



Botley West Solar Farm

NPPF Compliance Table with updated local policy context

Other Documents

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Prepared by:

RPS
101 Park Drive
Milton Park, Abingdon,
Oxfordshire, OX14 4RY
United Kingdom

Prepared for:

Photovolt Development Partners GmbH,
on behalf of SolarFive Ltd.

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Glossary

Term	Meaning
The Applicant	SolarFive Ltd
The Project	The Botley West Solar Farm (Botley West) Project

Abbreviations

Abbreviation	Meaning
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
NGET	National Grid Electricity Transmission
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
PEIR	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
PV	Photovoltaic
PVDP	Photovoltaic Development Partners GmbH
AGD	Above Ground Development
VSC	Very Special Circumstances

Units

[Include all units used in the document in the table below. The units included in the table below are examples – delete if they are not relevant to this document and add those used.]

Unit	Description
%	Percentage
km ²	Square kilometres
kWh	Kilowatt hour
MW	Megawatt
MWe	Megawatt electrical
MWh	Megawatt hour

1 Introduction

1.1 Purpose of this Report

1.1.1 As set out in the Applicant's response to second written questions [**REP4-037**], the Applicant committed to re-visit its Planning Supporting Statement [**REP1-012**] and submit a NPPF compliance table with an updated local policy context. This report meets that commitment.

1.1.2 The purpose of this report is to provide the following:

- The inclusion of additional local planning policies that are considered relevant to the Project, and which were drawn to the Applicants' attention by the Oxfordshire Host Authorities' (OHAs) during the Examination period (although the Applicant maintains that the National Policy Statements remain the primary policy and this principle is understood and agreed with by the OHAs);
- The revised NPPF paragraphs (i.e. the paragraphs of relevance whose number has changed or where the text has changed), following the update to the NPPF in December 2024, post-DCO submission; and
- An addendum to Appendix 8 of the Planning Supporting Statement [**REP1-012**] in light of the amendments to the NPPF in December 2024 and the updated Planning Practice Guidance (PPG) published in February 2025.

