OLD HAYES SOLAR FARM AND BESS

Coleshill, Oxfordshire

Reference Planning Application P25/V1646/FUL

SUBMISSION FROM COLESHILL PARISH COUNCIL

Prepared by the Parish Council and Coleshill Solar Farm Focus Group,

October 2025.

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APPENDICES

1. Summary

This document is Coleshill Parish Council's formal objection to Planning Application P25/V1646/FUL – Old Hayes Solar Farm.

The submission represents the collective view of the Parish Council and local residents on the proposed 73ha industrial-scale solar and battery installation at Old Hayes, Coleshill. It is supported by independent professional reviews on flood risk, landscape and heritage. We identify the reasons for refusal and the relevant breaches of the adopted Vale of White Horse Local Plan 2031 (Parts 1 & 2) and the National Planning Policy Framework.

We recognise the importance of renewable energy but believe this proposal is the wrong development in the wrong location. It would cause severe and lasting harm to the local landscape, heritage, biodiversity, and productive farmland, with minimal proven benefit.

As can be seen from the Planning Application and its supporting documents, the proposed development breaches almost every local and national planning guideline for renewable energy developments, and the mitigation proposals either exacerbate breaches of other guidelines or are ineffective.

For these reasons, we request that the Vale of White Horse District Council refuse planning permission for the Old Hayes Solar Farm in its entirety.

Definitive Reasons for Objection:

1. **Flood Risk and Watercourse Protection:**

   Flooding affects the whole proposed site, with upstream and downstream impacts. The Applicant has failed to provide a compliant flood model and consistently underestimates the present and future degree of flood risk, from both fluvial and surface-water flooding. The application fails Development Policy 30 and Core Policy 42.

2. **Landscape and Visual Harm:**

   The site lies within open, gently undulating farmland forming part of the historic Coleshill Estate. The landscape is in the highest category of sensitivity for large-scale solar farms. The Applicant's own Landscape and Visual Impact Assessment (LVIA) underestimates the true extent of harm. Independent review confirms serious deficiencies: missing viewpoints, absence of winter photomontages, and reliance on unverified assumptions. The result would be an industrial-scale intrusion highly visible from surrounding homes, public rights of way, and National Trust land, contrary to Core Policy 44 of the Vale of White Horse Local Plan 2031.

3. **Ecology and Biodiversity Net Gain Failures:**

   Surveys are incomplete, habitat and species data are missing, and mitigation proposals are inadequate. Ecologically important species, species assemblages and habitats will be lost or degraded. The River Cole, its backwater and corridor have been left out of the assessments, thus ignoring major ecological features and impacts. Transboundary and within-site impacts are not considered, as stipulated in the claimed Guidance followed, and in BNG regulations. BNG calculations are incorrect; Loss is more likely. This conflicts with Core Policy 46 and the Environmental Act 2021.

4. **Archaeology, Heritage and Landscape Setting:**

   New research has shown that virtually the entire proposed site is of great importance archaeologically, probably of national importance. The site has been farmed for centuries, with no damage to the archaeology. Turning this site into an industrial-scale solar farm would cause irreparable damage. The analysis of impacts from the development on the archaeological remains, and the suggested mitigation, cannot be accepted. The scheme would damage the historic setting of the Coleshill Conservation Area and the wider designed landscape associated with the National Trust estate. The LVIA fails to assess these impacts properly, contrary to Core Policy 39 and NPPF paragraphs 207 and 216.

5. **Highways Access – Snowswick Lane**:

   Snowswick Lane is an attractive, narrow rural lane. This is the road designated by the Applicant as its main access route for construction and maintenance traffic. This route is in no way suitable for the dramatic change in use, and multiple claims in the Application documents are inaccurate or untrue. It is unrealistic and impractical to use this lane.

Other serious issues:

6. **Loss of Agricultural Land and Food Security:**

   The proposal would remove 70 hectares of productive farmland from agricultural use, of which almost 20% is Grade 3a, Best and Most Versatile agricultural land. At a time of increasing concern about national food security, this is an indefensible loss of agricultural capacity and conflicts directly with Core Policy 43 and paragraph 187(b) of National Planning Policy Framework concerning Best and Most Versatile land. The land has been farmed since before the Iron Age, and its field lay-out is datable from 1666. The proposal would not only remove viable farmland from production, damaging the soils by deep compaction, but also destroy a historic farm landscape.

7. **Incomplete and Unreliable Environmental Assessment:**

   The application lacks a Lighting Impact Assessment, a standard requirement for a project of this type. The absence of this assessment means the Council cannot reasonably determine the full impacts on residential amenity or the local environment.

8. **Failure of Public Consultation**:

   The developer has conducted no meaningful engagement with the local community. Given the scale and permanence of this proposal, this lack of consultation falls far below expectations under the NPPF and the Council's own Statement of Community Involvement.

9. **Unproven Need and Limited Public Benefit:**

   The claimed renewable energy benefits are not site-specific and do not outweigh the serious and irreversible environmental harm identified above. No information on possible connection routes to the grid are provided, and there are no significant local economic or social benefits.

Conclusion

Taken together, the proposal fails multiple key policies of the adopted Vale of White Horse Local Plan 2031 (Parts 1 & 2) and several policies in the December 2024 National Planning Policy Framework. Indeed, the proposal significantly adversely affects all six of the provisions of Core Policy 41 on renewable

energy, even taking into account the proposed remedial actions. It would cause **permanent damage** to the character, biodiversity, and productivity of the Vale's countryside for minimal proven gain.

In the Parish Council's view, there are no substantial or verifiable actions that can be taken to mitigate the damage the proposal would cause.

For these reasons, and as stated above, the Coleshill community and Parish Council urge the Vale of White Horse District Council to refuse this application in its entirety.

2. Introduction

2.1 This submission objecting to the proposed Old Hayes Solar Farm has been prepared on behalf of the Coleshill Parish Council by members of the Council and the Coleshill Solar Farm Focus Group, with content, drafting and guidance from John Vale, Plan A Planning, Cirencester, and Helen Farrell, University of Westminster. We, the Council and Focus Group members, live in the villages of Coleshill and Buscot and nearby area. We know the proposed site and area intimately. We live with its regular and serious floods, enjoy its rural and peaceful landscape and beautiful historic buildings, monitor and study its flora and fauna and farm its productive though flood-prone soils.

2.2 We have read and scrutinised the documents attached to the Application. We are shocked that many of these evidence only a cursory or passing acquaintance with the site, little experience other than that of one-off visits, and virtually no knowledge of its wider catchment. The seemingly hasty preparation of the documents, lack of cross-referencing between them, multiple omissions and superficial analyses add to our objection to this Application.

2.3 We could not agree more with para 44 in the NPPF which states 'the right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessments and Flood Risk Assessments)' We query the validity of many Application assessments.

2.4 The planning application for the proposal to build a solar farm at 'Old Hayes' was validated by the Vale of the White Horse District Council on 20th August 2025. The full description of the proposal is as follows:

Temporary planning permission for 40 years for the construction and operation of a solar farm, battery energy storage system (BESS) with associated infrastructure, access improvements and ancillary development, including ecological enhancements and continued agricultural use.

2.5 The application site is made up of 9 irregularly shaped arable or ley grassland fields bounded by existing hedgerows and wide field margins, amounting to approximately 73ha. The River Cole forms the entire western boundary and is the boundary between Oxfordshire and Wiltshire. A backwater of the Cole forms part of the southern boundary. The northern boundary and southern boundaries have tall, well-grown hedgerows of antiquity, and watercourses. Snowswick Lane runs along the eastern side and is the only proposed access to the site.

2.6 The proposal would install 93,000 solar panels covering 54.6ha. The panels would be supported by 25,000 mountings driven to 3m deep in the ground. With a 2m-high security fence, >3,500m of hardened track 6m wide, kilometres of trenching, the BESS, other large built structures, lighting and a car park, this surely substantiates our claim for transformation from a peaceful rural site into an industrial complex.

2.7 Landscape, ecological, heritage, archaeological and other interests are covered in this submission. There is a Public Right of Way across part of the site which has important recreational value. There are 5 scheduled monuments, 162 listed buildings, 2 conservation areas, and 1 Registered Park and Garden within the vicinity of the site.

2.8 Although the River Cole flows along the whole west side of the proposed site, with its backwater along the south, the river and its associated margins and adjacent wetlands have been 'scoped out' of the Application, as outside its boundary. This contravenes guidance for the preparation of Impact Assessments, and is quite illogical, as it is clear that the development would affect the river, and vice versa.

2.9 We have not addressed any of the decommissioning promises as we do not believe there should be a solar farm here. However, solar PV development for 'only' 40 years runs counter to the national planning goal of more permanent use of renewable energy developments. As stated in paragraph165(a) of the December 2024 National Planning Policy Framework, national policy is for sites to maximise what the paragraph describes as 'future repowering and life extension' of renewable energy developments'. Thus, all references in the Application to full restoration of the site to agricultural use after 40 years (albeit probably impractical) could be obsolete.

3. Development Plan and relevant policies

3.1 The proposal has been assessed against the adopted Vale of the White Horse Local Plan 2031 (Parts 1 and 2) which remains the statutory framework for decision-making, the emerging Joint Local Plan 2041 (status somewhat unclear) and the National Planning Policy Framework as of December 2024. Relevant policies include Core Policies 39, 41, 43, 44, 45, 46 and Development Policies 16, 23 and 30.

3.2 Other legislative instruments are mentioned where applicable in the following sections of this submission.

3.3 **Summary of Policy Position:**

The proposed Old Hayes Solar Farm conflicts with multiple adopted policies in the Vale of White Horse Local Plan as above and fails key tests in the National Planning Policy Framework. These policies and conflicts are summarised in the following matrix table. The breaches are substantive and cumulative. The development cannot be made acceptable through conditions or minor design changes, and we submit that it should therefore be **refused in its entirety**.

Policy / Source	Policy Requirement	Selected Reasons for Breach / Conflict
Core Policy 44 – Landscape Character (Vale of White Horse Local Plan 2031, Part 1)	Development must protect, conserve and enhance the key features of the Vale's landscape and avoid harmful visual intrusion.	The proposed solar farm would industrialise a 73-hectare area of open rural countryside, introducing large reflective panels, tracks, fencing, and lighting that would permanently alter local character. The LVIA underestimates this harm and omits key viewpoints.
Core Policy 39 – The Historic Environment	Development must conserve and enhance heritage assets and their settings.	The proposal would permanently destroy and damage archaeological remains, including the large Iron Age village. It would damage the setting of the Coleshill Conservation Area, nearby listed buildings, and the wider designed landscape associated with the National Trust estate. The LVIA

		and Heritage Assessment fail to assess this adequately.
Core Policy 46 – Conservation and Improvement of Biodiversity	Development should maintain and, where possible, enhance biodiversity, avoiding net loss of habitats.	The applicant's ecological work is incomplete and provides insufficient evidence of Net Gain. Watercourse buffers fall below required standards and species surveys are inadequate.
Development Policy 30 – Watercourses (Vale of White Horse Local Plan 2031, Part 2)	Requires a minimum 10-metre undeveloped buffer either side of all watercourses and measures to enhance ecological corridors.	The plans show only 5-metre buffers in several areas, directly contrary to this policy. The Environment Agency has objected for inadequate protection of watercourses.
Core Policy 42 – Flood Risk	Development must avoid flood risk areas and reduce risk overall through sustainable design and natural flood management.	The majority of the proposed site is subject to regular and substantial flooding. The Flood Risk Assessment is incomplete and has not been accepted by the Environment Agency. No natural flood management or floodplain reconnection is proposed.
Core Policy 43 – Agricultural Land and Rural Economy	Seeks to protect best and most versatile agricultural land (Grades 1–3a) and support the rural economy.	The site is productive farmland, with 17% of the land being Grade 3a. The proposal would remove 70+ hectares from food production, harming local agriculture and food security.
Core Policy 37 – Design and Local Distinctiveness	Requires development to be visually appropriate, well-integrated, and respect local context.	The large-scale industrial appearance of solar arrays, battery units, and fencing conflicts with the rural character and settlement pattern of Coleshill.
Core Policy 22 – Infrastructure Requirements	Development should provide adequate supporting infrastructure and demonstrate deliverability.	The applicant has provided no confirmed grid connection or delivery plan. Renewable energy benefits cannot therefore be assured.
National Planning Policy Framework (NPPF) Paragraphs 192-195, 202, 207-217	Require avoidance of significant adverse impacts on landscape, heritage, biodiversity, and amenity, and refusal of	The cumulative environmental harm identified across landscape, heritage, and ecology far outweighs unproven renewable energy benefits.

