

BY E-MAIL ONLY: botleywestsolar@planninginspectorate.gov.uk

Secretary of State for Energy Security & Net Zero

Cassington Parish Council,

Department of Energy Security & Net Zero

IP [REDACTED]

3-8 Whitehall Place

London

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14th July, 2026

Botley West Solar Farm – Application for an Order granting Development Consent

Cassington Parish Council Responses to Submissions in Response to
the Secretary of States Consultation 1 Letter issued 14th April, 2026
(original) and 20th April, 2026 (Amended).

[REDACTED] (Cassington Parish Council).

Dear Secretary of State,

Herewith, Cassington Parish Council presents our findings in response to the submissions to the Secretary of State's (SoS) Consultation Letter 1. We note that yet again, this has required considerable work under tight deadlines for a Parish Council most of whose Councillors work full time. This is disappointing given that we have been dealing with the Botley West Application for Development Consent since the informal consultation in December 2022, a period of over three and a half years including the Examination which lasted from April to November 2025 prior to the preparation of a recommendation by the Planning Inspectorate. During this time the information requested of the Applicant by the SoS in Consultation Letter 1 was requested time and again on topics such as ecology, flood risk, residential visual amenity, landscape and heritage by interested parties, including Local Authorities and the Planning Inspectorate. You can therefore understand why as representatives of our parishioners we are astonished and disturbed that the Applicant is being given yet another chance to provide information that should have been provided previously. As you state in your letter dated 8th June, 2026, responding to a further request for an extension to provide missing information (Ref: EN010147):

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

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

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

Cassington Parish Council are of the firm belief, along with many of our parishioners, that the confidence and integrity of the planning process has already been significantly undermined by the decision to allow the Applicant yet another opportunity to provide information that should have been presented over the last three and a half years. We sincerely hope that the SoS does not allow any further submissions. These would certainly demand further public scrutiny and would extend the Application process even further. An even worse scenario is if such submissions are made and Interested Parties are not allowed to respond.

Unfortunately, despite this application having been consulted upon and examined over a period of three and a half years the Applicant's responses to the questions in the Consultation 1 Letter show enormous deficiencies and gaps of evidence. These have arisen because the Botley West proposal was ill-conceived in the first place in terms of location and scale and as a result, impacts on landscape, Greenbelt, agriculture, heritage, ecology and flood risk remain at unacceptable levels. The Applicant has either distorted narrative to fit their vision, used evidence selectively, or simply not undertaken work where the results would show up the true impacts of this proposed Utility-Scale Solar Power Station. Our review of the Applicant's responses below clearly demonstrates these major flaws which in our view requires further substantial reduction of the project or rejection, allowing the Applicant to consider putting forward a more sensible and reasoned proposal. We only deal with matters of direct relevance to the Parish of Cassington because of limitations of time but as experience has shown us, every time we have dug into details of this proposal further shortcomings become apparent.

Alternatives and Site Selection

Secretary of State's Question

6. Having consideration for NPS EN-1 paragraphs 4.3.9, 4.3.10 and 4.3.15, the Applicant is requested to provide additional and detailed reasons, and considerations in respect of the following:

- a. Discounting of the National Grid Electricity Transmission Limited ("NGET") substation at Northfleet in East London, briefly referenced in the Environmental Statement Chapter 5 Alternatives considered [APP-042].
- b. Progress made with regard to securing land in the Cowley NGET substation allocation [APP-042] up to the point of becoming aware of National Grid's proposals for a preferred

site at Farmoor, noting that the search began to find at least 250 hectares ("ha") of land in the Cowley NGET substation area.

c. Details of the search radius applied from the grid connection point at the proposed Farmoor NGET substation, whether this was incrementally extended and how it compared to the search area and approach applied to the Cowley NGET substation search for land.

d. The environmental, social and economic considerations and financial viability and technical feasibility considerations in respect of both the initial point of connection at Cowley NGET substation and the proposed Farmoor NGET substation in line with NPS-EN1 paragraphs 4.1.22 and 4.3.15.

e. The site selection methodology used in relation to the proposed development and grid connection at the proposed Farmoor NGET substation.

Applicant's Response

The Applicant describes at length (22 pages) the process by which the Botley West site and connection to grid was selected. This includes a discussion of possible connection at Cowley compared to Farmoor where a new substation could be built.

Cassington Parish Council Response

Cassington Parish Council is very sceptical of this lengthy narrative response from the Applicant and find parts of it, for example the routing of the cable through the historic city centre of Oxford, ridiculous. Here the Applicant is trying to justify reliance on the Farmoor NGET substation (or its own substation) on Greenbelt land rather than connecting to the Cowley – Seven Springs 4TE line, where a substation could be located on brown field land.

“directly through the Oxford Historic Core Conservation Area on High Street, Magdalen Bridge, Queen Street, and Park End Street.’ passing ‘Magdalen College (GI), The Queen’s College, All Souls College, University College, and Magdalen Bridge itself (GI)."*

The recently approved Red House Farm Solar proposal to Oxford City Council plans to connect to the SSEN substation on Ferry Hinksey Road, only 50m from NGET’s Cowley - Seven Springs 4TE 400kV (Oxford City Council planning application 23/02816/FUL granted on 27th April 2026). Furthermore, there is no mention of the possibilities to connect to the Cowley to East Claydon 4YH line, which is nearest to the northern and central sites. East Claydon has just been connected to a BESS facility which Botley West currently lacks, a significant issue when trying to balance electricity production and demand across the grid.

Cassington Parish Council believes that the main, and possibly only driving factor behind selection of the Botley West site was the willingness of a single large landowner

to lease a large amount of land for solar projects. The Community Consultation Leaflet for the West Botley Solar Farm sent to our Parishioners in late 2022 stated very clearly that access to the grid was a primary consideration for location of a utility-scale solar farm in southern England. This is at odds with an account of how the process of identification of the West Botley site was undertaken given by Marc Owen-Lloyd of PVDP at the Cassington Village Consultation on the 25th November, 2022. Instead, it was stated that the process was initiated by PVDP sending land agents out across the south of England to identify large landowners who may be interested in offering their land for use for solar renewable energy. Schemes were then developed where land offered up was deemed as suitable for development of utility-scale solar power stations. This is consistent with the Examiner's comment in October 2025 (EV5-003 EN010147-000804-Transcript ish1 pt 1 at 01:11:35 – 01:12:13:18):

'you're saying, we've got landowners, we've got land, and that's where we decided to build'

It is also broadly supported by their response to the SoS:

"Whilst the Applicant knew that there were many planning and environmental constraints within the SE area (and indeed throughout the UK) that would need to be addressed in detail, the search for a broad location within the UK was not initially dictated by the presence or absence of Green Belt, agricultural land value, mineral resource, or Flood Zones or the London Oxford Airport constraints. The Applicant was cognisant of these constraints and generally sought to avoid them, but these constraints would play an increasingly important role as the Applicant began to try to secure land for the Project and in their detailed locational and design choices. Also, as the Project did not directly affect The Blenheim Palace World Heritage Site, the action required by the Applicant was to understand then accommodate its setting."

Cassington Parish Council believe that this imperative led to a lack of consideration of the project's potential impacts on a large number of households, Greenbelt Land, best and most versatile agricultural land and ecology. The Applicant has inadequately considered these impacts during their design choice because they were supremely confident that under the current planning policy environment of the U.K. the need for renewable energy would trump all other planning considerations.

Cultural Heritage

Secretary of State's Question

15. The Secretary of State notes that no assessment was made of the setting of the Park Walls of Blenheim Palace WHS in either the Settings Assessment or the Heritage Impact Assessment. Historic England's Good Practice Advice Note ("GPA3") defines setting as 'the surroundings in which a heritage asset is experienced'. The Secretary of State

requests the Applicant to consider whether an updated Settings Assessment considering the effects of the Proposed Development on the setting of heritage assets is required, having particular regard to recognised good practice approaches and guidance, including, but not limited to, GPA3, the 2022 UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context, the Operational Guidelines for the Implementation of the World Heritage Convention, and UNESCO's Policy Document on Climate Action for World Heritage 2023. The Applicant should also consider NPS EN-1 paragraphs 5.9.10 and 5.9.12 and demonstrate in its response how the Proposed Development is compliant in relation to these policies.

19. The Secretary of State notes that the International Council on Monuments and Sites ("ICOMOS") submitted three technical reviews ("TR") via Historic England (as adviser to the State Party) during Examination [RR-0398, REP4-052 and REP7-117]. The Secretary of State notes the Applicant did not provide a response to specific concerns in these TR and therefore requests the Applicant to consider and provide a response to all three ICOMOS technical reviews.

Applicant's Response

For 15, the Applicant focuses on the effects of the proposed development on the Park Walls of Blenheim Park. It states that the heritage assessments undertaken by the Applicant meet with regulatory requirements. For 17, the Applicant claims that any impacts on the setting of the Blenheim Palace WHS will be temporary and a change of visual use of the land which will remain in the hands of the landowner. Requests for a Landscape Character Assessment an independent Heritage Impact Assessment and an assessment of the cumulative impacts of development on the Blenheim WHS are dismissed at not being in the remit of the Applicant.

Cassington Parish Council's Response

Cassington Parish Council regard the Applicant's conclusions regarding the setting of the Blenheim Palace WHS as flawed. Cassington Parish Council refers to the 2017 Management Plan for the Blenheim Estate World Heritage Site, produced by a consultancy for Blenheim Palace with input from the Blenheim Palace Senior Management Team, the Dept. of Culture Media and Sport, Historic England, ICOMOS-UK, Natural England, Oxfordshire County Council and West Oxfordshire County Council, that stated:

"...the WHS stands at the core of an extensive private estate, which has - over the centuries - exerted huge influence over the character and appearance of the wider landscape, and neighbouring landowners."

In Appendix 3 of this report a description of the setting of Blenheim Estate WHS is given as lying in the Cotswolds National Character Area and the southern part lying in the Upper Thames Vale National Character Area.

The value of this setting to the Blenheim Estate WHS is described as:

- *The importance of the village clusters, farmed countryside and woodlands/trees in enhancing local distinctiveness and fostering a sense of place;*
- *The use of local stone in the vernacular buildings which is very distinctive of the area as well as creating a contrast to the high quality architecture of the Palace and its associated buildings;*
- *The contribution it makes to the distinctive quality of the landscape and environment around Blenheim, making it an attractive place to live, this having significant benefits for the economy;*
- *The opportunities the setting provides for recreation and leisure which contributes to a healthy lifestyle;*
- *The opportunities for landscape to contribute to the green infrastructure of the area by supporting a wide range of wildlife habitats which, in addition to the nature conservation benefits, allows people to experience wildlife close to where they live and work.*

The Appendices later state that:

The importance of these elements of the setting of Blenheim in reinforcing the OUV and in maintaining and enhancing local distinctiveness and the high-quality environment, can perhaps best be understood by considering the implications of not protecting them:

- *The conversion of significant areas of agricultural land for other purposes, or the large-scale loss of woodland would detract from the distinctiveness of the setting;*
- ***Tall developments on the skyline, or large-scale development (particularly those of a non-residential nature which tend to be bulkier and non-vernacular, for example industrial development; wind turbines; solar farms etc) could detrimentally influence the character of the adjoining rural areas;***
- *Increased levels of pollution and silt in the river catchments feed into the WHS and affect the highly significant Lancelot Brown lakes;*
- *Views from the Palace to the rooftops and church spire of Bladon could be lost, reduced or impacted on;*
- *The historic physical, and occasionally glimpsed visual, connection with Woodstock could be lost or reduced;*
- *Development that results in the joining of one village settlement to another could result in the settlements losing their distinctive nature.*

Following the ICOMOS Technical Review both Blenheim Estates (TOR & Co, 2025; EN10147-001743) and PVDP (REP 4-037) took views at odds with the 2017 Report. A key to this argument is defining what actually constitutes the setting of Blenheim Palace. Helpfully, PVDP's response to the Examiner in REP 4-037 casts some light on this issue.

".....the Applicant has provided a detailed explanation in that document of how setting and sensitivity can be linked not just to intervisibility but to other factors such as land ownership (past and present) and land use."

The Applicant here identifies that land ownership, including past and present use, i.e. historical connection to Blenheim Estate should be a consideration of setting. In our submission to Deadline 5 of the Examination we identified:

1. That Cassington Village, because of its historical connections to the Estate and Estate Farmlands, by virtue of its conservation area, including Grade 2 listed houses and the Church of St Peters which is Grade 1 listed, fits within the characteristics of the setting of the Blenheim Estate WHS, even if it was not explicitly mentioned in Appendix 3 of the 2017 report. Several of the roads connecting to the village were included in the Appendix 3 report with the views from them.
2. Regardless of this, much of the land to the north of Cassington, between it and Blenheim Park certainly was included in the Appendix 3 report on setting.
3. Appendix 3 of the 2017 report states categorically that such land contributes to the outstanding universal setting of Blenheim Estate WHS.
4. The Appendix further categorically states that "conversion of significant areas of agricultural land for other purposes, or the large-scale loss of woodland would detract from the distinctiveness of the setting".

Historically, the village has been highly influenced by Blenheim Estate and past Dukes who enclosed large areas of land to the north of Cassington following the 1801 Enclosure Act and furthermore modified the village and its road connections, including to Cassington Mill. For all purposes related to heritage, Cassington can be viewed as an Estate Village, both historically and to the present day given recent housing developments in the village by Blenheim Estate and the potential impact of the current proposal.

We will not go into the legal minutiae within the document presented by Tor & Co. (2025) on behalf of Blenheim Estates. In the Summary to this document, they claim to present an independent approach to OUV, this simply cannot be the case as they are representing the Landowner. TOR identify that:

"Palace and Park reflect the rejection of French models of classicism and the beginnings of the English Romantic movement; and that Blenheim Palace was the nation's equivalent of a European princely residence"

And that anything lying in the setting that does not contribute to this foremost reason for World Heritage Status is irrelevant to the Application. However, it is very clear to us that Cassington and many of the villages surrounding the local area of Blenheim Estate certainly do contribute in both a historical and visual sense to the main purpose of the WHS designation as stated by TOR (2025). These villages were highly influenced, modified and subject to land acquisitions by the Estate and as such certainly contributed to its being the equivalent of a European princely residence. Labour for Blenheim Estate, its landscaping, operation of its farms etc., etc., were drawn from these very villages. To Cassington Parish Council, therefore, what sets the boundary for the setting is easily defined by land ownership and historical interaction with the surrounding villages and landscape. “*Traditional English Countryside*” as a term, attacked by TOR & Co. (2025), is a distraction from what is a discussion about the historical connections between Blenheim Estate, the people living around it (i.e. heritage), as well as a landscape still dominated by agriculture. In this context, the ICOMOS Technical Review is in no way a “*wayward assessment*” and is in fact fully in harmony with the content and spirit of the 2017 WHS Management Report and designation of the Blenheim Estate WHS. That the landowners are now trying to refute this because it is inconvenient is financially motivated. We also note that Tor & Co.’s claim that:

“...what is required to argue successfully that setting contributes to OUV, we have established that this conclusion has not been adequately made out.”

works both ways. We believe that PVDP and Blenheim Estate have not made a clear case that setting does not contribute to the Blenheim WHS, especially given the content of the 2017 Management Report, and furthermore, they have not made the case that the huge solar farm proposed for this setting does not constitute substantial harm. This harm is compounded by the cumulative impact of other development in the area including that by Blenheim Estates. It cannot be viewed as temporary by our residents as its longevity will certainly exceed that of many adults in the Parish.

On another point we note that the Applicant claims that the land taken for the Botley West Utility-Scale Solar Power Station is only leased. The Parish Council believe that the Applicant has the option to buy this land through compulsory purchase should it decide to do so.

Secretary of State’s Questions

20. The Secretary of State notes that Historic England [REP7-118, REP7-037] and the Applicant arrived at different conclusions in relation to the magnitude of impact of the Proposed Development on the significance of other designated heritage assets (The Roman Villa at Sansom's Platt, Church of St Peter and St Paul, Church Hanborough, Church of St Peter, Cassington, Church of St Michael, Begbroke). The Applicant's

Settings Assessment (Rev 3) [CR2-038] details the harm to the significance of these assets from development in their setting.

21. The Applicant is requested to consider whether updated assessments of effects on the significance of these assets and Blenheim Palace WHS, addressing concerns raised by Historic England, ICOMOS, ICOMOS-UK, the Oxfordshire Host Authorities ("OHA"), Cassington Parish Council and other Interested Parties during Examination regarding the methodology used and the conclusions reached [RR-0413, REP1-085, REP1-086, REP1-103, REP2-069, REP7-118, REP7-037, RR-0398, REP4-052, REP5-068, REP7- 117, REP7-058, REP7-191, REP7-221, REP8-003, REP8-004 and REP8-005] is required. In doing so, the Applicant is requested to have particular regard for NPS EN-1 paragraphs 5.9.9, 5.9.10 and 5.9.12 and the best practice guidance available, including, but not limited to, GPA3 Guidance and the 2022 UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context.

Applicant's response

The Applicant States:

"The Applicant has examined the setting of these Grade I and II listed churches and reviewed the nature and extent of the Project in relation to the setting. No designed or associative views would be impacted, and the Project would not compete with the heritage significance of the churches in views from, towards or across the churches. As such, whilst there would be some impact on the heritage values or the churches, there would also be impacts on their landscape values. These latter impacts are addressed in ES Chapter 8: Landscape and Visual Impact Assessment [REP6-012]. The Applicant now proposes additional design changes in the form of increased buffers around residential properties. This will further reduce likely impacts on a number of designated heritage assets including the Grade I listed Church of St Peter and St Paul at Church Hanborough and the Grade I listed Church of St Peter at Cassington."*

Cassington Parish Council Response

Cassington Parish Council disagrees with the PVDP Settings Assessment (EN010147/APP/6.5) conclusion of negligible adverse effect, and furthermore, that although Historic England have also stated that in their view the Applicants assessment underestimated the impacts of the scheme on St Peter's Church (EN010147-001366 D3 Submission) their own opinion underestimates the impacts of the scheme. The views of Cassington Church against the background of the village and surrounding Estate Farmland, rising to the north (viewed from Wytham Woods to the south) or of the church and village lying on the edge of the Thames Valley viewed from the footpaths to the north towards the south are important in terms of aesthetic appreciation of the landscape overall as well as preserving the historic context of a village in the Upper Thames Clay Vales and estate lands to the north of the village. We have described the

close historic connections between Blenheim Estate and Cassington above. These views of the village will be significantly degraded either by a sea of solar panels bounded by hedges and tree lines, viewed from the south or views will be lost altogether from footpaths to the north of the village as a result of the presence of solar arrays or proposed mitigation. St Peter's Church is a Grade 1 historic building of great local and regional significance and recently Cassington village celebrated the church's 900th birthday.

