

Summary of Rationale for Submission to PINs: Botley West DCO and Existing Renewable Energy Initiatives - The Balance of Harm.

Balancing Regional Renewable Energy Progress with National Infrastructure Decisions

This submission is made to ensure that the Examining Authority gains a thorough understanding of the extensive, sustainable renewable energy initiatives already established within the areas affected by the Botley West DCO proposal.

During the public hearing, the Chief Planning Inspector, Mr Wallis, asked Mr Wynne to elaborate on how granting the Botley West DCO would impact the DESNZ supported project he represents. Mr Wynne responded unequivocally: “it would squash it.” This response underscores the gravity of decision-making around the “Balance of Harm,” as well as considerations of viable alternatives.

The attached document, “Next Zero© Oxfordshire”, provided by Mr Wynne for the Glyme Valley CIC, details the principal projects currently underway in the region (see page 5). It not only outlines these core initiatives but also encapsulates the policies, financing mechanisms, and the network of national agencies involved - many as longstanding partners. These projects have been designed and implemented in harmony with existing government Net Zero strategies and have been shaped by the strategic planning of all five Local and District Authorities impacted by the Botley West proposal.

A central tenet of these ongoing initiatives is to foster regional economic resilience through renewable energy projects that are both community-driven and enduring - intended to thrive well beyond the 40-year span typically associated with such proposals. The concept of ‘Next Zero’ illustrates a commitment to long-term, sustainable energy, economic stability, and biodiversity that collectively underpin Oxfordshire’s future.

It is critical for the Examining Authority to appreciate the scope and significance of these initiatives in assessing the balance of harm. Should the DCO be approved, it would bring about the cessation of these important regional endeavours - many of which are recipients of central and local government funding. With further consolidation of local authority powers anticipated from 2028, substantial public investment is already committed. Overriding these with a single-use scheme like Botley West would not only undermine regional resilience but also represent a considerable waste of public funds.

This submission champions the continuation and flourishing of these vital green alternatives, which are tailored to Oxfordshire’s particular landscape and resources. It is in the public interest that their potential is not curtailed. The harm resulting from approval of the DCO must therefore be weighed with full awareness of what would be lost.

NEXTZERO[©]

OXFORDSHIRE



Glyme Valley CIC

01 August 2025



Parks and Valleys Regional Park Oxfordshire

Protected Landscapes - National Parks, UNESCO World Heritage Sites, UNESCO Biosphere Reserves and Geoparks, National Trust assets - are controlled by strict rules around the protection of sites. On the other hand, a 'regional park designation' in England doesn't provide these protections. Instead, it relies on local stakeholders setting out their own policies/mechanisms that will apply within the area. In this way, the Parks and Valleys Regional Park Oxfordshire works with a flexible Nextzero framework for local government, civic groups, communities, commerce and the Oxfordshire Innovation Ecosystem to co-create and co-own better green place-based infrastructure based on a genuinely Just Transition that is not only low-carbon, but also place-based, equitable, thriving and Resilient for generations to come. As a place-based solution, the Regional Park also responds to the 'whole-of-society' approach as framed in the UK Resilience Action Plan July 2025



Glyme Valley REM (Regional Energy Market) Oxfordshire

Net Zero, however well-intentioned, is perpetuating a "burn now, pay later" approach to decarbonization. Short-term fixes for utility-scale renewable models cannot come at the cost of long-term solutions. Such short-term fixes terminate place-based solutions and 'whole-of-society' resilience as framed by the UK Resilience Action Plan July 2025. The Glyme Valley REM (Regional Energy Market) in Oxfordshire is a proposed regional energy infrastructure project, with DESNZ (department for Energy and Net Zero) and CEF (Community Energy Fund), situated within the Parks and Valleys Regional Park, Oxfordshire. The regional community model emerges from Next Zero to co-create a resilient regional energy system in a genuinely Just Transition that is not only low-carbon, but also place-based, equitable, thriving and Resilient for generations