	planning permission where harm outweighs benefits.	
NPPF Paragraph 44	Right information is crucial to good decision-making, especially formal assessments for environment and flood risk	The Application's Flood Risk Assessment, Ecological Impact Assessment, Biodiversity Net Gain calculation and other key documents are inadequate and based on wrong conclusions.
NPPF Paragraph 89	Development must be sensitive to its surroundings and does not have an unacceptable impact on local roads.	Snowswick Lane as the only access route to the proposed site would be irrevocably damaged and wholly changed from its present rural character.
NPPF Paragraphs 170-171 and 181-182 - Flood Risk **NPPF Chapter 14** **NPPF Chapter 15**	Development must be safe for its lifetime without increasing flood risk elsewhere and reduce rates and volumes of run-off where it could affect drainage on and around the site. Direct development to land with the lowest risk of flooding. Emphasis on the wider benefits from natural capital and ecosystem services.	The Environment Agency has objected due to lack of a compliant model; flood risk safety has not been demonstrated; upstream and downstream impacts have not been considered. This land is already experiencing a high risk of flooding, which will become more extreme with climate change. Floodplain water storage and flood alleviation downstream will be compromised by the development. Carbon accumulation in soils does not take place under solar farm panels (Lancaster University research, 2025).
NPPF Paragraphs 172-175, 177-180, and NPPF Annex 3 (and Tables 1 and 2 in NPPG, downloaded 23.10.25).	Specify requirements for solar farm developments in flood zones to satisfy the Sequential and Exception Tests	Neither test properly applied and not satisfied. VOWH must state that they are 'passed', not the developer. Data insufficient to do this.

NPPF Paragraph 193(c)	Developments resulting in the loss or deterioration of irreplaceable habitat (such as ancient or veteran trees) should be refused, unless there are wholly exceptional reasons.	Ancient and Veteran trees along the boundary of the site will be damaged by construction, compaction and loss of ground into which they would naturally spread. Other mature trees within the site will be damaged and have been wrongly assessed as having a limited potential lifespan.
NPPF Paragraph 116 Highways	There has to be an unacceptable impact, or severe cumulative impact, on highway safety for an application to be refused.	The Application has not considered the evidence that traffic and congestion will mean that construction traffic will risk the highway safety of other users of Snowswick Lane and the A417 to this extent.
NPPF Paragraph 169	Applications outside areas where renewable energy developments are considered suitable should be judged against the council's criteria for suitability.	The site proposed does not meet the VOWH published criteria for visual impact, distance from viewpoints or local landscape type.
Vale of White Horse Statement of Community Involvement	Developers must engage meaningfully with affected communities prior to submission.	No meaningful pre-application consultation was undertaken. The absence of engagement breaches both policy expectations and public trust. It brings into question the developer's preparedness to adhere to any conditions attached to planning approval or any mitigation undertakings.

3.4 The Environmental Statement, in para.1.10, outlines requirements for an Environmental Impact Assessment for projects likely to have significant effects on the environment, as set out by the EIA Directive 2014/52/EU (European Commission, 2014). This development requires screening regarding:

- the use, availability, quality and regenerative capacity of natural resources, in particular land, soil, water and biodiversity,
- the absorption capacity of the natural environment paying particular attention [*inter alia*] to wetlands, riparian areas and river mouths (in this case the mouth of the River Cole, where it discharges into the River Thames, c3km downstream).

3.5 None of these topics has been considered in this Application. The River Cole, its riparian areas and wetlands are 'scoped out', as noted, there is no data on water quality, and soils are barely mentioned in environmental terms (as opposed to archaeological), with no field research. Projected impacts of the

development on these attributes have not been analysed. Therefore, we submit that ABEI has not fulfilled the Directive's requirements.

4. Flooding and Hydrology

Reference APPENDIX 6.1 FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY, Lucion, July 2025 and Environmental Statement, Chapter 6, Flood Risk

4.1 Members of Coleshill Parish Council and local residents live within the Flood Zones of the proposed development site and know too well the extensive Fluvial and Surface Water Flooding affecting this area. For example, local floods recorded in Coleshill were 4 major floods in 2023, 5 major floods in 2024 and 2 major floods this year to date, with sheet water over very extensive areas, and depths of >20cm. There were additional more moderate floods, and > 100 flood / soil saturation days in 2023 and 2024, with 79 days to date this year.

4.2 OVERALL VULNERABILITY – THIS IS A VERY SENSITIVE SITE:

- Main River, R. Cole, immediately adjacent along long west boundary; backwater along southern boundary,
- Functional Floodplain extensive,
- Main River subject to low flows in drought periods,
- Secondary A Aquifer underlying whole site, contributing to base-flow in river,
- Copious groundwater even in summer and autumn (noted during trenching for Appendix 5.4, Archaeological Evaluation Report),
- Most of the site is in Flood Zones with medium or high probability of flooding (Flood Zones 2, 3a and 3b),
- Most of the site is subject to Surface Water Flooding. The risk is high, not low, as stated (para 4.3.13). The whole site was waterlogged for c5 months in winter / spring 2024-2025,
- Both National and Local Planning Policies direct developments, including Solar Farms as essential infrastructure, away from high Flood Risk areas,
- **'Development should not be permitted' in a functional floodplain.** This is a key constraint, not adequately emphasised. The Sequential and Exception 'Tests' are not properly applied in this document (see below).
- If this site is developed, there will be no opportunity to extend the River Cole River Restoration carried out immediately upstream on National Trust land, a project of European significance, nor will there be opportunity to carry out wetland restoration and natural flood management projects currently being undertaken upstream and on the farmland adjoining the site to the east.

4.3 The Parish Council has commissioned a review of this Flood Risk Assessment and Drainage Strategy document. It has been prepared by Dr. Nick Haycock (BSc, DPhil (Oxon)) and is attached as Appendix 1 ('The Haycock Report'). The part of our submission on these pages relates to a range of questions in the FRA, and conclusions which we do not accept. Chapter 6 of the Environmental Statement also covers the subject matter of the Flood Risk Assessment and Drainage Strategy, authored by 'experts' (their quotes). That chapter largely repeats all the statements and conclusions of Appendix 6.1 and does not include any new research or field data.

APPLICANT'S REPORT CONCLUSIONS QUESTIONED:

4.4 The applicant's report concludes that there will be **no reduction in floodplain capacity, no increase in fluvial flooding impacts, no increase in surface water flooding impacts and no groundwater flooding. As further detailed in the Haycock Report, all these conclusions are unjustified.**

4.5 The consideration of soil hydrology in the report is negligible. This topic is key to flooding impacts. The wet gley soils here are particularly vulnerable to compaction. **Serious soil compaction results from the construction of solar farms.** This affects infiltration of rain and flood water, resulting in longer periods of flood from both fluvial and surface water sources.

4.6 **'Minimal increase in impermeable area' (para 6.3.1), with coverage of 93,000 impermeable panels, is not a valid statement.**

4.7 The soils here, including stagnogleys and mottled soils, i.e. seasonally waterlogged soils, indicate a long history of a wet or waterlogged landscape, contrary to the report statement 'no indication of historical surface water flooding' (para 4.3.11). Appendix 5.4, Archaeological Evaluation provides evidence of this long history of flooding too.

4.8 **Climate change scenarios indicate even more acute winter flooding periods in the future.** This has not been addressed.

4.9 Soil compaction and **infiltration problems will not be adequately mitigated by a permanent grassland** cover, given the poor grass growth in the dry shade under the panels and the consequent poor delivery of organic matter to the soil. Serious compaction, under permanent grassland, can take up to 50 years to remedy.

4.10 Runoff from the panels themselves is noted briefly (para 6.3.3). This runoff surcharges a small area of ground, the drip line, which cannot accommodate the water. Erosion channels are formed, the water is not absorbed into the soil, and the speed of runoff is accelerated. Mitigation due to grassland cover is not considered adequate, as noted above and outlined in the Haycock Report.

IMPACTS NOT EVALUATED IN THIS FRA:

4.11 **The FRA does not consider the impact of flood debris** (trees, fencing etc) that are washed along with floodwater, and how this debris is caught in the frames of the PV panels. This debris when caught (snagged) results in the panels being damaged or pushed over which further blocks flood water and results in great depth of flooding. This risk is therefore not assessed.

4.12 The proposed development will **exacerbate summer drought effects and low flows in the River Cole,** as well as flooding. Loss of rain to evaporation from the panels is noted but not developed further. Deep summer cracking is a feature of the clay-based soils here and could be worse; this impact is not considered.

4.13 The impacts on the drainage network of c3,570m hardened causwayed tracks on the site, with pooling and ponding of water along their margins, are not evaluated. Permeable surfaces are noted, but the infiltration potential 'should be confirmed through site-specific testing' (paras 6.2.2 and 6.2.3). The clay subsoil is known to be impermeable. Track permeability cannot be relied on.

4.14 Impacts of 25,000 panel piles / mountings driven 2-3m into the soil (Environmental Statement, para 3.14), as well as concrete pads, will impact soil hydrology and therefore flooding / water retention / soil drying. The piles will damage existing underdrains. This topic is not considered.

4.15 **Impacts on water quality** resulting from increased runoff rates and the trenching and excavation to be carried out during construction have not been addressed. Not only will silt and sediment loads be increased, but there are risks from contaminant pollution from the BESS compound structures. The River Cole will be impacted, as will the Thames downstream. There is no water quality data against which these risks can be assessed.

4.16 Watercourses have catchments. Possible changes in catchments, such as proposed development in Swindon, will affect river dynamics and should be examined. This applies also to land management affecting the smaller watercourses crossing the site. **Catchment management is not considered in this report.**

4.17 Similarly, downstream impacts from operation of the flow control structures on the River Thames have not been considered. Flooding in Buscot, Buscot Wick and on the A417 is severe and frequent in our experience. Any increase of flooding on the development site will make this even more severe.

The River Cole's functional floodplain. Left: downstream at Buscot Wick, 26 November 2024, and right: upstream at Coleshill bridge looking towards the proposal site, 24 September 2024.

4.18 According to the report 'detailed hydraulic modelling' was commissioned. This has since been queried by the Environment Agency and by Dr Haycock in Appendix 1 to this commentary. No original research has been carried out for this report, and there is no evidence that the authors gained any meaningful field-knowledge of the proposed site.

4.19 Note that the limited parts of the site not at risk of flooding (at present; according to existing and easily obtainable data – so to be confirmed) have Best and Most Versatile land for agriculture designation, a different but major ground for refusal of planning approval.

Sequential and Exception Tests wrongly claimed to be 'passed'.

4.20 For developments in floodplains and land with a medium and high probability of flooding (Flood Zones 2, 3a and 3b), the National Planning Policy Framework (paras. 172-175 and 180) states that in order to avoid developments in such areas the Sequential Test must be applied. The test takes all sources of flooding, and climate change, into account. It should seek reasonably available sites elsewhere, over the whole Planning Authority and river catchment area, and consider flood depth, velocity, hazard and speed of onset of flood. The Local Planning Authority is responsible for deciding whether the test is passed.

4.21 For 'essential infrastructure', including solar farms, an Exception Test is also required (paras.177-179). Under this addition to the Sequential Test requirements, the development must provide wider sustainability benefits to the community and be safe for its lifetime without increasing flood risk elsewhere.

4.22 This FRA claims that there is no increase in flood risk and therefore claims that both tests are passed. It is clearly apparent that a) the tests have not been undertaken, b) flood depths, velocities, etc. have not been measured accurately or at all, and c) it is not up to the Applicant to decide if the tests are passed. **The Planning Authority should demand that the tests are properly carried out, with adequate data, or else reject the whole FRA.**

4.23 The Environment Agency's formal objection confirms that the proposal fails to demonstrate flood risk safety and therefore conflicts with Core Policy 42 and NPPF paragraphs 170-171, and 181-182. This alone is sufficient reason for refusal. It is recommended therefore that the application is withdrawn and significant work undertaken to understand fully the flood risk implications of the proposals.