The Applicant's contention that pull-back of the proposed solar scheme from Cassington Village is simply false as these views are from a significant distance and on elevated land. Furthermore, this pull back will do nothing to prevent obstruction of views on the footpaths to the north of Cassington as these will be obscured by solar panels or mitigation to prevent users of this footpath from seeing panels (hedges, once they've grown). We also point out that this particular footpath, known locally as "The Track" is the most heavily used by our residents because it connects to the centre of the village. These views are part of the experience of using this amenity and part of the cultural heritage of our residents and visitors. We also note that because the applicant has continued to push detailed development in relation to buffer zones between villages and solar infrastructure (see below), their statement to the SoS is unreliable.

Landscape

Secretary of State's Questions

24. The Secretary of State notes the conclusions of the LVIA presented in Environmental Statement Chapter 8, and the concerns from Interested Parties regarding the application of guidance, the determination of significance, and the extent to which landscape and visual considerations informed the siting, scale and design of the Proposed Development. The Applicant is requested to consider whether an updated LVIA assessment of the landscape and visual impacts of the Proposed Development is required. In doing so, the Applicant is requested to have regard to the requirements of NPS EN-1 paragraphs 5.10.6, 5.10.16, 5.10.19, 5.10.22 and 5.10.24. As part of this, the Applicant is requested to:

- a. Consider and respond to the concerns highlighted by the OHA in section 2.3 of their closing statement [REP7-191], in addition to their response to the ExA's Rule 17 Letter including their comments on documents submitted at Deadline 6 [REP7-190];
- b. Consider and respond to Interested Parties comments received at Deadline 7;
- c. Confirm whether the visualisations submitted in the Examination are representative and verified in accordance with recognised good practice, including details of viewpoint selection, verification methodology, and any acknowledged limitations;

d. With reference to NPS EN-1 paragraphs 5.10.6 and 5.10.19, explain how landscape and visual considerations informed the siting, scale and design of the Proposed Development at the early stages of scheme development, including how the mitigation hierarchy has been applied to avoid, reduce or offset adverse effects. The Applicant should identify specific examples of how their findings influenced the layout, design or configuration of the scheme.

Q25 - 28 are also addressed below.

Applicant's Responses

The Applicant states that visual impacts of the project were carefully considered in its design. It has attempted to deal with criticisms of its original plans by extension of all residential offsets to a minimum of 100 m with the potential for further extension to 250 m to craft view corridors responsive to the baseline conditions and people's visual amenity. It was disputed as to whether or not an RVAA was required. The extension of buffer zones from 100m – 250m from properties will negate the need for an RVAA. However, a revised RVAA is being prepared. The Applicant has sought to reduce the impact of the project on the Greenbelt and has justified its impacts through Very Special Circumstances. The Applicant admits that the solar arrays of the scheme will be visible from Cassington because of the rising landscape to the north of the village. No specific mitigation is proposed for this as it is not feasible. They state that the low lying nature of the solar arrays and vegetation will break up the view. The RVAA considered the impacts of the scheme on properties in Cassington and these will be further considered in a revised RVAA.

Cassington Parish Council's Response

Cassington Parish Council reiterates that the prime driver for the Applicants was to maximise the scale of the Botley West Solar Power Station for financial gain. Other considerations were, by their own admission, secondary. We simply do not believe that the scheme was carefully designed to avoid impacts on Greenbelt land or visual impacts on the landscape and residential visual amenity. If this were so they would not have been in the current position of scaling back their proposals, although as we point out below, how this is being done has not been clearly stated.

LVIA and RVAA

ICOMOS in REP2-069 of the Examination provided specific comments made by Hal Moggridge OBE VMH PPLI FIHort RIBA AADip, a landscape expert, with respect to the proximity of Botley West to villages (see Cassington Parish Council comments on REP3-076 in REP5-068). Whilst these comments form part of the overall discussion on the setting to Blenheim Estate they were made specifically because Mr Moggridge concluded the infrastructure associated with Botley West is far too close to villages including Cassington. This is specifically addressed by his comments:

“ICOMOS-UK’s Cultural Landscapes and Historic Gardens Committee recommends 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.”

Mr Moggridge makes it very clear that in his opinion areas of arrays should be removed where they are damaging to the landscape, which form part of the setting of Blenheim Estate but also where they are oppressively close to villages, including Cassington. Notwithstanding the relevance of the Blenheim Estate farms and their land, and associated villages to the setting of Blenheim Estate, proximity to Cassington in and of itself is an issue in the opinion of Mr Moggridge and the Local Authorities as outlined in our submission to Deadline 3 (REP3-074). WODC also recommended a reduction of the scheme from the hills to the north of Cassington which was also ignored by the Applicant.

As the Examiners pointed out in both the Issue Specific Hearing and the Rule 17 Letter of the 14th October, 2025, the LVIA has probably been one of the most controversial aspects of the Botley West Solar Power Station proposal. Cassington Parish Council believes strongly that consideration of individual views across the Central Site of the proposal, alongside the reliance on mitigations that are equally damaging to the current landscape and views currently enjoyed by our residents, have overall led to an underestimation of the significance of impacts of the project to our landscape. The vast scale of the project and the change in use from agricultural to an industrial landscape cannot in any sense be seen as insignificant or of low impact. The contoured land of the central area, in particular, means that the proposed Solar Power Station cannot be “lost” in the landscape and alongside its close proximity to residential properties in Cassington means that its impact will be overwhelming. We have visited this issue multiple times in our submissions. The Applicant, throughout the Examination avoided addressing the issue of the Buffer Zone being far too narrow along the northern border of the village of Cassington and Jericho Barns and as a result simply refused with no grounds to contemplate a reduction of the scheme on the edge of these settlements.

These issues are related to the LVIA, which we still regard as flawed, and the very poor RVAA which we will turn to now.

In response to criticism by the Examiners of the lack of an RVAA PVDP's consultants rushed together a report post the Issue Specific Hearing. Cassington Parish Council found many deficiencies in this report including:

- The strict imposition of the Zone of Theoretical Visibility (ZTV) on the basis of a model implemented through ARCGIS. Even where properties or settlements abut or fall inside 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.

The very poor nature of the widely criticised RVAA has resulted in the Applicant taking on a new consultancy to undertake a new RVAA, an action which speaks loudly as to the quality of the original work. So far, we are unaware of any of our residents as having been approached with respect to data collection for this new RVAA.

As a result of the defects of 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 it was proposed by the Examiner that:

“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.”

Cassington Parish Council finds it unacceptable that despite requests for an RVAA to be done throughout the Examination it was only produced following the Issue Specific Hearing and even then, was of such poor quality a blanket 250m buffer zone was proposed. We also find it unacceptable that according to our information the Applicant is still trying to complete a new RVAA for submission to the SoS by or on the 16th July, despite having already been refused permission to do so. This will not allow proper scrutiny of the RVAA by the public and, frankly, PVDP have had ample time and requests to do this work.

Cassington Parish Council also note the now ambiguous language with respect to implementation of a 100m buffer zone extendable to 250m depending on circumstances. This is a bending of the Examiner’s request for a 250m buffer zone. We further note that such buffers will not be determined until after the DCO is granted as part of a Residential Visual Amenity Plan (RVAP). This has many potential issues as it will require a further detailed RVAA on all affected properties (~250), will mean multiple changes to the proposed scheme, may not be able to be supported by the OHAs and will not be subject to public scrutiny (see OHA’s submission – EN10147-002474-C1-024). Furthermore, we note that on the Masterplan for the project this buffer zone is shown as 250m leading to a discrepancy between the text and the plans such that are likely to lead to confusion and misinterpretation by the public. This is not acceptable and against the outcomes of the Examination, which came about because of PVDP’s own flawed approach.

Very Special Circumstances (VSC)

Approximately 69% of the Botley West Solar Power Station is located on Greenbelt land, 2.65% of Oxford’s total area of Greenbelt. Oxford’s Greenbelt is already under significant pressure and 3.5% has been lost to Local Plans. Cassington Parish Council have disputed the VSCs put forward to justify the impacts of this proposal on Oxford’s Greenbelt.

VSC2 The Applicant relies on the urgent need for significant amounts of large-scale energy infrastructure (e.g. NPS EN-1, para 1.1.2) and the substantial weight to be given to this need in assessing applications (e.g. NPS EN-1, para 4.2.6) as well as related

policies. However, Cassington Parish Council pointed out in their Deadline 3 Response out that that the current queue for solar is at 738GW (NESO; <https://www.powersystemsuk.co.uk/neso-opens-evidence-window-to-reform-uk-grid-connection-queue/>). The current Government target for solar is 45-47GW by 2030 and ~70-75GW by 2050. Approximately, 60% of these targets comprised large-scale solar the rest coming from domestic and commercial rooftop (~40%; see: <https://www.gov.uk/government/publications/solar-roadmap/solar-roadmap-united-kingdom-powered-by-solar-accessible-webpage>). This means that despite the substantial weight in favour of solar NSIPs, the U.K. is in a position where targets will be met and exceeded with or without Botley West. This in our opinion lowers the weighting given to any single project and means that the most sustainable projects with respect to renewable energy generation, with the lowest impacts on people and nature can be selected. We point out here that the NGET connection date for Botley West is Q4 2031.

VSC4 The applicant states that there is expected to be an overall Biodiversity Net Gain (BNG) of over 80%. As we stated Biodiversity Net Gain is an algorithmic approach to assessing the conversion of habitat types including consideration of their condition during a development. As such it is primarily based on types of vegetation, water bodies etc. and not impacts of development on individual species, particularly animals.

Examination of document Environmental Statement Volume 3 Appendix 9.13: Biodiversity Net Gain Statement (EN010147/APP/6.5) is informative as to how Botley West provides a “Biodiversity Net Gain”. It shows that there is a gain in Habitat Units of 80.80% and a gain in hedgerow units of 57.93%. It is important to recognise that on the information presented, the large proportion of BNG is generated by the loss of arable farmland and conversion of it to grassland (majority) and floodplain wetland mosaic. Hedgerow gain would seem to mainly be achieved by improvement of existing hedgerows rather than including new hedgerow, which will likely be of poor habitat value until established.

However, BNG does not reflect the negative and potentially severe impacts on other aspects of wildlife across the Botley West Solar Power Station most notably on farmland birds and bats and potentially on other wildlife as we have previously noted in our WR. We therefore believe that reliance on BNG as a VSC should be balanced by the likely negative impacts on specific elements of wildlife, including threatened and nationally / internationally rare species.

VSC6 Cassington Parish Council, as with the vast majority of residents in vicinity of Botley West do not believe that the project will improve the landscape. In fact, all the evidence suggests the opposite including the opinion of the District Councils, ICOMOS and many IPs. Given the impacts on landscape, public rights of way and residential visual amenity we challenge VS6 as being treated entirely subjectively by the Applicant and not a reflection of reality. We note that Botley West is remarkable in terms of the

total number of households in the vicinity of the development, 11,000 households within 1.5km. As such the scheme will impact a large number of residents.

Waste

Secretary of State's Question

52. The Secretary of State notes that issues relating to waste arising from the Proposed Development, including the capacity of local waste management facilities, were raised during the Examination. In line with NPS EN-1 paragraph 5.15.9, the Applicant is requested to provide an update on their proposed arrangements for the decommissioning of solar panels, including whether suitable waste processing and recycling facilities have been identified. The Statement of Common Ground between OHA and the Applicant did not cover this issue although it was covered during the Examination. The Applicant and OHA are requested to provide detail of any further consultation that has taken place since the end of Examination on this matter.

Applicant's response

The Applicant states that it is not possible to specifically outline recycling and disposal options for the Botley West Solar Power Station but the intention was to achieve this through use of private contractors.

Cassington Parish Council Response

Cassington Parish Council would like to register concern at the vagueness of the response to the SoS question, especially in terms of any financial guarantee that the dismantling and disposal of solar infrastructure will be paid for by PVDP or a subsequent operator. Some form of bond or other financial mechanism to ensure that removal and disposal of this infrastructure is surely needed?

Ecology and Biodiversity

Secretary of State's Question

33. The OHA and the Berks Bucks Oxon Wildlife Trust have raised the issue of habitat loss for breeding skylark throughout examination [REP5-125, RR-0098 REP7-191]. The Secretary of State observes that the Skylark Technical Note [REP4-037] indicates that the Proposed Development site could potentially support 33.19 skylark territories. The 2024 surveys (APP-159) record 228 territories. If impacts to breeding skylark cannot be mitigated on site, the Applicant is requested to provide a Skylark Compensation Strategy providing off-site habitat to compensate for the net loss of breeding skylark. The strategy should be developed in collaboration with the OHA, and include details of long-term management, monitoring, reporting, and data-sharing. Compensation should not incorporate areas within the array, or areas owned by third parties unaffiliated with

the Project. The Applicant is requested to provide drafting to secure this Strategy within the dDCO and relevant control documents.

Applicant Response

The Applicant proposes the following:

- Establish a baseline of average number of skylark breeding territories based on a third year of surveys (completed by July, 2026).
- To establish the number of territories that are supported within the Botley West Development area not covered by solar panels and associated with the following features: grassland, greater than 50m from hedgerows, trees or solar infrastructure. The project aims to uplift Skylark numbers in these areas.
- To establish compensatory skylark areas outside the site which are then managed to enhance skylark numbers through measures such as moving from winter-sown crops to spring-sown crops or to convert the land to meadows with other management measures related to grassland maintenance and prevention of grazing from April to July. In addition, the provision of skylark plots in winter-sown crops.

Cassington Parish Council Response

It is well understood that skylark numbers, along with those of other British and European farmland birds have declined significantly. DEFRA, updated the Accredited Official Statistics Wild bird populations in the UK and England, 1970 to 2024 on the 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 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.

The decline in skylarks has been attributed to intensification of farming which has resulted in a decrease in favourable crops (e.g. spring-sown crops) and an increase in unfavourable habitat (winter-sown crops, oilseed rape, intensively managed or grazed grassland; Chamberlein and Siriwardena, 2000; Rahman et al., 2012; Blösch et al 2025). The impact of solar arrays on skylarks has been poorly studied although a recent Master's thesis (Secker, 2024) indicated that no skylark nests were identified within 28 solar parks across the U.K. although they may provide foraging areas for farmland birds. This included skylarks which may bring food from solar arrays to nestlings or recently fledged chicks located adjacent to solar parks (but see below; Secker, 2024).

Cassington Parish Council objects to a number of aspects of the Applicants proposed skylark compensation strategy:

Baselines: The Applicant is proposing to base the extent of compensation on an average of three years, given the large differences in nesting skylark numbers (72 in 2023 and 228 in 2024). Adding another year's data to these observations will not substantially improve the estimation of average numbers of breeding territories held by skylarks in the area. This is likely to depend on the type of arable cropping or grazing undertaken and patterns of weather during the year. Instead, we would suggest a more precautionary approach would be to take the highest number of territories over the three years and use this as the baseline on which to calculate necessary compensation. This is a more conservative approach, but given the decline of skylarks nationally, a more appropriate approach to compensation.

Within site uplift: The Applicant aims to estimate the number of skylark territories within the site (redline) by identifying areas:

- greater than 50m from hedgerow, tree, woodland and solar infrastructure (including fence lines) (i.e. area is away from any location where avian predators may perch);
- grassland habitat;
- >16m² in area; and
- within an area of grassland >5ha in overall size

We note that according to Government guidance AHW4: Skylark Plots (<https://www.gov.uk/find-funding-for-land-or-farms/ahw4-skylark-plots>) 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). We note that the Applicant's Skylark Compensation Strategy fails to include the case where compensation areas are bounded by trees which require an area of grassland of >10ha. This is also important given the impact of fragmentation of grassland on skylark territories (see below).

For the area mapped as suitable for skylarks within the redline a high density of territories is assumed as a result of management measures to enhance skylark numbers (e.g. management of crop heights to be optimal for skylark nesting and other measures outlined in Table 11.1 of the OLEMP as well as the provision of skylark plots in solar arrays). First, we note that skylark plots or strips are a tried and tested method of maintaining skylark breeding territories within arable fields. However, their use in solar arrays is untested and may risk higher predation rates of foraging skylarks.

We also note that there are contradictions between the measures outlined to enhance skylark territory densities between Table 11.1 in the OLEMP and measures outlined in Section 5 of the Outline Skylark Compensation Strategy (Doc. Ref. EN010147/APP/20.4). For example, the OLEMP states that grazing will be reduced to avoid trampling of skylark nests, whereas in EN010147/APP/20.4 it states that "Grassland grazing will be shut up between April and July". Presumably these measures should be the same whether the

compensatory land is inside or outside the redline and measures should be consistent between the Outline Skylark Compensatory Strategy and OLEMP. Further, we do not understand why the observations used to estimate skylark breeding territories in the project area as a whole based on surveys in 2023, 2024 and 2025/2026 cannot be used to give the maximum number of annually observed territories in areas within the redline but outside the array areas, since these data have been collected. This would seem a more accurate measure than an area-based estimated based on high skylark occupation.