1. Overview

Nationally and internationally, we continue to seek damage-limitation solutions to the fallout from the global Covid-19 crisis and the increasing impacts of global climate change. And however well-intentioned, our siloed solutions are tying us up in knots into a perfect storm of our own making where policies are proving to be doing more harm than good :

a) Net Zero. The concept of Net Zero is proving to be doomed to fail because, in practice, it perpetuates a reductionist belief in technological salvation. It is a gamble on policy promises of future solutions, a “burn now, pay later” approach, as CO₂ emissions continue to soar. (2024?)

b) Biodiversity Loss. Equally far from reality is the perception of the management of biodiversity loss. For example, nature is faring worse within the borders of even UK protected landscapes than outside (Report 2024).

c) Inequity The road to net zero is paved with inequality due to inequalities in the way energy is currently distributed. Despite how global energy demand could be reduced to sustainable levels, under the current net zero paradigm, there is no guarantee that everyone would have access.

Clearly, a new narrative is inescapable. This next iteration beyond Net Zero can be defined as, quite simply, Next Zero

2. Three Horizons

The Future Generations Commissioner for Wales and the Scottish government have already adopted the Three Horizons Framework. According to the Three Horizons model (Sharp 2004), the current Net Zero model belongs firmly in 'Horizon 1' - where quick fixes and siloed technological solutions are linked to existing societal systems, assets and practices. 'Sustainability' belongs to Horizon 1. But neither Horizon 1 nor sustainability are working. A more radical, visionary paradigm is required. Unshackled from Horizon 1, Horizon 3 fosters a culture of long-term thinking, systems innovation, and collective responsibility to work alongside, not sustainability, but resilience. Horizon 2 (H2) bridges between present H1 and future H3, a transitional space of innovation.

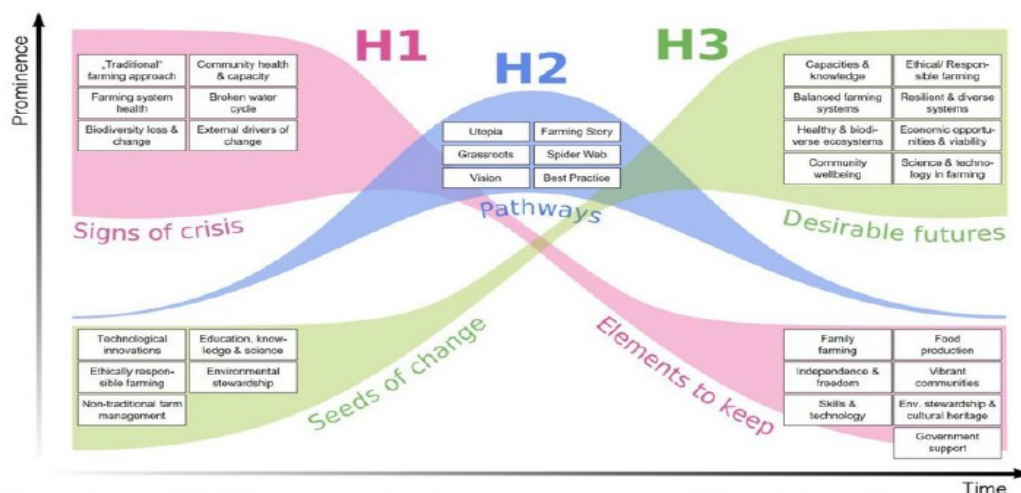


Fig 1 : Horizon 3 Model adopted by the Future Generations Commissioner for Wales and the Scottish government.

The Three Horizons Framework enables a blueprint for transcending the current net-zero biodiversity loss inequity impasse, embracing the interconnectedness of our challenges. It enables co-creating a future that is not only low-carbon, but also just, resilient, and thriving for generations to come. PWC research (Accelerating Net Zero Delivery 2022) found that Place-based solutions to net zero can significantly contribute to achieving net-zero targets, potentially generating up to four times more value than a one size fits all approach. Mobilizing green investment from the private sector thus generates higher benefits for lower costs, precisely part of the drive for Devolution.

