

Botley West Solar Farm

Written summary of oral submissions at the Hearing 13th May 2025

by

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My concerns in relation to the Botley West Solar Farm proposal are that it is being justified as being of national significance but without a full examination of the national planning policy context within which the planning decision should be taken.

The justification that has been put forward is essentially that the proposal will provide a significant amount of renewable energy. This is not in dispute. The proposal has a greater output of energy than most power stations in England and is currently the largest solar farm proposal to be made. However its very size requires a decision to put within a much wider policy context than smaller scales of development.

The broad principles involved in the various National Planning Statements on energy infrastructure include a range of guidance will be key tests at this examination. For example, it is understood that 38% of the proposed Botley West Solar Farm is on the Best and Most Versatile (BMV) agricultural land (Grades 1–3a), which is not supportive of the the government's desire for land to develop to solar farms to be mainly on brownfield, industrial and low and medium grade agricultural land (DESNZ Solar Strategy 2023 page 37).

I however also want to draw your attention to two specific matters that arise specifically because of its scale and have a bearing on the tests of the appropriateness of the development.

The scale of the development to serve about a third of million households clearly serves an area greater than even Oxford City Region (c. 160 K). So any consideration of alternatives needs to be across a much wider area. The technical supporting documents makes assertions generally about the area of search but does not demonstrate this with any detail. For example, it states that the search was in terms of the requirements for a 250 MW farm (para. 5.4.1.10) but no demonstration of the alternative locations that could meet this scale of energy output nor why they could not meet their own criteria, namely:

- avoiding adverse environmental impacts that arise from the scale proposed;

- suitable for constructing a solar farm with available grid connection;
- being commercially attractive.

On this basis it is difficult to accept that there are no other acceptable alternatives within the broad area of search that the applicants state was undertaken, namely, the south east of England (5.4.1.8), otherwise the government's targets for solar renewable could not be met.

In addition, ministerial decisions have stated in determining applications that, by definition, solar farms are inappropriate development in the Green Belt requiring to be justified through exceptional over-riding circumstances. It is therefore important to note that the applicant's consideration of planning and environmental constraints of the proposal makes no reference to Green Belt considerations (para 5.4.1.19).

National Policy is very clear that Green Belt policy has to be taken into account and applied. Contrary to the assertions of the applicant there is no presumption in favour of large scale solar farm development in the Green Belt. On the contrary, EN1 (overarching Policy Statement) states there is a general presumption against inappropriate development in the Green Belt, and in effect the special case has to be made.

Although Green Belt policy has now to be interpreted within the additional consideration of greybelt land in the Greenbelt, the overall principles remain in the context of Botley West.

In making a decision on a NSIP proposal the Secretary of State has also to take into account environmental, social and economic benefits and adverse impacts, at national as well as regional and local levels. These not only include matters identified in the NPS, but also any other matters which the Secretary of State thinks are both important and relevant to the planning decision.

In this context I consider that there are three areas of national policies that apply to the location of the proposed solar farm and need to be taken into account in reaching its decision. These are:

- The integrity of the Oxford Greenbelt
- The national development goals for the Oxford City region
- The relationship to the wider national land use framework

Firstly, in terms of the integrity of the Oxford Greenbelt, it needs to be recognised that much of the area of the proposed Solar Farm has been evaluated in the past (e.g. LUC Report) and recognised as making an

important contribution to the purposes of the greenbelt (e.g. sites YA3 and CU1).

This is particularly significant since the proposal lies within the inner area of greenbelt which contributes most to the purposes, especially checking the unrestricted sprawl of built-up areas and preventing neighbouring towns merging into one another. This is reflected in recent decisions in planning appeals.

However the impact of the proposal on the Oxfordshire Green Belt goes well beyond site specific issues. The scale of development that is proposed is so great that the land that will be developed as a Solar Farm will no longer contribute to the Green Belt because it will re-define the landscape character in terms of their openness and their permanence (para 142 NPPF). In any subsequent review of the greenbelt boundaries I can see a strong argument for much of it to be deleted from the Green Belt.

It also would leave open for this area of the Green Belt, in part at least to become classified over time as developed land with implications in terms of a presumption in favour of development for other uses of the land.

The second area of concern is in relationship to the national development goals for the Oxford city region. In this context there is a need for the proposal to be assessed in terms of its impact on the government's priority, and I quote, *"to unleash the potential of the Oxford-Cambridge Growth Corridor that will add up to £78 billion to the UK economy according to industry experts, catalysing growth of UK science and technology."*

The Oxford Growth Commission was launched in January this year – and the Chair of the Commission, Neale Coleman, was only appointed very recently. Its aims are, and I quote, *'to prioritise and create a coherent narrative for the delivery of infrastructure, housing and employment across the city and surrounding area – i.e. a spatial strategy. Key to this is developing a partnership approach to drive meaningful growth across one of the UK's economic powerhouses.'*

This new national policy will have major implications for the wider Oxford area. The Oxford-Cambridge Corridor consists of three city regions which are to plan for an additional 1.5 million homes. A significant part of this will be within the Oxford City Region which by definition, and from

experience, will create a need for further urban expansion with all its associated demands.

This includes not only the demand for housing land, infrastructure, and urban services but also the need for a strong greenspace framework and quality landscape setting, which is currently provided by the Green Belt in the Botley West area.

It is too soon to know in detail what the planning implications of this policy are. However from experience in preparing strategic plans it is considered that the granting of consent for a development of the scale of the solar farm on the urban fringe of the City at this stage will limit the options for delivering the Government's policy for growth and therefore could prejudice the implementation of this wider national planning priority.

The third area of concern is in relation to the Government's stated goal for a more integrated approach to infrastructure decisions. Here I [quote](#), in *"launching a national conversation about land use, to minimise trade-offs and optimise the use of our land. At a national and local scale, we need better spatial planning. For too long, a haphazard approach has been taken to the way infrastructure is sited, or homes are built. In order to grow the economy and meet the challenges of future decades, we need to use our data to make better decisions. This will also bring better lives - supporting homes to be built where there is access to water and clean air, and major infrastructure built where it least disrupts nature."*

Given the scale and long-term nature and impacts of what is being proposed, consideration should be given to the potential implications of the new national land use framework for a more integrated joined up approach to the use of land to underpin the Government's Plan for Change, supporting economic growth through building 1.5 million homes and delivering critical infrastructure, securing clean power, protecting farmland and restoring the natural world.

(<https://www.gov.uk/government/news/government-launches-national-conversation-on-landuse>)

In this context although the Botley West proposal is being justified in its contribution to overall renewable target of the Government, it needs to be put in the context of the recognised need by the government for a more integrated approach to the management of land nationally, including the scale of current and potential proposals to come forward

nationally and the need to test whether national energy needs can be met in more sustainable locations.

Therefore my concern is that the sheer scale of the proposal means that a decision on the application not only needs to address local and site specific issues but needs to be taken within the wider national policy context which goes well beyond simply helping meet the UK's net-zero target, and which will be directly and materially affected by the proposal.