: <https://www.gov.uk/government/statistics/wild-bird-populations-in-the-uk/wild-bird-populations-in-the-uk-and-england-1970-to-2024#breeding-farmland-bird-populations-in-the-uk-and-england> . These disturbing statistics indicate that Farmland Birds have declined by 62% since 1970 and continue to decline at a fast rate, with an 11% decrease in the five years following 2019. Many of these species are those which occur in the farmland that will be impacted by the Botley West Solar Power Station including, for example, grey partridge, starling, yellow hammer, linnet, skylark (weak increase in the last 5 years), kestrel and reed bunting. Noting here that Grey partridge, starling, yellowhammer, linnet and skylark are farmland specialist species.

As previously noted, these birds require the mosaic of habitats within farmland and are also reliant on cropping as a food source. These forms of connectivity have not been acknowledged as a significant factor in the likely impacts of Botley West on farmland bird populations.

Failure to present a comprehensive and effective strategy to mitigate impacts on farmland birds by the Botley West Solar Power Station would be a failure of the SoS's and Government's national and international commitments to protect wildlife. Just this

month the UK Government's new Planning and Infrastructure Bill has drawn criticism from the European Union, which warns that the reforms could jeopardise the UK's trade relationship with the bloc. The core issue lies in a perceived weakening of environmental and habitat protections, which may conflict with "level playing field" obligations under the EU-UK Trade and Cooperation Agreement (TCA). We note that although this refers to wider legislation regarding development it is relevant here because it notes increasing international concern at the lack of effective protections for nature within the U.K. These concerns are justified based upon statistics which demonstrate the continued decline of species such as farmland birds and bats.

With respect to bats, no new evidence is produced. The Technical Report on Bats adds one reference, which has just been published, on findings in the US that careful management of the design of solar farms can benefit bat populations (Szoldatits et al., 2025). This study is focused mainly on small solar farms (7.5 – 34.5ha) with four sites between 188 and 485ha, all much smaller than Botley West. Of these sites, 8 out of 12 were 100% managed as ecovoltaic sites, in other words managed and planted to enhance wildlife, particularly insects, a favoured prey of most bats in Europe in contrast to European sites where grass is the main habitat, grazed by livestock (as in Botley West; Szoldatits et al., 2025). The larger sites were only managed for a small proportion of their land to enhance nature (<5% - <10%; Szoldatits et al., 2025). We also note that these bats were different species to those in the U.K. and Europe and so likely exhibit very different ecologies. Furthermore, control sites, which were exclusively arable fields in the USA are likely to be subject to different patterns of pesticide use than in the U.K. There is also a difference to studies on bats and solar in the U.K. and Europe where a wider range of habitats were used as controls (Szoldatits et al., 2025). This paper is referred to in an attempt to lead the Examiners to conclude that evidence on the impact of solar on bats is equivocal. It is not. The US study has so many differences to those in the U.K. and Europe as to be of limited use in the present Examination of a Large-Scale Solar Power Station in the U.K. The US study finds that for one bat species abundance is increased compared to control sites, for another this varies through the year and for a third, no difference is detected (Szoldatits et al., 2025). This confirms one universal conclusion that the species of bat studied is important as they vary in response to habitat changes. Szoldatits et al (2025) point out that the negative impact on European and U.K. bat species by solar projects may result from proximity to rural landscapes, tree rows, isolated trees, riparian zones, and water bodies which are important habitats for bats. Alterations to these landscape features by solar development can result in impacts on migrating, foraging, and hibernating behaviours (Szoldatits et al., 2025). The landscape in the vicinity of the Botley West Solar Power Station has all of these landscape characteristics and so even this paper confirms Cassington Parish Council's concerns regarding impacts on a bat community that is of at least national significance and likely, international significance.