The UK Resilience Action Plan July 2025, National Security Strategy 2025, and UK Resilience Framework 2023 all pivot resilience to a 'whole-of-society' strategy where regional, placed-based solutions are central to the UK's ability to withstand and recover from climate & pandemic crises and shocks across sectors such as infrastructure, public health, public sector : <https://www.gov.uk/government/publications/uk-government-resilience-action-plan>

3. Next Zero

With this in mind, Oxfordshire needs a new narrative. It's Third Horizon must strike a balance between decarbonising its ancient rural economy against the Oxfordshire Local Industrial Strategy whose ambition is to be a top three global innovation knowledge ecosystem by 2040. All whilst simultaneously adopting ESG frameworks such as OXLAEP 2026, Local Plans 2040 and Oxfordshire Devolution 2028. The Oxfordshire Innovation Ecosystem asserts "*...the need to be proactive in telling Oxfordshire's innovation story – how rich, varied and excellent this ecosystem is...that change is good for the city and region such as equality, diversity, inclusivity and the relationship to, and codependence with, the foundational economy, generating social value. There is a need to speak with 'one voice' with clear messaging and shared assets.*" Oxfordshire's rural-knowledge economy differs markedly from UK regions such as Greater Manchester, West Midlands etc whose H3 visions are founded on their industrial heritage. Achieving Net Zero remains an urgent goal for all regions but Oxfordshire's rural-knowledge economy requires a very different H3 vision.

Protected Landscapes. In English rural regions such as Oxfordshire, 'Protected Landscapes' (National Landscapes, UNESCO World heritage Sites, UNESCO Biosphere Reserves and Geoparks) are promoted as leading the transition toward climate solutions, carbon neutrality, social equity and nature recovery. However, despite their designation, they are consistently failing (Campaign for National Parks : National Parks Health Check Report 2024). Key problems include : Water, Management, Land Ownership, Biodiversity, Habitat Loss, Financing, Pollution. These existing protected landscapes are locked into rigid siloed frameworks, controlled by strict rules around the protection of sites. On the other hand, a 'regional park' designation does not provide any such protections/constraints. Instead, they rely on local stakeholders setting out their own policies/mechanisms that will apply within the prescribed boundary.

The Parks and Valleys Regional Park is an Oxfordshire pilot to show-case place-based regional economies' statutory uptake of incoming local governmental objectives re: economic growth, environmental targets, health, equity, Nature Recovery and Resilience

4. The Parks and Valleys Regional Park, Oxfordshire

The new Parks and Valleys Regional Park lies within the buffer zone of the Blenheim World Heritage Site with the Cotswold National Landscape adjacent. The hilly landscape is a veritable palimpsest, dotted with a mosaic of Bronze Age barrows, Roman ruins, medieval villages, churches and country estates all espaliered along the Glyme River, sharing the Glyme Valley watershed. The Regional Park is 50 sq miles of agricultural/woodland/urban fringe landscape sitting ten miles to the North of Oxford City, mostly in the WODC District. The area is characterized by the WODC 1998 Landscape assessment as 'Eastern Parks and Valleys', hence our adoption of the name for the Regional Park.

The topography is a natural insulator from urban sprawl, but this landscape is increasingly being pressured by urban development and increasing recreational pressures – eg the current PVDP BW Solar Park proposal, numerous housing developments, water reservoirs, commercial car museums etc. The two protected landscapes already in the area (Blenheim WHS and Cotswolds National Landscape) are largely insulated against development but they are not fit for their intended conservation purpose. The regional park concept is not about preventing development but about creating an over-arching regional flexible protected landscape that integrates social value, biodiversity loss and net zero in alignment with regional place-based empowerment. The Park therefore provides a large-scale living laboratory for place-based solutions focussed on Horizon 3.