Appendix 1

West Oxfordshire Policy – Compliance Tables – Additional Relevant Policies

Table 1: West Oxfordshire Local Plan 2031 additional relevant planning policies

Policy	Brief Description	Comment
Policy OS1 – Presumption in Favour of Sustainable Development	Reflects the Presumption in Favour of Sustainable Development in Paragraph 11 of the NPPF.	Solar farms are generally considered to be sustainable forms of development. They produce renewable energy, help cut down harmful GHG emissions, will help generate employment and significantly enhance the landscape and biodiversity of the area. The Project therefore benefits from the presumption in favour this policy provides.
Policy OS3 – Prudent use of Natural Resources	Requires all development proposals to show consideration to the efficient and prudent use and management of natural resources, including, <i>inter alia</i> , making the most efficient use of land whilst having regard to the character of the locality, minimising impact on soil resource, minimising risk of flooding and minimising waste.	<p>The Project utilises light and the sun's energy to produce renewable energy which itself is a prudent use of natural resources. The Applicant has demonstrated that it has applied the mitigation hierarchy to minimise or avoid harmful effects, including minimising impact upon soil resource, avoiding flood zones and minimising waste. The Project is in substantial compliance with this policy.</p> <p>The Project has evolved in a way that positively balances the impacts associated with development at scale in countryside locations, with the very significant benefits the Project will bring. Importantly, the Project is regarded by Government as being a CNP, providing as it does a vital contribution to the delivery of the Governments solar targets ; making a positive contribution to its Net Zero obligations and its BNG goals, and also by helping to positively address the Climate Change Emergencies that the host authorities have declared.</p>
Policy OS4 – High Quality Design	Expects new development to respect the historic, architectural and landscape character of the locality, contribute to local distinctiveness and, where possible, enhance the character and quality of the surrounding including, <i>inter alia</i> , demonstrating resilience to future climate change and enhancing local green infrastructure and biodiversity.	<p>In the Applicant's response to other Deadline 3 submissions it produced an updated Outline Layout and Design Principles document [REP4-032] providing more detail on the design parameters and how that are secured. The Applicant also submitted an updated Project Mitigation and commitments Schedule. Also attached to that submission is a consolidation of the Applicant Approach to Design Note which also deals with the latest Government design guidance issued in April 2025 – Annex 4 of [EN010147/APP/14.2].</p> <p>Throughout the Examination, successful discussions have been had with Historic England to ensure the historic and architectural context are protected. These will be captured in the Statement of Common Ground with Historic England, of which an updated version will be submitted at Deadline 7.</p> <p>To the extent this policy applies to solar farms, the Project complies.</p>
Policy T1 – Sustainable Transport	Seeks for new developments that have significant transport implications to include a Transport Assessment and a Travel Plan.	The Applicant has environmentally assessed the environmental effects of traffic associated with the Project. It has also produced an Outline Construction Traffic Management Plan as part of its Outline Code of Construction Practice [CR2-047] . The Project is in substantial accordance with this policy.
Policy T2 – Highway Improvement Schemes	Requires all development to demonstrate safe access and an acceptable degree of impact on the local highway network and that development proposals which are likely to generate significant amounts of traffic shall be supported by a Transport Assessment and Travel Plan.	The Applicant has environmentally assessed the environmental effects of traffic associated with the Project. It has also produced an Outline Construction Traffic Management Plan as part of its Outline Code of Construction Practice [CR2-047] . The Project is in substantial accordance with this policy.
Policy T3 – Public Transport Walking and Cycling	Expects all development to be located and designed to maximise opportunities for walking, cycling and the use of public transport.	<p>Chapter 12 of the ES, Traffic and Transport, fully considers opportunities for walking, cycling and the use of public transport [REP5-016]. Section 12.6 of this chapter sets out the available public transport and the existing pedestrian and cycling infrastructure within the traffic and transport study area, highlighting the sustainable transport options for construction staff.</p> <p>Travel plan measures have been included within an oCTMP [EN010147/APP/7.6.1] secured as part of the Code of Construction Practice (CoCP) requirement within the draft DCO. The Project is in substantial accordance with this policy.</p>
Policy EH5 – Sport, recreation and children's play	Expects new development to not result in the loss of open space, sports and recreational buildings and land and where this is unavoidable, for an assessment to demonstrate a surplus to existing requirements or the need/benefits of the alternative land use clearly outweigh the loss, and equivalent replacement is made. Where appropriate, developments are expected to provide or contribute towards provision of improvements to open space, sports and recreational buildings and land.	This policy is geared towards protection of existing usable areas of public open space, recreational areas, not farmland on which the majority of the development is sited. Notwithstanding, the Project contributes towards new areas of recreational paths and cycleways and is therefore not in conflict with this policy.

Policy	Brief Description	Comment
Policy EH10 – Conservation Areas	Development within or affecting the setting of a Conservation Area will be permitted where it is demonstrated that the development conserves or enhances the special interest, character, appearance and setting.	Where possible, conserving and enhancing of heritage assets, including their settings, has been achieved through the design and layout of the Project. No part of the Project falls within any Conservation area, nor, in the Applicant's opinion, adversely affects its setting.

Table 2: Eynsham Neighbourhood Development Plan additional relevant policies

Policy	Description	Comment
Policy ENP7 – Sustainable Transport	New development should have safe access to local transport networks by car and public transport.	There will be no employees on site once operational and so this policy does not apply. During construction, Section 12.6 of Chapter 12 [REP5-016] sets out the available public transport and the existing pedestrian and cycling infrastructure within the traffic and transport study area, highlighting the sustainable transport options for construction staff. The movement of construction vehicles has been considered to make best use of the existing network to ensure efficient movement on the network. Travel plan measures have been included within an oCTMP [CR2-045 & CR2-047] secured as part of the Code of Construction Practice (CoCP) requirement within the draft DCO.
Policy ENP10 – Building a strong sustainable economy	New developments should support the existing and potential scale of local employment in the Eynsham area.	The Project has an outline Skills, Supply Chain & Employment Plan designed to support employment in the local area e.g. section 3.2 [REP4-020] .
Policy ENP13 – Trees	As far as practical, development should preserve or enhance the quality and quantity of tree cover of sites affected by development. Where possible, existing health mature trees should be preserved, particularly as part of hedgerows and trees lost or in poor condition should be replaced.	The outline Landscape and Ecology Management Plan [CR2-051] delivers this policy goal.
Policy ENP14 – Sustainable Growth	Seeks for development to protect the character and community of Eynsham with development required to, <i>inter alia</i> , sustain the village character, enhance the significance of designated and non-designated heritage assets and avoid harm to them and their settings, protect the wider village setting (inc the Oxford Green Belt), have regard to the impact on the natural environment and ensure the rural setting of the village is retained.	The Project delivers sustainable growth by delivering a large renewable energy project, but whilst the project protects and enhances designated assets and the natural environment, there will be a change to parts of the character of the area. On balance, having regard to national energy requirements and need, the Applicant considers that the Project is in substantial accordance with this policy