Cassington Parish Council remain of the opinion that given that the Applicant's survey work has identified an abundant and species rich community of bats in the area of the proposed Botley West Solar Power Station. As we have described, new evidence arising from this and other work, that bats use arable fields as habitat and that solar arrays have a strong negative impact on bat communities, is extremely strong. Mitigation of impacts on bats based on buffers around migration corridors demonstrates that the Applicant and English Nature have fallen into the trap of old thinking about bats and utterly fail to appreciate the importance of the wider arable fields and landscape to several species of this "at least nationally important" community. The evidence that arable fields are of importance to bats comes from the peer-reviewed literature and PVDP's own survey results. We believe this mitigation will be wholly inadequate to protect this important bat community. We conclude, based on the evidence presented, that this project should be either rejected in its entirety or much of the Central Site of the project reduced. We further point out that failing to protect such an important community of bats, including rare species, would be a failure of the U.K. to meet its national and international commitments and could, along with other questionable decisions by the Government on development projects which impact nature, open a potential challenge to inconsistent approaches to biodiversity conservation through Judicial Review.

REP5-068 Cassington Parish Council Landscape and Visual Impacts

These comments are dealt with in the response to the RVAA by Cassington Parish Council, above. We maintain the significant issue with downgrading of "Moderate" impacts to non-significant as outlined in REP5-068. The Applicant has produced no evidence to change our view on the poor application of methodologies in the LVIA and the very poor RVAA. As the Examiner's stated during the Issue Specific Hearing, why should the Applicant's opinion be the only one that counts.

REP5-068 Cassington Parish Council Greenbelt, Landscape & Ecology 1

Cassington Parish Council remains adamant that solar NSIPs must represent sustainable, well-designed projects which are located in areas where they exert minimum impact on landscape, heritage, people and nature. The fact that so many solar projects have come forward is highly relevant to Botley West. If the U.K. has an abundance of project proposals, then it can be selective as to which are best in terms of meeting the Government's goals with a minimal impact on people and the environment. We have made this case strongly and the lack of further response from the Applicant means they have no argument against this contention.

The Applicant does not dispute the potential serious impacts of the proposed development on farmland birds or bats, instead relying on Biodiversity Net Gain. Cassington Parish Council have identified that such impacts require mitigation, a significant change in the project design or a recommendation not to accept the project

to protect these important elements of U.K. wildlife. In the case of the bat community in the Central Section of Botley West, this is of at least national significance and likely international significance.

The Applicant contests the views of an independent landscape expert who worked on behalf of ICOMOS to assess the visual impacts of the Botley West Solar Power Station. There is no reason why the Applicant's opinion on such impacts should carry greater weight than such an expert, as well as experts employed by the OHA and other IPs. This point was eloquently put forward by the Examiners during the Issue Specific Hearing. The simple fact is that this proposed development is too close to villages in the area, particularly Cassington, which the RVAA has identified is closest to Botley West, but also others. It thus has an overbearing impact on residents. Furthermore, it is set on areas of rising land, such as along Lower Road and as such has a very high visual impact on the landscape. Mitigation, in terms of reductions of the project have been relatively small and focused around Bladon, because of the very close proximity to Blenheim Palace and Gardens. This rather small reduction has not mitigated wider impacts on the Setting of the Blenheim Palace WHS, nor mitigated impacts on the residents of Cassington or Jericho Barns.

The RVAA referred to by the Applicant is reviewed above, it has clearly been completely in haste following the Issue Specific Hearing and is of poor quality. Its conclusions are unreliable.

REP5-068 Cassington Parish Council Greenbelt, Landscape & Ecology 2

Cassington Parish Council disagree that the Sports Fields and Sports and Social Club are well screened from the proposed scheme. The northern edge of the field is quite well screened, the eastern edge is not. In both cases, screening is much less during the winter months. This again is clearly a matter of opinion.

REP5-068 Cassington Parish Council Health and Efficiency

Cassington Parish Council note that the Applicant seems to have confounded two issues in their response to REP5-068 as they appear to address increases in environmental temperature and impacts on Cassington residents versus the overall health benefits they put forward to the scheme, successfully demonstrated by Cassington Parish Council as insignificant.

