

Tuesday 1<sup>st</sup> July 2025

**Calum Miller MP for Bicester and Woodstock:  
submission to Planning Inspectorate re Botley West Solar**

Summary:

This is a major scheme that would have a very significant impact on residents and communities in my constituency. We need successful renewable projects in our area that combine low-carbon energy production with suitable community benefit and engagement. I believe there is a more appropriate scheme that could be proposed by the Applicants, but I regret that the scale of their current proposal is not appropriate and does material harm.

- We need to transition our energy supply towards low or zero carbon sources, including solar power.
- Where solar schemes are proposed that bring national benefits in supporting this goal, they should be clear on how they will mitigate any impact on the local environment and community.
- Botley West is a huge scheme, and its proposers have not done enough to engage with the concerns of local residents, communities and councils around scale.
- I strongly support the representation made by WODC on 9 June and draw particular attention to the concerns shared with me by my constituents around landscape and visual impact, flood risk and impact on the historic environment.
- I do not support the proposed scheme at its current scale. The developers should be pressed to justify the 840MW output target and whether any given output could be achieved with less land by using more efficient panels.
- The level of community benefit proposed (£625/ MW) remains far too low. It should be revised to a level more consistent with the examples set by South Hill Community Energy (£10,000/ MW) and the Scottish Government (£5,000/ MW), taking account of the consultation by the UK Government launched on 21 May.
- Inspectors should satisfy themselves over the financial structure of the scheme in order to have confidence that the undertakings given by the developer and by Blenheim Estates to the local community can be delivered and/ or enforced over the lifetime of the project.

## **The need for an increased supply of renewable energy**

I support efforts to transition our energy supply to renewables. Climate change is real and is starting to have effects in our area: for example, in the flash flooding experienced in September 2024. We have a duty to future generations to steward the environment and reducing the harmful effects of fossil-fuelled energy production is part of that obligation. Solar power is a key element in that change and I am supportive of schemes that achieve the right balance between the national goal of decarbonising our energy supply and the impact that any major scheme inevitably has on a local community and the local environment. I have also supported measures, first introduced by my Liberal Democrat colleague, Max Wilkinson MP, for all new homes to have solar panels by default. I am glad the Government has recently adopted Max's proposal.

There is a balance to be struck between measures to protect our environment by reducing global warming and the direct environmental impact that specific measures may have. The risk to local wildlife, biodiversity and ecosystems must be taken seriously by developers as large solar schemes are set to be in place for decades and will have long term impacts.

## **Size of proposed solar plant**

From the start, the developers of Botley West have been clear that this is a huge scheme. With a targeted output capacity of 840MW, it would be one of the largest consented schemes in England.

In my view, this scale demands that the scheme developers show a strong appreciation for the impact the proposed solar plant will have on the local landscape, local environment and local communities. I regret that this has not been obvious in the process to this point. The developers have made only minor adjustments to their original proposal in response to non-statutory consultation.

Here I endorse the submission made on 9 June by West Oxfordshire District Council (WODC). I hope that inspectors will pay close attention to the objections raised by WODC, as the local planning authority with the largest area of land affected by the scheme. Organisations, individuals and local authorities within my constituency have raised with me valid concerns under each of the topics highlighted by WODC. I wish to highlight three points in this submission.

### Landscape and Visual Impact

There are several communities for whom the scheme represents a material loss of amenity. Under the current proposals, solar panels will come close to their village boundaries and be highly visible from properties within the village. The scheme will fundamentally alter the environment for these communities. Within my constituency, these are particularly Bladon, Cassington, Church Hanborough and Wootton. The Applicants argue that the impact on landscape is minimal and can be screened. Yet map 4 articulates how the topology of the area means that large areas will be visible. I urge inspectors to pay close attention to these factors – and this map – on their site visit and to consider whether the claims of the Applicants are valid.

### Flood risk

The flooding in September 2024 significantly affected this area and I draw inspectors' attention to the concerns of WODC around hydrology and flood risk. As they state, this is a particular issue for the village of Cassington. I know residents there are deeply concerned that the mitigation measures will not be sufficient – in the context of predicted increases in

extreme weather conditions over the next 45 years (the proposed duration of the scheme) – to avoid an increased flood risk to homes and businesses in that area.

### Historic Environment

The scheme will be very largely situated on land owned by the Blenheim Estate. The setting of this UNESCO World Heritage Site (WHS) is key. Blenheim set a ten-year plan in 2017 that committed it to maintaining and safeguarding this status. That document specifically ruled out situating solar panels in the broader setting of the Palace site. UNESCO guidance [2015 WHS Operational Guidelines (para 13)] is clear that the “broader setting” of a site is “related to its role in supporting the Outstanding Universal Value” of a WHS. I am genuinely perplexed as to how the Trustees have arrived at the view that a solar scheme of this scale so proximate to that precious setting was appropriate. As the WODC submission makes clear, there are other heritage assets in the area covered by the proposed scheme and constituents have raised with me their concern that the scheme does not adequately take these into consideration.