Table 3: Cassington Neighbourhood Development Plan additional relevant policies

Policy	Description	Comment
Policy CAS2 – Active Travel	Development proposals that affect the Active and Sustainable Travel Network should sustain and where practicable enhance the multi-functionality of the network with support not to be given to proposals that will harm the functioning or connectivity of the Network.	The project will not harm the functioning or connectivity of the travel network. Section 12.6 of the Traffic and Transport chapter of the ES [REP5-016] sets out the available public transport and the existing pedestrian and cycling infrastructure within the traffic and transport study area. These highlight the sustainable transport options within the traffic and transport study area for construction staff. Movement by sustainable means will be facilitated and encouraged. Travel plan measures have been included within an oCTMP [EN010147/APP/7.6.1] secured as part of the CoCP requirement within the DCO.
Policy CAS7 – Local services and community facilities	Development proposals that will affect the use of identified community facilities or significantly undermine their quality will be resisted unless suitable alternative provision is made. Proposals which change the use of part of a community, open space, sport or recreation facility which is surplus will be resisted unless it can be evidenced that the proposal will not undermine the overall viability and importance of the community, open space, sport or recreation facility in question.	The Project will not adversely effect community facilities. The Project will increase the number and location of recreational paths and cycleways. The Project is not in conflict with this policy.

Appendix 2

Cherwell District Council Policy Compliance Table – Additional Relevant Policies

Table 4: Cherwell Local Plan 2011-2021 (Part 1) additional relevant planning policies and additional relevant ‘saved’ policies of the Cherwell Local Plan 1996