The Applicant repeats the evidence put forward by Cassington Parish Council that Solar Power Stations increase ambient temperatures but then suggest this only occurs in arid environments. Respectfully we point to the evidence from thermal modelling, analysed above, that Botley West will increase ambient temperatures. Even a 1oC increase in temperature could have a significant impact on health for our residents, many of whom are pensioners, especially given the increasing frequency of high maximum summer temperatures in the U.K. both now and into the future. As pointed out in the literature

cited by the Applicant the best mitigation for these effects is a buffer zone of several hundred meters.

REP5-068 Cassington Parish Council Noise and Vibration Impacts

Despite the reassurances of the Applicant, Cassington Parish remain concerned about this issue, especially during construction. The scale of the proposal means that such noise will be prolonged over an extended period of time with consequent disturbance and health effects on our residents.

REP5-068 Cassington Parish Council Cumulative Impacts

The Applicant repeats the contention that the massive Botley West Solar Power Station will not significantly impact the Blenheim Palace WHS or its setting. They also repeat that relatively minor reductions around Bladon mitigate impacts to the WHS and its setting. Cassington Parish Council have comprehensively rebutted these contentions in REP5-068 and previous documents. The Applicant produces nothing new here, just that their opinion carries more weight than that of several independent landscape and heritage consultants and the expert advisory body for UNESCO World Heritage Sites in the U.K., ICOMOS. The massive scale of the Botley West Solar Power Station, along with existing and further proposed housing developments around Woodstock and Long Hanborough (see <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2031/>) represent an increasing and cumulative erosion of Blenheim Palace WHS and its setting.

REP5-068 Cassington Parish Council Agricultural Land Use

Cassington Parish Council note with interest the Applicant's comments that 20ha / 40% loss of BMV land refers only to permanent loss of agricultural land and therefore Botley West will not result in significant impacts to agricultural land. Although 40 years is viewed as temporary by the Applicant, it is a very long time to take land out of agricultural production. As we know, the world is rapidly changing and, as a result, food security is an extremely important consideration. Analyses by David Rogers of SolarQ have identified that despite NPPF Guidelines recommending that solar development avoids Best and Most Versatile (BMV) land, in fact it is disproportionately targeting Grades 1-3 land classifications (the best agricultural land; see: <https://www.solarq.org/analyses>). Irrespective of the Applicant arguing that the land will be mostly only affected temporarily (for more than four decades) undoubtedly this proposed developed has a high proportion of BMV land against the recommendations of the NPPF. Cassington Parish Council are also not convinced of the assumption of little or no impact of solar development on soil structure. Compaction of soil, coverage with solar arrays, driving in of pilings over such a large area, we believe may have substantial and significant impacts on soil structure and fertility and may take some time for remediation to restore to full agricultural production. This suspicion is reinforced by

findings of studies on soil health beneath solar arrays which find significant declines in plant growth, biomass accumulation and negative impacts on soil microbial communities compared to control areas (e.g. Lambert et al., 2024; Scholten et al., 2024).

Closing Statement Cassington Parish Council

Cassington Parish Council would first like to thank the Examiners for their thorough and complete treatment of the evidence coming forward for the Botley West proposal. We have been extremely impressed by the depth of detail into which the Examiners have gone on this particular development. This has provided some reassurance to the residents of the Parish of Cassington that this proposal is not simply a “done deal” and has been treated fairly and according to the regulations.

Cassington Parish Council would also like to thank the OHAs for their hard work on this proposed project, especially for the Local Impact Report and in their attention to providing answers and evidence with respect to the Examiner’s questions. Again, our residents have felt supported by the work of the OHAs.

At the end of the Examination of the proposed Botley West Solar Power Station Cassington Parish Council finds that many significant issues with this development have not been resolved.