Offsite provision: We find the approach used to estimate the numbers of skylark territories in offsite land very approximate. Rather than relying on surveys the Applicant will use Fox (2022) to estimate the number of territories prior to management measures to improve the land for skylark occupation and then again to estimate the number of territories with management measures in place. Simply stating that such measures “can double the skylark territory density” is not good enough. These measures, and the land area on which they are implemented must be adaptive and must respond to direct evidence of their effectiveness through the comparison of post development monitoring results with a baseline survey for these areas. As stated in the preceding paragraph, the management measures to improve skylark occupation in the Outline Skylark Compensatory Strategy contradict those in the OLEMP. Furthermore, it is important that the recommendations in Government guidance AHW4: Skylark Plots (<https://www.gov.uk/find-funding-for-land-or-farms/ahw4-skylark-plots>) are followed and 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, as well as being greater than 50m from hedgerow, tree, woodland and solar infrastructure (including fencelines) and >16m² in area.

Avoiding fragmentation of such compensation areas is extremely important as work on restoration of brownfield sites for skylarks has demonstrated that as well as mean vegetation height, the size of sites was a significant predictor of the number of skylark territories (Rahman et al., 2012). The presence of woodland in or bordering grasslands can also reduce skylark numbers presumably because of the interactions with predators (Rahman et al., 2021). Furthermore, we note that countermeasures, such as set asides or land managed for conservation often cover insufficient area for compensation and are considered high-risk habitats (especially for breeding), as predators are also increasingly attracted to them (see Blösch et al., 2025 and Refs. therein). We also find that the contention in EN010147/APP/20.4, that skylarks are capable of raising four broods of chicks a year is an over-optimistic statement of the capability of single territories to contribute to overall population numbers. Observations suggest up to three broods per year (less in unfavourable habitat) and that a number of these broods are often lost to predation or other forms of mortality (e.g. Chamberlain and Siriwardena, 2000 and Refs. therein).

So, overall, whilst many of the skylark compensation measures are based on observed effects of compensatory measures in arable land and grassland we find that the Outline Skylark Compensation Strategy is deficient in several areas, experimental in aspects of approach, contradictory to Table 11.1 of the OLEMP to which it refers and in need of a clearly stated monitoring and adaptive management strategy (clearly stated responses if the compensatory measures fail) which is lacking. However, all of this is hearsay given that as with many other aspects of the Applicant's responses to the SoS, the details of the actual skylark compensation measures are kicked beyond the granting of the DCO which means that it is likely to lack public consultation and scrutiny.

Finally, 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 agreed with the OHAs during the Examination 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 during the Examination 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).

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.

Secretary of State's Question

34. The Secretary of State requests that the Applicant provides further information regarding the wintering and breeding bird monitoring protocol proposed in the Outline Landscape Ecological Management Plan ("oLEMP"). The Secretary of State requests that the oLEMP be updated to include the wintering and breeding bird survey methods, survey programmes, timescales for the monitoring/monitoring reports to be delivered, and relevant parties to whom the reports will be provided.

Applicant's Response

The Applicant proposes breeding and wintering bird surveys according to a walking transect method as outlined in the OLEMP sections 12.11.2 and 12.11.3 broadly following the survey areas set out in the baseline Wintering Bird Survey Report at ES Appendix 9.10 [APP-159] and Breeding Bird Survey Report at ES Appendix 9.9 [APP-158]. These surveys will be undertaken in years 1,2,4,6 and 10 and every five years thereafter and results reported to the local Planning Authority, Natural England and BBOWT.

Cassington Parish Council Response

The methods previously employed for bird surveys and outlined here are effective for large area surveys and have revealed the rich diversity of farmland birds present in the area of the proposed Utility Scale Solar power Station. We request that the SoS asks for these surveys to be extended to offsite areas used in the Outline Skylark Compensation Strategy as these are not explicitly included in the OLEMP or in the Applicant's response to Q34. We note that as with the Skylark Compensation Strategy this is an Outline Landscape and Environmental Management Plan and that yet again the details of the Landscape and Environmental Management Plan (LEMP) will not be settled until after the DCO is granted assuming this is the outcome of the SoS determination. This is yet another example of important aspects of the proposed development being kicked down the road to after consent which will again limit public scrutiny and influence on the LEMP.

Secretary of State's Question

35. The Secretary of State requests that the Applicant updates Section 17 of oLEMP to ensure that any remedial actions considered necessary will be agreed with the local planning authority. Furthermore, due to the bespoke mitigation developed for bats, the oLEMP should be updated to include Natural England ("NE") as a consultee in the event that remedial action may be required.

Applicant's Response

The Applicant states that they have updated Section 17 of the oLEMP Rev 8 [EN010147/APP/7.6.3]. Section 17.1.8 of the updated oLEMP now explicitly states: Any necessary remedial measures will be set out in the relevant monitoring report for agreement with the relevant planning authority, in consultation with Natural England, BBOWT (where it relates to the Evenlode Corridor) and any other relevant stakeholder. Agreement from consultees to the remedial management is required prior to their implementation.

Cassington Parish Council Response

General comment

Our first response to the answer to the SoS question is there is a complete lack of any reference to what remedial measures might be. Given that the impact on some aspects of biodiversity may be severe, most notably to bats (see below) we would like to understand just how far remedial measures might go. For example, could this result in removal of solar arrays if significant declines in a species or group of species was detected? Without these important details being included in the OLEMP or LEMP we believe the powers of the planning authorities and Natural England to recommend or enforce any remedial measures will be limited.

Bats

The information provided by the Applicant at Deadline 5 of the Examination in terms of the Bat Technical Note 2025 and updated Volume 3 Appendix 9.4 Bat Surveys PINS Ref: EN010147 Document Ref: EN010147/APP/6.5 confirmed many of the statements made by Cassington Parish Council during the Examination with respect to bats in relation to habitat and in relation to solar installations. These include:

- That solar arrays cause a negative and severe impact on the occurrence of bats.
- That the mechanism driving this impact has not been elucidated (see below).
- The Project site is important to a high diversity of UK bat species (14 out of 18), including some of the rarest threatened species, such as Bechstein's bat and barbastelle.
- A number of bat species move and forage over fields.
- Bats in the area are using a mosaic of habitats as part of their daily foraging activities and annual patterns of migration and roosting associated with reproduction and the autumn dispersal.
- That the area surveyed is of "at least national importance" to bats or even of International Importance (Table 9.6.4; EN010147/APP/6.3).

The new data arising from the tracking Bechstein's bat and barbastelles undertaken by the Applicant's consultants indicate that the former are confined mainly to wooded areas for all activities of foraging and roosting whilst the latter are much wider ranging in their foraging activities. The Environmental Statement, Volume 3 Appendix 9.4: Bat Surveys demonstrates very clearly the high importance of the landscape within the Central Section of the proposed solar power station, including fields north of Cassington, north of Purwell Farm and north of the Cassington Sewage Works to barbastelle bats (Appendix 2, Fig. 2 summarises this information). Acoustic recordings furthermore demonstrate the importance of fields for noctules, common and soprano pipistrelles and *Myotis* spp (Bat Technical Note 2025). These are areas that will be largely covered in solar arrays by the proposed project. Despite the data arising from their own studies the Applicant still states in Appendix 9.4 Bat Surveys (Document Ref: EN010147/APP/6.5) Paragraph 5.1.3.

"However, the area to be developed comprises species-poor fields, which are of much lower value for bats."

As we will demonstrate below, based on the Applicant's own work, this statement very much depends on what species of bats are considered and cannot be said for the bat community as a whole. The Applicant's own work identifies that the surveyed arable fields represent good habitat for bats. Overall, an area with a mosaic of different habitats, such as woodland, hedgerows, fields and water (lakes, rivers and streams) will be favourable for bats (Stebbing, 1988). The Central Section of the Botley West Solar Power Station represents such a mosaic.

Whilst the Bat Technical Note 2025 acknowledges the findings of negative impacts of Solar Power Stations on bats it does not detail just how serious this impact is. The investigation by Tinsley et al (2023) in the U.K. demonstrated that 6 bat species were negatively impacted by solar including serotine bats, *Myotis* spp., *Nyctalus* spp (inc. noctules) common and soprano pipistrelle bats and *Plecotus* spp (long-eared bats). Common pipistrelles and *Nyctalus* spp. (a genus that includes the noctule) were negatively impacted in both open field and field margin habitats, *Myotis* spp. and serotines were impacted along field margin habitats, whilst soprano pipistrelles and *Plecotus* spp were negatively impacted in open fields with solar compared to control open fields (Tinsley et al., 2023). Common pipistrelle activity in open fields compared to those with solar was reduced by 86%, soprano pipistrelles by 68%, *Nyctalus* pp. 48% (Tinsley et al., 2023). On the margins around fields compared to margins around fields with solar common pipistrelle activity was reduced by 40%, soprano pipistrelles by 71% (not statistically significant) and *Nyctalus* by 30% (Tinsley et al., 2023). As mentioned during the Issue Specific Hearing by the Applicant, who was clearly aware of this peer-reviewed paper, the effects of solar on barbastelle bats were not significant, probably because there were insufficient numbers of this rare species detected in the study,

making it unlikely that statistical analysis would identify significant differences between control sites and those covered with panels. However, it was demonstrated at a landscape scale, that arable land, the type that dominates much of the central section of Botley West, had a positive influence on barbastelle recordings (Tinsley et al., 2023). The work demonstrates that the impact on bat numbers recorded over solar projects, both in open fields and field margins is dramatic and significant.

During the Examination Cassington Parish Council cited evidence from the U.K. and elsewhere in Europe that the presence of solar arrays has a significant impact on bat numbers over open countryside (e.g. Montag et al., 2016; Szabadi et al., 2023) which for some species is severe. **This evidence has continued to accumulate** with recent papers such as Baudouin et al. (2026) set in southern France and Tavernier et al. (2026) set in the Netherlands. The reasons that solar arrays cause significant declines in bat populations, including across all seasons (Tavernier et al., 2026) is still unclear but may relate to an impact on insect populations upon which bats feed and collision with solar panels causing bat mortality (Tavernier et al., 2026). Three-dimensional acoustic recording of bat behaviour above solar farms has detected that their behaviour changes compared to over control sites (Barré et al., 2024). This change in behaviour is associated with the bats flying faster and straighter with a lower occurrence of feeding buzzes, in other words reduced feeding effort (Barré et al., 2024). There is also some evidence that bats collide with vertical smooth surfaces because of interference with their echolocation and mistake horizontal smooth surfaces for water, also potentially causing collisions (Greif and Siemers, 2010; Greif et al., 2017).

Further evidence of the effects of solar energy projects on bats is arising from the Gwent Levels. Whilst we do not have detailed information from this project a letter from the Friends of Gwent Levels and Gwent Wildlife Trusts to the Minister for Climate Change in 2022 detailed biodiversity losses attributed to Llanwern Solar Farm. The letter states:

“The diversity of bat species decreased markedly, and for the majority of locations, abundance of species has dropped dramatically (95- 100%).”

Concerningly, a report on Gwent Levels Post Construction Monitoring by Arup (2024) notes that of the bat boxes, presumably placed for mitigation purposes, only one had been occupied and that additional monitoring years will give insight into the potential decreases of bat abundance in the array fields post-construction. These findings indicate that bats are not simply reducing their foraging in the vicinity of solar arrays, but populations are either being destroyed or displaced, or a combination of the two by solar power stations. The mechanism through which this is happening remains obscure as stated in the Bat Technical Note (2025). These observations have been repeated in a BBC News article which has also identified declines in bird, bat and insect numbers on the Llanwern Solar Farm (<https://www.bbc.com/news/articles/cx27nd0kn2no>).

During the Issue Specific Hearing Cassington Parish Council raised the fact that the radio tracking data for barbastelle, a highly threatened species, indicated that as well as commonly flying along specific natural and artificial landscape features, they were also foraging in fields which are to be covered in solar arrays (e.g. fields between Cassington Sewage Works and Begbroke). This is visible in Figure 2, Appendix 2 of EN010147/APP/6.5 Annex B Bat Radio-tracking Survey Report 2025. During the Issue Specific Hearing, the Applicant's ecologist tried to explain this away by stating that this was an artifact of the (in)accuracy of the tracking method. However, it should be noted that this result is not only supported by the kernel density maps (the orange shaded areas on the maps) but also by the point locations for bats estimated by identifying the direction of the strongest echo location signals between two tracking parties (the yellow dots on the maps). What the Applicant's ecologist also failed to acknowledge was that the results from 2024/2025 paired bat detector studies where one detector was located in a hedgerow and one in a field also identified that a number of bat species in the Botley West proposed area use both hedgerows and fields as habitat (e.g. common pipistrelle, soprano pipistrelle, *Myotis* sp., Leisler's bat, noctules and barbastelle; Bat Technical Note 2025). These surveys, mainly undertaken in the Central Site, identified that Noctule in particular, but also *Myotis* sp. and Leisler's bats occurred more often over the field detector than the paired hedge detector, in some cases, depending on location, much more (Bat Technical Note, 2025). This is of no surprise as it is clear from the scientific literature that bats do forage over arable land to a varying extent depending on species (e.g. Heim et al., 2017; Finch et al., 2020; Tinsley et al., 2022; Foxley et al., 2023; Szabadi et al., 2023).

We note that the sewage farm is an important location for bat foraging. It is highly likely that bats in this location are performing a positive ecosystem service for people in the area by suppressing insect numbers around the sewage farm.

Drawing this evidence together it is concluded that:

- The proposed Botley West Solar Power Station is sited in an area at least of national, and possibly international significance for bats.
- The diverse bat community results from a mosaic of habitats favourable to bats.
- The Central Site of Botley West is of particular importance to bats and includes roosting and foraging sites including woods, hedge/tree lines, water bodies, fields and man-made features favourable to bats. The Applicants own consultants point to the high numbers and diversity of bat species captures "over only 14 nights of trapping" demonstrating the importance of the habitats within and adjacent to the project site (EN010147/APP/6.5 Annex B Bat Radio-tracking Survey Report 2025).
- Species include the rare Bechstein's and barbastelle bats, both of which are of a Near Threatened status, as a result of declining populations (IUCN Red List).

- Fields, particularly in the Central Site of the Botley West Solar Power Station, are important habitat for several bat species in the bat community, including noctule, *Myotis* sp. and Leisler's bat as well as barbastelle.
- Solar installations have a very serious and significant impact on bat communities, the driver of which is unknown although new studies are suggesting impacts on prey availability and collision mortality.

Following on from this evidence Cassington Parish Council note that while the additional buffer zones that will be planned into the Botley West Project are welcome there is no evidence that these buffer zones will mitigate the impacts of the project on what is at least a nationally, if not internationally important abundant and diverse community of bats. It may provide some protection to bats using the specific features for which buffer zones are provided but provides zero protection for species using open field habitat and unprotected field margins that will be carpeted in solar infrastructure. Our lack of confidence in this mitigation also results from the currently unknown cause of bat decline around solar arrays and that there is no mitigation provided for open field habitat.

At the Issue Specific Hearing, Cassington Parish Council pointed out that the U.K. was a signatory to the Convention on Biological Diversity (<https://www.cbd.int/>) and the recent Kunming-Montreal 2030 Biodiversity Targets. A 2024 Parliamentary Insight Article into biodiversity loss pointed out that the U.K. is one of the most biodiversity depleted countries in the world and has successively failed to meet targets for biodiversity conservation and restoration (<https://commonslibrary.parliament.uk/biodiversity-loss-uk-international-obligations/>). New domestic targets to meet commitments to the CBD were set in 2021 including to reduce the risk of species extinctions and to ensure overall species abundance is increasing rather than decreasing by 2030. The Kunming-Montreal Biodiversity Targets (<https://www.cbd.int/gbf/targets>) include:

- Target 1 To plan and manage all areas to reduce biodiversity loss
- Target 4 To halt species extinction, protect genetic diversity and manage human – wildlife conflicts (especially of threatened species)
- Target 12 Enhance green spaces and urban planning for human well-being and biodiversity
- Target 14: Integrate biodiversity in decision-making at every level

Given that the Applicant's survey work has identified an abundant and species rich community of bats, including threatened species, in the area of the proposed Botley West Solar Power Station, the 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, this project should be either rejected in its entirety or much of the Central

Site of the project largely removed. We note that this argument extends to farmland birds as well, although the bird community is of lower conservation significance than that of the bats which is important at the level of the U.K. and possibly at a European level. This is especially the case because the U.K. currently benefits from many more solar projects than needed to fulfil the government's renewable energy targets (see Cassington Parish Council submissions REP4-055 and REP5-068). 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.

Natural England and Evidence at the Examination

At the end of the Examination Natural England agreed to the Applicants suggested mitigation strategy, despite details being incomplete and withheld further comment on the basis they needed to receive further data. In fact, they did not need data further to that which was already available and has been since the Deadline 5 documents were published for the Examination. Their agreement to mitigation based on buffers around migration corridors demonstrates that their officers 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 which we have detailed above. Cassington Parish Council believe that it is exactly this *laissez-faire* attitude that has led to the U.K. being one of the most biodiversity depleted countries in the world. Their carelessness over such an important bat population especially given this is one of Europe's largest Solar Power Stations is breathtaking and irresponsible. Cassington Parish Council has two ecology Professors on its team (one retired), one an expert on terrestrial ecosystems, the other on marine ecosystems with more than 250 scientific publications. This has enabled the Parish Council to undertake a thorough and scientific evaluation of ecological survey results from the Applicants Environmental Statement. It is a shame that Natural England's scientists have not examined the matter of bats in this project with more scientific rigour.

The most significant omission by Natural England was the failure of its representatives to identify the conservation importance of the Central Site to bats and the possibility it could be designated as a Special Site of Scientific Interest (SSSI). The revelation that the site has the potential for SSSI designation would have been important in the context of the Examination with respect to Ecology and its outcome in terms of recommendations. However, the SoS's questions now give Cassington Parish Council the opportunity to reveal that in fact **the site is now on the list for consideration as a SSSI for bat conservation** based on the evidence gathered by PVDP's consultants and subsequently presented to Natural England by Cassington Parish Council following the Examination.