Policy	Description	Comment
Cherwell Local Plan 2011-2021 (Part 1)		
Policy PSD1 – Presumption in Favour of Sustainable Development	Reflects the Presumption in Favour of Sustainable Development in Paragraph 11 of the NPPF.	Solar farms are generally considered to be sustainable forms of development. They produce renewable energy, help cut down harmful GHG emissions, will help generate employment and significantly enhance the landscape and biodiversity of the area. The Project should benefit from the presumption in favour this policy provides.
Policy SLE4 – Improved Transport Connections	Where reasonable, seeks for development to facilitate the use of sustainable modes of transport, Development that is not suitable for the roads that serve it and have severe traffic impacts will not be supported.	<p>The project will not harm the functioning or connectivity of the travel network.</p> <p>Section 12.6 of the Traffic and Transport chapter of the ES [REP5-016] sets out the available public transport and the existing pedestrian and cycling infrastructure within the traffic and transport study area. These highlight the sustainable transport options within the traffic and transport study area for construction staff. Movement by sustainable means will be facilitated and encouraged.</p> <p>Travel plan measures have been included within an oCTMP [EN010147/APP/7.6.1] secured as part of the CoCP requirement within the DCO.</p>
Policy ESD 2 – Energy Hierarchy and Allowable Solutions	Promotes an energy hierarchy which reduces energy use by the use of sustainable design and construction measures, supplying energy efficiently and prioritizing decentralised energy supply, making use of renewable energy and making use of allowable solutions.	<p>This policy seeks to achieve carbon emissions reductions by seeking to: reduce energy use; supplying energy efficiently; making use of renewable energy, and making use of ‘allowable solutions’ (measures which secure carbon savings off-site).</p> <p>In principle the Applicants Project achieves these policy aims.</p>
Policy ESD 3 – Sustainable Construction	Seeks for development proposals to be encouraged to reflect high quality design and high environmental standards, demonstrating sustainable construction methods including, <i>inter alia</i> , reducing waste and pollution and making use of sustainable drainage methods.	<p>Environmental standards in construction are captured in the Applicant’s management plans, in particular in the Applicants Code of Construction Practice [CR2-046 & 047], itself containing the Outline Site Resources and Waste Management Plan. Drainage strategies are dealt with in the Applicants Chapter on Hydrology and Flood Risk [REP3-012], and Appendix 10.2 [REP4-018].</p> <p>The Applicant’s Project complies with this policy.</p>
Policy ESD 6 – Sustainable Flood Risk Management	Seeks for the management and reduction of flood risk throughout the District by using the sequential approach to development, for surface water to be managed effectively on site and for flood risk to not be increased elsewhere as a result of development.	Flood risk management strategies are dealt with in the Applicants Chapter on Hydrology and Flood Risk [REP3-012] . The Applicant’s Project complies with this policy.
Policy ESD 7 – Sustainable Drainage Systems	All developments are required to use SuDS for surface water run-off management. In considering SuDS, the need to protect ground water quality must be taken into account, especially where infiltration techniques are proposed.	<p>Drainage strategies are dealt with in the Applicants Chapter on Hydrology and Flood Risk [REP3-012], and Appendix 10.2 [REP4-018]. All development will be required to use sustainable drainage systems (SuDS) for the management of surface water run-off. Where site specific Flood Risk Assessments are required in association with development proposals, they should be used to determine how SuDS can be used on particular sites and to design appropriate systems.</p> <p>The Applicant’s Project complies with this policy.</p>
Policy ESD 8 – Water Resources	Seeks for the protection of water quality, ensuring adequate water resources and the promotion of sustainability in water use. Development will only be permitted where adequate water resources exist, or can be provided without detriment to existing use. Proposals which adversely affect water quality will not be supported.	<p>Water quality and protection is dealt with in the Applicants Chapter on Hydrology and Flood Risk [REP3-012], and Appendix 10.1 [REP3-020]. A Conceptual Drainage Strategy is secured via Requirement 9 of the draft DCO CR2-009.</p> <p>The Applicant’s Project complies with this policy.</p>
Policy ESD 15 – The Character of the Built and Historic Environment	Expects new development to complement and enhance the character of its context through sensitive siting, layout and high quality design and to meet high design standards.	The Applicant has produced an updated Outline Layout and Design Principles document [REP4-032] providing more detail on the design parameters and how that is secured. The Applicant has also submitted an updated Project Mitigation Measures and Commitments Schedule [REP4-014] , and a consolidation of the Applicant Approach to Design Note which also deals with the latest Government design guidance issued in April 2025 – Annex 4 of [EN010147/APP/14.2] . The Applicant considers that its Project substantially accords with this policy.
‘Saved’ policies of the Cherwell Local Plan 1996		
Policy C15 – Prevention of Coalescence of Settlements	Development will be resisted in areas of open land which are important in distinguishing settlements.	This policy notes that each town or village has its own separate identity, and it is important that development on areas of open land between them is restricted to prevent their coalescence. This is acknowledged and the

Policy	Description	Comment
		<p>Applicant has endeavoured to site its development so that the actual or perceived gaps between settlements are retained. Clearly, however, renewable energy development like solar farms have to be sited on agricultural or 'open' land if they are to take place at all. The need for this development at scale is urgent and a balance has to be struck between delivering on national energy priorities and following through on policies like C15 in the CLP 1996. Policy references to need for deployment at scale can be found at NPS EN-1 paras. 4.2.2 to 4.2.4. Also see Chapter 5, Alternatives, para 5.5.7 [APP-042]. Other references to scale are found in Table 5.1, page 13 and 17.</p> <p>On its face, taken in isolation, the Project is in conflict with this local plan policy. However, when balanced against national energy policy, and the approach the Applicant has taken to design and layout, the Applicant considers the overall planning balance favours allowing the development to proceed. It is also temporary and so ultimately the local plan policy goals will be protected.</p>
Policy C33 – Protection of Important Gaps of Undeveloped Land	The retention of any undeveloped gap of land which is important in preserving the character of a loose-knit settlement structure, or in maintaining the setting of a listing building or preserving a view/feature of recognised amenity or historical value will be sought.	See response to Policy C15 above.