***For these reasons, I believe that the current scheme takes up too large an area and should not be consented as proposed.***

### **Pre-commitment to 840MW**

The proposers of the scheme mount the argument that they must deliver 840MW as this is what they promised National Grid in return for the commitment to provide a new connection to the grid. The first point is that this was presumptuous of the developers. They should have sought to design the right scheme for this setting and sought consent to that, rather than designing the whole project to meet an arbitrary output target that they are unwilling to be flexible about.

I would therefore urge inspectors to ask two questions of the Applicants:

1. What is the minimum output you could install under the terms of your contract with National Grid and still be able to obtain a connection to the grid?
2. Taking account of the pace of advances in solar panel efficiency, what output capacity do you estimate you would have by the date of first energy production if solar panels were placed on the whole area proposed in the scheme?

I strongly suspect that inspectors will discover that (1) there is flexibility in the output required by National Grid; and (2) the developers have proposed more capacity than they require even to meet the 840MW output target. If so, there is no requirement for the scheme to be at its current scale.

### **Community Benefit**

The other area where the response of the Applicant has been disappointing is in the discussions with local community representatives around community benefit. I appreciate this is not a planning consideration but, since the developers have highlighted it in their submission, I believe it is appropriate for inspectors to pay attention to it, as you did at your initial hearing.

From an initial, derisory, offer of £50,000 per year, I note that the developer is now proposing to make a payment of £525,000 per year. If that is a ten-fold increase, it would take a further increase of similar scale to match the community benefit contribution proposed by the Scottish Government for onshore renewables: at £5000 per MW of installed capacity, that would amount to £4.2m for an 840MW scheme. In the hearing, the Applicant's lawyer argued that it is not fair to compare a solar plant with onshore wind. However, the Government's

Working Paper proposes to treat all technologies the same when it comes to the level of developer contribution from renewables.

I have repeatedly raised this issue in the House of Commons and spoken with the Energy Minister about it. I am pleased that the Government has indicated an intention to set a mandatory level of community benefit contribution for new renewable energy schemes in England. The Working Paper published by the Government on 21 May consults on illustrative examples of either £1000 per MW capacity at £1 per MW/h output – which is around one fifth of the level adopted in Scotland. I anticipate that the level will change before a final figure is adopted and I hope it will be closer to the Scottish model than that proposed by the UK Government.

What is, in any case, clear is that developers should be taking this likely direction of government policy into consideration even in those schemes that are consented before any new regulation takes effect. Prior to that point, the Government indicates that developer contributions will be voluntary. I think the developers of Botley West should expect to pay an amount of at least the consulted upon government figure (i.e. £840,000 for an 840MW plant) than the offer they have made so far. Inspectors will have noted the evidence provided by Liz Reason of South Hill Community Energy Trust on 13 May that the Trust is providing ten-times this figure - £10,000 per MW – as community benefit each year.

I would therefore urge inspectors to ask the Applicants:

3. What is the basis for selecting £625/MW as the level of annual community benefit from this scheme? Why is a scheme of this scale unable to offer a more generous contribution to the local community, in line with the examples set by the Scottish Government or, more locally, by South Hill Community Energy?

### **Financial structure and viability**

While financial viability is not, strictly, a planning consideration, I trust that inspectors will spend some time considering the structure of the scheme to satisfy themselves that the undertakings made by the Applicant will be delivered and upheld through the construction of the project and its operation over 40 years.

The heart of the project appears to be a long lease of land by Blenheim Estate to PVDP/ Solar Five Ltd. Given this appears to be a civil contract, it is surprising that the Applicant has applied for Compulsory Purchase Order powers over the whole area of the proposed site. This may be precautionary, but – were it to be enacted – it would put at risk the undertakings given to the local community by Blenheim Estates that they will remain the long-term stewards of the land and, given this, that they have a strong interest in the management of the project.

PVDP/ SolarFive Ltd are under no obligation to retain the site for the full 40 years of operation. They may choose to sell the project if consented either prior to or after construction. Under these circumstances, it would be critical to ensure that the undertakings given by the Applicant (for example on good management, ecology and community benefit) were enforceable with any subsequent owner.

I would therefore urge inspectors to ask two further questions of the Applicants:

4. Why have the Applicants sought compulsory purchase powers for the whole site when the landowner (Blenheim Estates) has said it is supportive of the project AND given undertakings to the local community that it will steward the land across the lifetime of the project?
5. What form of binding commitments do the Applicants propose that would give confidence to the communities affected by the scheme that the scheme operators (whether the Applicants or any further party to whom the scheme is sold) will uphold the undertakings made during the application and consultation process?

This planning proposal covers a vast area of valuable countryside. If built as currently proposed, this solar plant would have a significant impact on residents in dozens of communities in my constituency, on the environment and on the landscape. I fully support successful renewable projects in our area that combine low-carbon energy production with suitable community benefit and engagement. I believe there is a more appropriate scheme that could be proposed by the Applicants. If the Applicants engaged more with the feedback from the community, and made some alterations at this stage to their proposals, to reduce the number of panels and address the concerns I and others have raised, I believe they could mitigate much of the most serious impact locally whilst still producing significant renewable energy output and a financially viable scheme. However, I regret that the scale of their current proposal is not appropriate and does material harm.