5. Landscape and Visual Impacts

5.1 An industrial solar power station on this site would have a devastating negative impact on the landscape. It is disproportionate to the neighbouring community and would be detrimental to the visual amenity and character of the area.

5.2 Thousands of visitors come from far and wide, as well as from the locality, to enjoy the landscapes around Coleshill and Buscot. They have done this for many years, drawn by the National Trust, by Buscot Park, and by the local towns. There is much for them to enjoy here. There are superb views from many of the surrounding elevated points, and from within the Cole valley itself. It would be impossible to mask the solar panels and the major BESS installations without blocking the entire view. The loss of this view cannot be mitigated. Blocking that view by screening is not 'mitigation'; it is permanent loss. This is the valued landscape, bordering the National Trust Conservation and Heritage land, which would be negatively impacted by a solar farm in its midst. The development would change the landscape from rural to industrial, ruining the views to and from the Coleshill Estate from all points of the compass. Comments to this effect from all around the world have been stated in opposition to the application.

5.3 Coleshill church visitors who stand outside the west door have a direct view down onto the development. Residents and visitors to Coleshill regularly walk the footpaths on Kings Hill, from the gate at the end of Church Lane to the cemetery and heading NW towards Worsall Farm. Both these paths afford views directly over the site. In addition, the site is visible from the multiple footpaths on the western side of the ever-popular Badbury Hill National Trust site off the B4019 to the east.

5.4 Highworth (as the name might imply) is said to be the highest town in Wiltshire. There are direct views of the whole Cole floodplain area, including the proposed development site, from many roads and houses in the residential areas on the east side of the town. Highworth Town council has objected to the proposal.

5.5 The VOWH seeks to resist development proposals that **that would harm the *significance of designated assets, such as Listed Buildings, Conservation Areas,*** *Registered Parks and Gardens and Scheduled Monuments,* ***and their settings.*** (VOWH Joint Local Plan 2031: Core Policy 39: The Historic Environment, *6.97).* The proposed development bordering a NT Heritage and Conservation site would **harm the significance of its setting.**

5.6 VOWH will encourage renewable energy *schemes* ***provided that they do not cause a significantly adverse effect to: i. landscape, both designated AONB and locally valued landscape.*** (VOWH Joint Local plan 2031Core Policy 41). The proposed scheme would cause a **significantly adverse effect to locally valued landscape.**

5.7 Core Policy 44 of the VOWH Joint Local plan 2031 seeks to protect key features that contribute to the landscape setting of the vale, including trees, hedgerows, woodland, field boundaries and water courses. **All these are important features of the Application site, and all will be damaged or altered by the proposed development.** There will be no opportunity for enhancement, another aim in this policy. Details are given in Section 6 in our submission.

5.8 The following is taken from the Landscape Architect's response in 2022, to a request for pre-application advice (P22/V0142/PEJ):

*The Proposed Development would be **visible from elevated viewpoints (with possible cumulative effects with other solar schemes), changing the agricultural context of the landscape setting**. It was also noted that **glint and glare from the panels could exacerbate the effect on elevated views from the south.** The advice letter concluded that:*

*"**The proposed development would adversely affect the rural landscape character and the setting of Coleshill village, causing landscape harm contrary to Core Policies 41 and 44, therefore is unlikely to be supportable in landscape terms.***

This key early statement pertains fully today.

5.9 Not enough weight has been given to the **harm to visual amenity (VA) of the locally valued landscape** overlooked **from public rights of way**, and also to **residential visual amenity (RVA) from properties bordering the Northwest edge of Coleshill Village**. These properties directly overlook the site from elevated viewpoints and would be impacted both in terms of RVA and the **risk of glint and glare**. The site would be overlooked from gardens and in some cases from inside the properties. ABEI have not submitted any visualisations from these viewpoints that we can find.

5.10 With reference to the Applicant's Supporting Documentation, APP. 4.5, Visualisations, the visualisations omit key viewpoints. The photographs attached below, taken from residential properties adjacent to Kings Hill Path leading to the cemetery, from the cemetery, and from a National Trust Estate Yard building in the village, are among key viewpoints that are omitted.

5.11 Visualisations submitted by the developers are taken from a distance and do not give an accurate representation of the resulting harm to visual amenity, especially from closer viewpoints public rights of way and private homes. They do not capture **the low-lying topography of the site and the fact that it is overlooked from higher viewpoints, and so cannot be mitigated by screen planting**, as noted below.

5.12 These viewpoints are also **receptors for Glint and Glare.** See Supporting Documentation APP. 4.12, p.33, 6.2, Appendix. A, Fig.1: **all residential properties 1-28 show *glare possible at receptor*.**

5.13 Raised solar panels make screening measures even more inadequate. Given the propensity of the area to significantly flood, ABEI is forced to raise the height of the solar panels. We note that panel heights are not accurately represented in APP. 4.12, the Glint and Glare report – they are shown as mainly 2m and 3.66m high. They will, in reality, measure 2.84m and 3.66m (Environmental Statement Figs. 3.2 and 3.3); with some up to 3.96m. (Environmental Statement para 3.9). This means that **even when the hedges are fully grown in c15yrs, to their stated target heights of 3.5m and 4m, only the top few centimetres of thin growth with no screening potential will overtop the panels.**

5.14 Accurate representations from the closer viewpoints should be submitted, depicting the site both before and after development. Visualisation of the **cumulative effect** with proximity to Lynt Solar Farm at Inglesham should also be shown. The risk of a **"lake effect" across the whole valley** is real.

5.15 The Applicant has submitted a Landscape and Visual Assessment (LVIA) to assess the impacts of the proposals. We have sought an independent assessment of the LVIA from Dr Helen Farrell, attached as Appendix 2 to this submission. This raises significant concerns with the Applicant's LVIA. It concludes of the submitted LVIA that:

i. *Residential Visual Amenity Assessment (RVAA) omitted: No formal RVAA despite several dwellings within 700 m.*
ii. *There is an unverified Zone of Theoretical Visibility (ZTV) and limited viewpoint coverage. Underlying GIS data and rationale for viewpoint selection not published; omission of National Trust Badbury Hill, and Coleshill Conservation Area viewpoints.*
iii. *Over-reliance on long-term planting. 'No significant impact' conclusions depend on full planting maturity at Year 15 with no evidence of enforceable long-term management.*
iv. *Lack of winter / worst-case visualisations. Most images show partial foliage; true leaf-off conditions not depicted.*
v. *Hedgerow removal under-represented. Up to 1 m gaps for fencing and access not modelled in photomontages.*
vi. *Absence of peer review. No independent verification of methodology by a Chartered Landscape Architect acting for the LPA.*
vii. *Under-assessment of heritage and cumulative context. Limited reference to the Coleshill Conservation Area, listed buildings, or other solar proposals.*

Given the deficiencies of the Applicant's LVIA and the inadequacy of the mitigation proposals, no weight can be afforded to the conclusions of their LVIA report.

5.16 At a district level the Application Site lies within the Upper Thames Clay Vales Natural Character Area (https://naturalcharacterareas.co.uk/upper-thames-clay-vales). Statements of Environmental Opportunity here include:

- Along the Thames and its tributaries, promote sustainable farming in order to conserve and restore seminatural habitats, historic features, geodiversity, soil quality and soil carbon stores and to regulate water flow in this area and downstream.
- Manage farmland across the Upper Thames Clay Vales to produce food sustainably and to maintain sense of place. Taking a catchment approach, improve filtration of pollutants and regulation of water flow by realising a farmland habitat mosaic that incorporates strategic areas of wet grassland, reedbed, wet woodland and ponds as well as ditches and hedgerows.

5.17 **It is considered that the potential to realise all these opportunities exists at present for the application site – indeed it would be a superb candidate for achieving the whole suite of enhancements. None would be achieved with the proposed development.**

5.18 **The land is not suitable visually for a large-scale solar farm.** A study for South Oxfordshire and Vale of White Horse District Councils in 2024 assesses the landscape sensitivity of the areas for solar and wind energy developments. It divides the areas into 14 main local Landscape Character Areas (LCAs), with over 40 subdivisions. Our area is 11a, Thames Upper Vale. **For a 'Very Large Solar', defined as 50 – 120ha (this proposal is for 73ha) the overall landscape sensitivity rating is High, the highest category of sensitivity.**

5.19 The study advises that on a sunny day solar panels will appear blue to the onlooker. In cloudy weather they will appear dark grey, posing a sharp contrast in both cases with the surrounding green areas. The linear edges of solar panel structures will stand out against the ragged alignments of older established hedgerows. The zones where visual impact will be at its greatest will be those within 3km ofa

solar installation. For this Old Hayes proposed site, in addition to Coleshill village, the residential parts of the hilltop town of Highworth in neighbouring Wiltshire overlooking the site are within the impact zone set out in the Council's criteria. Developers, the study says, should pay particular attention to "very large scale" schemes of 60 – 120 ha as posing a "high" sensitivity to visual landscape impacts. See South Oxfordshire and Vale of White Horse Renewable Energy Study. Landscape Sensitivity Assessment. South Oxfordshire and Vale of White Horse District Council. LUC. Sept. 2024.

5.20 **This Sensitivity Assessment has not been taken into account in the Application, and the 'High' degree of sensitivity specifically for a solar farm development should be acknowledged as a major constraint.**

5.21 We applaud the Campaign for the Preservation of Rural England, CPRE, for their campaign to put solar installations on roofs, preventing the increasing loss of our most beautiful and tranquil rural land to solar farms.

5.22 Loss of Visual Amenity and the risk of Glint and Glare should be considered in relation to the wellbeing of the community and mental health concerns. Green spaces and natural views significantly enhance wellbeing. This topic is covered in Section 10 below.

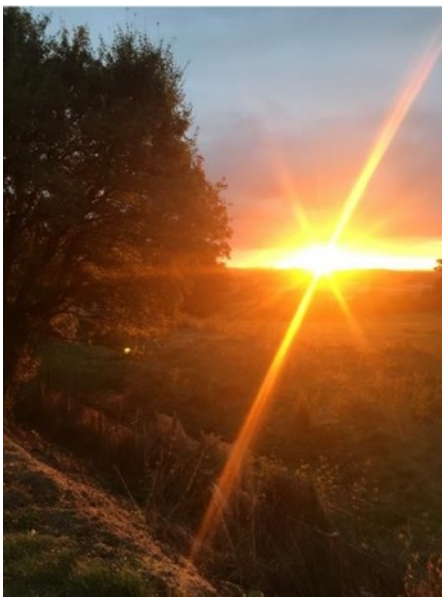
5.23 A particularly intrusive element into the proposed site would be the BESS installation and associated infrastructure. These will amount to the bulk of 20 shipping containers. There will be 20 BESS units, 7m long and 2.8m high – they are large structures. Inverters and transformers will be 7m long and 2.9m high; 36 power stations will be 12m long and 2.9m high, and the switching station 7m long and 3.6m high (Environmental Statement, paras. 3.11 – 3.17). Proposed screening with trees will be ineffective for many years, if trees survive at all - at least 30% loss of planted trees can be expected, even on favourable sites. The siting of the BESS compound is at the north end of the proposal, closest to Coleshill village. It is adjacent to the functional floodplain in Field 9 (I), currently a particularly valuable site for nature, bordering the Coleshill Fritillary Meadow. Flood waters cause many problems for these electrical devices. The risks of contaminant-pollution and BESS fire are noted in Sections 4 and 10 respectively.

5.24 **In conclusion it is considered that the landscape setting of the development falls in the highest category of Sensitivity for large scale solar development. The proposed development would cause adverse harm to the locally valued landscape, to its heritage setting, rural character, Residential Visual Amenity and the quality of its soils and water.**

LANDSCAPE PHOTOGRAPHS

Residential Visual Amenity Assessment **Key viewpoints RVAA omitted from Application**

From residential properties adjoining Kings Hill footpath, National Trust estate building, and below the cemetery.



Sunset – danger of Glint and Glare, from garden adjoining Kings Hill Path to the cemetery.

From a bedroom in a property adjoining Kings Hill.

Flooding and proximity to Inglesham solar panels from garden adjoining Kings Hill footpath to cemetery.

Site excavation from National Trust building, Estate Yard, Coleshill.

Site excavation from residential garden adjoining Kings Hill footpath to cemetery.

