Planning Inspectorate Inquiry.

Application by Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd for an Order Granting Development Consent for the Botley West Solar Farm project.

Submission for Deadline 7, November 10th, 2025

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The local, regional and national need for Botley West Solar Farm

Summary

- This document looks at the regional renewable solar targets recommended in the Clean Power 2030 (CP2030) Report and complements previous comments on the over-supply of solar projects at both the local (Oxfordshire) and national (UK-wide) levels.
- The National Energy Systems Operator (NESO) is responsible for implementing the CP2030 proposals, taking account of the current distribution of supply and demand across both the nation-wide Transmission network and a series of regional Distribution networks. For electricity grid planning purposes, the Transmission network is divided into eleven different Regions, T1 to T11, the Distribution network into eight, D1 to D8.
- Large NSIP-scale solar projects, with potentially large outputs of electricity, expect to be connected to the Transmission network; smaller sub-NSIP projects to the Distribution network. Electricity from Transmission network projects is distributed across the country and is not confined to any local area; such projects therefore bring no immediate benefits to the communities where they occur. Smaller, sometimes community led and owned projects feed into the local Distribution network, with actual or likely benefits locally.
- NESO produced a CP2030 Action Plan Connections Reform Annex in December 2024 which envisaged that c. 75% of solar projects would be of the smaller, Distribution level type. Figures for NESO's expected capacities at both the Transmission and Distribution levels for 2030 are here compared with the current solar pipeline (in planning or already operational for smaller projects; in scoping or already operational for NSIP-scale ones).
- Five of the eight Distribution regions, Dx, already have sub-NSIP projects providing between 103% and 121% of the 2030 target figures; the remainder are providing between 46% and 89% of target figures.
- Seven of the eleven Transmission regions, Tx, already have NSIP-scale solar projects in the pipeline that will provide between 108% and 2,146% of the NESO target values; the remainder will provide between 0% and 86% of target figures. The great discrepancy between one region and another, from 0% to 2,146% of targets figures, indicates a solar planning system completely out of control.
- NSIP-scale solar proposals already account for almost 40% of all solar projects in the development pipeline, far in excess of NESO's original aim of only one quarter of all capacity coming from Transmission-connected projects.
- In April 2025 NESO produced a new edition of its Connections Reform Annex which effectively abolished any distinction between Transmission and Distribution connected projects, giving a single (Tx+Dx) target for each of its Transmission regions. It also avoided giving any 2030 (Tx+Dx) target, replacing it with a 2035 (Tx+Dx) target instead.
- Current capacities of (Tx + Dx) solar projects in the eleven Tx regions are between 38% and 161% of the 2035 target values, with a national figure of 89%, indicating a current shortfall, but only against that 10-year ahead target.
- Current capacities of (Tx+Dx) solar projects compared with a shorter-term, 2030 NESO target are between 58% and 265% of the 2030 figures, with a national figure of 131%. On the basis of a 5-year ahead target, UK solar is already above NESO capacity requirements although, once again, regional imbalances are pronounced.
- There are considerable dangers and increasing costs of exceeding targets, especially on the Transmission network that *inter-alia* will involve excessive curtailment payments to turn off systems that are over-producing. The greater the excess Transmission capacity, the greater those curtailment payments are likely to be, and therefore the higher the costs to consumers. Excess Transmission capacity also runs the risk that large electricity suppliers will simply switch off when the network is over-loaded, thus destabilising the entire national electricity supply, leading to blackouts of the sort that affected the Iberian Peninsula in 2025.
- I ask the Planning Inspectorate to consider the 'bigger picture' outlined here. The present and previous submissions show that at the local (Oxfordshire), regional and national levels, Botley West Solar Farm is surplus to requirements. Its construction could do nothing but increase costs while, at the same time, inflicting all the harm that others in the Inquiry have already pointed out.

The local, regional and national need for Botley West Solar Farm

Introduction

In my previous submissions[1] I pointed out that Oxfordshire at present has far more solar projects either in the development pipeline or already operational than are needed according to the Pathways to a Zero Carbon Oxfordshire Report[2] from the Environmental Change Unit in the University of Oxford, a document signed up to by all of the county's Local Authorities.