The question of increased flood risk to the village of Cassington, Jericho Barns and Worton remain unresolved. Cassington Parish Council, with the assistance of a professional hydrographer, Clive Carpenter, have found strong evidence, across multiple academic publications that solar arrays increase runoff from rain event because of the dripline effect. Any increase in runoff, especially connected with extreme rainfall event will increase flood risk to Cassington and potentially Jericho Barns and Worton. Nothing the Applicant has presented provides convincing evidence that this is not the case. Indeed, modelling studies carried out by the Applicant confirm Cassington’s extreme risk to pluvial flooding. The Applicant has failed to take actions that may have presented some level of comfort to the Parish Council such as infiltration testing and modelling of mitigation measures. Instead, they simply rely of assurances that they will undertake planning for flood prevention in detail post consent. Cassington Parish Council have no confidence in such promises, especially as the developer may not be PVDP, and also because of our lack of ability to effectively intervene post consent because of financial and other constraints of powers. We therefore impress upon the Examiner that it remains in our firm view that the only option open which provides certainty with respect to increased flood risk to Cassington, Jericho Barns and Worton is to reduce the scheme on the hills to the north of these settlements as outlined in this and previous submissions. This applies a precautionary approach and prevents a

situation where our residents may face an increased frequency of flooding and no power to prevent it or hold the owners/operators of Botley West accountable.

The issues of landscape and visual impacts are inextricably linked to heritage in the Botley West location. At the centre is the Blenheim Palace World Heritage Site (WHS) and its setting which comprises the ancient and historical villages surrounding it. Cassington Parish Council have demonstrated how Cassington has shared a long history with Blenheim Estate, a history which has shaped the village and the Estate Farmlands around it. The village itself comprises a historic centre with many Grade 2, listed buildings and a Grade 1 listed church, St Peters. In this respect we share features with other villages forming the setting of the WHS including Woodstock, Church Hanborough, Long Hanborough and Bladon. This land mostly comprises Oxford's Greenbelt and as such has an important function in preventing urban sprawl and in providing beautiful countryside for amenity and enjoyment. This all adds up to a landscape which offers an incredible quality of life as expressed by our residents through the Forever Fields project.

The Applicant and landowner have consistently downplayed the significance of the impacts of this enormous development on our landscape and heritage. Their arrogant contention that only their consultant's opinion mattered or somehow had precedence over other experts has been a disturbing aspect of this Examination. Independent landscape experts have pointed to many failures of the Botley West Solar Power Station in terms of landscape and heritage. Given the view of the NPPF is that solar is inappropriate development for Greenbelt land this project, 70% on Greenbelt will convert a landscape of high heritage value, aesthetic beauty and amenity to a semi-urban environment. The buffer zone, has been particularly problematic, and although there is no set distance for such developments, Botley West's 25m is substantially lower than other solar projects in the U.K. There have been multiple submissions on what constitutes the setting of the Blenheim Palace WHS, including statements and consultancy reports on behalf of the palace that directly contradict the WHS Management Plan of 2017. Cassington Parish Council have provided solid evidence on this topic and believe that Botley West must be significantly reduced or refused to prevent further degradation of the value of the Blenheim Palace WHS and long-lasting damage to an outstanding landscape much valued by its residents. Finally, the RVAA, which despite numerous requests, did not appear until Deadline 6, has been rushed and is completely inadequate for examination of Residential Visual Amenity Assessment in Cassington and other locations. Frankly, this document was an insult to all Interested Parties, the OHA, the Examiners and the people of West Oxfordshire and Vale of the White Horse. We agree with the Examiners that the buffer zone should be extended to 250m from residential properties.