Flooding from residential garden adjoining Kings Hill footpath to cemetery.

Overlooking King's Hill to Inglesham from residential garden adjoining Kings Hill footpath to cemetery.

Flooding from from below Coleshill Cemetery, King's Hill, February 2024.

6. Ecology and Biodiversity Net Gain

6.1 Core Policy 46 seeks to maintain and where possible enhance biodiversity, avoiding net loss of habitats. Core Policy 44 of the LPP1 sets out the Council's approach to protecting the important landscape setting of the Vale. It seeks to protect key features such as trees, hedgerows, woodland and field boundaries that contribute to the nature and quality of the Vale of White Horse District's landscape from harmful development and where possible ensure they are enhanced. CP46 provides for the conservation and improvement of biodiversity. The National Character Area objectives are referred to in Section 4 above. None of these policies are incorporated into the ecological sections of the Application. The Application was submitted on the basis of the proposed site being of 'low ecological value (arable land)', which stance has been maintained, despite overwhelming evidence to the contrary.

a. Ecology

Reference APPENDIX 4.13 ECOLOGICAL IMPACT ASSESSMENT, The Landmark Practice, June 2025.

6.2 The Ecological Impact Assessment (EIA) submitted by the Applicant is wholly inadequate. It underpins the Biodiversity Net Gain calculation (Appendix 4.14), which in turn is wrong, and in addition contradicts claims in the EIA. Both these Appendices should therefore be withdrawn and re-submitted.

6.3 The validity of the EIA is in doubt for reasons relating to the survey methods, survey coverage, impact assessments and consequent lack of justification for the report's claims and conclusions.

6.4 A major omission is **the 'scoping out' of the River Cole and its backwater from the Assessment**. The Application Site boundary is immediately adjacent to the river along its entire western boundary, and adjacent to its backwater along part of the southern boundary. These ecologically important sites are only 5 – 12m away. They support species and habitats which overlap or utilise the Application Site and will be significantly impacted by the development. Both the **EIA regulations (para 1.10 in Environmental Statement) and the CIEEM Guidelines for EIAs, which this report claims to follow (p. 17, para 3.42), stipulate that significant effects of a development must include the transboundary nature of the impacts, and the Zone of Influence of the project.** These regulations have been ignored.

6.5 A key activity in Scoping the EIA is to **consider the full distribution or extent of any ecological features which overlap the Zone of Influence. Omitting the river and its backwater is not acceptable. It is inevitable that the development will affect the river, and the river will affect the development. Riparian species and habitats will be affected.**

6.6 Other omissions from the immediately surrounding Zone include the immediately adjacent Coleshill Fritillary Meadow to the south, and the hedgerows, verges and wet woodland along Snowswick Lane, the eastern boundary of the Application site.

6.7 **The Coleshill Fritillary Meadow immediately abuts the southern margin of the Application site**, on National Trust tenanted land, bordering the River Cole and its backwater. This site has more than 1000 snake's-head fritillaries, a rare and declining plant largely limited in the UK to the Upper Thames valleys and Suffolk. It is an 'IOLD', or Indicator of Local Distinctiveness of the Upper Thames. Here it has been monitored annually since 1979; this long data-run is published in a recent definitive book on Meadows. Any meadow with more than 50 fritillary flower heads is regarded as important. This site should be recognised in the EIA report. The hydrological impacts and threats from changes in flooding and water quality, both of which may occur as a result of the development, should be analysed. With reference to Biodiversity Net Gain (see below), there would be no opportunity for the fritillary and the other scarce

meadow plants present in the Coleshill meadow to spread into Field 9 of the proposal site, the floodplain field adjacent.

6.8 There are significant omissions in the survey and assessment within the site boundaries. They include geology, geomorphology and soils; all invertebrates (e.g. butterflies, moths, dragonflies and damselflies, molluscs, pollinators, and saproxylic invertebrates associated with old trees); survey of arable flora; survey of aquatic and wetland plants, and recording of Ancient & Notable Trees, e.g. the huge crack willows along the river, or other trees of at least 70 years of age within the site. Available species information was not acquired from immediately upstream land.

6.9 These omissions are not technical oversights, but fundamental failures to comply with the EIA Regulations and Core Policy 46.

6.10 There is no 'Phase 2' quantitative information on any habitat or plant assemblage, and so no basis for monitoring against which Biodiversity Net Gain or Net Loss can be assessed in the future. Many inadequacies of the survey are in fact mentioned in the EIA (e.g. in paras 3.54, 3.55, 3.57 – 3.62, 4.19, 4.109, 4.115 and 5.26) but are not taken into account in the conclusions.

6.11 CIEEM Guidelines state that **the EIA must consider all development and activity associated with the main proposal**. The pathways for emissions, e.g. water and soil, and the receiving environment, need to be considered. In this case **activities not considered, for any species or habitat, include soil disturbance, trenching, soil stripping, soil compaction, changes in soil hydrology, flooding, drought effects, ground excavation for foundations, construction of hardened access tracks and emissions from vehicles. There is no mention of the risks of water pollution from siltation and increased sediment loads into the Rivers Cole and Thames, nor the possible risk of contaminants from the BESS compound.**

6.12 **Habitat losses have not been addressed in this EIA.** Habitat losses are acknowledged (para 1.30) but not assessed. They will include loss of open arable land (important for breeding and wintering birds including Red- and Amber-listed species, and potentially important for specialist plants and invertebrates, not surveyed); loss of field margin grasslands (reduction in widths of margins and buffer zones); hedgerow losses (unspecified in the EIA but 7 sections to be lost referenced in the Arboricultural Impact Assessment) and mature tree damage and potential losses (many sources of damage, and recognition that 'tree replacement' may be needed, and 'if felled, fell sensitively').

6.13 Other Appendices relevant to the EIA, notably Appendix 6.1 (Flood Risk Assessment and Drainage Strategy), Appendix 4.16 (Arboricultural Impact Assessment) and 4.14 (Biodiversity Net Gain) have not been consulted; information contained in these will modify statements and conclusions in the EIA.

6.14 **Taking inadequate survey, no consideration of impacts, no evaluation of habitat losses and conflicting information in other Appendices together, mean that the multiple conclusions of 'no impact' in the current EIA cannot be accepted.**

Repeated conclusions of 'no impact' or 'no significant impacts/ effects' (paras 5.15, 5.23, 5.30, 5.38, 5.2 p. 68, 5.7 p.69, 5.12 p. 70, 5.13 p.71, 5.23 p. 72, 5.30 p.74, 5.34 and 5.35 p. 75, 5.41 p. 76), 'negligible value', 'low value' or 'less than local value' (paras 3.42, 3.43 and 5.6 p. 69), 'species-poor' (para 4.17), 'not due to be affected' (para 4.59), 'insufficient diversity and/or no potential effect pathway' (Table 24 and para 5.2), and 'likely only on occasion' (para 5.26 p. 73) – all these are unreliable judgements.

6.15 '**Adequate mitigation' is required for harm to biodiversity under the National Planning Policy Framework. Mitigation proposed in this EIA is not adequate.** 'Species-rich grassland' is a recurring mitigating feature, but the grassland will not be species-rich, for various reasons, as specified in

Appendix 4.14, Biodiversity Net Gain, and shown on the Detailed Softworks Plan (Environmental Statement Application Plans, 30001).

6.16 Loss of 50ha arable land cannot be mitigated by planting 0.5ha of wild bird seed; hedgerows and watercourses will be 'buffered' by inadequate margins, not noting that c2,500m of hedgerow are to be bordered by hard vehicle access tracks with impacts from diesel fume pollution. New woodland and tree planting is planned but on only 2.84ha. 'Inspection' before tree removal cannot be guaranteed over a 73ha site with 179 workers on site, nor can 'sensitive felling' as a mitigation for bat roost trees, nor 'precautionary measures during hedge removal' or 'removal of suitable nesting habitat [for birds] outside the breeding season'. The mere 20cm gap under the security fence will be flooded and clogged with debris and so will not be mitigation for much reduced freedom of movement for otter, water vole, badger and other mammals. Numerous other examples occur in the text.

6.17 In summary, the findings of the EIA describe hedgerows and field margins of value, a Regionally important bat assemblage, use of the river corridor by otter and water vole, and large numbers of breeding and wintering birds including Red- and Amber-listed species. 'No significant adverse impacts' from the proposed development is a phrase repeatedly stated, for species and habitats. The only exceptions to this acknowledged in the EIA are for badger and skylark. **Given the scale of survey omissions and flawed methodology, the losses, changes, the Applicant's conclusions of 'no significant effect' are demonstrably unreliable.**

b. Biodiversity Net Gain

Reference APPENDIX 4.14 BIODIVERSITY NET GAIN, The Landmark Practice, June 2025.

6.18 Biodiversity Net Gain rules dictate that habitats retained, enhanced, created and lost all have to be assessed and quantified in order to apply the metric for calculation. On this site **habitats lost have not been assessed nor quantified. Similarly, habitats of value to be retained have not been quantified.**

6.19 **The River Cole, bordering the entire west margin of the proposed site, and its backwater along the southern margin, have been 'scoped out' of the Ecological Impact Assessment (Appendix 4.13) and out of this BNG assessment. This is a major omission** in terms of biodiversity. There is likely to be Biodiversity Net Loss to the riparian features. Other omissions are outlined in the commentary on the EIA, above.

6.20 **Impacts on biodiversity value have not been considered**. **Flooding** is a defining feature of this proposal site, with a major influence on biodiversity. It has not been considered in this report. The same applies to **summer droughts, soil disturbance, trenching, soil compaction and other impacts, along with the effects of climate change. Biodiversity Net Loss is very likely to result.**

6.21 **Species-poor grassland will cover 34ha of the 73ha site – if not more (the area under panels is 54.6ha).** Multiple times in the EIA, and in this report, 'species-rich grassland' is claimed as a major ecological benefit, replacing arable land. This report admits that this will not be the case in the area under panels, due to the dry shade and heat generation under and around the panels not being conducive to species-rich grassland.

6.22 The area claimed to support 'species-rich grassland' is 17ha. **Much if not all of this already exists** as (moderately) species-rich grassland in wide field margins and marginal zones. The **current extent of this existing grassland has not been specified. This grassland, too, the report admits will not be a species-rich sward** which requires 10+ vascular plant species/m^2. The report states this will be 'difficult to achieve' and so of 'moderate condition'. **This is not a BN Gain.**

6.23 **'Extensive areas of the site will be planted with wet and broadleaved woodland'** (stated in para 5.36) **is an exaggeration – it will amount to 2.84ha only.**

6.24 **The existing 41 trees on the site** (specified in the Arboricultural Impact Assessment, see below)**, including some 70 – 120 yrs old, will be liable to damage by vehicles and construction work, causing inevitable soil compaction and physical damage. There will be BN Loss.**

6.25 The report proposes the creation of 'Many areas of new species-rich hedgerows across the site', suggesting that the site is currently devoid of hedges. **The site is extremely well hedged** with many of them species-rich, as stated in this report and the EIA. Seven hedgerow sections are to be removed (AIA). **This will be a BN Loss.**

6.26 New hedges are to be planted to score BNG points. They will destroy a historic field layout unchanged for at least 200 years, including several hedges featuring on the map of 1666. This is a valuable and unusual feature of farmed landscapes, as noted in the Archaeological Evaluation Report and Heritage Assessment. **New hedges should not be created and will be a loss to historic landscape value. New hedges should be removed from the calculation.**

6.27 **Most of the existing hedgerows are to be bordered by hardened vehicle access tracks**, (approx. 2,500m of hedgerow will be bordered by these tracks). Pollutants from diesel fumes will affect soils, water, vegetation, bees and other pollinating insects. The 'undesirable' plants of hedgerows such as nettles, which have to be < 20% cover to achieve a BNG score, will be encouraged, and hedgerow health could be compromised. **This topic is not considered at all in the BNG report. It will result in BN Loss.**

6.28 Arable land has been omitted from the BNG calculations. There were no surveys of arable flora and invertebrates, and there is no acknowledgement of the value of this open arable land for important populations of wintering birds, and scarce and declining breeding birds, as listed in the EIA. **Arable land habitat should be assessed as a BN Loss.**

6.29 Skylark territories will be lost. It is claimed that 7ha of retained open land (not 'created' as stated in the EIA, para 6.10), will compensate for the loss of 13 territories. There is no evidence for this, and **the BN calculation will be another loss.**

6.30 Planting 0.5ha with wild bird seed cannot compensate for the loss of >50ha of arable land.

6.31 **The wide grass field margins on the site are a feature of current biodiversity value. They will be reduced in width, another BN Loss, not calculated.**

6.32 **'Species enhancements for bats, badgers and birds' are claimed. This is not so.** For bats, damage to 41 trees is likely; new trees are not a replacement for mature trees for bats or any wildlife; a key mitigation for bats is claimed 'species-rich' grassland but as noted above this will not be the case. For badgers there will be a major loss of sett habitat, and fences will deter freedom of movement and foraging time. For birds, all will be disturbed during the construction phase; curlew, lapwing and snipe will not nest among the panels; wintering birds will lose important feeding grounds.