Appendix 3

VoWH District Council Compliance Table – Additional Relevant Policies

Table 5: Additional relevant planning policies of the VoWH Local Plan 2031 Part 1 and 2

Policy	Description	Comment
Core Policy 1 – Presumption in Favour of Sustainable Development	Reflects the Presumption in Favour of Sustainable Development in Paragraph 11 of the NPPF.	Solar farms are generally considered to be sustainable forms of development. They produce renewable energy, help cut down harmful GHG emissions, will help generate employment and significantly enhance the landscape and biodiversity of the area. The Project should benefit from the presumption in favour this policy provides.
Core Policy 7 – Providing Supporting Infrastructure and Services	Requires developments to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements and delivered either directly and/or through appropriate financial contributions.	The Project is self-sustaining in terms of on-site infrastructure requirements (it does not rely upon external support), and the Applicant is also willing in principle to support maintenance of nearby PRoW (funding amount currently in discussion with the OHA's). There is therefore no conflict with this policy.
Core Policy 37 – Design and Local Distinctiveness	Seeks to ensure all development achieves high quality design standards.	The Applicant has produced an updated Outline Layout and Design Principles document [REP4-032] providing more detail on the design parameters and how that is secured. The Applicant has also submitted an updated Project Mitigation Measures and Commitments Schedule [REP4-014] , and a consolidation of the Applicant Approach to Design Note which also deals with the latest Government design guidance issued in April 2025 – Annex 4 of [EN010147/APP/14.2] . The Applicant considers that its Project substantially accords with this policy.
Core Policy 40 – Sustainable design and construction	Sets out the requirement for new development to incorporate climate change adaption measures to ensure resilience to climate change.	The development is sustainable as it will produce renewable energy and avoids areas liable to flood. It is inherently resilient to climate change seeking to transition the UK to a low carbon economy. The Project accords with this policy.
Local Plan 2031 Part 2		
Development Policy 16 – Access	Sets out the key requirements for suitable and safe access within development proposals	Traffic management measures for construction vehicles to allow for efficient deliveries and access are set out in the oCTMP secured as part of the CoCP ([CR2-045 and 047]) requirement within the draft DCO. All construction accesses are existing gated field accesses which have been designed to accommodate the movement of HGVs as set out within Appendix 12.8: Accesses and highway drawings [APP-206 to 209] and Site Construction Compound Accesses [APP-226] .
Development Policy 17 – Transport Assessments and Travel Plans	Provides additional guidance on the information required within Transport Assessments or Statements and Travel Plans	Chapter 12 of the ES [REP5-016] contains an integrated TA throughout to consider the potential impacts and effects on the operation of the highway network arising from the Project. Travel plan measures have been included within an oCTMP secured as part of the Code of Construction Practice (CoCP) [CR2-045 and 047] requirement within the draft DCO. National Highways and Oxfordshire County Council (OCC) as the relevant highway authorities have been consulted on the potential impacts and mitigation relevant to the SRN and the LRN as set out in Section 12.3 of this chapter.
Development Policy 28 – Waste Collection and Recycling	Sets out measures to ensure the provision of adequate facilities for the sorting, storage and collection of waste for development proposals.	To the extent this policy applies, waste and resources is addressed in Chapter 18 of the ES [APP-055] , as well as in the Outline Code of Construction Practice [CR2-045 and 047] , and in the Decommissioning Plan [REP4-030] .
Development Policy 38 – Listed Buildings	Sets out the Council's measures for assessing development proposals that affect a Listed Building and/or its setting.	The Applicant has applied appropriate measures in consultation with the County archaeologist and NE to assess setting.

Table 6: Cumnor Neighbourhood Development Plan additional relevant policies

Policy	Description	Comment
Policy DBC 1 – General Design Principles in the Parish	Seeks for development proposals to have regard to the VoWH Design Guide and the essential character of the local area, defined by the Cumnor Parish Character Assessment. Also seeks for the general design principles listed in the policy to be taken into account within Development Proposals.	The Applicant has produced an updated Outline Layout and Design Principles document [REP4-032] securing more detail on the design parameters. The Applicant also submits an updated Project Mitigation and commitments Schedule. Also submitted is a consolidation of the Applicant Approach to Design Note which also deals with the latest Government design guidance issued in April 2025 – Annex 4 of [EN010147/APP/14.2] . It has also submitted a document addressing the WODC Design Guide – Annex 1 of [EN010147/APP/14.2] . Having considered all local policy, there is nothing in the local design guides that is not already in national policy and has not already been addressed by the process the Applicant has gone through (as set out in the OLDP [REP4-032] and the Applicants Approach to Design Note – Annex 4 of [EN010147/APP/14.2]). The Applicant considers it is in substantial compliance with this policy.