The current statutory planning lens is situated squarely within the current net zero paradigm. PINS is one such example of how the lens is deployed in central planning reviews for NSIP projects, for example with Botley West Solar Park. However, this lens is entirely at variance with the incoming Next Zero lens that contains the multidimensional ESG frameworks that are increasingly obligatory for decision-making in local government.

The balance of harm in the Planning lens cannot be deemed compatible with the balance of harm required to be assessed through the much broader and social value-based Next Zero lens.

5. Parks and Valleys Regional Park Projects

The Park has a number of place-based initiatives launched by Glyme Valley CIC over the past five years. Each project includes place-based partnerships: commercial, community, educational, local investors. They're adopting innovative mechanisms such as Blended Finance Models and the PBII Place-based Impact Investing model that target social, environmental and economic impacts within specific geographic areas. The Regional Park aligns with the UK Environment Act 2021's broader protective spatial strategy to create and finance large-scale socio-ecological corridors across landscapes. The Regional Park model, that we are developing with the National Trust, is designed to align with the Oxfordshire Green Prospectus 2025.

1. RIPL© Resilient Inclusive Place-based Landscapes. 2023

- **Purpose :** Proposal for a regional economic model in Oxfordshire based on : a) watershed b) federated medieval community clusters and c) doughnut economics. Focus is on federating 30 000 residents in the Parks and Valleys region.
- **Partner Organizations :** OCC DEFRA OFCC (Land-use Framework) One Planet, DEAL

2. REM© Regional Energy Market. 2023

- **Purpose :** Regional Community owned renewable infrastructure model - at regional scale. Clusters of communities across the region to trade electricity between each other. Focus is on energy security
- **Partner Organizations :** OCC GSEZCH DESNZ Thrive REs, Locogen, Ridge, Rambolle
- **Link :** www.gsenetzerohub.org.uk

3. Quaking Grass© Ancient Meadow Recovery. 2021

- **Purpose :** Ancient Meadow Recovery with Cotswolds National Landscape. 97% of ancient Water Meadows have disappeared and Shire horses are on the IUCN Red List. We have five sites in the Glyme Valley region where we are killing two birds with one stone : conserving local ancient meadows (incl with 'Quaking Grass!') and meadow maintenance with Shire Horses, as one package at the scale of the region. Focus on the IUCN Local Red List.
- **Partner Organizations :** CNL, PFMP, Oxford University SYNXH OCC, Witney College

4. VTN Village Travel Network. 2021

- **Purpose :** The Village Travel Network is an association of local Parishes committed to the promotion of non-vehicular connectivity between communities around the Blenheim Palace UNESCO WHS. It seeks better connectivity by active travel means (cycling, walking, riding) and the better management of road traffic to facilitate and encourage more active travel.
- **Partner Organizations :** WODC OCC DESNZ
- **Link :** [\[REDACTED\]](#)

5. Know Your Place© Regional Distributed Tourism. 2023

- **Purpose :** Place-based distributed Tourism and heritage in the Regional Park area. Heritage, Nature
- , Dark Skies, Health, Well-being, Transport, History, Civic engagement. Twinning Glyme Valley with Sister Regional Parks in Western Eurasia : Chiani Valley, Coa Valley, Val di Noto, Bekaa Valley, Omo Valley
- **Partner Organizations :** VisitEngland, Visit Cotswolds, OCC, WODC, UNESCO, DCMS

6. HUSK© Heritage and Unique Seed Ko-operative. 2024

- **Purpose :** Regional network of heritage seed vaults in Country estates' Walled Gardens (Rousham, Chastleton, Sezincote, Ditchley, Cornbury, Bruern, Sezincote, Goose-Eye, FarmEd). Focus is on food security, resilience, heritage, health and well-being.
- **Partner Organizations :** OCC MSBP (Millenium Seed Bank Partnership), Garden Organic WODC Space Hive Oxford Botanic Garden, Batsford.