6.33 **Otter and water vole, and other mammals,** will not move freely to and from the River Cole due to the security fence. The mere 20cm gap underneath will flood, and be clogged with debris, and will not be effective.

6.34 **All these species and assemblages are likely to suffer a BN Loss. The loss should be calculated.**

6.35 Research on the biodiversity of solar farms shows varying results; the claims that solar farms are 'good for biodiversity' are not proven. A survey of 124 Solar Farms by Solar Energy UK (https://solarenergyuk.org/resource/solar-habitat-2025) shows that very few solar farms are managed with high biodiversity as a priority. The average number of grassland plants per m^2, for example, is 6 species, i.e. very poor. The EIA (p. 72 para 5.22) refers to a recent study (Copping et al, 2025) stating that solar farms have greater bird abundance and species-richness than arable land, but in this study the arable sites were intensive farms in the fens without hedges or field margins, so the comparison is not valid here. Furthermore, the Royal Town Planning Institute notes that agency staffing is inadequate for monitoring BNG and ensuring it is applied properly. **This is the national context in which claims for BNG should be viewed – with major reservations.**

6.36 **In view of these points, the conclusion that there will be significant Biodiversity Net Gain cannot be accepted.**

c. Trees and Hedges

Reference APPENDIX 4.16 ARBORICULTURAL REPORT AND IMPACT ASSESSMENT, Cura Terrae, June 2025.

6.37 Trees and hedges are key aspects of Ecology and Biodiversity Net Gain as included in the preceding sections; however, this Arboricultural Report specifies tree and hedgerow losses and vulnerabilities which Appendices 4.13 and 4.14 fail to do.

6.38 The brief for the Arboricultural input was to survey trees on the Application Site, recommend methodologies to protect retained trees and measures to compensate for loss of trees. The River Cole margins and the backwater along the southern edge have very fine Ancient and Notable crack willows. There are many good mature oaks and other trees along Snowswick Lane (the construction route). Neither of these sites were included in the survey. As for other reports, this is a major omission, as the trees will clearly be impacted by the development. Paragraph 193 (c) of the NPPF states that '**development resulting in the loss or deterioration of irreplaceable habitat (such as ancient woodland and ancient and veteran trees) should be refused**, unless there are wholly exceptional circumstances'.

6.39 Three key principles in the AIA are immediately apparent:

1. There will be **loss and damage to individual trees, groups of trees and hedgerows with trees**. These losses are not specified in the EIA, Environmental Statement Appendix 4.13, nor in Appendix 4.14, Biodiversity Net Gain.
2. 41 individual trees have been recorded. Of these, 28, i.e. **well over half, have been assessed without justification as having a life span of only >10yrs** (i.e. 10-20 yrs), and as such are 'not a significant constraint on the development proposals'. Some of these trees are 70–120 yrs old. **These trees are indeed a significant constraint.**
3. The methods advised for the protection of retained trees, like the methodology, are relevant to urban and development sites, not to the countryside. The **methods advised bring into sharp relief the transformation of this rural landscape into an industrial site.**

6.40 Seven hedgerow sections will be removed (7 out of the 20 surveyed), 'Selective removal' will take place in 3 tree groups.

6.41 Only 5 out of the 41 trees recorded are given expected life-expectancies of 'at least 40 yrs', all pedunculate oaks. It is well known that in good conditions oaks can live for many hundred years. Willows, field maple, thorn, alder and crab apple, present on this site, can all achieve veteran status. There will be little chance of long and healthy growth on this development site.

6.42 Damage to trees is acknowledged, and thus many mitigation methods are proposed. They include digging fencing post-holes by hand, damaged roots to be pruned, damaged roots to be wrapped in hessian, an arboriculturalist to be available, and vehicle movements to be supervised by a banksman. **It is hard to believe that these mitigation methods are practical with a workforce over a period of 1 year – 18mos, on a 73ha site, with a workforce of 179.**

6.43 Root Protection Zones are specified, generally of 10m radius. It is well known that the root systems of trees, particularly oaks, extend many tens of metres into surrounding land. There is no mention of the critical importance of fungal mycorrhizal networks attached to these roots, important for water and nutrient uptake in trees, which, with the roots, will be damaged by soil compaction and disturbance.

6.44 **'Tree loss will be mitigated by planting'. A newly planted tree is not a substitute for an established, well-growing tree.** 30% loss can be expected in the planted trees, from experience on similar soils nearby. Even more loss can be anticipated due to exacerbated flooding, and summer drought, as pointed out in the section on Flooding and Hydrology above. To ensure success, trees must be weeded by hand annually for 5 years. As with the mitigating actions noted above, this seems unlikely.

6.45 **It is clear from this report that there will be losses of trees and hedges, and that the proposed mitigation is likely to be impractical. Losses to trees mere metres from the boundary, which will be cut back, damaged by vehicles, compaction and other impacts, although not included here, means that there will be a net loss to this important existing resource, contrary to the policies referred to earlier.**

7. Archaeology and Heritage

a. Archaeology

References APPENDIX 5.4 ARCHAEOLOGICAL EVALUATION REPORT, Cotswold Archaeology, July 2025, and HERITAGE ASSESSMENT, ARCHAEOLOGICAL SECTIONS (SECTIONS 3, 4 AND 6). Cotswold Archaeology, June 2025.

7.1 Development Policy 39 of the LPP2 seeks to ensure that development will not be detrimental to the site or setting of Scheduled Monuments or nationally important designated or non-designated archaeological remains. We note that the Oxford County Council archaeologist raises significant concerns in relation to the submission, and particularly the proposed mitigation contained in the Environmental Statement.

7.2 The Archaeological Evaluation Report and Section 3 of the Heritage Assessment present original research on the proposed development site. The results are evaluated in terms of the potential effects of the development in Section 4 of the Heritage Assessment. Section 6 of the Heritage Assessment provides brief Conclusions.

7.3 The Geophysical Survey (Phase 1), Appendix 5.2, Feb. 2023, established the presence of a large (100 houses) Iron Age village on a one-time island in the braided River Cole. **This site (at least) is now being**

considered as scheduled ancient monument quality, i.e. of National Importance. The 7ha area covered has been left unpanelled in the development proposal.

7.4 Not surprisingly, in the vicinity of such a major population centre, a great number of associated features (including trackways, paddocks, ditches, pits and possible droveways for animals) have subsequently been found (Appendix 5.3, August 2024). There are now known to be three main areas of activity.

7.5 This Archaeological Evaluation Report describes the result of excavation trenches throughout the proposed development site and lists the hundreds of finds. These reveal occupation from the Neolithic onwards, with Early Bronze Age well represented, as well as Roman finds dominating the pottery (locally sourced from kilns west of Swindon).

7.6 **In summary, the whole site, with the exception of Field I, has revealed multiple archaeological interests.**

7.7 An important feature of this site is that the **deposits have been mainly undisturbed by later activity.** There is post-medieval ridge-and-furrow and drainage, but modern farming activities have been benign regarding cultural values. **Construction of a solar farm will not be benign.**

7.8 **Extensive excavation trenching 1m in depth, piling / panel mounts driven 2-3m into the soil, concrete-based infrastructure and other development will damage or destroy this long-term occupation history.** Pilings will damage buried archaeological remains as yet unrecorded.

7.9 **The current field lay-out is noted as unchanged from early maps (1666, 1761 and early 1800s)**. This is a feature of value, especially in the context of most modern-day farms increasing their field sizes. This layout will be changed under the development by removal of some sections of hedgerow, and planting sections of new hedgerow.

7.10 The frequent references in the archaeological reports to wet soils, waterlogging, groundwater infiltrating trenches and causing collapse of trench walls should have informed the Applicant's Appendix 6.1, Flood Risk Assessment.

7.11 Palaeochannels of the River Cole, in Fields G and I (Fields 7 and 9 in APP. 4.13, Ecological Impact Assessment) have been mapped. There is a complex series of these occupying much of the area of Field I (9) – explaining why few / no archaeological finds occur in this field. Borehole investigation was commissioned by Cotswold Archaeology. The palaeochannels, with borehole data, are valuable geomorphological features which should have been assessed in the EIA.

7.12 'Extreme silt-clay compaction' was noted at depth in archaeological borehole investigation. This emphasises the vulnerability of the soils on this site, which should also have informed the FRA.

7.13 **Section 4 of the Heritage Assessment fails to adequately represent the value and significance of this archaeology and landscape history. It greatly underestimates the damage that will be done by developing the site, and relies on unspecified methods of mitigation. This is alarming. Some key examples follow:**

- para 4.24 et seq. The solar panel mountings / piles are claimed to be 'minimally intrusive'. There will be c25,000 of pilings, 2-3m deep into the ground, as noted above. It is known that they destroy field underdrains, so it seems extraordinary that this report claims they will not impact upon any discrete features within or near them. This cannot be accepted.

- para 4.26 states that 'the footprint of the development – piling, topsoil stripping and excavation – is anticipated to be very limited in area, typically a fraction of a solar park, resulting in only minor effects'. Soil compaction, a main cause of archaeological destruction, and a known impact of solar farm development, is not mentioned.
- In the case of pilings, 'the quantity of displaced archaeological remains in the case of larger features such as ditches would be insignificant compared with that left undisturbed.' **As above, again these seem extraordinary statements, especially in respect of the pilings which will be throughout the site.** And in the case of smaller, discrete features 'the probability that piles .. would affect any more than a small percentage is low'.
- All these statements could be interpreted as **there will be damage to archaeological features. With no development on this site, there will be no damage.**
- para 4.27 'The proposed development presents an opportunity to restrict further damage by modern ploughing'. **Ploughing has not damaged the archaeological remains**, a welcome finding, emphasised in the Archaeological Evaluation and in Section 3 of the Heritage Assessment.
- paras 4.30 – 4.32 note that the BESS compound and the water tanks will indeed damage Roman and medieval ditches and enclosures.
- para 4.33 Trenches will be 1m deep, and numerous, and are noted as a potential cause of damage, quite logically. However, 'due to narrow width, most of the archaeological features will be preserved' and there will be 'limited impacts'. Yet again, it is impossible to understand how this can be the case.
- para 4.35 New access tracks: 'Present farm tracks will be utilised' – this is not true, as most tracks will be new, as shown in the Detailed Softworks Plan (drawing 30001). **There are to be >3,500m of hardened, causewayed access track. The existing two tracks will be widened to 6m or more, and Soil stripping will be necessary for constructing the tracks. It is admitted that these works could impact archaeological remains.**
- c2,500m of historic hedgerow will be bordered by these access tracks, **altering the quality of the hedgerows and their meaning.** This is not mentioned.
- New hedge planting is planned to score points for Biodiversity Net Gain (APP. 4.14), including in fields bordered by hedges dating from 1666. This too will **damage the long history of field pattern.** The Application should compare Fig. 5a in the Heritage Assessment with Fig. 3 in APP. 4.14, as they conflict.
- para 6.4 (Conclusions) 'For areas where piles may impact, concrete pads could be used instead'. These could exacerbate flood risk even further, and soil sealing with concrete is bad practice.
- para 6.6 'No hedges will be removed' – this is not true; **7 sections of hedgerow will be lost**, as stated in APP. 4.16, Arboricultural Impact Assessment.
- paras 6.7 and 6.8, indicate that there will be few impacts and that 'investigation and recording of archaeological remains will be managed through suitable mitigation measures.' Mitigation measures are unspecified.

