



HOUSE OF COMMONS
LONDON SW1A 0AA

Monday 10th November 2025

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

I refer the Examining Authority to my submission dated 1st July 2025, in which I set out my core concerns and questions regarding this application. I have followed the proceedings of the Inquiry since that point and wish to use this opportunity to update my submission in light of the information that has – and has not – been provided in the meantime.

In summary:

- I do not believe the Applicant has successfully demonstrated the need for a project at the scale they propose and continue to believe it would do material harm.
- I still strongly support the core submission of the local planning authority, West Oxfordshire District Council, dated 9th June, in respect of appropriate reductions in scale.
- While there are national benefits to increasing renewable output, the Applicant has not demonstrated sufficient engagement with the mitigation hierarchy required under the Development Consent Order (DCO) process to demonstrate they have appropriately addressed local impacts.
- I do not believe that the level of community benefit of £525 per installed MW capacity is sufficient; there are higher rates being proposed for other, comparable schemes and, at minimum, the rate should be re-set to the government's adopted mandatory level when this is adopted.
- I continue to have concerns about the financial structure of the scheme and the capacity of the Applicant to fund and deliver the project – and community benefits – at this scale over the lifetime of the project.
- The repeated failure of the Applicant to engage constructively with the Examination Process is a cause of real concern. The Examining Authority must recommend and the Secretary of State must decide on a DCO solely according to evidence-based merit. Where the Applicant fails to respond to the Examiners' questions or provides insufficient information, it is hard to uphold that due process has been followed or that there is a basis for a reasonable decision.

Case for renewables

I restate my position as set out on 1st July. In summary: “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.”

Scale of project/ pre-commitment to 840MW

I restate my position as set out on 1st July. Precisely because Botley West would be the largest consented scheme in England, the Applicant has an obligation to make the case for this scale. I regret that they have not attempted to do so during the Inquiry. As the Examiners have noted, the Applicant has not provided compelling information as to why it is necessary to generate 840MW. National Energy System Operator (NESO) confirmed that the Applicant had successfully applied for a right to supply up to 840MW but that this was not an obligation. The case for 840MW is therefore entirely commercial and the merits for it should be weighed against the cost and effectiveness of any mitigation. To argue that reducing the scale of the project would make it unviable – as the Applicant has done – while failing to address the concerns raised across a range of material planning policy areas is not an argument for consenting the project; it is an argument that the project is not appropriate to the location.

Landscape and Visual Impact

My submission of 1st July set out my concerns about the material loss of amenity for a number of communities – and residents – within my constituency. I have followed the examination of this point and note that the Applicant had to be asked three times to produce a Residential Visual Amenity Assessment (RVAA), particularly focusing on the impact on the properties within 250m of the edge of the development, and that there remains dispute as to whether or not the 30 properties or groups of properties included in the RVAA represented all those in that proximity to the development. I am therefore concerned about the level of the Applicant’s engagement with this point and the robustness of the evidence submitted by the Applicant to the Inquiry.

A key consideration for the Examining Authority will be whether a Very Special Circumstances argument has been effectively made for the siting of this project on the Green Belt. The Applicant’s assertion is that the need to deliver solar power is sufficient to satisfy this. However, I do not believe that this is sufficient. I understand that approximately 60% of the proposed land to be used by Botley West is Green Belt. Yet there is no precedent for solar to be cited on Green Belt land. An analysis of all the solar projects consented by PINS shows that none to date have been. I do not believe the Applicant has made the case for an exception here on necessity grounds. Cassington

Parish Council points out that the quantity of solar power queued for approval is now 738GW when the Government's target for additional capacity is, at maximum, 75GW by 2050. Of the 738GW, approximately 442GW is large scale. I do not believe that, with this quantity of excess capacity seeking consent, there is a clear argument to break precedent and use Green Belt land for this project.