Appendix 4

NPPF Compliance Table

Table 7: NPPF December 2024 paragraphs (where a change in paragraph number has occurred or a change to the paragraph text has taken place)

Section/Paragraph Number	Description	Comment
Section 11 – Making effective use of land		
Paragraph 125	Identifies how planning policies and decisions should encourage multiple benefits from both urban and rural land and take opportunities to achieve net environmental gains such as developments that, amongst other things, would enable new habitat creation.	The Project has evolved in a way that positively balances the impacts associated with development at scale in countryside locations, with the very significant benefits the Project will bring. Importantly, the Project is regarded by Government as being a CNP, providing as it does a vital contribution to the delivery of the Governments solar targets ; making a positive contribution to its Net Zero obligations and its BNG goals, and also by helping to positively address the Climate Change Emergencies that the host authorities have declared.
Section 13 – Protecting Green Belt land		
Paragraph 153	Highlights that local planning authorities, when considering a planning application, should ensure that “substantial weight is given to any harm to the Green Belt.” As of December 2024, the paragraph also states “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances” And continues “Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”	The VSC case which supports the project being allowed in this location for a temporary period is set out in the Planning Supporting Statement (PSS) [REP1-012]. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Paragraph 154	Details that where development in the Green Belt is not considered inappropriate development, which range from, inter alia, agricultural buildings, provision for outdoor sport and creation to limiting infilling in villages. As of December 2024, the paragraph now also includes the forms of development which are also not considered to be inappropriate development in the Green Belt, providing they preserve its openness and do not conflict with the purposes of including land within the Green Belt, including engineering operations.	The Applicant considers that the provision of electrical cables and related works (see Appendix 5 of this document and Appendix 8 of the PSS for details) comprise engineering operations directly associated with the Project is not inappropriate development in Green Belt terms. The wider VSC case which supports the project being allowed in this location for a temporary period is set out in the PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Paragraph 160	In specific relation to renewable energy developments; “When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”	The Applicant's VSC case supports the project being allowed in this location. Details of the Green Belt assessment are set out in Appendix 5 of this document and Appendix 8 of the PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Section 14 – Meeting the challenge of climate change, flooding and coastal change		
Paragraph 160	As of December 2024, the paragraph now states “The planning system should support the transition to net zero by 2050 and take full account of all climate impacts ... It should help to: shapes places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; ... and support renewable and low carbon energy and associated infrastructure.”	Climate Change effects are set out within Chapter 14 of the ES. Significant beneficial effects from the Botley West Solar Farm are predicted. The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.
Paragraph 165	Seeks to help increase the supply of renewable and low carbon energy and heat through the plan-making process via positive strategies which maximise the potential for suitable development, future re-powering and life extension, whilst ensuring adverse impacts are addressed, including cumulative landscape and visual impacts.	Whilst the host authorities have not expressly allocated land for renewable energy development, all have policies which support in principle renewable energy development. The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.

Appendix 5: Green Belt Update – Addendum to Appendix 8 of the Planning Supporting Statement

1.1.3 This statement should be read as an addendum to the Planning Supporting Statement Appendix 8, submitted at Deadline 1 [REP1-012], and alongside the Applicant's response to question 1 in the Rule 17 letter [PD-017] which has also been submitted at Deadline 6.

1.1.4 At the time of submission of the Botley West Solar Farm for Examination, the latest version of the NPPF was September 2024. The NPPF has been subsequently updated in December 2024. The Applicant has addressed the minor amendments to the NPPF in relation to Botley West in Q1.1.1 in the Applicants' Response to the ExA's First Written Questions (ExQ1) [REP2-025].

1.1.5 In relation to the Green Belt, the main changes included the introduction of the Golden Rules and the Grey Belt. Subsequently, the Planning Practice Guidance (PPG) on Green Belts was also updated on 27th February 2025. The PPG now clarifies that when considering Green Belt purpose A, B and D, it is *towns*, NOT *villages* that should be considered when assessing impact upon Green Belts See extract below:

Purpose A – to check the unrestricted sprawl of large built up areas

This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.

Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages

Purpose D – to preserve the setting and special character of historic towns

This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against the purpose.

1.1.6 The effect of this PPG is set out below and replaces section 8.4.4 to 8.4.27 of Appendix 8.

1.1.7 The updated policy compliance, therefore, relates in particular to the first two Green Belt Purposes. These are update below, but has also included with the other purposes for completeness.

Purpose 1

1.1.8 Green Belt purpose 1 is to 'check the unrestricted sprawl of large built up areas'. However, the PPG (Feb 2025), makes clear that whilst this purpose relates to the sprawl of large built up areas, villages should *not* be considered large built up areas.

- 1.1.9 The Project by being located on agricultural land, means that it falls between towns – Woodstock, Witney, Oxford (City) and Abingdon. During the operational life of the Project, it does mean that one has introduced ‘development’ between these settlements. However, there is considerable distances between the towns affected and the Project site, and as such this reduces the perception of ‘sprawl’ than would otherwise be the case if these towns immediately abutted the Project. Also, this along with many other solar schemes, is not ‘built-up’ in the way development in the Green Belt usually means. It does not comprise of ‘buildings’ that would otherwise occupy significantly more ‘volume’, and it is not permanent, unlike virtually all other development types – solar development is reversible if the Applicant makes it so. Here the Applicant has chosen to make the development temporary and reversible.
- 1.1.10 In the Applicants view, therefore, whilst they are introducing development that lies between towns, that development is not ‘unrestricted’ in policy terms. It is development that is ‘restricted’.
- 1.1.11 It is ‘restricted’ in design and location – it is restricted in height to a low level, hugging the contours of the existing landscape, and laid out in a way with significant buffers between sensitive receptors and with significant landscaping protection and enhancement measures. In the Applicants experience, these attributes or characteristics of the development are much more positive and beneficial than would normally be offered or insisted upon if it were commercial or residential development, where planning policy normally drives development towards higher densities with significantly more urbanising influences (roads, other hard surfacing, lighting etc) than that associated with solar development.
- 1.1.12 Also, as it temporary and reversible, the Project prevents other forms of permanent built development eroding the openness of the Green Belt and that would otherwise permanently undermine its purposes. Not only does the Project provide that particular safeguard, but during its operational, and beyond, it has overwhelming benefits.
- 1.1.13 Lastly, the operational life is planned to be approximately 37.5 years. That is accepted as a long time. But infrastructure planning in the UK is not about short term expediency. One has to plan for the long term in the public interest. In that context, whilst the temporary period is long in duration, it is nonetheless, temporary in planning policy terms with limited harm to Green Belt purpose 1.

Purpose 2

- 1.1.14 Green Belt purpose 2 is to prevent neighbouring towns merging into one another. PPG (Feb 2025), makes clear that this purpose relates to towns, *not* villages.
- 1.1.15 As discussed earlier, the Project, by virtue of being located on agricultural land, falls between the towns of Woodstock in the north, Witney to the west, Oxford to the east and Abingdon to the south, and that the operation of the Project will introduce ‘development’ between settlements. However, there is considerable distances between the

towns affected and the Project site, and as such this reduces the perception of town merging into one another than would otherwise be the case if these towns immediately abutted the Project site. Also, this along with many other solar schemes, is not 'built-up' in the way development in the Green Belt usually means. It does not comprise 'buildings' that occupy significantly more 'volume', and it is not permanent, unlike virtually all other development types – solar development is reversible. Here the Applicant has chosen to make the development temporary and reversible. To that extent therefore, any conflict with purpose 2 is temporary and reversible.

- 1.1.16 The introduction of low lying energy solar infrastructure, itself following the contours of the land, keeping away from the relatively high ground, respecting the existing landscape structure which itself will be enhanced by further extensive landscaping proposals, means that the visually, one will not see or likely to perceive any conflict with Green Belt purpose 2 at any point between the nearest towns. Where the Project is present within the Green Belt, there are significant separation distances such that this issue of the merging of towns is minimal resulting in very limited, if any conflict with purpose 2 of the Green Belt.
- 1.1.17 Again, as the Project is temporary and reversible, the Project prevents other forms of permanent built development which would otherwise cause the merging of settlements in this part of the Green Belt.
- 1.1.18 In the Applicants opinion, therefore, conflict with Green Belt purpose 2 is limited.