We include in this document Appendix A which is a copy of the case for SSSI designation of much of the Central Site of the Botley West proposed development, named here as The Three Rivers potential SSSI site based on the presence of the rivers and river valleys in the region. This was submitted to Natural England after a series of email communications during which a staff member stated that all such designations had been suspended (Cassington Parish Council can supply this email if required). Following a Freedom Of Information (FOI) request this indeed has proved to be the case (Appendix B). Designations of SSSI have been suspended since March 2025 across all of England with the exception of work on the Flamborough & Filey Coast in Yorkshire, and North Thames Estuary & Marshes in Essex. However, we note that no designations for SSSIs have occurred since 2024 and only two after 2022. The reason given for this suspension is to enable a review to be completed to align with Natural England's strategy, *Recovering Nature for Growth, Health and Security* (Appendix B). This may explain why the matter of SSSI designation was never raised during the Examination. Subsequent to the submission of Appendix A to Natural England by AD Rogers from Cassington Parish Council, the Deputy Director of the Thames Solent Team, Graham Horton replied that:

"You have made a compelling submission and although we were already well aware of the exceptional ecological value of this area to support the bat species you have referenced, I can see how this might fit into a broader vision for nature recovery in the area which includes the exciting work happening in the Evenlode catchment and on the Blenheim Estate.

As you'll be aware, the designation of new SSSIs is a decision for Natural England's Board, rather than myself. We know that SSSIs are the foundation of England's most precious habitats and species and form the core from which wider nature recovery can spread. Natural England has a rolling programme to keep under review places that may merit and benefit from designation as SSSIs. I would like to add this site to that programme so that we can consider its merits and take a view."

The full email from Mr Horton is provided in Appendix C.

It is important to recognise that SSSI designation is critical in enabling the planning process in the U.K. at all levels, District, County and National (NSIPs) in enabling Councillors, Examiners and the SoS to ensure that important sites for biodiversity, especially those harbouring threatened species, are protected (Chapman et al., 2026). The failure of the officers of Natural England to notify the Examiners and ultimately the SoS of the possibility that the central site of Botley West might be considered for SSSI designation is a failure of this Statutory Authority to adequately discharge its duties in respect of the Botley West NSIP Examination. This failure extends to DEFRA's responses to The Right Honourable Calum Miller's MP questions to Parliament on the 22nd April, 2025. These questions were in response to evidence presented by Cassington Parish

Council on failure to identify the possibility of SSSI designation to The Right Honourable Calum Miller MP, who is the Member of Parliament for Bicester and Woodstock, within which the Parish is located. The MP's questions included:

Question

Calum Miller

Liberal Democrat

Bicester and Woodstock Commons

To ask the Secretary of State for Environment, Food and Rural Affairs, whether Natural England has (a) paused and (b) delayed the designation of any Sites of Special Scientific Interest.

Answer

Mary Creagh

Labour

Coventry East Commons

Answered on

28 April 2026

Natural England has a rolling programme to keep under review places that may merit and benefit from designation as SSSIs.

The answer to The Right Honourable Calum Miller MP's question was clearly incorrect at the time of the question and response on the basis of the evidence produced in Appendix B.

Another question asked by The Right Honourable Calum Miller MP on the 22nd April was:

Question for Department for Environment, Food and Rural Affairs

Sites of Special Scientific Interest

To ask the Secretary of State for Environment, Food and Rural Affairs, how many Sites of Special Scientific Interest have been designated in England in each of the last five years.

Answer

Sites of Special Scientific Interest (SSSI) designation is a two-stage process. Sites are first notified, at which point they become legally protected. Notifications are then

confirmed, usually within nine months, once any objections or representations have been considered.

For the purposes of this answer, “designated” is taken to mean confirmed SSSI notifications. On that basis, the number of SSSIs designated in England, by calendar year, is as follows:

<i>Year</i>	<i>Number of SSSIs designated</i>
<i>2021</i>	<i>6</i>
<i>2022</i>	<i>1</i>
<i>2023</i>	<i>1</i>
<i>2024</i>	<i>0</i>
<i>2025</i>	<i>0</i>

Confirmation often takes place in a year following notification, so notified and confirmed figures do not necessarily relate to the same sites.

This information is confirmed by Natural England’s response to the FOI by AD Rogers on behalf of Cassington Parish Council (Appendix B).

Cassington Parish Council have to ask whether the answer to The Right Honourable Calum Miller MP’s question relating to SSSI designation suspension was a genuine mistake or whether the answer from DEFRA was deliberately misleading. Pressure has been mounting on the lack of progress on SSSI designation by Natural England following a report by the non-governmental organisation Wild Justice (Chapman et al. 2026) and subsequently highlighted in the national press. We note that no SSSIs have been designated since 2023 and only two in the last 4.5 years. The question is therefore raised as to whether a suspension was already in place before March 2025, whether official, unofficial or as a result of lack of resources, or de-prioritisation by Natural England.

To conclude, Cassington Parish Council puts it to the SoS that Natural England made a major omission to the Planning Examination for the Botley West Utility-Scale Solar

Power Station and subsequently in terms of the SoS's own further questions regarding the proposed development. It is now clear that SSSI designations have been officially suspended since March 2025 and no sites have been designated since 2023. It is likely that this policy, which has not been communicated to the public until the Wild Justice Report (Chapman et al. 2026), had an influence on the failure of officers of Natural England to recognise the true importance of the Central Section of the Botley West proposed development, that it could host a future SSSI. This failure has now been rectified, and Natural England have placed the area on the list for consideration as a SSSI. This is fully in line with Oxfordshire's Local Nature Recovery Strategy, Priority Species List (Oxfordshire County Council, 2025) which lists as Potential Measures:

- Design, create, and enhance wildlife corridors to support bats (in both urban and rural areas).
- Manage woodlands for bats. Typically, retain deadwood and mature trees with dark, humid conditions with well- connected foraging/commuting corridors nearby.

It further notes: *There are 18 bat species in the UK, 14 of which were recorded in Oxfordshire between 2019 – 2023. In 2024, a very rare, almost extinct species of bat was also found in Oxfordshire's woodlands – Bechstein's bat.*

Bechstein's bat is one of the species that form the community of 14 species in the Central Sites of the Botley West Scheme.

Given this new evidence and based on the findings of multiple peer-reviewed papers, Cassington Parish Council believe that the Botley West Utility-Scale Solar Power Station, even with the proposed mitigation, has a high risk of severe damage to a nationally or even internationally important bat community. The importance of this community of bats is now recognised as a large area of the Central Site of the scheme is now under consideration for designation as a SSSI. Natural England should determine the exact dimensions of the area under consideration based on the evidence already in hand and further survey work as they deem necessary to determine whether the site should be designated as a SSSI. The SoS must consider this new evidence and reject the Botley West Proposal in its entirety or insist the Applicant redesigns the scheme to remove solar arrays from areas that form important habitat for the bat community.

Secretary of State's Question

42. The Outline Code of Construction Practice states that pre-commencement surveys will be conducted for dormice, great crested newt, badger, reptiles, arable weeds, otter and water vole, as well as method statements prepared for protected species, as necessary. The Secretary of State requests that the Applicant updates the oCoCP to provide the methodology to be used for each species-specific pre-commencement survey and detail the method statements expected to be required. As surveys for otter

and water vole have not been undertaken to inform the Environmental Statement, the Applicant is requested to set out how any mitigation measures, method statements or licence requirements will be developed in consultation with NE.

Applicant's Response

The Applicant provides outline methods for surveys for dormice, great crested newt, badger, reptiles, arable weeds, otter and water vole. Examples of precautionary measures to protect these categories of wildlife are outlined including translocation (great crested newts, reptiles).

Cassington Parish Council's Response

Again, Cassington Parish Council ask why these surveys have not already been undertaken and why, yet again, both the detailed methods, and results of the surveys will not be available until after the DCO is granted. This means that both the methods, and results of these surveys as well as mitigation measures will lack public consultation and scrutiny through an Examination process.

Translocation to avoid development impacts on wildlife is at best an unproven mitigation strategy and at worst, likely to fail. In a review of 91 translocation projects for reptiles and amphibians only 42% were found to be successful, 28% failed and the rest were of uncertain outcome (Germano and Bishop, 2009). Work within the U.K. examining the success of 6 mitigation translocations for slow-worms (*Anguis fragilis*), viviparous lizards (*Zootoca vivipara*), adders (*Vipera berus*) and / or grass snakes (*Natrix helvetica*) encountered very few translocated individuals in post-translocation monitoring (Nash et al., 2020). Only 1.6% of populations we recaptured following translocation and at three of the study sites (50%) no recaptures made (Nash et al., 2020). Explanations for failure to detect translocated populations are that individuals disperse away from release sites or that release sites represent poor habitat and a high mortality is suffered by the translocated populations (Germano and Bishop, 2009; Nash et al., 2020). Nash et al (2020) conclude that there was no evidence from their study that mitigation-driven translocations are compensating for the losses of populations to development. It is notable that mitigation-driven translocations are much less successful than those undertaken for the purposes of species conservation (Germano and Bishop, 2009; Germano et al., 2015). Because mitigation releases are economically motivated, outcomes may be less successful than those of releases designed to serve the biological needs of species (Germano et al., 2015). As one review states, "translocation as a regulatory tool may be ill-suited for biologically mitigating environmental damage caused by development" (Germano et al., 2015).

Cassington Parish Council therefore, has no confidence that translocation is a viable and successful mitigation strategy for amphibians and reptiles and probably other groups of species. This is a case of "Emperor's new clothes", translocation is employed

by developers to convince planning authorities in the U.K. that they are not destroying wildlife populations through development. Planning authorities lack the resources or interest to follow-up on whether or not such mitigations are effective and so this mitigation strategy persists. Evidence suggests that the majority of such translocations fail.

Secretary of State's Question

43. Natural England is requested to provide an update on the progress of issuing any protected species Letters of No Impediment, including whether they consider that a mitigation licence for bats should be sought. The Applicant is requested to provide details of how construction impacts to roosting bats will be managed if a licence is not pursued.

Applicant's Response

The Applicant's position is that no licence for disturbing bats is required as the buffer zones implemented will avoid or mitigate any impacts on bats. Specifically they state:

“Botley West has produced a novel and innovative mitigation strategy which we advise is likely to avoid or mitigate any potential impacts to bats’.”

Cassington Parish Council's Response

As can be seen in our response to the Applicant to the SoS Q35 Cassington Parish Council has provided ample evidence that the buffers proposed to avoid / mitigate impacts on the rich population of bats in the Central Site of Botley West will not protect bats using arable fields for foraging. This evidence is backed up by multiple peer-reviewed scientific surveys which also demonstrate how damaging solar arrays are to bat populations. Both the Applicant and the Natural England Officers have fallen into the trap of only considering flight lines along field margins / hedgerows that the bats use to fly between roosting sites and feeding sites and have ignored species-specific behaviour which means that the proposed mitigation will fail to protect this exceptional and diverse bat community. We note that **the wording “novel and innovative” in fact means experimental** in this context and given the evidence of how bats use the landscape it will inevitably lead to a decline of this element of biodiversity in the proposed project area. The importance of the bat community of the Central Site of the Botley West Utility-Scale Solar Power Station is now recognised through the area now on the list to be considered a SSSI.

Hydrology and Flood Risk

Secretary of State's Question

57. Noting the concern raised by both Cassington and Cumnor Parish Councils [REP7-068 and REP7-076], and the ExA's second written questions [PD-012, Q 2.10.3] and

paragraph 5.8.36 of NPS EN-1, the Applicant is requested to provide further data to evidence the efficacy of the mitigation measures suggested within the Conceptual Drainage Strategy [REP4-018], in particular for the central and southern areas of the Proposed Development. The Applicant is requested to share the results with the Environment Agency for review and comment.

Applicant's Response

The Applicant's response represents absolutely no shift in position regarding the elevated pluvial flood risk that the Botley West Solar Power Station poses to the village of Cassington. Instead, they double down on the contention that vegetation underneath the solar arrays will mitigate any increased runoff resulting from rain falling on hard surfaces and forming drip lines along the lower edge of the arrays. They then, as before, put forward several measures, including the creation of a drainage pond to the north of Cassington, ditch widening and the creation of bunds to redirect water flow. We note the latter will in themselves create environmental impacts and should be subject to review by the public and by the local authorities. There is no evidence, whatsoever, that these measures will mitigate increased runoff from the solar arrays to the north of Cassington, no modelling, no testing or any other work.

Cassington Parish Council's Response

The infiltration testing requested by Cassington Parish Council and detailed in the Applicant's Response to the SoS's questions was undertaken near to Cumnor, not Cassington. As such, its relevance to the situation at Cassington may be limited. However, we note that in these tests three out of four test pits showed no infiltration at all and the pit which did show some infiltration "*cannot be considered sufficient for the effective use of soakaways for the disposal of surface water*". This is unsurprising as much of the low-lying areas surrounding Cumnor and Cassington are formed of clay which prevents efficient drainage of surface water. This, and the elevated nature of the landscape to the north of Cassington, proposed to be covered in solar arrays, are why the village is prone to flooding. It may explain the reluctance of the Applicant to undertake infiltration testing as this demonstrates that the soils around Cumnor and presumably Cassington represent the worst possible situation for drainage in that they have a very low permeability for water and cannot be relied on to take up increased runoff from solar arrays (see below).

Cassington Parish Council has repeated in submissions throughout the Examination that the localities of Cassington, Jericho Barns and Worten 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 vulnerability of Cassington to flooding is not contended by the Applicant. To justify building the proposed scheme in a flood-prone area, the Applicant has to apply the Exception Test. One of the criteria for this requires the Applicant to demonstrate that "the project will be safe for its lifetime taking into

account the vulnerability of its users, without increasing flood risk elsewhere, and where possible will reduce flood risk overall”. The Applicant contends that evidence (Pisinaras et. al., 2014; Cook and McCuen, 2013) indicates that the solar panels do not change volume or peak rates of runoff and base their entire contention that the proposed scheme will not increase flood risk to Cassington on the basis of these two, now rather old papers.

Cassington Parish Council employed the consultant, Clive Carpenter, from GWP Consultants, an expert with 30 years’ experience in water management and impact assessment projects in the U.K. and overseas. His evidence in REP3-076 points out that:

*“As before to support their [the Applicants] statement solar panels do not increase storm run-off, they refer to **out-dated research by Cook and McCuen published in 2013**, which they advise concluded that full vegetation cover is required beneath the modules to make changes in run-off flows insignificant. As before the Applicant goes onto dismiss research by Pisinaras (2014) and Yavari (2022) which report increases in storm run-off, considering these results as inappropriate given the semi-arid environment the work was undertaken in.”*

And further:

“It is very noticeable however, that the Applicant does not challenge the more recent research, referenced by ourselves in our July 2024 report letter, in this technical area, which provides consistent conclusions that solar panels increase peak run-off, increase total flows and increase erosion compared to the pre-development situation. This more recent research is considered to better represent the micro-hydrology of, and the inter-relationship between, the solar panels, the below-panel shaded vegetation and the inter-panel access corridors.

For ease of the reader, the following research summaries are repeated here from our July 2024 report letter:

- Gullotta et al (2023) found that whilst there were no practical changes in run-off immediately after installation, that in the long-term, peak run-off rates increased by 20-35% due to changes to the vegetation and soils, principally: increased saturation of the access corridor due to panel run-off drip-lines; corridor soil compaction due to maintenance vehicles resulting in reduced infiltration; and lower*

250611.v01 BOTWEST Independent Review of Botley West Solar Farm Env... (Report Letter) 03/06/2025 5 vegetation growth under the panels due to shading. The 3 contributing factors result in faster surface water run-off, greater total run-off volumes (up to 5%) and increased velocities, which logically will result in more erosion. It should be noted, it is peak run-off which is primarily responsible for flooding.

- Galzki et al (2024) undertook research on 5 commercial solar farms in the USA over a wide range of climatic conditions. They found that run-off from a fixed panel was approximately 10 times that from the incident precipitation rate on average, and that run-off increased by 14% for widely spaced panels, to 23% for narrowly spaced panels – note this did not include soil compaction in the access corridors. Panel orientation relative to the ground slope angle was also found (as would be expected) to be important, with panel rows orientated on the landscape contours generating less run-off than those installed up and down the hillslope. Increases in soil density in the access corridors (as would be caused by maintenance vehicles) also increased storm water run-off.

- Lastly, Liu et al (2023) investigated the effects of solar farms on soil erosion. He concluded that the effects of concentrating rainfall along solar panel downslope edges and the reduction in vegetation beneath the panels (due to 67-90% less solar radiation from panel shading), increased storm run-off peak flow rates by between 7% and 73%, and annual total run-off by between 14% and 4,046%, with erosion increasing by 58% to 88%. Liu identified rainfall intensity increasing by 5 times at the drip line compared to natural rainfall intensity. Liu also highlighted that once erosion commenced, this accelerated erosion rates increase further as it further concentrates overland flow into run-off channels. Liu also highlighted the particular risks during the construction period when vegetation removal and vehicle movements are at their greatest.

Whilst the above is a rather technical discussion, the concluding point is that contrary to the Applicant's submissions, research shows that solar panels do increase storm rainfall run-off. Because the Applicant cannot demonstrate the vegetation solution has a guaranteed reliability and effectiveness up to a given design event (ie a regulator specified required 1 in 100 Year plus climate change return period), then the vegetation and filter strip mitigation measures cannot be considered to be reliable to maintain storm run-off at predevelopment levels up to and including 1 in 100 Year return period storms.

The consequence for the Applicant is that they will need to manage (capture, store and slowly release) the storm water rainfall run-off from nearly all 14km² (1,400 hectares) of the development that contains the 840 hectares of solar panels, as opposed to the 2.2 hectares they are proposing. This is a fundamental error on the part of the Applicant, which underestimates (if we assume hectares to be managed as a reasonable metric) surface water flood risk by almost 3 orders of magnitude. On this basis the application should be refused."

We note that some details of the design of Botley West Utility-Scale Solar Power Station have changed, but the fundamental point that solar arrays potentially cause an increase in runoff remains a significant issue for Cassington which lies on low ground to the south of the hills on which the Applicant still plans to site solar arrays.