The nation as a whole also has far more solar capacity than the 45-47GW by 2030 figure in the Clean Power 2030 proposals[3].

There is therefore no urgency in developing yet more solar projects without a more detailed spatial plan identifying where any additional capacity is required. There are dangers of renewable overcapacity i) introducing system instability; ii) requiring more infrastructure than otherwise would be needed; and iii) increasing rather than decreasing the cost of electricity to the consumer, through both increased infrastructure and curtailment costs.

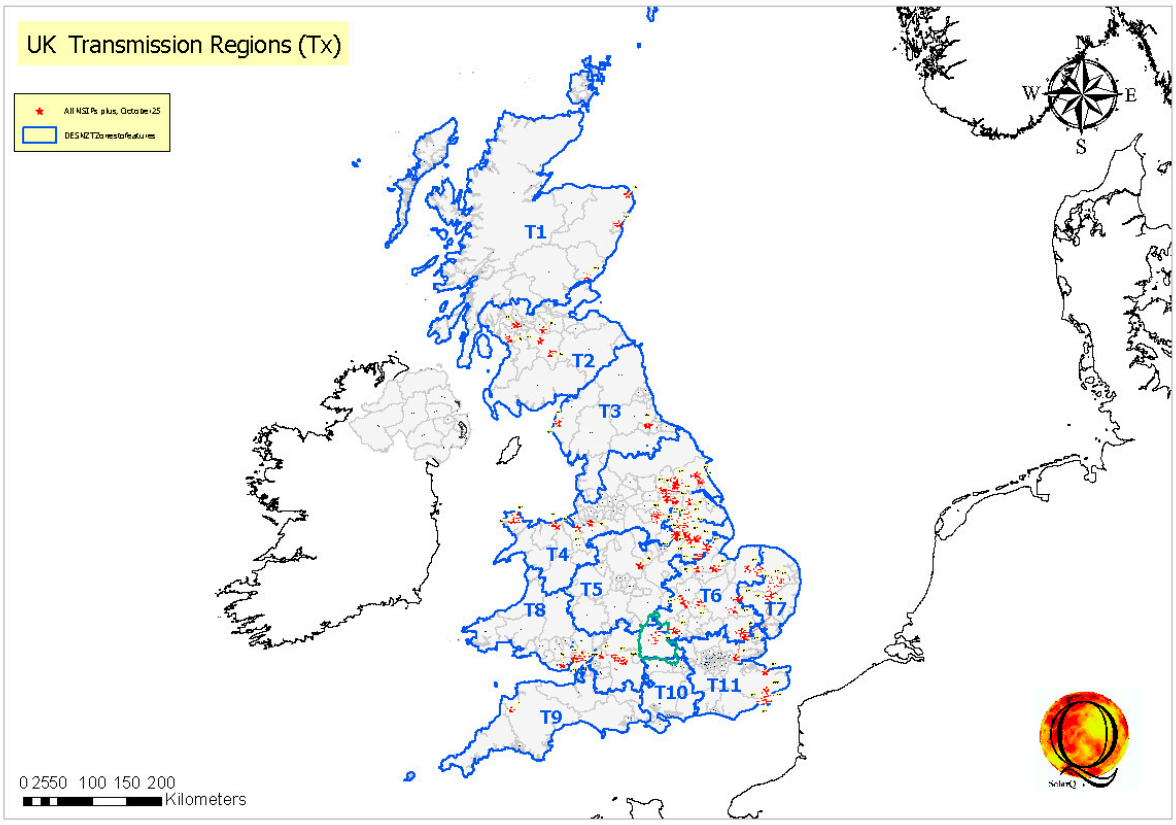
The present document looks at the plans of the National Energy Systems Operator (NESO) to implement the Clean Power 2030 ('CP2030') recommendations at a regional level and thus complements the local and national pictures outlined above. The conclusion from this analysis is that even at the sub-national, regional level there is no obvious need for Botley West.