Cassington Parish Council successfully argued for Ecology to be included in the Examination as a substantive issue. Surveys of Farmland Birds and Bats provided by the Applicant have been undertaken to regulatory standards. They have revealed a strong community of farmland birds using the land for nesting and overwintering. They have also provided evidence of a community of bats, particularly in the Central Area of the proposed development of at least National Importance and likely of International Importance. Cassington Parish Council believe this finding is likely a result of the mosaic of habitats in the area which is highly favourable to bats. Given these animals are indicator species this points to the high ecological value of the area, the very opposite of claims of the Applicant that the area was of low ecological value. Of course, as residents of the area we know it is of high value to wildlife, we see while walking the area or working in the allotments or in the school grounds birds, including those in national decline, amphibians and reptiles, bats and even rare insects such as the rugged oil beetle. We are saddened and disappointed by the inadequate mitigations proposed for farmland birds, notably sky lark but also nationally declining species such as linnet and yellowhammer. A comprehensive conservation plan for farmland birds is required in mitigation. The mitigation proposed for bats is unlikely to effectively protect all members of the community and will lead to a decline of this important population. We believe the only mitigation for this is removal or large-scale reduction of the central section of the Solar Power Station. It should be borne in mind that U.K. biodiversity is amongst the most depleted globally and even recent evidence indicates continued decline of groups of species such as farmland birds. Development must either enhance the environment for such species or be avoided if we are to turnaround this biodiversity loss.

Cassington Parish Council has noted other potential impacts on our residents by Botley West Solar Power Station including danger during catastrophic weather events such as tornadoes and the heating effect of solar arrays. In many cases these threats to people can be reduced by establishing a buffer zone of several hundred meters to mitigate such hazards.

Cassington Parish Council would like to point out the enormous burden in time and resources that this Examination has placed on us and other Interested Parties. The fact that developers spend large amounts of money employing teams of consultants to produce poorly indexed reports numbering thousands of pages make enquiries for NSIPS highly asymmetric. Despite the production of such vast quantities of information Cassington Parish Council, other IPs and even the Examiners, have found many of the analyses presented defective in methods and approaches, highly biased in assumptions, such as the overriding importance of their own consultant's subjective opinion and generally not able to withstand close scrutiny in detail. We believe the SoS actions in waving through NSIPs which were recommended for rejection by Examiners has encouraged at least some developers, such as PVDP to go through the motions of

consultation and generation of materials such as the ES and its LVIA and RVAA without being serious in meeting the community of residents in an open spirit of collaboration and co-development. This is a huge, missed opportunity for both PVDP, the landowners and our residents. We recognise the serious threat of climate change, and we are generally supportive of renewable energy. Locally we have excellent projects such as the Charlbury Community Solar Farm and the Osney Lock Hydro Power installation. We firmly believe that a genuinely open approach to local communities to build a renewable energy project that worked for communities and wildlife would have been achievable. This may not have been at the scale of an 840MW Power Station but still would have been substantial and qualify as an NSIP. Instead, a will to maximise profit for the investors in this scheme and for leasehold income for the landowners has driven an uncompromising and unsympathetic approach to this development, encouraged by a view that the current drive for renewables means anything will pass the NSIP process. The current adversarial planning system in the U.K. underlies our experience whereby the developer presented a plan as *fait accompli* to the public which drives them into a position of opposition because the alternative is to accept a scheme which will have enormous impact on our environment and residents. A process where developers were obliged to meaningfully involve communities in planning large scale projects would be much more acceptable to all parties and would likely speed up planning, rather than further, and further tilting the table towards developers with the inevitable perverse outcomes, growing opposition and political discontent.

Our view is that as it stands, Botley West Solar Power Station is not acceptable as a development because of its impacts in the following areas:

- Landscape and the amenities it offers (e.g. Public Rights of Way)
- Residential visual amenity
- Heritage
- Increased flood risk
- Ecology
- Threats to health (e.g. heat, catastrophic damage scenarios)
- Greenbelt
- Best and most versatile agricultural land

The Applicant has relied on the very special circumstances (VSCs) of the national need for increased renewables and other VSCs, most of which have proved to be unjustifiable or contrived (e.g. positive impact on health, socioeconomics). We believe that this is an example of an unsustainable development in terms of its impacts on people and nature. Given the current queue for solar in the U.K. the impacts of this proposed development cannot be outweighed under the VSC for renewables which must be weighted by other opportunities for more sustainable solar or wind renewable developments. We also

note the continuing concerns regarding the financing of this project and around the nationality and interests of investors.