7.14 **The 'minor adverse effects' and 'insignificant areas' of damage claims by the Applicant cannot be believed, when a solar farm with 93,000 panels and built infrastructure will replace low-key arable farmland, little modified for centuries. The valuable Archaeological research has been undermined by these unacceptable assessments. It seems obvious to us that this site should not be developed in any way.**

b. Heritage Assets

Reference HERITAGE ASSESSMENT. Cotswold Archaeology, June 2025.

7.15 The historic village of Coleshill, which thousands of visitors come to enjoy throughout the year, has a medieval core, with its church and the water mill mentioned in Domesday, and the 46 listed buildings, mostly 19thC architect-designed cottages built as a model Estate Village for the famous Coleshill House of 1650. The Coleshill Model Farm, 1854, now forms the heart of the visitor experience, with the Rural Skills Centre visited by schools and adult learners, twice-weekly popular tours run by the National Trust (and a destination café). The Coleshill Estate was famed for being at the cutting edge of agricultural improvement well into the last century. So too was the adjoining Buscot Estate, where from the mansion of 1780 the Thames Navigation, and then the farmland, were developed into one of the most commercially advanced enterprises in the country. Agricultural history here spans millennia, and its legacy defines the Vale landscape around us. This is the Heritage we so value today.

7.16 Core Policy 39 of the LPP1 seeks to ensure that new development conserves, and where possible enhances, designated heritage assets and non-designated heritage assets and their setting in accordance with national guidance and legislation.

7.17 Development Policies 36, 37 and 38 of the LPP2 sets out the Council's approach to conserve and enhance heritage assets in the Vale so that development within conservation areas and within the curtilage and setting of a Listed Building will conserve or enhance its special architectural or historic interest and significance.

7.18 Policy 41 of the LPP1 only supports scheme for renewable and low carbon energy generation where they would not cause a significant adverse effect on both designated and non-designated heritage assets, including by development within their settings.

7.19 Taking the above policies and other relevant policies and material considerations into account, an independent Heritage Consultant, Dr Victoria Thomson, Thomson Planning and Heritage, was instructed to undertake a critique of the submitted, desk-based Heritage Assessment (HDBA). A copy is provided at Appendix 3 of our submission. The Thomson critique raises concerns concerning conclusions reached that 'no harm' is caused to designated heritage assets. The 'no harm' claims are not fully substantiated, and there is no clear and convincing justification as per paragraph 216 of the National Planning Policy Framework.

7.20 The Thomson Heritage critique recommends that:

i. The identified issues in the HDBA are addressed, and the assessment extended in scope to demonstrate consideration of a wider range of heritage assets, in order to provide the local planning authority with the information required under paragraph 207 of the National Planning Policy Framework, and necessary to inform their decision-making in light of the requirements in legislation, national policy, and the development plan.

ii. The 'Late Iron Age to Roman' settlement (see under Archaeology, above) within the centre of the application site is regarded as being of schedulable quality. Whilst it is not currently subject to any designation, it is eligible to be considered for identification as a non-designated heritage asset by the local planning authority during the decision-making process (which would cause it to be considered under the NPPF policy in paragraph 213 (b) which applies to scheduled monuments).

7.21 It is considered that both of these requirements indicate withdrawal of the current application to enable a fully substantiated assessment of the cultural heritage impacts of the proposal. Meanwhile it is not possible to assess the accuracy of the conclusions reached in the submitted heritage assessment. To us they appear unjustifiable.

7.22 **On the basis of the Heritage Critique and archaeological findings, the proposal would cause serious harm to heritage assets of national and local importance. The Application is therefore considered to be contrary to policy CP39 of the LPP1, DP36, DP37 and DP38 of the LPP2 and NPPF paragraphs 216.**

A direct view of the proposed solar farm site from a listed cottage at the edge of Coleshill. It shows the Foal House of 1850, one of the historic Coleshill Model Farm buildings and a unique Heritage Asset, October 2025.

8. Highways, Traffic and Access – Snowswick Lane

Reference Application documents: Planning Design and Access Statement, ABEI Energy and Cadence Planning, July 2025; Construction and Traffic Management Plan (CTMP), Glanville, July 2025, and Transport Statement (TS), Glanville, July 2025.

8.1 Snowswick Lane, a narrow, rural and attractive lane, is the proposed route for all vehicles to access the proposed site for Old Hayes Solar Farm. From the outset, ABEI claim that there is 'good highway access' to the site. This is incomprehensible to us. Nothing could be further from the truth.

8.2 A member of our Coleshill Parish Council Solar Farm Focus Group, Janet Ragon-Chambers, has submitted a document to the VOWH Application website covering all the issues involved in the use of Snowswick Lane as the access route for the proposed development. This includes meticulous ground survey of road widths, road surfaces, verge conditions, installations on the verges, road junctions, analyses of each claimed, 'passing place', flooding implications and the conditions of the adjoining A417 Lechlade to Faringdon Road. It is clearly demonstrated in every paragraph and every photograph that **this**

route is in no way suitable for the proposed change in use, and that multiple claims in the Application documents are inaccurate or untrue and should be refuted.

8.3 This section is a summary of that analysis.

8.4 We strongly object to the Planning Application on the following grounds:

- the safety of all road users,
- the adverse and detrimental effects on the residents of Snowswick Lane and all its local users,
- Snowswick Lane is wholly unsuitable for the constant use by HGVs and construction and maintenance traffic. It will suffer significant damage to the verges, ditches and driveways,
- the lane is too narrow to allow vehicles to pass, and there are no passing places,
- there will be significant effects from dust, disturbance and noise,
- the destruction of the natural environment of a valuable rural lane. There will be loss of hedges, trees, grass verges, ditches and their associated wildlife,
- legislation in the National Planning Policy Framework should be examined.

8.5 Snowswick Lane is already a route for local traffic, especially when roads are closed in Lechlade. The lane has sharp bends and blind spots. It is frequently flooded in three main locations, and closed for flooding. The peripheral ditches, if damaged by heavy traffic, will exacerbate flooding depths and frequency. The road surface is uneven, pot-holed, buckled, scored and affected by water-seepage from below. The sub-base structure to the lane was not designed and constructed to endure traffic of modern heavy goods vehicles; surface repairs and patching are needed regularly. **It is quite clear that Snowswick Lane will not withstand the great increase in use required for the construction and maintenance of the proposed solar farm. The Application documents do not reflect these major constraints.**

'Passing places'

8.6 Drawing 8240396/6203, Passing Places Overview: This drawing confusingly shows informal passing places as "*Parking places*". There are no 'parking places', nor are there any purpose-built passing places on Snowswick Lane. The 'passing places' referred to in the CTMP are merely encroachments onto verges, private driveways or farm entrances to fields and farms. **The statement that "*Several informal passing places exist along this route and will support vehicle manoeuvres during construction*" in the CTMP (para. 5.3) is unsupportable.** Likewise, para. 5.4 '..*demonstrates that vehicles can safely pass each other at identified places. This confirms the suitability of Snowswick Lane for daily HGV use during the construction*". **Again, this is incorrect.**

Road widths

8.7 The width of Snowswick Lane carriageway narrows to 3.3m. It is not 4.5m at the same location as claimed in the Application. The wider areas are generally where the verges have been churned up by vehicles attempting to pass, or by careless road repairs. Despite this, **the CTMP claims that 16.6m Low Loaders with Inverters weighing 55 ton[ne]s and BESS Battery units weighing 70.5 ton[ne]s can pass safely. Again, this is clearly insupportable.**

8.8 There is a width restriction of 6.6' except for access on Snowswick Lane. The 16.6m low loaders proposed for use in construction have a width of 2.5m, 85cm more than the width restriction.

Junction with A417

8.9 The CTMP (para 3.6) states "*Snowswick Lane forms a simple priority junction with the A417 approximately 3km* north of the site". The reality is otherwise, as shown in the photographs attached to Ragon-Chambers' document. There are frequent issues of vehicles veering off the main road here. The A417 to Faringdon, especially passing the Conservation village of Buscot, has received not a single mention in the Application. Between Buscot and the junction of Snowswick Lane there is a series of dangerous bends liable to flooding and known locally as 'accident spots'.

8.10 Buscot Parish Council has worked tirelessly to get the road speed limit reduced, and road safety is an ongoing priority issue. The failure in the Application to realise the significance of the A417 junction is a serious safety omission and shows the paucity of its research.

Left: View to Snowswick Lane from A415 showing damaged sign to Coleshill from A417 caused by vehicle impact, and right: bus veered off A417 immediately north of junction with Snowswick Lane onto Buscot Wick Farm field.

Snowswick Lane / School Lane closed due flooding on the A417

Snowswick Lane flooding, with fields both sides of the lane under water. A day or so later the A417 to Faringdon was closed at Buscot.

8.11 Snowswick Lane is currently an attractive rural lane, although well-used by local traffic. It is a historic routeway, now valued as part of a local cycle route and for other recreational activities. Its hedges and trees support large flocks of wintering birds, and many breeding birds. Like the adjacent land, it is frequently flooded, as is the adjoining A417.

8.12 The proposed change of use contravenes para. 89 of the NPPF which states that **development should not have an unacceptable impact on local roads. The impacts here are clearly unacceptable.**

8.13 The NPPF para.116 states that 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios'. **The cumulative impacts on Snowswick Lane, its junction with the A417 and the A417**

through Buscot have been outlined here: they will impact drivers and cyclists and are unacceptable.

8.14 **The proposed total change of use from this rural lane into an industrial highway is a) totally unrealistic and impractical; and b) very poorly researched and acknowledged by the Application. We find it incomprehensible that ABEI claim their proposed solar farm site has 'good highway access'. We hope and trust that the VOWH will refuse the proposal on these grounds alone.**

9. Agricultural Land and Food Security

Reference APPENDIX 4.11 AGRICULTURAL LAND CLASSIFICATION REPORT, Reading Agricultural Consultants, May 2024.

9.1 **By removing 70 hectares of productive farmland from use, the development undermines local food security and directly conflicts with Core Policy 43 and the May 2024 Ministerial Statement on agricultural land protection.**

9.2 The land on the proposed development site is EITHER Best and Most Versatile Land (class 3a)* OR waterlogged and flood prone. The waterlogged and flood-prone land, class 3b, is of moderate quality, currently producing commercially viable arable crops. **Both these land types, BMV land and land prone to flood, make this site unsuitable for a solar farm development.**

9.3 The ALC report covers 55ha of the 73ha, being the original Application site, although the map provided covers the whole site.

9.4 On this 55ha site the land is graded 3a (17%), Best and Most Versatile, and 3b (83%), moderate quality. Wetness is the limiting factor in the dominant Denchworth and Fladbury 1 association soils, overlying the clay geology, with prolonged periods of waterlogging. Note that no new soil survey has been carried out for this Application; these soil types are based on the small-scale mapping of the 1984 Soil Survey of England and Wales.

9.5 The climate is suitable for agriculture, and there are currently enough days in the year with favourable opportunities for agricultural field work.

9.6 These soils, and classification classes 3a, 3b (and 4, not present here), are typical of the Upper Thames Vales, covering extensive areas of arable land and pasture. They grow reasonable crops of cereals and other crops, and very good grass for silage, hay and pasture, on commercially viable farms. **As such, farmland such as this on the proposed development site provide a significant contribution to the UK's food security.**

9.7 In this connection, the objections to the VOWH Planning Application Site from Pennyswick Farm, adjoining the proposed site, are very relevant, reflecting the experience of a local family farm over several decades.

9.8 **It is commonly claimed that agricultural use is maintained by grazing sheep around the panels on solar farms. Sheep grazing management is likely to be impractical here**, given the wet soils, unsuitable for sheep. Grazing would only be possible in the summer, when grazing is incompatible with maintenance of species-rich grassland (stressed by Emorsgate, the seed-supplier for the development - see APP. 4.7, Plant Schedule). Sheep grazing is not appropriate for wet or floodplain grassland. If it is implemented, additional soil compaction may result – sheep being a known cause of compaction. A

minor ‘conservation grazing’ scheme here cannot be regarded as a contribution to food security or viable agriculture.