Flooding

I expressed in my submission of 1st July that I shared the concerns of WODC around flood risk and I cited the impact on Cassington in particular. I have therefore paid particular attention to the submission to the Inquiry from Cassington Parish Council. This pointed to material risks of surface water flooding and merited a more detailed investigation by the Applicant. They should have undertaken water penetration testing, and modelling for the effect of flood mitigation measures. I regret that the Applicant has not undertaken this work.

Historic Environment

On 1st July, I said I was "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". I am no less perplexed now. The ICOMOS Technical Review produced in August showed there would be a negative impact on the World Heritage Site from the scheme. Historic England indicated that ICOMOS would produce a further Technical Review before the end of the examination. I believe it would be helpful if the Examiners could indicate how interested parties will be able to comment on this to the Examiners since it will fall after the deadline for final submissions.

Community Benefit

My view remains as it was on 1st July: the offer of £525 per installed MW capacity from the developer is inadequate and should be increased to match commitments from other UK-based projects. I understand the Applicant has claimed this is the most generous offer in the UK. However, I have seen reporting that the developer Elements Green is proposing £1,200 per MW capacity installed for the 800MW scheme at Great North Road, Newark.

The Government has said in its Working Paper on Community Benefit that it will arrive at a new mandatory community benefit level. I strongly feel that the Applicant should commit to match that level. Given the long life of the project, it would be unfair on this community were the developer to lock-in a lower community benefit rate for the whole of that period. At least, the developer should commit to raise funding to the new mandatory level within five years of generation.

Financial structure and viability

As set out on 1st July, I remain concerned about the financial arrangements of this proposal. I have followed the Applicant's responses to questions relating to funding availability and funding. They indicate that the Applicant does not have the funds to build the scheme and that its funds are only sufficient to progress to decision stage. While I note EY express the view that the scheme should be able to attract debt and equity investors if consented, this leaves open whether this will indeed be the case and gives no assurance that the organisation responsible for building and maintaining the scheme will be the current Applicant, who may, instead, elect to sell the project after consent is granted. I am very surprised that Blenheim Palace, as the underlying landlord, is content to take this risk. It also continues to trouble me that the applicant has applied for the right to enforce compulsory purchase orders (CPOs) against Blenheim for the land. This seems to undermine the assertion that the project is mutually and jointly supported by the Applicant and the land owner. Further, I have seen evidence that any such transfer of ownership would be contrary to the Act of Parliament that granted the lands of the Blenheim Estate to the Duke of Marlborough; in that case, a CPO would not be legally enforceable.

Basis for decision

My submission of 1st July was made in good faith and in the expectation that the Applicant would fully engage with the process. There are a number of examples that this has not been the case. Perhaps the clearest expression comes in the Examining Authority's own Rule 17 letter of 14th October which states (para 10): "Please could you explain why you still consider your approach to be correct and everyone else's approach to simply be subjective opinions that would not materially affect your assessments?".

A reasonable decision cannot be taken by the Secretary of State on the Examining Authority's recommendation if there is no evidence-led basis for that. In light of the approach of the Applicant, I am concerned that any decision to grant a DCO could be unfounded.

Conclusion

I continue to support the deployment of solar as a renewable energy source to reduce our energy dependency on fossil fuels. Yet supporting solar in principle does not mean supporting all solar projects as proposed. They should be well-designed, appropriate in scale and design to their setting, they should have suitable mitigation strategies to counter negative local impacts (including appropriate community benefit) and they must be financially viable for the duration of the project. I regret that the current Botley West proposal does not meet those tests.

It is a particular concern to me that the Applicant does not appear to have engaged constructively with the Examination process. Indeed, the failure to respond adequately to the Examining Authority conveys a sense of arrogance about the decision. The

Applicant's approach and attitude suggests that they are assuming that national policy priorities will trump due process. If it were to be consented despite this, I believe that would be improper and, in the absence of the full information sought by the Examiners, irrational.

For the reasons set out above, the current proposal is materially flawed and should not be consented.