Whilst the Applicant still contends that solar arrays do not increase runoff rates, contrary to the up-to-date and strong evidence presented by Clive Carpenter we note that our consultant is not the only hydrologist who has raised this issue in the U.K. Richard Skeffington is an Emeritus Professor of Geography and Environmental Science at the University of Reading. He has been involved in hydrological research since 1977, first as an environmental scientist in the electrical generation industry working on the effects of acid rain on freshwaters, and after he returned to academic life in 1999, working on modelling and monitoring freshwaters, and hydrology and climate change. He is the co-author of a key paper on climate change and the water environment in England and Wales and co-led the modelling work packages of two large EU-funded projects, EUROLIMPACS and REFRESH, which investigated the predicted effects of climate change on waters across Europe. His publications on hydrological topics have been referenced more than 1000 times. He is currently looking at the potential impacts of the Lime Down Solar Power Station on flood risk.

Here, we cite the evidence presented in EN010168-001403-SLD_Appendix F2 Runoff from Solar Panels at Lime Down by Prof. Skeffington which has been submitted to that Examination. Note that in this evidence “The Applicant” refers to the applicants for the Lime Down Solar Power Station.

Research on the Effects of Solar Panels on Runoff

9. The difficulty facing all models of the effects of solar panels on runoff is how to represent the fact that there is an impervious surface, the panels, raised above the ground surface. UK regulation seems to have started from the premise that the panels are therefore irrelevant, since there is the same amount of ground after the panels were built as there was before¹. In contrast, the initial regulatory approach in the USA was to specifically regulate solar farm storm drainage and treating the panels as impervious surfaces on the ground (Yavari et al., 2022), and mandated engineering measures to prevent the consequent excess runoff and erosion.

10. Both views are clearly wrong. The US view ignores the capacity of the ground under the panels to infiltrate water and mitigate runoff. The British view ignores the fact that the panels redistribute water. In particular, the panels concentrate water at the lower edge of the panel slope, often as discrete drip points, and that the ground under the panels is considerably drier.

The question then arises as to whether the soil can assimilate the volume of water under the drip points, which is much greater than the natural rainfall rate. If the answer is “no”, then a surface water flow will develop. If it continues to flow over a saturated or impervious surface then there is the risk of soil erosion and a rill or small gully may develop. These transfer water much more quickly to drains and streams than percolation through the soil, leading to quicker runoff and higher flood peaks. If the

surface water reaches the drier area under the panels, then it may return to the soil water or groundwater without causing flooding. On the other hand, drying some types of soil can cause an impervious surface crust to form, and the soil under the panels may no longer be able to assimilate much water. The soil under the drip line is likely to be saturated more frequently than it was before, and this may also increase runoff rates. Clearly the small-scale configuration of the panels, such as the orientation of the panels relative to the slope of the ground, and where any engineered mitigation is placed, will have a large effect on the outcomes. Modelling and measuring these effects is a considerable challenge as will be seen below.

11. The Applicant's FRA makes reference to the paper prepared by Cook and McCuen (2013), an early review of the hydrological effects of solar farms. The authors identify several potential problems, including increases in the volume of runoff, increased height of flow peaks, and increased kinetic energy of runoff from the panels leading to soil erosion. They built a computer model on hydrological principles to test these issues, which concluded that "the solar panels themselves did not have a significant effect on the runoff volumes, peaks, or times to peak". This conclusion is often quoted by solar developers in the UK. In the paper itself, however, the conclusion was contingent on appropriate ground management, in the absence of which the model could show significant increases in peak discharge and potential for soil erosion:

"The addition of solar panels over a grassy field does not have much of an effect on the volume of runoff, the peak discharge, nor the time to peak. With each analysis, the runoff volume increased slightly but not enough to require storm-water management facilities. However, when the land-cover type was changed under the panels, the hydrologic response changed significantly. When gravel or pavement was placed under the panels, with the spacer section left as patchy grass or bare ground, the volume of the runoff increased significantly and the peak discharge increased by approximately 100%. This was also the result when the entire cell was assumed to be bare ground."

"The potential for erosion of the soil at the base of the solar panels was also studied. It was determined that the kinetic energy of the water draining from the solar panel could be as much as 10 times greater than that of rainfall. Thus, because the energy of the water draining from the panels is much higher, it is very possible that soil below the base of the solar panel could erode owing to the concentrated flow of water off the panel, especially if there is bare ground in the spacer section of the cell. If necessary, erosion control methods should be used."

12. Cook and McCuen (2013) suggested some management strategies to alleviate the risks identified: "Bare ground beneath the panels and in the spacer section is a realistic possibility (see Figs. 1 and 5). Thus, a good, well maintained grass cover beneath the panels and in the spacer section is highly recommended. If gravel, pavement, or bare ground is deemed unavoidable below the panels or in the spacer section, it may

necessary to add a buffer section to control the excess runoff volume and ensure adequate losses. If these simple measures are taken, solar farms will not have an adverse hydrologic impact from excess runoff or contribute eroded soil particles to receiving streams and waterways.”

13. However, Cook and McCuen (2013) did not model or assess proposed mitigation measures. There is no evidence that the Applicant’s proposed “planting” would be effective. Additionally, as many subsequent authors have commented, Cook and McCuen’s (2013) modelling was not validated by field measurements from real solar farms. Work over the last 15 years has somewhat clarified the range of factors which need consideration and shown that many of Cook and McCuen’s conclusions are flawed. These are reviewed below. The Applicant should not be quoting outdated work simply because it supports a pre-determined position.

14. Cook and McCuen (2013) were not the only authors to attempt to model runoff from solar panels. In a review of solar farm hydrology, Yavari et al (2022) noted that, up to that time, evaluation of runoff generation was confined to model-based studies. They drew attention to several papers, some of which come to contrasting conclusions to Cook and McCuen:

a. Barnard et al (2017) used a combination of HEC-HMS hydrological models from the US Corps of Engineers and the Flo-2D routing model to design a drainage system for a large solar farm in West Texas. The system required both hard engineering (retention ponds) and SuDS-like features (swales and berms), as well as regrading of the site in places to prevent excess runoff and soil erosion. There was no suggestion that allowing water to infiltrate under the panels would be adequate on its own. The area has a similar annual rainfall to Lime Down, but rain typically comes in large convective storms so requires the ability to cope with heavier short-term rainfall than in the UK. The paper illustrates that it was felt necessary to use a connected set of models on a wide spatial scale, involving modelling of over 130,000 grid elements, to produce estimates of not only flood depths but velocities and off-site flows. These models were used to design flood mitigation works.

b. Pisinaras et al (2014) used the SWAT model to predict the effect of replacement of agriculture with solar farms in the Vosvozis river basin in NE Greece. The model demonstrated increased surface water runoff and percolation, although changes were not significant at the watershed scale. For small river basins (c. 10km²), replacement of 1% or 5% of current agriculture with solar panels led to increases in surface runoff of up to 110 mm, according to the model. For the large river basins (c. 300km²) the effect was much smaller, about 6 mm, though not all the basin was modified. The area has a Mediterranean climate, with most rain falling in winter.

c. A non peer-reviewed study by Edalat (2017) which showed a modelled increase in runoff after solar panel installation. In this case, however, the model assumed the panels were flat impervious surfaces on the ground, which would exaggerate the effects.

15. A later model-only study by Gullota et al (2023) used the US EPA Storm Water Management Model (SWMM). A variety of hydrological and soil conditions were simulated, with and without panels. In the short-term, the panels made little difference. However, when the model was parameterised to incorporate the redistribution of soil moisture by the panel structures over time, peak flows increased by 6-35%, and total runoff by 1-5%. These would be significant values for a project meant to last 60 years.

16. Nair et al (2024) also used the SWMM, set up somewhat differently, to model a range of conditions in a model solar farm. In this case both peak runoff and total runoff volume were increased by the solar panels. The magnitude of the results depended on how the panels were oriented relative to the slope. These model-only studies show that different but credible models, with varying model parameterisations, applied in different climates, yield a wide range of results, including increases in peak runoff and runoff volume. There is no basis for assuming that the presence of solar panels will have no effects on runoff.

17. Genuine experiments where the experimenter is in control of artificial rainfall on an experimental solar setup are difficult to perform. Baiamonte et al (2023) studied the effects of a pair of solar panels on runoff in a bare soil in Sicily. The panels increased runoff rates by a factor of about 11, and shortened the time to peak by a factor of about 4. These would be huge effects in the real environment. In contrast, Wang and Gao (2023) worked with a similar plot-scale setup in a soil from the Loess Plateau in China, and found that the panels made little difference to runoff, but perhaps not surprisingly, reduced soil erosion. In practice these studies, which have bare soil, relatively steep slopes, and high rainfall rates are not very relevant to typical British conditions.

18. Modelling predictions which are tested against real data offer the most reliable way to predict the effects of solar panels on runoff. Mulla et al (2024) measured soil hydrological values at 5 contrasting solar sites across the USA, with annual rainfall rates varying from 406 mm to 1245 mm. They built a hydrological model based on the observed facts: that solar panels collect and concentrate runoff along a drip edge; that this water percolates into the soil and migrates both downwards and laterally; that the open area between panel rows is available for water infiltration; and that the dry area under the rows of panels is also available for infiltration. They applied an established soil hydrology model, Hydrus-3D, to this framework, and calibrated it to each of the five sites. Their model gave good simulations of the observed soil moisture parameters during subsequent storm events. They used the model to predict the effects on runoff of the 100-year design storm for each site.

19. One of the aims of the Mulla et al (2024) paper was to demonstrate to US regulators that simply treating the solar panels as an impervious surface would lead to an exaggerated effect on runoff, and their model succeeded in this. The study yielded other insights, however, which are not mentioned in the paper Summary. One was that, averaged over the 5 sites, stormwater runoff was 14% higher in the presence of panels than it would have been in their absence.

Another was the importance of soil type. The soil at the Minnesota site was a deep, coarse textured soil with a high saturated hydraulic conductivity, and produced no excess runoff even in the 100-year storm. The other 4 sites all produced excess runoff in the 100-year storm in the presence of panels. The site in Georgia also produced excess runoff in the 10-year storm, and the sites in Oregon and New York in the 10-year and 2-year storms. The soil at the New York State site was shallow with limited storage capacity, and generated about 125 mm of runoff in 24 hours, from a rainfall input of 150 mm. The authors note (Mulla et al., 2024; Section 3.7) that:

“one of the primary strategies solar developers should use for mitigating runoff is to select sites for development that have good potential for infiltration, avoiding development on sites with low permeability or shallow soils.”

20. The Lime Down soils are mostly shallow with low permeability (see Section 6 below). The Mulla et al (2024) paper, which is one of only two which have tested a hydrological model of a solar farm against real data, thus demonstrates that: (1) solar panels can increase water runoff in a range of soils, even in short return period storm conditions; and (2) that soil infiltration and storage capacity are vital attributes that need to be assessed. The authors used their data to generate an assessment model (Galski et al. 2024) which could be used for assessment in UK sites.

21. The other study which developed and tested a hydrological model of a solar farm against data is Liu et al (2023). Liu and co-workers developed a complex hydrological model (SOFAR) which takes into account the concentration of rainfall by the panels into driplines; soil moisture dynamics; vegetation growth; landform evolution; and hydrological connectivity, defined as “the internal physical linkages between runoff/sediment generation in the upper parts of a catchment and the water/sediment received through the fluvial system”. They calibrated the model in a solar farm in the Loess Plateau of China, with an arid continental climate (annual rainfall, 186 mm). They then used the model to predict runoff and soil erosion under a range of conditions. Runoff due to the panels was considerably increased in all situations (99% to 150%), as was soil erosion (25% to 76% during operation). This is in a very different climatic environment to the UK, but it does show that the same physical processes that apply in the UK can produce large increases in runoff. It is also the only model which attempts to model the larger scale effects, through its hydrological connectivity parameters.

Conclusions on Research

22. It is clear from the above that it cannot be assumed that the existing ground surface will absorb all the water running from the panels as the Applicant claims, such that there will be no effects on runoff or soil erosion. Credible models, including the only ones tested against data, consistently show that the panels can increase runoff given certain conditions. The Mulla et al (2024) paper highlights soils with a low infiltration capacity, low hydraulic conductivity and low storage capacity as particularly vulnerable. To assess the risks at Lime Down, it is thus necessary to know the condition of the soils, and also the characteristics of the panels which are to be used. These are discussed in the following sections.

On the basis of evidence from Clive Carpenter and Prof. Richard Skeffington Cassington Parish Council concludes that the Applicant's position that solar arrays do not influence rates of runoff of rainfall is simply untenable. Given the expertise available to the consultancies employed by the applicant to look at the environmental impacts of the proposed Botley West Solar Power Station, we find it difficult to believe that they are not aware of the recent peer-reviewed publications that all indicate that contrary to their position, solar arrays can under certain conditions increase runoff. We can only assume that this evidence does not suit the narrative of the Applicant and therefore they have attempted to bluff their way through the examination and now through the SoS questions so that they do not have to account for increased runoff in their scheme. We believe this is because this issue potentially threatens the entire feasibility of the proposed Solar Power Station. Clive Carpenter concluded:

"Surface water management of this scale will require considerable land take, which will need to be outside of the river flood zones in order to be effective. It is not clear whether this is achievable on the site with the number of solar panels proposed and as such this questions the feasibility of the proposed development. Conversely if the Applicant chooses to reduce the number of solar panels to accommodate the necessary surface water management infrastructure, this would presumably impact the cost effectiveness of the development and may result in the financial viability of the scheme becoming problematic."

At this point Cassington Parish Council would like to remind the SoS that should the scheme go ahead with such lack of consideration of the potential for increased runoff, especially given the positioning of solar arrays on slopes above the village on soils with low permeability, then it is likely that our parishioners will be subject to increased occurrences of flooding. This is unacceptable and contrary to the planning regulations.

However, the issues of potential flooding related to this proposal are not just related to increased runoff resulting from the solar arrays themselves. A second issue is the likely destruction of land drainage. Cassington Parish Council were astonished to find that the

Applicant, even at the late stage of the Issue Specific Hearing had not requested field drainage plans from the landowner, Blenheim Estates, or even enquired as to whether such plans even existed. The Applicant undertook to do this during detailed planning and to repair any damage to land drainage incurred during construction. We note that now, the number of estimated pilings to install the solar arrays for Botley West has approximately doubled previous estimates to 2.5 Million. The Applicant admits that these pilings will disrupt field drainage but states that maps of field drains have now been obtained and measures will be taken to avoid field drains or repair them following damage. The claim that such mapping, avoidance and repairs for such a high density of pilings stretches credibility. Cassington Parish Council are highly sceptical as to whether this will be even partially possible. 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 D). 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. Furthermore, the disruption and disturbance to soils from such activity will be much larger than previously conceived of in the original application. Again, this poses a significant risk of increase of flood risk to offsite locations.

Cassington Parish Council point out that both of these issues have 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.

The Applicant States *“It is noted that the general approach to be adopted is in line with current solar PV standards accepted across the UK.”* Cassington Parish Council puts forward that with all due respect, the topography and soil characteristics of the proposed site for Botley West Solar Power Station is not necessarily typical of solar developments elsewhere. Both in Cumnor and Cassington solar arrays are placed on slopes on soil with a low permeability to water.

To conclude Cassington Parish Council’s opinion on the Applicant’s drainage strategy is that it simply is not credible.

- Scientific evidence is massively weighted to the view that solar arrays can lead to increased rates of runoff as a result of the drip-line effect. In some cases, this can be a substantial increase.
- The Applicant’s view that solar arrays do not increase runoff rates is not only not credible but undermines their entire approach to drainage across the site because of underestimation of the amount of water to be controlled.

- The Applicant's plans to deal with land drainage lack credibility and will lead to substantial damage of the soil potentially increasing flood risk through compaction.
- Leaving the detailed design of drainage from the site until after the DCO is granted is not acceptable. This project represents a significant risk of increasing the vulnerability of homes to flooding. This is a matter we will return to at the end of this response under "Other Matters".
- That the Environment Agency have simply ignored the evidence presented and given the go ahead for this approach is another example of a statutory authority failing in its duties with respect to this project. We see no evidence that the Environment Agency has considered the likely impacts of this project on pluvial flood risk, instead they have simply accepted the Applicant's position which we have demonstrated is materially incorrect.
- We note that the connection date given by National Grid is Q4 2031 not 2029.

As a result of no apparent shift of position by PVDP on flooding, despite the evidence we have presented throughout the examination and which has increased, we see no alternative but to request that the SoS ensures that solar infrastructure of any kind from the hills above Cassington, Jericho Barns and Worten as detailed in the letter in Appendix E. Furthermore, we recommend strongly that similar modifications are imposed in other areas prone to pluvial flood risk such as around Cumnor. We view the current flood / water management plans presented by PVDP as wholly inadequate.

Other Matters

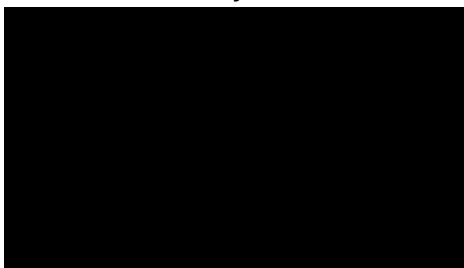
Cassington Parish Council maintain that the Applicant developed the Botley West project in partnership with Blenheim Estates to maximise size and therefore profit for the project. This is understandable from a business perspective but has led to a severe disregard or underestimation for many of the impacts of such a large-scale proposal in rural Oxfordshire, a heavily populated rural area, rich in heritage, of high landscape values, valuable farmland and rich ecology. We acknowledge the climate emergency and the need for renewable energy but this has to be balanced with impacts on people and nature. Here that balance has not been met.