9.9 **This land has been farmland since the Iron Age, if not before.** The Archaeological Evaluation, Appendix 5.4, describes this long-term continuity. There is no damaging impact of current or recent farming activity on the abundant and widespread archaeological remains. This is an unusual and valuable feature of the site. Below the usual surface plough-layer of c 40cm max., **the archaeological remains (including skeletons) are safe beneath the soil. This would not be the case with deep trenching, 1m deep, for the cabling, and for the insertion of thousands of panel mounting piles, 2 – 3m into the soil** (specified in the Environmental Statement, Main Report, para. 3.14)**.**

9.10 This arable farmland is well-hedged, with species-rich hedges, wide field margins and wetland communities along the watercourses and the River Cole. It has many features of biodiversity value. The hedgerow lay-out, again as emphasised in the Archaeological Evaluation, and in the Heritage Assessment, has remained unchanged for at least 200 years, with several hedgerows shown on a map of 1666. This is another rare and valuable feature in much modern arable farmland. **The proposed development will change this historic land-use, and with the planned hedgerow removal and new hedge planting, destroy the historic landscape.**

Output of straw and hay from farmland adjacent to the proposed development site, on the same soil types showing good productivity from this commercially viable farmland in September 2025.

Fields on the proposed development site after flooding, 31 January 2025. Left: field 7; Right: Field 5 (as numbered in Appendix 4.13, Ecological Impact Assessment).

*Agricultural Land Classification: Soils are classified according to guidelines of 1988 (Provisional ALC updated by Natural England in August 2025), into 6 classes depending on soil characteristics which limit agricultural use and options. Classes 1, 2 and 3a are classified as 'Best and Most Versatile' (BMV), suitable for a range of crops. 3b is of 'moderate; quality, 4 is poor and 5 very poor for agriculture. BMV land is a planning constraint on development. BMV status is protected under the 2024 National Planning Policy Framework, para.187(b). The level of this protection is disputed by farming interests.

10. Harm to Amenity

10.1 The application proposals will have a significant negative impact on the amenity of both residents and people that work in and visit the area. The area of Coleshill and Buscot is not a vacant rural area. This is a rural area that is being specifically maintained by the National Trust with its force of volunteers, and by Buscot Park, for the enjoyment and use of the wider public, forever. Thus the concerns noted here impact far beyond the local community. There will be both short term and long-term impacts from the proposals.

10.2 Policy DP23 of the LPP2 seeks to ensure that proposals will not result in significant adverse impacts on the amenity of neighbouring uses. Factors to be considered are:

- Loss of privacy, daylight, or sunlight
- Dominance or visual intrusion
- Noise or vibration
- Dust, heat, odour, gases, or other emissions
- Pollution, contamination, or the use of / or storage of hazardous substances
- External lighting.

10.3 **All these factors can impact Mental Health:** the harm to existing levels of visual amenity and the risk of glint and glare from the industrial solar complex are serious concerns, particularly in relation to the wellbeing and mental health of the local community, workers and visitors to the region. The negative impacts of such a development on mental health are of great concern. These have been highlighted in a published submission by Cllr Amelia Bailey to the National Infrastructure Planning hearing for Springwell Energy Farm Ltd, Lincolnshire, in 2025 (EN010149-000468).

10.4 Of particular concern is the importance of the natural environment, not having been considered by the Applicant. Exposure to green spaces and natural views significantly enhances bio-psycho- social wellbeing. Furthermore, scientific evidence strongly supports that visual contact with nature (real or through images) reduces stress, enhances positive emotions, and restores cognitive functioning.

10.5 The Application would result in the significant loss of farmland, greenspace, hedgerows, trees and wildlife. Large-scale solar farms pose a potential threat to mental health through:

- Loss of Greenspaces: reduces access to restorative natural environments.
- Landscape Industrialization: damages residents' sense of place, causing anxiety and distress.
- Construction Disruptions: noise, dust, and traffic can increase community stress.

- Environmental Degradation: violations (e.g., stormwater mismanagement) erode trust and raise anxiety.
- Community Tensions: lack of proper consultation can create social friction and collective stress.

10.6 Although direct studies linking solar farms to mental health outcomes are limited, there is evidence from environmental psychology and community case studies that strongly suggests potential negative impacts from such proposals.

10.7 **Dominating visual intrusion:** Visual intrusion of the whole solar farm into the beautiful landscape has been covered in Section 5 above, but the dominating presence of the BESS compound, located very close to Coleshill village, may be particularly upsetting to visitors. It will be a large and incongruous built complex, with installations amounting to the bulk of 20 shipping containers – the BESS itself, inverters and transformers, 36 power station modules and the switching station. There will be noise, lighting and fire dangers resulting from these, again not adequately described in the Application.

10.8 **Noise:** we are not in a position to critique the Noise Impact Assessment submitted with the Application, although our experience with other supporting documents causes us to be cynical about the proposal's 'acoustically acceptable' conclusion. Members of our Focus Group were much disturbed by noise of pile-driving during the construction of Lynt Farm solar, Inglesham. Noise is generated by the BESS, inverters, transformers, pumps and switchgear. It can range from 48 to 72 decibels. We note that an appeal against a refusal of planning permission for a solar array at Alfreton, Derbyshire, was dismissed, with comment on the impacts of 'a dominant industrial installation with associated noise from inverters'. There is no background noise at this site which might mitigate the noise. The predicted increase in traffic will also raise noise levels. Residents, visitors and pupils at the nearby nursery school shortly to open in Coleshill, are all likely to be disturbed.

10.9 **Air Quality:** We are concerned that the Council's Air Quality officer has assessed the proposals and has requested that an Air Quality Assessment should be provided by the applicant. We would expect such a document to be submitted with the application itself. We are concerned both from the short-term air quality impacts of the proposal from construction traffic, and the longer term impact from the BESS, major increase in vehicle traffic and the use of industrial equipment necessary for the operation of a solar farm.

10.10 **Lighting**: No Lighting Impact Assessment has been submitted. The Environmental Statement (para. 3.26) claims that no permanent lighting would be required. Lighting during construction is likely, as is lighting around the BESS compound. The EIA (see Section 6 above) gives many (arguable) suggestions on the types of lighting required to mitigate disturbance to the Regionally important bat assemblage. However, no assessment of light spill nor nocturnal effects has been undertaken.

10.11 **Heat**: Research in the USA has established that air circulation issues around solar farm panels can raise temperatures by up to 4°C, a temperature far exceeding the 1.5° climate change threshold for 2025 – 2029. This would have a major impact on the predicted summer drought impacts caused by panel evaporation of summer rainfall outlined in Section 4 above, causing lower flows in the River Cole and poorer water quality here and downstream. The difficulty in growing a good grass cover in the dry shade under the panels has also been addressed above (in Section 6), and this great temperature increase would worsen the prospects for grass growth even more. Heat is a serious impact which should have been addressed in the Application.

10.12 **Fire risk:** Like any technology producing electricity, there is a risk of fire, especially associated with the BESS lithium-ion batteries. BESS fires lead to various forms of contamination including air

pollution from toxic smoke and gases, and soil and water contamination which will affect the River Cole and River Thames. Our county border location may be problematic for emergency services to attend quickly.

10.13 **Crime risk**: Risk of crime on solar farms has increased. Solar farms are targeted principally for the copper used in cables. The risk was highlighted by the VOWH in a response to the Applicant's Scoping Opinion Request – reported crimes on solar farms increased by 93% between 2021 and 2022, driven by a 48% increase in thefts of cables; thefts of solar panels has quadrupled. Once a solar farm has been targeted once, it is likely to be targeted again. We are all concerned about this risk, especially those residents and members of our Focus Group living close to the proposed site.

11. Community Engagement and Public Consultation

Reference APPENDIX 1.7 COMMUNITY INVOLVEMENT, ABEI Energy, July 2025.

11.1 **Engagement and consultation between the developer, ABEI, and Coleshill Parish and community has been negligible, verging on nil.** Government guidance (National Planning Policy Framework, paragraph 40) states that pre-application engagement ('early engagement' and 'good-quality pre-application discussion') improves outcomes for the community. **This guidance has been ignored.**

11.2 As noted earlier in connection with the VOWH Statement of Community Involvement, this lack of consultation brings into question the developer's preparedness to adhere to any conditions attached to planning approval or any mitigation undertakings.

11.3 ABEI's website https://abeienergyprojects.co.uk claims that '*Forming close working relationships with landowners, local councils, and other affected stakeholders is integral to our development philosophy.'* In this case **ABEI's own philosophy has not been applied**.

11.4 APP. 1.7 to the Environmental Statement in the Planning Application, Statement of Community Involvement, ABEI Energy, July 2025, cross-referenced in the brief ES para 1.24, makes **many claims, none of which can be substantiated in reality.** These include:

- para 1.1 '*ABEI has conducted a programme* [programme?] *of public consultation and stakeholder engagement'*
- para 1.2 – they '*set out how the findings have been incorporated into the proposed scheme*'
- para 3.3 '*the Applicant is keen to work with local communities…all parties benefit from a communication programme and have the opportunity to input at an early stage*'.
- Under POLICY CONTEXT paras 5.11 and 5.12, the Local Guidance of South Oxfordshire and VOWH in their Statement of Community Involvement (SCI, December 2022) is quoted. This also highlights the importance of early community engagement before planning applications are submitted. *'The pre-application phase encourages applicants to carry out early engagement with the local community before submitting a planning application*.
- para 6.1 In advance of submitting the planning application, the *Applicant has sought to inform and engage with interested parties on the evolving design process at an early stage.*

11.5 **The developer's claims to prioritise engagement with, and early involvement of, the local community do not reflect the experience of residents and stakeholders. Our experience and the reality of consultation is summarised below.**

The claimed 'programme' of public consultation

11.6 The 'programme' consisted of one drop-in session in Coleshill on 17th September 2024. The information on the scheme was only provided on boards, not in writing, making it hard to focus on the veracity of statements such as 'low ecological value (arable farmland)' and 'good highway access'. Biodiversity Enhancements were only represented on a map, with an illegible key. Members of the public thought the notice period for this event (less than 2 weeks) was too short. No similar event was held in Buscot, nor Highworth.

11.7 ABEI claimed that at the event they could explain and discuss any issues and concerns raised. However, ABEI representatives were unable to answer many questions put to them and keen to underplay concerns raised. In our opinion, the questionnaire provided for feedback was designed to lead in a certain direction, e.g. on climate change issues.

11.8 At the time of this event, it was stated that the Planning Application would be submitted in December 2024. Thus, we believed that in only 2 months we would have full access to the proposal details. As it was, we waited 8 months for the application to be submitted (on 29 August 2025.) During this long period repeated requests for more information, and another consultation event, were ignored, or at best 'noted' but not provided. We heard nothing from ABEI of any import during this long period.

11.9 ABEI claimed to provide contact details for follow-up questions after the drop-in event, but as noted these were not answered. Initial contact details handed out on a business card had an invalid email address.

11.10 ABEI created a website for the proposal, claimed to 'provide further opportunity to get in contact with the development team or leave feedback'. The website was not kept updated and gave misleading information, in particular on the date for submitting the application. E-mails with queries following the drop-in session, sent by our Coleshill Parish Council Focus Group and interested individuals, were not answered. When chased, ABEI was unable to answer many queries raised.

Incorporation of findings (of consultation) into the proposed scheme

11.11 Para 1.13 of APP. 1.7 claims 'The layout was adapted to minimise impact on heritage assets and landscape impact as well as improving on the biodiversity of the site'. We have seen no material in the Application Documents describing what these 'improvements' entailed, other than exclusion from panel coverage of the 7ha area overlying the Iron Age village. Otherwise, ABEI dealt with all issues raised by referring to future documents they would submit with the Planning Application. All three vital features of this site – heritage, landscape and biodiversity – remain under severe threat from the proposal, even if 'adaptation' was incorporated.

Early-stage consultation and engagement with the local community

11.12 Contrary to the claim in para 6.1 quoted above, ABEI specifically sought to exclude the Parish Council from early consultation. ABEI was '*disappointed'* that the VOWH made public the February 2022 EIA Screening Report (in accordance with the Vale's standard operating procedures, any application once submitted is shown online for transparency reasons). ABEI was *'very sorry that* [the] *Parish Council have found out about our proposed development via this means* [online, on the Vale's website]. *We did not agree with the LPA that they could undertake external consultations and considered that the Vale had made a mistake in this matter'.* Details on this counter-productive situation are provided in the comments on the Application Website by a member of our Focus Group, Rosamund Webster, Rectory Cottage, Coleshill.