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Appendix 1 Letter Cassington Parish Council to WODC, August 13th 2024

████████████████████
West Oxfordshire District Council,
Woodgreen Office,
Council Offices,
Witney,
Oxfordshire,
OX28 1NB
Email: ██████████@westoxon.gov.uk

████████████████████
Parish Councillor,
Cassington Parish Council
13th August, 2024

CC: Councillors ██████████@westoxon.gov.uk); ██████████
██████████@westoxon.gov.uk); ██████████@westoxon.gov.uk); ██████████
████████████████████

Dear ██████████

I am writing to you as a member of Cassington Parish Council on behalf of my fellow Councillors and residents of Cassington and Worton. There are many issues which are of great concern with respect to the Botley West Solar Power Station proposal including:

- Damage to heritage including a World Heritage Site;
- Damage to the Greenbelt, which in WODC's own words is functioning well around Cassington;
- Damage to productive farmland;
- Damage to our landscape and the setting in which Cassington and Worton residents live;
- The proximity of the solar arrays to properties in Cassington;
- Loss of amenity;
- And Flooding.

I am specifically focusing on the last of these issues with respect to Cassington and Worton. Both Cassington and Worton have suffered from repeated flooding issues over many years resulting from surface water runoff from the hills lying to the north. This matter was specifically raised with PVDP and their consultants in a meeting with Stop Botley West on the 19th January, 2024 with respect to comments made in the very first response written by Cassington Parish Council to the first "informal" consultation held in December 2022 and the response to the Scoping Report, June, 2023. PVDP and their consultants dismissed without hesitation or discussion our concerns on the grounds that the peer-reviewed evidence we produced on the matter were from other countries and settings and therefore not relevant to this development.

We have now seen evidence from two commissioned reports by hydrologists, one asked to look at the flooding implications for a private landowner in the Parish of Cassington, the second, a report to Stop Botley West. In both cases, these reports indicate that not only are our concerns legitimate but that the Botley West proposal has neglected to deal with the risk of increased runoff resulting from the placement of solar arrays on the land to the north of the village in its

proposals to date. There has been no willingness to alter the footprint of the Central Section of the proposal to ensure the safety of the properties of our residents. There is no sign to date of any specific design features of this proposal to alleviate the increased flood risk that this proposal represents.

Cassington Parish Council are therefore proposing that either the Botley West proposal is rejected which remains both the Parish Council's and resident's favoured option, or it is scaled back from the north of the village to the summit of the hill contours that lie to the north of the village. A rough sketch of what this would look like is indicated in Figure 1 below.