Cassington Parish Council is highly concerned about the number of aspects of this proposed project that have been pushed into post consent for planning, design and implementation. We note that Solar 5, the owners of PVDP and the Botley West Project are a Special Purpose Vehicle (SPV) and as such, under Planning Act Guidance (for DCOs) Article 34 they can sell the project on to someone else. This is highly likely given that this is how the current owners of the company or companies have operated in the past. They get permission for solar development and sell the project on to others to build and operate. We note that the UK part of Island Green Power is now wholly owned by Macquarie and that Quinbrook is now the sole owner of the entire Cleve Hill Solar

installation and recently bought out the Mallard Pass solar DCO. As we have discovered with the water industry, such investors do not necessarily have the best interests of the public in mind. Cassington Parish Council therefore has no faith whatsoever in various promises to undertake detailed planning post consent. This includes, especially, detailed work related to flood mitigation in Cassington; the complete environmental management plan; wildlife monitoring and adaptive management; the RVAP and determination of buffer zones in the spirit of the 250m requested by the Examiners; waste management and final disposal at end of life of solar infrastructure and the location of the substation for connection to the grid. The list of things to be done post consent is very long, but of course in all likelihood PVDP will not be the company paying for this work to be done.

Finally, Cassington Parish Council points out that many of our residents have been extremely stressed by this proposal. The overall impression has been that whilst the Applicant has gone through the motions of informal and formal consultations, the public have not been listened to. This has manifested in the Examination through the Applicant stubbornly resisting repeated requests (e.g. for the RVAA) or creating and sticking to narratives that suit their aim to push through a project that is too large and in the wrong place (e.g. issues of flood risk, impacts on Greenbelt, amenity etc). It has also been exacerbated by false claims both in person, in the media and during the Examination about matters such as quality of farmland and the richness of wildlife in the area. The impression has been one of dishonesty and playing fast with the rules. This, unfortunately has continued to manifest with the kicking of matters into post consent and continued efforts to bend the rules, even post Examination, with the unreasonable requests to complete work that should have been completed months / years ago. We are of the mind that the Applicant should be refused and asked to consider a proposal of different scale which genuinely considers impacts on landscape, residential amenity, Greenbelt, agriculture, heritage and wildlife.

Yours Sincerely



On behalf of Cassington Parish Council

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Appendix A Letter to [REDACTED] by [REDACTED]

[REDACTED],

Deputy Director, Thames Solent Area Team,

Joint Nature Conservation Committee,

Natural England,

Foss House, Kings Pool,

1-2 Peasholme Green,

York,

YO1 7PX

Prof. [REDACTED],

8 Orchard Close,

Cassington,

Oxfordshire,

OX29 4BU

28th April, 2026

CC: [REDACTED]ell, Nature Recovery Officer, West Oxfordshire District Council

CC: [REDACTED], Senior Biodiversity Officer, West Oxfordshire District Council

CC: [REDACTED], Executive Member for the Environment, West Oxfordshire District Council

CC: [REDACTED], Director, CPRE Oxfordshire

CC: Calum Miller MP for Bicester and Woodstock

Dear [REDACTED],

Many thanks for your letter of the 30th March, 2026. I am very pleased to see the clarifications with respect to the policy regarding the public's ability to notify Natural England of potential SSSIs sites for consideration for designation. As you have outlined, and which I would only expect, such designations require assessment by an evidence-led process that tests data against selection guidelines, combined with expert judgement. I have considered the designation criteria outlined in the SSSI Guidelines, Part 1 and Part 2 and remain convinced this site requires urgent designation as a result of poor land management and high pressure of development in this location. Therefore, what follows in the rest of this letter are the full details of why I believe this area of the Thames Clay Vales should be considered for designation as a SSSI. Much of this material is a repeat of my first letter to Natural England but with revisions according to my re-reading of the SSSI Guidelines. I would be very grateful if you can forward this material, along with the additional attached documents which present survey data to your team for consideration for inclusion in the SSSI Designation Programme for

investigation. Of course, this depends on whether Natural England have lifted the suspension on designations, a matter which I have not had an answer to in terms of my FOI request. I will be writing to your Legal Department to clarify matters relating to suspension.

The Three Rivers Bat Potential SSSI

Introduction

Recent environmental impact assessment work with respect to the Botley West Solar Power Station NSIP has led to the discovery of an exceptional site for bats of at least national importance, and potentially international importance in West Oxfordshire. The Botley West proposal is currently under consideration by the Secretary of State as to whether to recommend acceptance or refusal of the proposal. Irrespective of the decision, it is critical that this bat community is afforded protection because of the extremely high pressure of development in the region and the poor management of woodland by the landowner that is used for roosting and hibernation by some of our rarest bats. The area is named The Three Rivers because of its location in the vicinity of the River Evenlode, River Glyme and the River Thames.

The area of concern lies in the district of West Oxfordshire but also borders Cherwell District Council. It lies roughly between Blenheim Palace and the villages of Woodstock, Long Hanborough, Bladon, Yarnton, Cassington, and Church Hanborough. To the north the area is bounded by the A4095 and to the south, the A40. However, the bat community discovered may migrate on a daily or seasonal basis outside of this area as both the Blenheim Estate Park and Thames valley include habitats which may be used for roosting, hibernation and foraging (Blenheim Estate Park has forest, including ancient oaks and is an SSSI; the Thames Valley has neutral grassland flood meadows inc. the SSSI, Cassington Meadows). The area is mainly agricultural land, used for growing grass and cereals, generally of Grade 3 but with areas of Grade 2 and Grade 1 land. Importantly, the land includes a mosaic of habitats including farmed fields, mature and diverse hedgerows, the Evenlode River Valley running into the Thames to the south and patches of woodland including Pinsley Wood, Burleigh Wood and Bladon Heath. Pinsley Wood contains fragments of the ancient Wychwood and is noted locally for its bluebells and other woodland flowers. Other landscape features include a railway cutting, Cassington Sewage Works and a number of gravel pits, now restored to form lakes. The land rises from south to north. It is this mosaic of habitats and the abundance of insects, including aquatic insects, that believe makes this area so favourable for bats.

Area of Search

National Character Area 108

Upper Thames Clay Vales

The Upper Thames Clay Vales National Character Area (NCA) is a broad belt of open, gently undulating lowland farmland on predominantly Jurassic and Cretaceous clays. Blenheim Palace World Heritage Site falls within the NCA, along with around 5,000 ha of the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and smaller areas of the Chilterns AONB and the Cotswolds AONB. Two of its Special Areas of Conservation (SAC) are designated for their lowland meadow vegetation communities, while Little Wittenham SAC has one of the most studied great crested newt populations in the UK. There are contrasting landscapes, including enclosed pastures of the claylands with wet valleys, mixed farming, hedges, hedge trees and field trees and more settled, open, arable lands. Mature field oaks give a parkland feel in many places.

Oxfordshire Wildlife and Landscapes Study Classification (OWLS)

(<https://owls.oxfordshire.gov.uk/wps/wcm/connect/occ/OWLS/Home/>)

The following Parishes are included in The Three Rivers area and habitat has been outlined in the OWLS scheme.

Begbroke

Wildlife Habitats

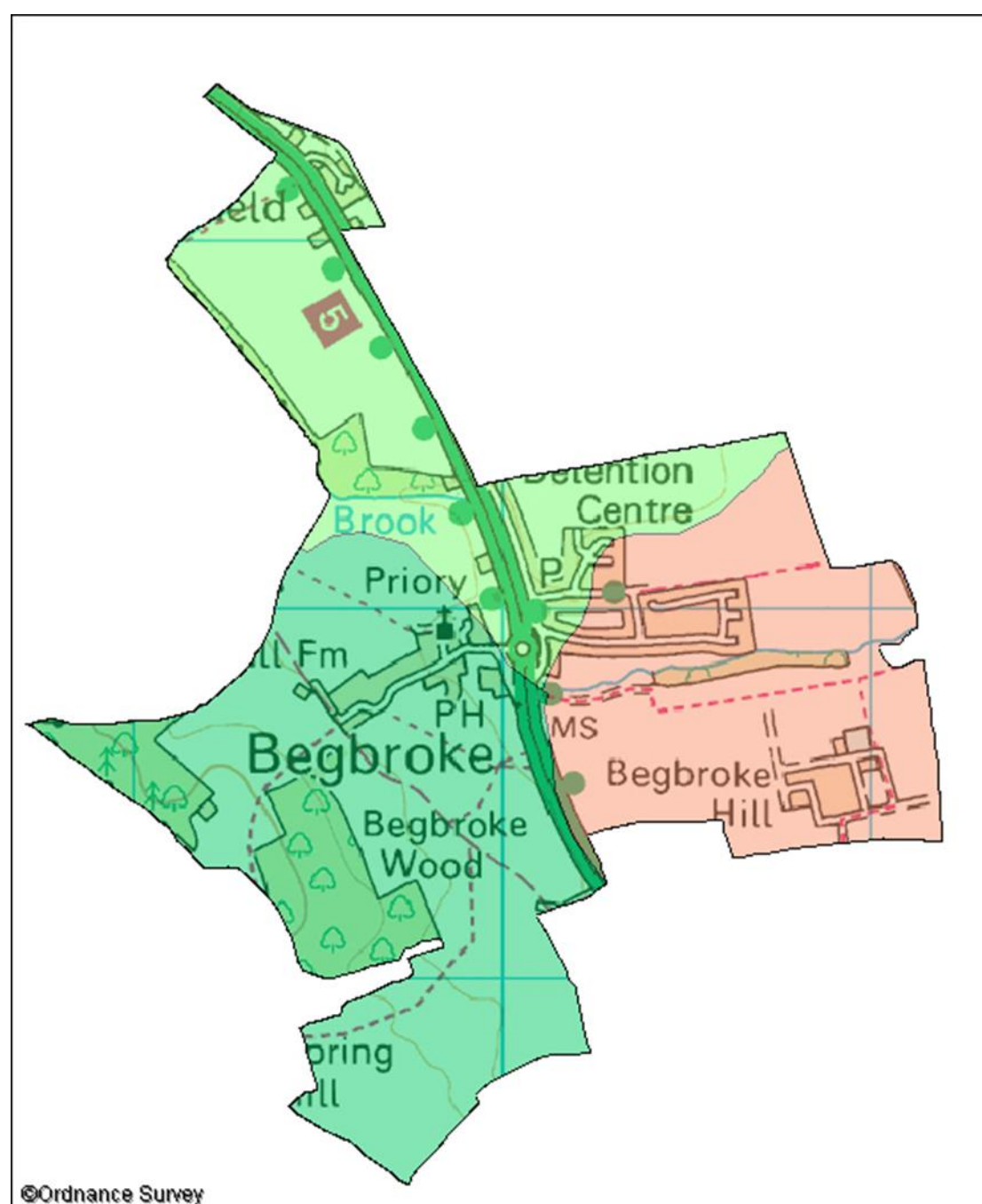
Wooded Estate lands

Site Code: 41R03

Area: 18.8ha

This site is an area of long established woodland. It is not ancient woodland but has the typical appearance of old woodland with mainly native trees and shrubs and a variety of woodland wildflowers. Broadleaved woodland such as this is a national priority for nature conservation.

The canopy of this wood mainly consists of oak trees along with some ash. There are also a few areas with conifers. There is a mixed shrub layer with hazel, buckthorn, guelder rose, hawthorn and wych elm. Woodland wildflowers present include primrose, bluebell, pignut, wood spurge and wood anemone.



Landscape Types

- Estate Farmlands
- Lowland Village Farmlands
- Wooded Estatelands

Bladon

The following wildlife habitats fall within this parish. They are listed according to their associated landscape type or local character area.

Wildlife Habitats

Wooded Estate lands

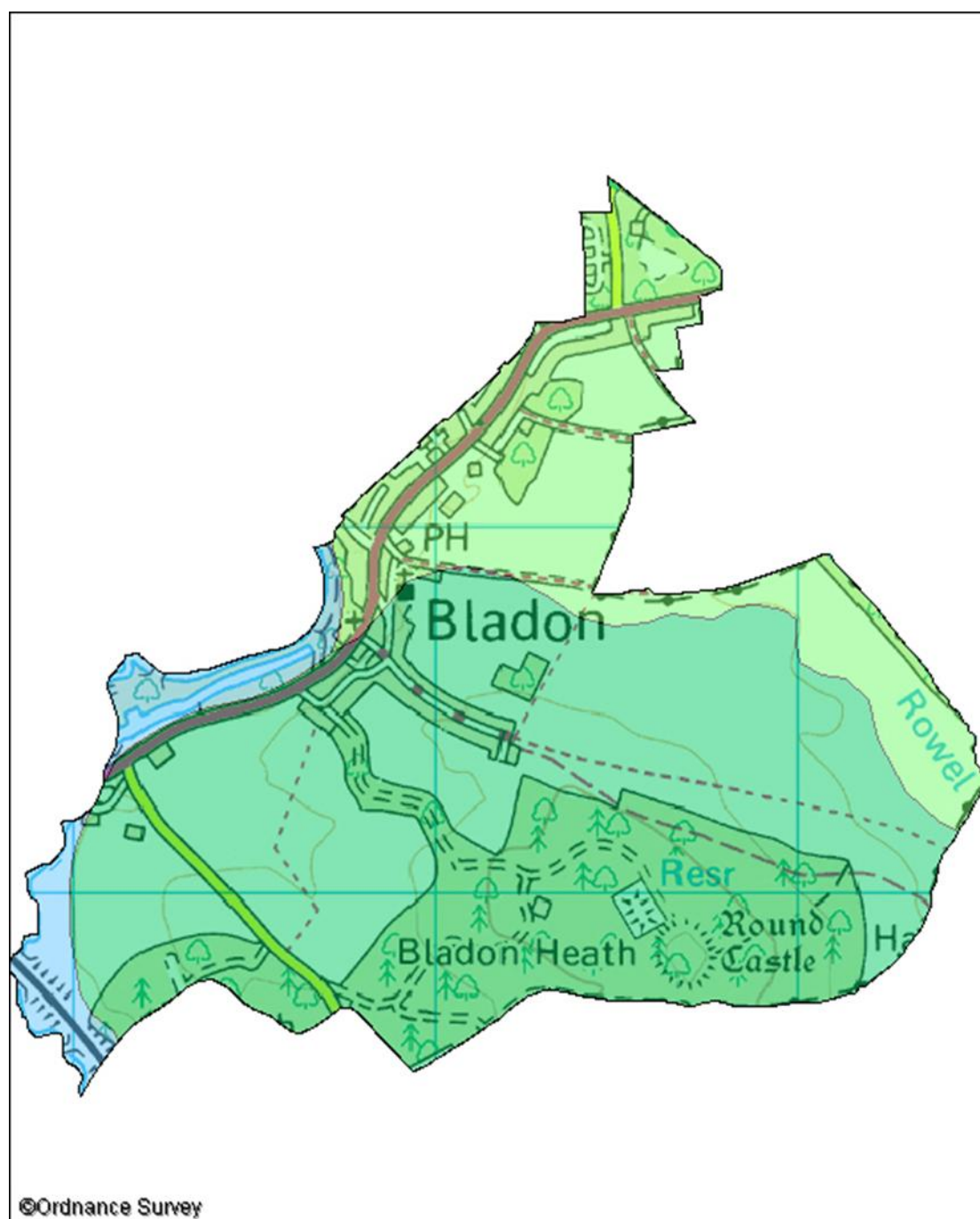
Site Code: 41L02

Area: 97.3ha

Grid Ref: SP455138

This site is a large area of woodland. Parts of the site have been continuously wooded for at least 400 years, and these are classified as ancient woodland. However, this site is largely plantation with large amounts of conifers. There are remnants of old woodland composed of native trees and shrubs with woodland wildflowers such as bluebell and primrose. This type of woodland is a national priority for nature conservation.

Heathland has been present here in the past. It is not unusual for the acidic sandy soils typical of heaths to have been planted with conifers. Some remnants of heathland remain and there is potential that it could be restored here. Patches of heather have been seen occasionally. Many rare and scarce insects have been recorded at this site. These include the silver-washed fritillary and purple hairstreak butterflies. The site is also good for birds. All three species of woodpecker are present, and this is one of few sites in Oxfordshire where woodcock nests.



Landscape Types

- Estate Farmlands
- River Meadowlands
- Wooded Estate Lands

Cassington

Wildlife Habitats

Lowland Village Farmlands

Site Code: 41K04

Area: 15.4ha

This site is an old disused gravel pit. Of the three areas of water that were left when gravel extraction finished in the 1950s two are now completely filled with beds of common reed. Between these areas there are areas of wet willow and birch scrub and woodland. These habitats are a national nature conservation priority.

The site is particularly important for birds. Reed bunting and song thrush, both national nature conservation priorities, nest here. Water rail has regularly nested in the past and there are good numbers of reed and sedge warbler. The rare bittern has been an occasional winter visitor.

Site Code: 41K07

Area: 5ha

This disused gravel pit has a number of pools of water with wooded areas between. The pools have shallow areas where plants that live in water are found along with wetland species. These include water lilies, yellow flag iris, marsh horsetail and the uncommon mare's-tail. Rich areas of water such as this are a national priority for nature conservation. The site supports a good range of dragonflies and damselflies. The nationally scarce club-tailed dragonfly has been seen here.

Fringing the pools and on the land between there are many willows along with birch, hawthorn and dogwood. There are open grassy areas where colourful wildflowers such as oxeye daisy can be seen. Common spotted orchids have been seen here in the past.

River Meadowlands

Site Code: 41Q02

Area: 7.03ha

Cassington Meadows SSSI

Cassington Meadows lie next to Thames south of Cassington village. The meadows have not been agriculturally improved through the use of herbicides and fertilizers or through ploughing and reseedling. Consequently, the meadows are rich in wildflowers. There is also an area of tall wetland vegetation dominated by reed grasses. Both habitats are national priorities for nature conservation.

Wildflowers found here include great burnet, dropwort, meadowsweet, adder's tongue fern and cowslip. The meadows are surrounded by tall hawthorn hedgerows with many willows which are also found along the riverbank.