11.13 **There was thus no early consultation at all in 2022, nor in the following years, and nor has there been any meaningful consultation between ABEI and the Coleshill Parish Council to date.**

11.14 For this reason alone, it could be argued the application should be withdrawn and, in its place, a well-considered, genuine and structured consultation programme undertaken with proper engagement with the local community. The developer's failure to undertake meaningful engagement fundamentally undermines public confidence and breaches the spirit of NPPF paragraph 43, which emphasises early and effective community involvement.

12. Connection to the Grid – the Route

12.1 We appreciate that the cable route connecting the proposed solar farm with the National Grid is not determined at this stage, however it is undoubtedly a key criterion in the selection of a suitable solar farm site. The consensus within the community is that the lack of any substantive information regarding the proposed route and indeed the high-level technical details such as the size of cable(s) and the construction methods required for underground cabling systems (especially in a high flood risk area), raises serious questions regarding the impact on the local infrastructure and additional lengthy disruption to the local communities affected.

12.2 It is envisaged that the cable routing will create major soil disturbance, potentially damaging impacts on the River Cole and riparian corridor and further loss of habitat and potentially productive farmland, over a length of land at least 7km. The uncertainty adds considerable anxiety and concerns over this entire Application.

13. Relevant Appeal Decisions

Shilton Downs Solar Farm (APP/D3125/W/16/3158494)

13.1 The Inspector's decision on Land at Shilton Downs Farm, Oxfordshire (APP/D3125/W/16/3158494, 16 August 2017) provides a relevant precedent for assessing the impact of the Hayes Solar Farm solar farm proposals.

13.2 The Inspector dismissed the appeal for a 7 MW solar farm, finding that even with mitigation the development would cause a dramatic change to rural character, introducing an extensive, manufactured and utilitarian form of development into open farmland.

13.3 He concluded that this caused a major adverse effect on landscape character and medium adverse effects on visual amenity, despite the temporary and reversible nature of the scheme (paragraphs 26–30 of the decision).

13.4 The Inspector emphasised that the need for renewable energy does not automatically override environmental protection and that considerable weight must be given to harm to local landscape character.

13.5 These findings are directly applicable to the Old Hayes proposal. The Coleshill site is similarly characterised by open, gently undulating farmland, a tranquil rural setting, and clear visual relationships with nearby villages and the wider Vale landscape. The scale of the Old Hayes development (73 ha) exceeds that at Shilton Downs and would therefore result in greater landscape and visual harm.

13.6 Accordingly, consistent with the Shilton Downs decision, the proposed Old Hayes Solar Farm would conflict with Vale of White Horse Local Plan Policies CP44 and CP41 and the NPPF paragraphs 180(b) and 185, as its benefits do not outweigh the substantial harm to the character, appearance, and enjoyment of the countryside.

Ashford Solar Farm (APP/E2205/W/24/3352427)

13.7. A recent decision of national significance is the Ashford Solar Farm Appeal (APP/E2205/W/24/3352427, decision dated 8 July 2025), where the Inspector dismissed an appeal by EDF Renewables for a 49.9 MW solar farm at Aldington, Kent.

13.8 Despite the Government's increased emphasis on renewable delivery (2024 Written Ministerial Statement and NPPF updates), the Inspector concluded that the need for renewable energy does not override environmental protection or heritage conservation. He found that the solar arrays, extending over valley edges and ridgelines, would "spill out of the valley floor into the rural hinterland," causing less-than-substantial but important harm to the setting of Grade I and II* listed buildings and a conservation area.

13.9 The Inspector emphasised that even less-than-substantial harm to designated heritage assets must carry great weight, and that such harm was not outweighed by the public benefits of renewable energy generation, notwithstanding the project's 49.9 MW output and 14 million kg CO_2 annual savings. He further observed that the development's 40-year duration was a relatively long time, such that its reversibility did not mitigate the significance of its landscape and heritage harm.

13.10 These findings are directly applicable to the Old Hayes proposal. The Coleshill site similarly forms part of a valley landscape whose openness, topography, and relationship with the historic settlement of Coleshill defines its rural character. The proposed solar farm would intrude upon this setting, introducing an incongruous industrial form visible from public rights of way and village approaches.

13.11 Consistent with the Ashford decision, the Old Hayes Solar Farm would therefore conflict with Vale of White Horse Local Plan Policies CP39, CP41 and CP44, as the benefits of renewable energy generation are considered insufficient to outweigh the lasting landscape and heritage harm that has been identified in this report.

13.12 The Inspector's reasoning in both cases is unequivocal: the landscape and heritage harm from large-scale solar arrays outweighs renewable energy benefits. The same conclusion is inescapable here.

14. The Need for Solar Energy

14.1 We appreciate the need for solar energy. However, this should not come at the expense of valued landscape and agricultural farmland, as we have already pointed out in Section 5 above. Nor should it be to the detriment of the local community. We support the Campaign for the Preservation of Rural England in their campaign for solar to be installed on rooftops. We would like to copy here CPRE's three main demands:

i. **"Deliver on plans for solar panels to be fitted on all new-build homes in England by 2027, including affordable and social rent homes.**

ii. **Put an end to 'wasted space' and retrofit all suitable domestic, commercial and public buildings with rooftop solar particularly warehouses and car parks.**

iii. Strengthen policy so that solar development is not put on our most beautiful and tranquil landscapes or best farmland.

We don't want rooftop solar to be seen as small change. With the right policy and incentives, it has the potential to power millions of homes and businesses across the country for the long term."

Solar Farms nearby

14.2 Data from the Global Energy Monitor and Tracker as at February 2025 records 9,031MW of electricity generated from Solar Farms in the UK, with an enormous jump to 25,070MW proposed – farms under construction or planned. This almost three-fold increase is possibly the greatest increase in the world. France, Germany, Italy and Spain all have considerably more solar farm energy generation, so increases are more modest. In terms of numbers of solar farm 'phases', i.e. units under one planning permit, the UK has 1,261 at present, and a further 1,064 proposed.

14.3 **There are already several solar farms close to Coleshill. These are listed on the table below:**

Site	**Year active**	**Energy output**	**Area covered**
Lynt Solar Farm, Inglesham	2015	27MW	37ha (91 acres)
Pentylands Solar Farm, Hannington Wick	2013	15MW	36ha (91 acres)
Westmill Solar Park, Watchfield (Community-owned)	2012		12ha (30 acres)
Stanton Solar Park, Stanton Fitzwarren	2015	5MW	12.8ha (32 acres)
Beech Farm Solar Farm, Stanton Fitzwarren	2016	4.55MW	10ha (25 acres)
Corner Copse Solar Farm, Stanton Fitzwarren	Under construction from 2024	49.9MW	95.5ha (236 acres)

14.4 The Old Hayes proposal is for **a large solar farm,** similar to Corner Copse. There are currently other solar farm proposals near us; Wiltshire has a particularly large number. We have been monitoring the campaigns against the 810ha Lime Down site, near Malmesbury, and of course the huge 1400ha Botley West proposal.

15. Planning and Balance

15.1 The application should have been assessed by ABEI on its merits, against the requirements of the adopted Local Plan 2031 Part 1 and Part 2 and the National Planning Policy Framework.

15.2 It is considered that no reasonable assessment of the application can be made in its current form. As the preceding paragraphs have demonstrated, the applicant has not undertaken sufficient public

consultation for a scheme of such significance and with wide reaching implications. In addition to our objection, there are other Councils that have objected to the application.

15.3 Overall, this Application has significant omissions in the evidence supporting the proposal. We have highlighted shortcomings in Flood Risk and Drainage, Landscape, Ecology, Biodiversity Net Gain, Heritage, Transport and Agricultural Land, among other issues.

15.4 The evidence that the Applicant has submitted cannot be relied upon.

15.5 The proposed solar farm would generate renewable electricity which would be supplied to the National Grid. This would contribute towards addressing the Climate Emergency that the Council has declared and towards meeting local and national policy on reducing carbon emissions. In favour of the development, significant weight is attributed to the need to provide additional energy from renewable sources, and the wider environmental benefits associated with increased production from renewable sources. Some limited weight is given to the time-limited and non-permanent nature of the installation, although we note this is now in doubt.

15.6 Throughout this submission we have highlighted the Core Policies and National Planning Policy Framework instruments which must govern planning decisions. A summary Planning Matrix is provided in Section 3. Landscape designations and commissioned research by the VOWH are also relevant. Many of these seek to limit solar farm developments where they would have detrimental effects on the character of the landscape, its ecology, heritage, amenities and ecosystem services. Valued landscape features including recreational value, time depth, and role as part of the wider setting in the National Landscape, must be evaluated.

15.7 Harm considered in the Application to be 'less-than-substantial' against policy tests, should be refuted. The acknowledged renewable energy benefits of the scheme do not outweigh the substantial adverse impacts identified in our report. The development conflicts with multiple policies. We note that similar solar farm proposals such as the appeals referenced earlier in the report have been refused for similar reasons.

15.8 Considering the Local Plan as a whole, the Proposal does not accord with the most relevant policies and therefore is in conflict with the Development Plan. The test is whether material considerations outweigh the conflict with the Development Plan.

15.9 Overall, this Application has significant omissions in the evidence supporting the Proposal. Irrespective, the Proposal will conflict with the Development Plan.

15.10 **The VOWH should refuse planning permission for the many reasons outlined in our submission.**

16. CONCLUSION

We have set out in the document why the proposed land off Snowswick Lane is a wholly inappropriate area for a Solar Farm to be developed. Core Policy 41 of the VOWH Local Plan 2031 sets out six significantly adverse effects that a renewable energy development should not cause. The Old Hayes Solar Farm Application causes every single one of these effects. The proposed remedial actions further aggravate other Core Policies (most importantly Core Policy 42 – Flooding) or are incapable of providing the necessary remedy.

In addition, almost every local and national planning guideline is breached by this application. The community recognises the importance of renewable energy and acknowledges The Vale of the White Horse's duty to balance the positive and negative effects of all planning applications. However, no reasonable conclusion can be made that the negative consequences of developing this particular site in preference to other available and existing sites both locally and nationally would be outweighed by the benefit of an additional 49.5MW of low carbon power generation.

GLOSSARY OF ABBREVIATIONS USED IN THIS SUBMISSION AND IN THE APPLICATION DOCUMENTS

AIA	Arboricultural Impact Assessment	LPP	Local Plan Part
ALC	Agricultural Land Classification	LVIA	Landscape and Visual Assessment
AONB	Area of Outstanding Natural Beauty	MW	Megawatt (one million watts; 1000 kilowatts)
APP, App	Appendix	NCA	National Character Area
BESS	Battery Energy Storage System	NPPF	National Planning Policy Framework
BMV	Best and Most Versatile (agricultural land)	NPPG	National Planning Policy Guidance
BNG	Biodiversity Net Gain	NPS	National Policy Statement
CIEEM	Chartered Institute of Ecology and Environmental Management	NSIP	Nationally Significant Infrastructure Project (e.g. solar farms)
CLVIA	Cumulative Landscape and Visual Assessment	OCC	Oxfordshire County Council
CP	Core Policy	PPG	Planning Practice Guidance
CPRE	Campaign for the Protection of Rural England	PROW	Public Right of Way
CTMP	Construction and Traffic Management Plan	PV	Photovoltaic (panel)
DBA	Desk-based Assessment	RVAA	Residential Visual Amenity Assessment
DP	Development Policy	SBC	Swindon Borough Council
EAP	Environmental Action Plan	SCI	Statement of Community Involvement
EcIA	Ecological Impact Assessment	SOVWHDC	South Oxfordshire and Vale of the White Horse District Council
EIA	Ecological Impact Assessment (main use in this document) or Environmental Impact Assessment (legislative requirement)	TS	Transport Statement
ELMEP	Ecological and Landscape Mitigation and Enhancement Plan	VOWH	Vale of the White Horse
ES	Environmental Statement	VOWHDC	Vale of the White Horse District Council
FRA	Flood Risk Assessment	WMS	Written Ministerial Statement
GIS	Geographic Information System	ZTV	Zone of Theoretical Visibility
HDBA	Heritage Desk-based Assessment		
HGV	Heavy Goods Vehicle		
LCA	Landscape Character Area		
LCT	Landscape Character Type		
LPA	Local Planning Authority		