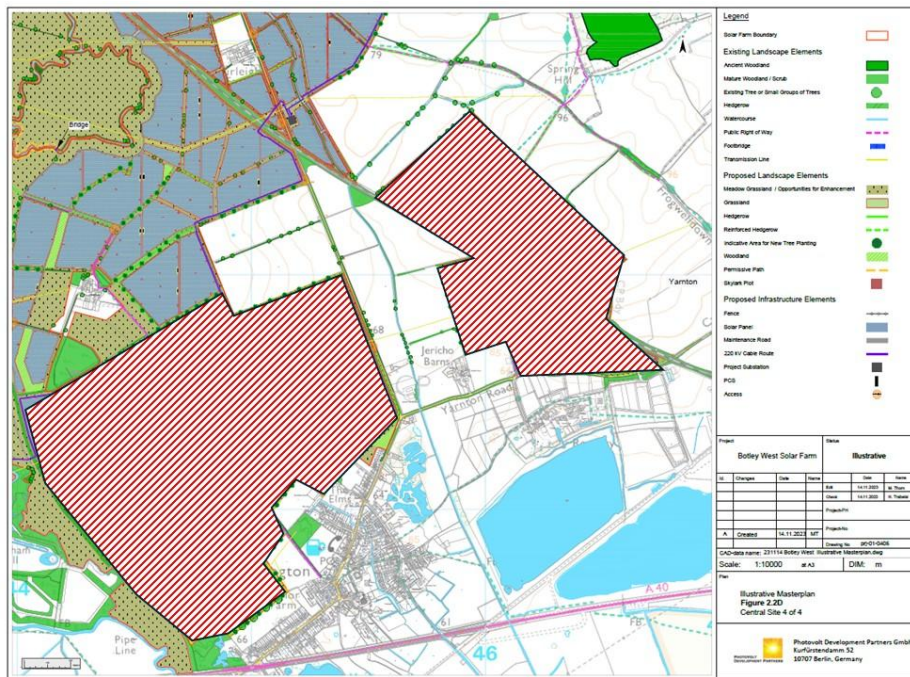


Figure 1. Proposed scaling back of the Botley West proposed solar arrays north of Cassington and Worton. Areas in red hatch are where solar arrays from the proposal are removed.


This proposal has the advantage of moving the entire scheme back from Cassington village where we believe that it is far too close to dwellings in the village. This will help to preserve amenity of at least some of the public rights of way from Cassington and Worton. It also avoids issues around the potential alterations to local temperature that may occur as a result of conversion of solar energy to heat by the vast array of panels across the landscape. It also preserves some of the greenbelt and farmland that would otherwise be lost.

As representatives of residents of West Oxfordshire, we sincerely hope that you are able to support the views of the residents of the Parish of Cassington and to ensure that through the coming months of the planning process our views are heard and fairly represented both in negotiations with PVDP and in submissions to the Planning Inspectorate. We believe that this will require the appointment of legal representation during the planning enquiry (assuming the proposal is accepted for examination) by WODC on behalf of all of the district councils affected by the proposal. We believe that this is absolutely the wrong proposal in the wrong place and that its imposition will stifle community-based efforts to attain carbon emission reduction targets. However, if the worst should happen and this proposal is accepted then it is critical that it does not pose threats to our residents and their property and has as little impact as possible

on amenity, landscape and environment. We are very happy to meet and discuss this and other issues related to the impact of this scheme on Cassington Parish.

Kind Regards



 on behalf of Cassington Parish Council



Appendix 2 Email from Roderick Craig January 29th 07.32

I attended the Botley Solar farm consultation at Cassington village hall on 12th January 2024. I had been involved with the agricultural management of all the land in question from 1978 to 2001 and have subsequently consulted farmers of the land up unto 2022.

I obviously refute the claim that the land is all classified as 3c and 3d for agricultural purposes, this is gross oversimplification of the fact. A far more in-depth study of this needs to be undertaken as this affects how the water movement off the panels will behave. I believe that there has never been such a large area of solar panels placed so close and ABOVE such a complicated river catchment area I.e Rivers Glyme, Dorn Evenlode and Thames. Manor Farm Purwell Farm and all the surrounding land south of Bladon all have complicated soil profiles involving soils other than 3c&3d involving heavy impervious clays. A lot of the land is under drained at 22 yard intervals all of which will be severely compromised during construction. This will change water flow and certainly increase surface run off from untapped springs. There is 92 pages of print supplied by the developer regarding hydrology none of which addresses in any depth the increased flooding risk downstream all the way to Cassington, Botley and Oxford. If your statement is correct that the developer has to demonstrate that all the above issues have or will be addressed, then they clearly as yet have not been addressed. If water goes down a plug hole then I think this could also affect Witney and the windrush. What affect does this water movement have on the existing housing stock and that to come, what affect does this have in times of flood on the already over loaded sewage system in the catchment area. Further the water level in Blenheim Lake has to be managed, both the Glyme and the Dorn feed into the lake, how is the increase in rapid flow going to affect water levels in the lake and in extreme circumstances the relief sluice has to be opened to protect the main dam letting yet more excess water into the Evenlode to head to Cassington and beyond. The developers will argue that the grass cover will prevent all this but it will not in times of severe storms as it will move off the panels too fast to permeate into the soil but will run off the surface. The houses below the allotments at Cassington at the bottom of Manor Farm were flooded some years ago and a flood pond was installed, this will not be sufficient to protect those houses. I believe at the very least the development should not continue beyond Bladon for the reasons stated above and someone needs to do some in depth research to address my concerns and scientifically prove me wrong.