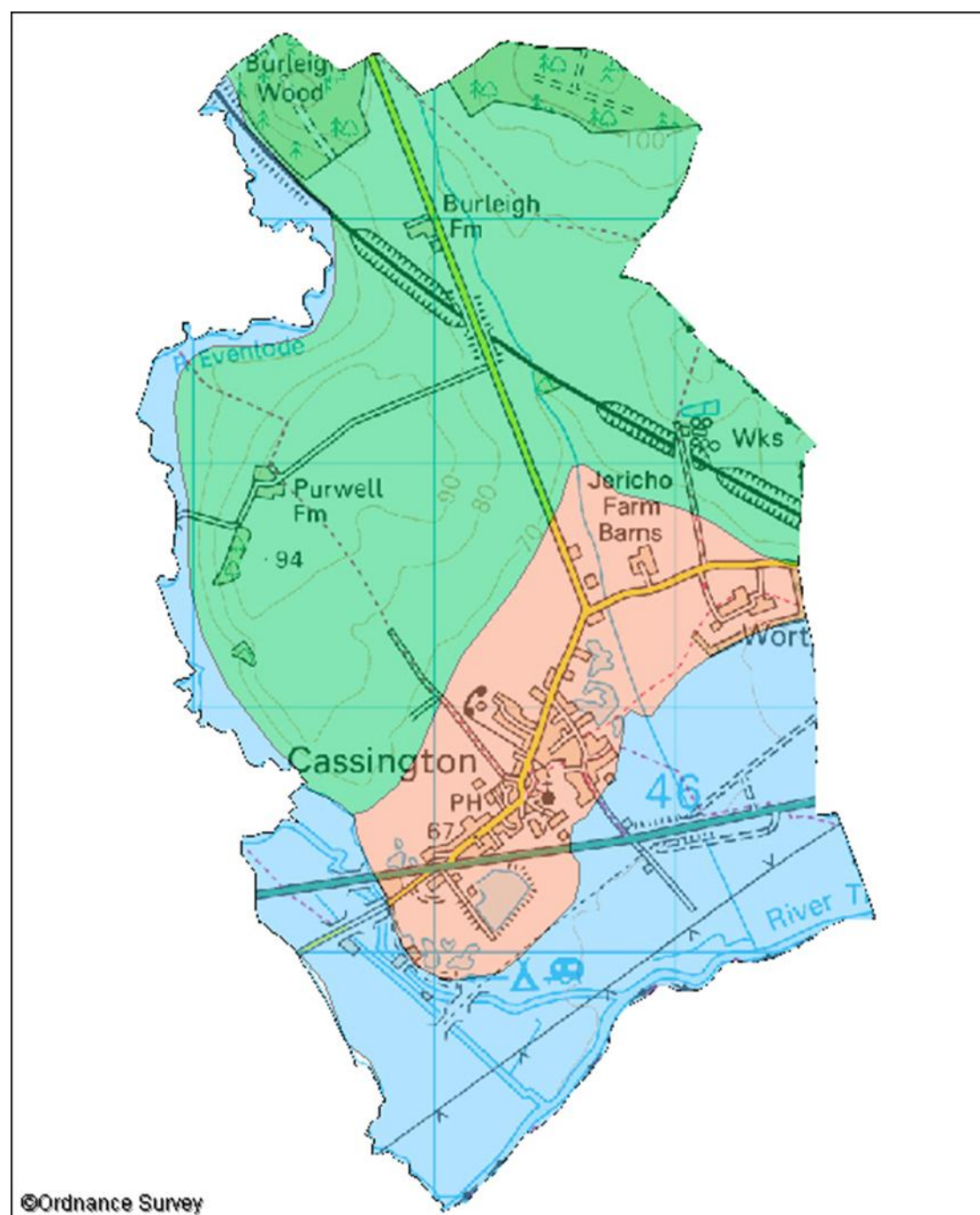
Wooded Estate lands

Site Code: 41L01

Area: 38.6ha

This site is a good-sized ancient woodland which means the site has been continuously wooded since at least 1600AD. Most of the woodland has been replanted with conifers and an area of beech. However, the remains of the old oak woodland can still be found in strips along the wood edge, in the south east corner and along the wide woodland tracks. Such woodland is a national priority for nature conservation.

There is a good variety of woodland plants associated with old woodland. The uncommon wild service tree is found along one of the tracks. Bluebells form carpets on the ground in the spring. Other woodland wildflowers present include early purple orchid and primrose. The white admiral butterfly has been recorded here recently.



Landscape Types

- Lowland Village Farmlands
- River Meadowlands
- Wooded Estate Lands

Hanborough

Wildlife Habitats

Wooded Estatelands

Site Code: 41G04

Area: 46.6ha

This site is a good sized ancient woodland which means that it has been continuously wooded for at least 400 years. Large parts of the wood have old traditional woodland with a canopy of oak, ash and field maple trees which carpets of bluebells on the ground. This type of woodland is a national nature conservation priority. Most of the centre of the wood has been replanted with conifers

The wood has many plants associated with ancient woodland including the uncommon wild service tree. Wildflowers found here include early purple orchid, yellow archangel, primrose and wood anemone. In the past purple hairstreak, wood white and white admiral butterflies have been recorded in the wood.

Site Code: 41G03

Area: 4.3ha

Long Hanborough Gravel Pit SSSI

The quarry faces at this disused gravel pit have exposures of rocks that are important in the understanding of geological history. Here there are fossil rich exposures of the gravels that underlie the Hanborough area where Palaeolithic hand axes have been found.

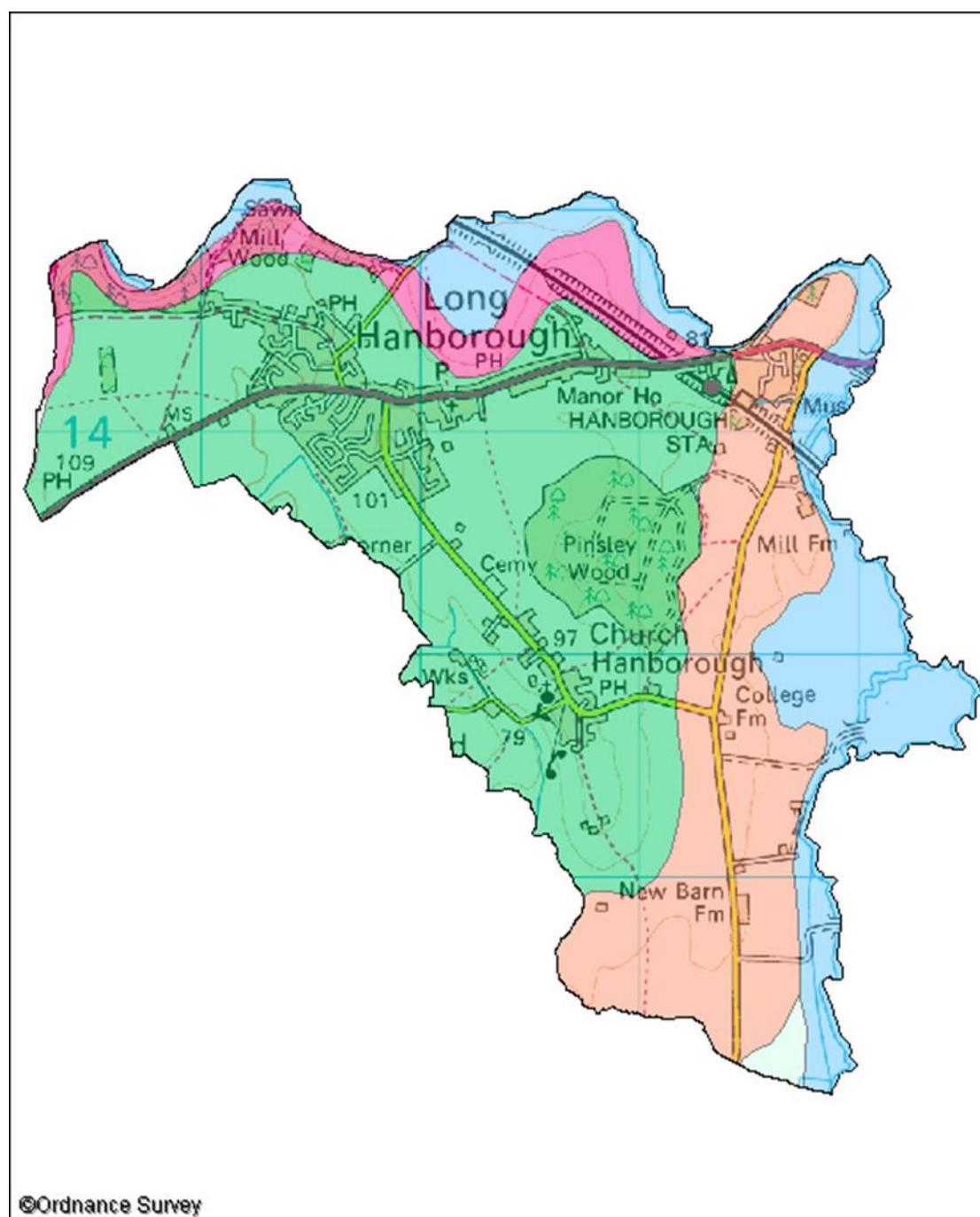
Wooded Estate Slopes and Valley Sides

Site Code: 41C01

Area: 2.4ha

This site consists of two banks which are important for the presence of areas limestone grassland, which is a national priority for nature conservation. The rare limestone grassland wildflower meadow clary is found here. This species is found mainly in this part of the Cotswolds and is protected under the Wildlife and Countryside Act 1981.

The eastern bank, where the meadow clary occurs, is mainly covered in scrub and the limestone grassland is restricted to small glades. The grassland on the western bank is quite recent in origin and less rich in species. Other limestone grassland species found on the banks include pyramidal orchid and harebell. The banks support a good variety of birds including linnet, skylark, bullfinch and song thrush which are all national priorities for nature conservation due to the rapid declines in their population. A nationally scarce snail has also been recorded here.



Landscape Types

- Alluvial Lowlands
- Lowland Village Farmlands
- River Meadowlands
- Wooded Estate Slopes and Valley Sides
- Wooded Estate Slopes and Valley Sides

Yarnton

Wildlife Habitats

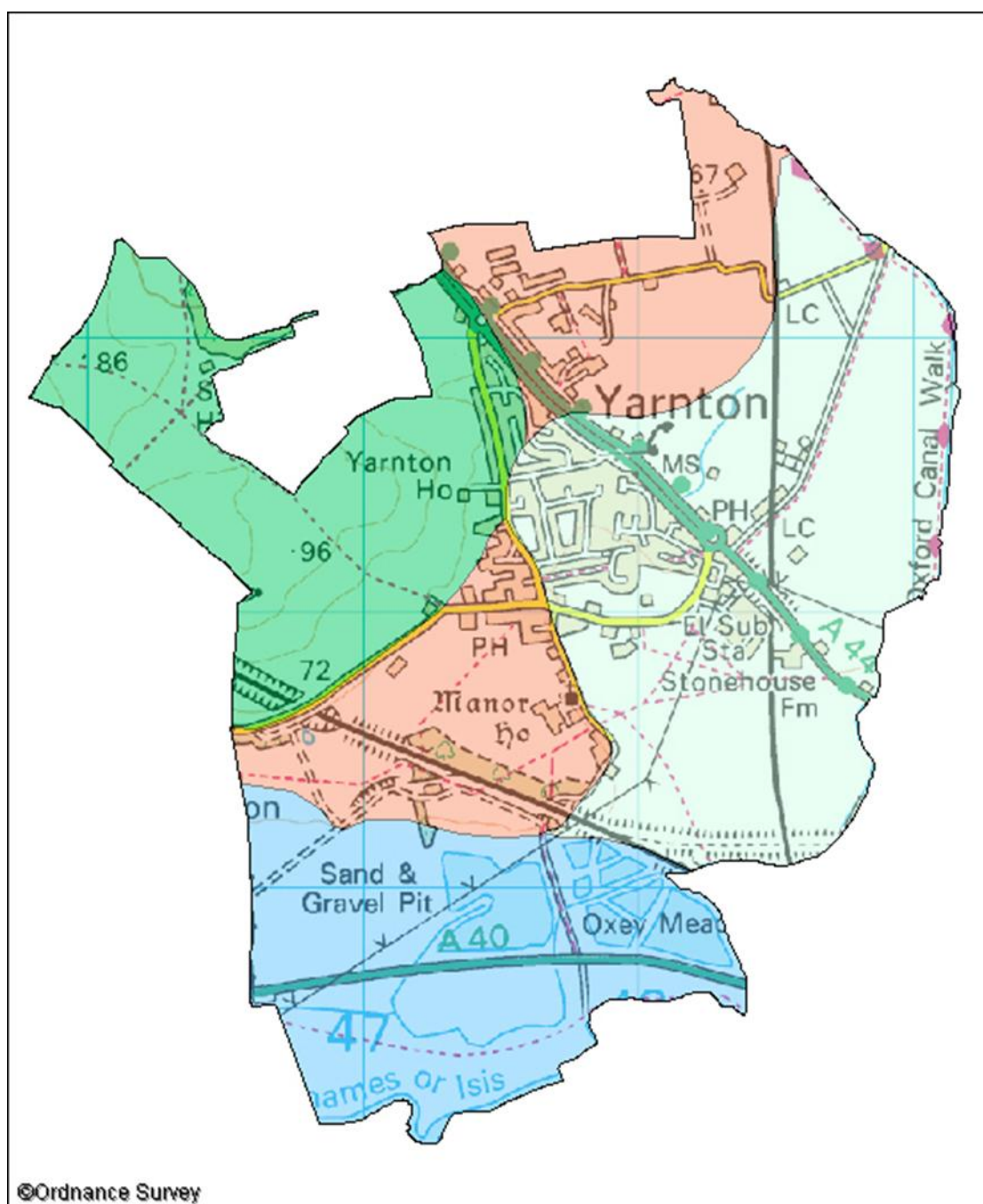
Alluvial Lowlands

Site Code: 41V08

Area: 1.5ha

This site consists of two small borrow pits which were probably dug during railway construction in the area. Tall wetland vegetation with large sedges and reed-grass is now found in the pits along with areas of wet willow woodland. Both habitats are national nature conservation priorities. There is also a bank of drier ash woodland along the southern edge.

Wetland wildflowers found here include the tall colourful purple loosestrife, meadow-rue, common valerian and yellow flag iris.



Landscape Types

- Alluvial Lowlands
- Lowland Village Farmlands
- River Meadowlands
- Wooded Estate Lands

Rationale for Consideration of The Three Rivers Site as a SSSI

The Three Rivers site superficially appears as being of low conservation priority with the exception of the SSSIs already listed at Blenheim Estate Park and the very rare lowland flood meadows along the banks of the Thames (Cassington Meadows SSSI). Most of the area is habitat modified for agriculture over time, mostly for arable farming and the growing of hay. A number of infrastructure features also lay within the area including a sewage works and a railway cutting. Whilst Part 1 of the Guidance for SSSI Designation identifies such habitat as being of relatively low conservation interest recent survey work for the environmental impact assessment for the Botley West Solar Power Station, an NSIP, has identified a diverse community of bats, including IUCN Red Listed and Habitats Directive Annex II species. I have included as attachments to this email the relevant section of the Botley West Environmental Impact Assessment (EIA) undertaken by RPS environmental consultants, and the Bat Technical Report prepared by Sylvan, another environmental consultancy on behalf of the Applicant, PVDP. Static detector surveys were undertaken late spring to autumn in 2022 and 2023 focusing on high-value habitats likely to be used for commuting or foraging of bats. Walking surveys and static detectors were deployed in 2024 alongside trapping and radio tracking of bats to gain a better understanding of local distribution. To summarise, the following bat species were identified during the earlier surveys:

- Barbastelle, *Barbastella barbastellus* – widespread though uncommon;
- Bechstein's bat, *Myotis bechsteinii* – very rare;
- Brandt's bat, *Myotis brandtii* – uncertain, few in-hand identifications;
- Brown long-eared bat, *Plecotus auritus* – widespread and relatively common;
- Common pipistrelle, *Pipistrellus pipistrellus* – common and widespread;
- Daubenton's bat, *Myotis daubentonii* – widespread;
- Leisler's bat, *Nyctalus leisleri* - widespread though uncommon;
- Lesser Horseshoe bat, *Rhinolophus hipposideros* – rare;
- Nathusius' pipistrelle, *Pipistrellus nathusii* – rare;
- Natterer's bat, *Myotis nattereri* – widespread though uncommon;
- Noctule, *Nyctalus noctula* - widespread though uncommon;
- Serotine, *Eptesicus serotinus* - widespread though uncommon;
- Soprano pipistrelle, *Pipistrellus pygmaeus* - common and widespread; and
- Whiskered bat, *Myotis mystacinus* – uncommon

Note that this represents a minimum number of species because of the difficulties with identifying *Myotis* bats to species level from acoustic data, these bats were generally grouped into genus level. Total identifications per detector per night were close to 1000. The common pipistrelle was the most frequently recorded species.

Ten Bechstein's bat roosts were identified during radio-tracking surveys. Of the ten roosts, nine were classified as maternity roosts either because of the number of bats recorded emerging from the roost during surveys, or as a result of the breeding status of the bats. The other roost was classified as an autumnal dispersal roost. The majority of maternity roosts were located within Bladon Heath and Burleigh Wood. A total of 41 barbastelle roosts were recorded including:

- 20 maternity roosts – concentrated in Pinsley Wood, Burleigh Wood and parkland trees / woodland within the Blenheim Estate;
- six autumnal dispersal roosts – split between Pinsley, Burleigh and Begbroke Woods;
- two summer day roosts in Wytham Woods and Great Park (to the south of the area)
- 14 solitary (male) roosts dispersed throughout the wider landscape.

A single Daubenton's bat roost was identified on the Blenheim Estate during surveys. This roost was classified as a maternity roost because of the breeding status of a radio-tagged bat. A single female post-lactating Natterer's bat was radio-tagged, and this bat used three different tree roosts in Bladon Heath, all classified as maternity roosts. The maximum count of Natterer's bat emerging was 25 bats from an oak tree.