Purpose 3

- 1.1.19 Green Belt purpose 3 is to assist in safeguarding the countryside from encroachment.
- 1.1.20 The Applicant accepts there is conflict with this purpose. Whilst the re-use of previously developed land can make a positive contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, the Government recognises (NPS EN-1 paragraph 5.11.3), that it may not be possible for many forms of energy infrastructure. Ground mounted solar falls into that category.
- 1.1.21 Given the significant shortfall that persists in respect of the amount of solar development that is needed to meet the Governments objectives of a five fold increase to 70GW by 2035 (see Solar DCO Capacity Calculation Chapter 5, Alternatives, Annex A **[EN010147/APP/6.4]**, it will inevitably require development in countryside locations and in some cases in Green Belt.
- 1.1.22 The Applicant has set out in Chapter 5 of the ES why the Project is in this location and of the scale that it is. Those reasons are not repeated here.
- 1.1.23 Notwithstanding, given the nature of ground mounted solar development, and the urgent need for it, conflict with purpose 3 of the Green Belt is in the Applicant view unavoidable, but temporary and reversible.

Purpose 4

- 1.1.24 Green Belt purpose 4 is to preserve the setting and special character of historic towns.
- 1.1.25 A comprehensive assessment of the likely significant environmental effects of the development is set out in Chapter 21 of the ES **[EN010147/APP/6.3]**. No significant adverse effects are predicted.
- 1.1.26 The evolution and refinement of the Project design and layout has minimised or avoided adverse effects on heritage assets. The Applicant has also undertaken an assessment of the impact upon The Blenheim Palace World Heritage Site (WHS), in accordance with relevant methodology. This study concludes that there is either no impact or a minor negative impact upon the WHS – see ES Appendix 7.4 **[EN010147/APP/6.3]**. In planning terms, the Applicant also concludes that in the absence of likely significant environmental effects, there is no ‘substantial harm’ caused either, in the context of the planning policy tests set out at paragraph 5.9.26 to 5.9.34 in NPS EN-1 (and elsewhere).
- 1.1.27 The Applicant concludes therefore that despite the scale and location of the Project, there is no conflict with Green Belt purpose 4.

Purpose 5

- 1.1.28 Green Belt purpose 5 is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.1.29 Given the nature of ground mounted solar development requiring large areas of land in a countryside location, and to be near to a suitable grid connection, this has resulted in a Project which is largely, but not wholly, within the Green Belt. Even this scale of development is too small to meet the Government target of a five fold increase to 70GW by 2035. Roof top solar, whilst supported by the Applicant, is not the solution to address the urgent need for renewable energy in the UK.
- 1.1.30 Directing ground mounted solar to previously developed land and/or urban locations, will not solve the climate crisis declared by the host planning authorities nor meaningfully address the urgent need to this type of infrastructure. Planning Policy whilst discouraging the use of Green Belt does not rule such development out, not least because of the critical national priority status this form of renewable energy benefits from meaning that the presumption is that as a starting point the VSC test has been met.
- 1.1.31 The Applicant believes there is a conflict with Green Belt purpose 5, but given the above, it considers the conflict is justified by these circumstances.
- 1.1.32 In addition to the above update, the Applicant had also previously undertook an analysis of the gap between the villages of Bladon and Begbroke, being considered the narrowest gap in the Green Belt that was considered by the Applicant to be potentially vulnerable in terms of undermining gaps between these settlements and the effect upon openness. However, since the publication of this PPG, this analysis is redundant as it was considering villages, not towns, as the new PPG a

makes clear. The Applicants analysis of this gap, therefore, is now not relevant in that context and neither is Figure GB2 in Appendix 8.

- 1.1.33 Overall, the balance of considerations and overall conclusions in relation to the Green Belt have not changed from the Planning Supporting Statement Appendix 8 conclusions, as submitted at Deadline 1 **[REP1-012]**, however this addendum provides an update on the Applicant's position since the publication of the NPPF in December 2024, and the PPG in February 2025.