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To: Botley West Solar Farm
Subject: Submission for Deadline 7

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CLOSING STATEMENT

I have closely followed the DCO application process for Botley West Solar Farm, read the documentation and attended the hearings. I conclude that the Applicant is relying heavily on significant, indeed overwhelming weight being given in its favour by the Secretary of State solely because it is a renewable energy project.

The NPPF strongly supports solar energy development and requires significant weight to be given to the benefits of renewable energy generation but it does not give free rein to developers to build any solar project anywhere they wish. It aims to balance renewable energy goals with other planning factors, for example:

- Protection of historic heritage: the NPPF gives 'great weight' to the conservation of assets of exceptional interest such as Grade 1 listed buildings and World Heritage Sites, recognising that the significance of such assets derives not only from their physical presence but also their setting.
- Protection of BMV agricultural land: it prioritises previously developed or non-agricultural land for large-scale solar farms and favours poorer quality agricultural land if greenfield sites are used.
- Protection of Green Belt: it considers projects in the Green Belt to be inappropriate unless 'very special circumstances' exist.
- Avoiding harm: the mitigation hierarchy prioritises avoidance of harm as the initial focus of site selection before considering mitigation or compensation.

The Applicant seems to have decided there was no need to invest very much in trying to address other important planning factors. For example:

- They initially dismissed any idea that the development would harm the Blenheim Palace World Heritage Site. Some way into the Examination, they were obliged to remove solar infrastructure from land near Bladon following advice from Historic England. They continue to dismiss the notion that the setting of such an asset comprises more than visible impacts although this has been clearly explained by ICOMOS International and Blenheim recognised it in its Management Review, 2017. Similarly the Applicant has failed to fully acknowledge harm to the settings of the Grade 1 listed churches in Church Hanborough and Cassington and many other important listed buildings located next to the proposed site.
- The Applicant and the majority landowner Blenheim Estates have both consistently maintained that the site comprises only poor quality agricultural land. Some way into the Examination, ALC surveys

commissioned by the Applicant showed the site in fact comprises 42% BMV land. It is obvious that little effort has been made to identify previously developed or non-agricultural land or non BMV land as an alternative site for the development.

- Over 70% of the proposed site is in Oxford's Green Belt. The Applicant claims that the need for renewable energy constitutes the 'very special circumstances' to justify such inappropriate development of Green Belt. The siting of a solar farm is much more flexible than some other forms of nationally significant infrastructure, but again the Applicant has resisted finding an alternative site that would avoid harming Oxford's Green Belt.
- The aim throughout the Botley West design process seems to have been to maximise the size of the development with scant regard for the principles of the mitigation hierarchy. The Applicant did not properly explore options to avoid or reduce impacts before resorting to mitigation. Many questions remain about the effectiveness of the mitigation measures that have been proposed, particularly concerning visual impacts.
- At the time of writing a week before the end of the Examination, big gaps remain in the information the Applicant was required to provide or was asked to provide by the ExA. If these gaps persist at the end of the Examination, it is hard to see how the Planning Inspectorate or the Secretary of State will be able to reach an evidence-based judgement.

In giving great weight to the benefits of renewable energy, I do not believe the Government's intention was to grant DCOs to any and all applications for renewable energy projects, regardless of their merit. Nonetheless, the Applicant has designed a scheme that does not observe the letter or spirit of the NPPF but relies on the assumption that it will be given the go-ahead because simply it is a renewable energy project. This is an abuse of the planning process and makes a mockery of the NPPF.

The consequence of approving any and all renewable energy projects regardless of merit would be unfettered harm being done to country's historic, natural and social environment. Almost inevitably it would also undermine public confidence in the national planning process and in the Government's renewable energy and climate change policies.

Fortunately this damage can be avoided. The Applicant claims Botley West Solar Farm is needed for the country to achieve its renewable energy targets but Government data tells us this is not in fact the case. The Renewable Energy Planning Database shows considerably more operational solar in the development pipeline than is needed to meet national targets. The Government can assess each project application on its merits, reject those that do not meet national planning requirements, and still meet its renewable energy targets. The UK does not need Botley West Solar Farm.