Foraging and flightline analysis by radio tracking recorded distinct spatial patterns of behaviour. Barbastelle activity was strongly associated with linear wet features and woodland. Core foraging zones (50 % kernel density estimates) lay (i) along the River Evenlode (ii) along field boundaries flanking Worton Heath and Begbroke Wood, and (iii) at the sewage works/Oxford to Hereford railway north of Worton. Regular commuting flight lines linked these foraging areas from roost sites along the River Glyme, Rowel Brook and the Oxford to Hereford railway. Re-use of identical routes by multiple tagged barbastelle bats on successive nights emphasises the importance of these corridors within the core sustenance zone (CSZ). The spatial distribution of Bechstein's bats during the radio-tracking period was over a markedly smaller footprint. All tagged bats restricted core foraging activity to woodland blocks predominately within Bladon Heath and Burleigh Wood.

The surveys and radio tracking indicated that in this area there are a number of key bat foraging and commuting resources:

- the woodlands, in particular the ancient woodlands at Pinsley, Bladon, Burleigh, Begbroke and those within the Blenheim Estate;
- the river corridors, in particular the River Evenlode;
- the sewage treatment plant north of Cassington;
- the Cotswold Railway Line;
- the green lane within the Northern Site Area; and

- smaller watercourses and other water bodies.

Bat activity (in particular, Annex II species) within the woodlands across the landscape around the Project site was generally high across all survey types indicating their importance for the bat assemblage present for roosting and foraging. The use of different woodlands varied with season; for example, Bladon Heath was important during the maternity periods but less used during autumn dispersal. However, overall, they appear to form a key element of the bat population's range, in particular for the two woodland Annex II species identified.

Similarly, all data collected also suggest that the River Evenlode corridor currently forms a key foraging/commuting corridor – statics placed here showed very high counts while the radio tracking data highlighted its use by barbastelle, in particular. In addition, from the radio tracking data, within the wider landscape, the corridors of the rivers Dorn and Glyme were also used by barbastelle for commuting with bats roosting in woodlands adjacent to the rivers.

Radio tracking data also suggest that the sewage treatment plant north of Cassington is a key foraging resource for bats with tagged bats observed moving from the woodlands to forage in the tree lines surrounding the plant. Of particular importance to commuting bats of all species, especially barbastelle, appeared to be the corridor formed by the Cotswold Railway Line.

The current conservation status of the observed bat species is as follows:

Barbastelle, *Barbastella barbastellus*: IUCN RL Vulnerable; EU Habitats Directive Annex II and IV; Bern Convention Annex II and Revised Annex I of Resolution 6 (1998); CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Bechstein's bat, *Myotis bechsteinii*: IUCN RL Vulnerable; EU Habitats Directive Annex II and IV; Bern Convention Annex II and Revised Annex I of Resolution 6 (1998); CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017)..

Lesser Horseshoe bat, *Rhinolophus hipposideros*: IUCN RL Near threatened; EU Habitats Directive Annex II and IV; Bern Convention Annex II and Revised Annex I of Resolution 6 (1998); CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017)..

Brandt's bat, *Myotis brandtii*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife

and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017)..

Brown long-eared bat, *Plecotus auritus*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Common pipistrelle, *Pipistrellus pipistrellus*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Nathusius' pipistrelle, *Pipistrellus nathusii*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Daubenton's bat, *Myotis daubentonii*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Leisler's bat, *Nyctalus leisleri*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Natterer's bat, *Myotis nattereri*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Noctule, *Nyctalus noctule*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Serotine, *Eptesicus serotinus*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Soprano pipistrelle, *Pipistrellus pygmaeus*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Whiskered bat, *Myotis mystacinus*: IUCN RL Least Concern; EU Habitats Directive Annex IV; Bern Convention Annex II; CCMS (Bonn Convention) Annex II; Schedule 5 of the Wildlife and Countryside Act (1981); Schedule 6 of the Wildlife and Countryside Act (1981); Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

All bats are particularly vulnerable at their breeding and hibernation sites and some of these sites can support a significant proportion of the species' population (Walsh et al., 2022). The lesser horseshoe bat, *Rhinolophus hipposideros* is widespread but rare species across its European range and has suffered population declines. In England and Wales, both species of horseshoe bat are at their northern limits of their range. Nevertheless, the UK supports one of the largest populations of the lesser horseshoe bat in Western Europe.

As can be seen above, three species within this diverse bat assemblage are in Annex II of the EU Habitats Directive. All species on Annex II of the Habitats Directive (1992), require the designation of Special Areas of Conservation (SACs; Walsh et al., 2022). Protection of SACs is delivered primarily through the SSSI mechanism in the U.K. (Walsh et al., 2022). The Wildlife and Countryside Act (WCA, 1981) enabled the UK to ratify the Bern Convention by transposing it into UK law. Signatories to the Bern Convention are obliged to protect all listed species. All species of bats are listed under Schedule 5 and 6 of the Wildlife and Countryside Act (1981) and Schedule 2 of the Conservation of Habitats and Species Regulations (2017).

Given the data acquired during the Botley West I am proposing that this area be placed on the list for consideration of SSSI designation because it forms habitat for some of our rarest bat species and because the area hosts an outstanding bat assemblage of at least national and if not international importance. This is fully consistent with duties within England, nationally and internationally to fulfil commitments under the EU Habitats Directive, Bern Convention and Bonn Convention as well as fulfilling commitments under the Convention for Biological Diversity, including the Kunming-Montreal Biodiversity Targets.

I note that the area is modified by human activity but point to Paragraph 3.9 of Part 1 of the Guidelines for Selection of SSSIs that states:

However, there are certain situations where sites are of SSSI quality given their species complement (e.g. rare bats or rare lichen assemblages on or in buildings). These sites may include artificial waterbodies, mining features, old buildings, and also certain

coastal and floodplain pastures, plantations, arable fields, and areas of previously-developed land.

I believe this is an exemplary site (Para. 4.6 Pt 1) based on both the presence of rare bat species and the overall diversity and abundance of the bat community. It is also fragile given the high pressure for development in the area and the sensitivity of bat species to disturbance of roosting, breeding and hibernation sites (Para. 5.1 Pt 1). The site also would form part of a local network of SSSI sites including Blenheim Estate Park, Cassington Meadows and further afield Wytham Woods and Wytham Ditches. It would also include County Wildlife Sites as well as part of the local Nature Recovery Network. As such it would be coherent with a network of conservation and recovery sites in West Oxfordshire (Para. 5.11 Pt 1). I also note the wording of Para. 7.1 Pt 1:

A site has to reach the qualifying standard for only one habitat or species to be eligible for selection as SSSI when the critical standard principle is being applied.

I firmly believe that the bat community is present in this area because of the mosaic of habitats present. This is specifically identified within the Paragraph 9.1 of Part 1 of the Guidelines for Selection of SSSIs that states:

However, there are a great many situations where different habitats are contiguous or associated in various combinations. Many organisms depend on more than one, often quite different habitats, and some live in the transition zones (ecotones) between habitats..... Bats and some birds and dragonflies range over very different habitats for feeding, away from those in which they breed or roost.

This is evident in the survey data present in the Bat Technical Report by Sylvan. I also note that the mosaic of habitats also makes this area rich in aquatic and other insects (e.g. rugged oil beetle), as well as hosting a diverse community of wintering and breeding birds (of County Level importance) including farmland bird species such as yellow hammer, skylark and linnet which are in decline nationally. Water-associated mammals occur in the area as well as populations of badgers, hedgehogs, hares and other farmland-associated species. More extensive analysis of existing data and further survey work may reveal other species and habitats of conservation interest.

Finally, referring to Part 2 of the Guidelines I note that (Para 4.5):

Bats

Designating roosts alone offers only partial protection for bat species as they are reliant on feeding areas and commuting routes within their territories. When designating new sites for bats, efforts should be made to include key feeding areas and commuting routes where possible.

I also note that Barbastelle (Para 4.5.3, Pt 2) and Bechstein's (Para 4.5.4 Pt 2) bats are specifically identified as rare, with relatively few known roosts and as species which require complex mosaics of habitat.

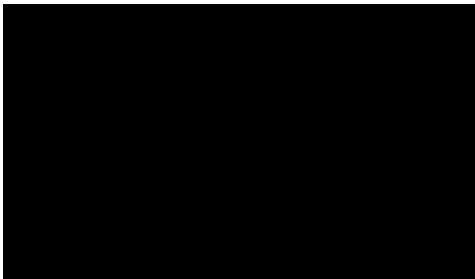
This is the rationale for including the entire area described so that the full range of habitats in use by bats is part of the SSSI.

Finally, I would point out that this area is under high pressure for development. The local authorities are keen to receive information on conservation assets to assist in their sustainable planning. Without designation this important bat site will continue to be degraded through poor forest management and development encroaching on roosting and hibernation sites. This matter is therefore urgent.

The attached documents fully describe the data on bats acquired in this area of Oxfordshire including maps of the survey areas, specifically related to the central section of the Botley West proposal. Further survey data are available for the breeding and overwintering birds of the area and other elements of wildlife. I am very happy to provide these to you, discuss what I know of the area and to host a visit if required.

I very much look forward to hearing from you.

Yours Sincerely



References

Bainbridge, I., Brown, A., Burnett, N., Corbett, P., Cork, C., Ferris, R., Howe, M., Maddock, A., Mountford, E., Pritchard, S. 2013. Guidelines for the Selection of Biological SSSIs Part 1: Rationale, Operational Approach and Criteria for Site Selection. JNCC, Peterborough.

Sylvan Biodiversity Experts 2025. Botley West Solar Farm, Oxfordshire Bat Technical Note 2025 Prepared for: PhotoVolt Development Partners GmbH (PVDP) for the Applicant, SolarFive Ltd (SolarFive) (note, two versions of this).

Walsh, K., Matthews, J., Halliwell, E., Morris, K., Raynor, R. and Bryce, J. 2022. Guidelines for the Selection of Biological SSSIs. Part 2: Detailed Guidelines for Habitats and Species Groups. Chapter 16 Mammals (version 1.1). JNCC, Peterborough.

Appendix B Letter Natural England to AD Rogers



26 June 2026

Foss House
Kings Pool
1-2 Peasholme Green
York
YO1 7PX

[REDACTED]

Dear [REDACTED]

Access to Information Request – Internal Review - IR [REDACTED]

Thank you for your email dated 28 April 2026, asking for an internal review of Natural England's handling of your request for information, EIR2025/01711 under the Environmental Information Regulations 2004 (the EIRs).

Process

In accordance with Natural England's internal review procedures, your request has been reviewed by a senior officer who was not involved in the original decision and is in discussion with colleagues who handled your original request.

Original Request

The original requests can be found in Annex A.

Natural England Response

The original response is in Annex B.

Review

Natural England has reviewed how we handled your request for information and whether we correctly complied with our obligations under the EIRs.

We originally extracted 3 points/questions from your letter dated 4 February 2026 addressed to Dawn Kinrade to be the scope of your request reference EIR2026/0711. The scope of the request was reiterated in our acknowledgment email dated 12 February 2026. We did not scope in the additional questions from your letter dated 17th February 2026 (incorrectly dated 4th February), nor did we address them separately. We apologise for this omission and have now addressed those questions below:

- **How wide is the pause on SSSI designations? Is it just my geographic area, is it wider (multiple areas) or is it the whole of England?**

The pause on the SSSI designation programme applies across the whole of England, with two exceptions. Work has continued on two cases: Flamborough & Filey Coast in Yorkshire, and North Thames Estuary & Marshes in Essex.

- **How long has this pause been going on and when is it expected to cease?**

This pause has been in place since March 2025. We are currently completing a review of our approach to the SSSI designation programme, from this financial year onwards. Once the review is complete, we will know more about when the pause will cease.

- **Why has the pause in SSSI designations been put in place?**

Some of the sites on the current published programme have been "paused" to enable a review to be completed to align with Natural England's strategy, [Recovering Nature for](#)

[Growth, Health and Security](#), and to ensure SSSI designations are prioritised effectively to support nature recovery at scale, climate resilience and long-term sustainability.

- Over the last 5 years how many pauses of designation have taken place and how long have they lasted?

This is the only pause on designations in the last five years. It has been ongoing since March 2025.

- How many new SSSIs have been designated over the last 5 years on an annual basis (i.e. how many each year) in England?

SSSI designation is a two-stage process. Sites are first notified, at which point they become legally protected. Notifications are then confirmed, usually within nine months, once any objections or representations have been considered.

For the purposes of this answer, "designated" is taken to mean confirmed SSSI notifications. On that basis, the number of SSSIs designated in England, by calendar year, is as follows:

Year	Number of SSSIs designated in England
2021	6
2022	1
2023	1
2024	0
2025	0
2026	0 to date

Confirmation often takes place in a year following notification, so notified and confirmed figures do not necessarily relate to the same sites.

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Regulatory Regime

We have concluded that the EIR Regulations are the applicable information access regime. This is because the information requested and held by Natural England meets the definition of environmental information in Section 2(1)(a-f) of the Regulations.

Timeliness (Regulation 5)

We have considered whether Natural England complied with the Regulations' requirement to respond to a requester within legal deadlines after receiving the request. Natural England's response to EIR2026/01711 was sent to you on 2 April 2026, which was 37 working days after the date of receipt (4 February 2026). Although Natural England did not respond within 20 working days it did respond within 40 working days after taking an extension to the deadline under Regulation 7 and therefore met its obligations. Under the Regulations, Internal Reviews must be responded to within 40 working days. We are responding today on 26 June 2026 which is 40 working days after receipt and therefore meets the Regulation requirements.

Conclusion and Decision

Natural England has completed an internal review of your information request. The decision is that your internal review is successful because we did not address your additional questions either within

the original response or separately. We have now addressed these additional questions within this response.

If you remain dissatisfied following this review, you may apply to the Information Commissioner for an independent review and decision. The Information Commissioner can be contacted at [REDACTED] or call on 0303 123 1113 (local rate), [REDACTED]

Yours sincerely

Access to Information Senior Officer
Legal and Governance
Natural England

Enc

RE: Proposal that an area of West Oxfordshire is considered as a SSSI for its outstanding bat community

Inbox

G

[REDACTED]@naturalengland.org.uk>

Fri, May 15,
5:36 PM

to me, SM-NE-Natural, SM-NE-FOI, Rebecca

Dear [REDACTED]

Many thanks again for sending this detailed submission over which I have read with interest. Please accept my apologies for the delay in replying to your email.

You have made a compelling submission and although we were already well aware of the exceptional ecological value of this area to support the bat species you have referenced, I can see how this might fit into a broader vision for nature recovery in the area which includes the exciting work happening in the Evenlode catchment and on the Blenheim Estate.

As you'll be aware, the designation of new SSSIs is a decision for Natural England's Board, rather than myself. We know that SSSIs are the foundation of England's most precious habitats and species and form the core from which wider nature recovery can spread. Natural England has a rolling programme to keep under review places that may merit and benefit from designation as SSSIs. I would like to add this site to that programme so that we can consider its merits and take a view. I'm afraid I can't give you a timeframe on how long this might take, but I would be happy to periodically update you on progress if that would be useful.

You might also be interested to know that we are currently in the process of preparing our response to the Botley West solar NSIP scheme. We shall be advocating that more needs to be done to protect the bat communities that live and forage in these areas. We will be attending the hearings shortly to publicly set out our position.

I hope this sets out our position, please do get in touch if you have any further questions.

With Best Wishes

[REDACTED]
[REDACTED]
Natural England
[REDACTED]

Please note I work Tuesday to Friday

Appendix D Email from [REDACTED] 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.

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

Councillor [REDACTED]
West Oxfordshire District Council,
Woodgreen Office,
Council Offices,
Witney,
Oxfordshire,
OX28 1NB
Email: andy.graham@westoxon.gov.uk

[REDACTED]
Parish Councillor,
Cassington Parish Council
13th August, 2024

CC: Councillors [REDACTED]
[REDACTED]
[REDACTED]

Dear Andy, Callum, Councillors, County Councillors,

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.

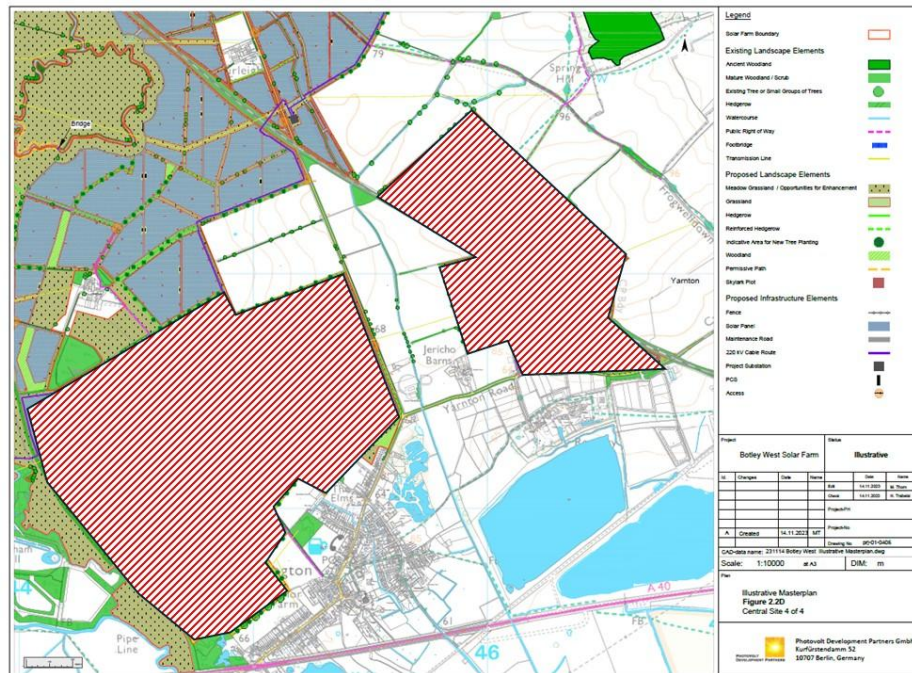


Figure 1. Proposed scaling back of the Botley West proposed solar arrays north of Cassington and Worton. Areas in red hatch are where solar arrays from the proposal are removed.

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

Barbara King, Chris Metcalfe, Graham Mills, Stewart Thompson