Background

The UK electricity network operates at two main levels, Transmission and Distribution. The Transmission network is the backbone of the national grid, like the motorways of our transport system, and is designed to carry electricity long distances, from places of supply to those of demand. Historically, large generators, fuelled by coal, nuclear, oil or gas, were connected to the Transmission system, the eleven regions of which are shown in Map 1 below.

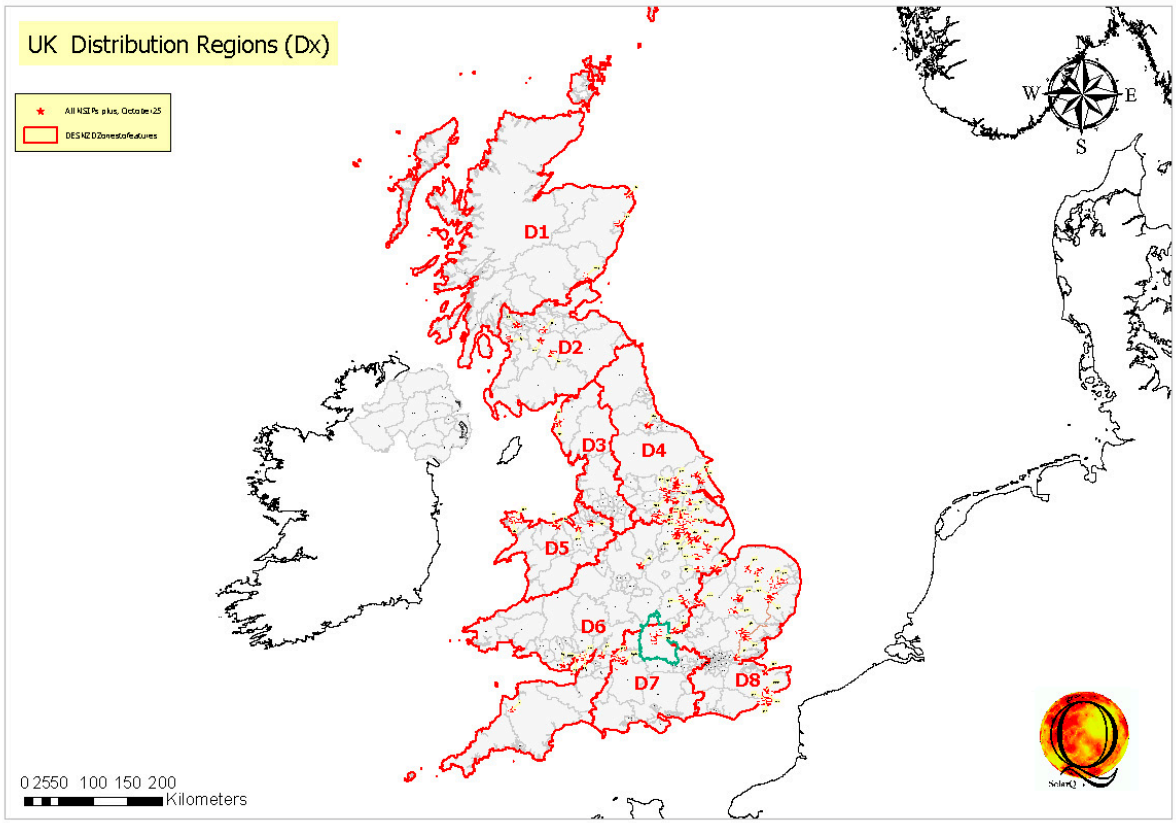
The Distribution network operates more locally, taking electricity from the Transmission system and delivering it the 'last mile' or so to consumers. The rather different eight regions of the Distribution system are shown in Map 2.

In the past, electricity flowed in only one direction, from generating station, through the Transmission Network, then the Distribution Network to the consumers. Heavy industries, needing large amounts of electricity, were and are directly connected to the Transmission Network.



Map 1 (above). UK Transmission network regions, T1 to T11, outlined in blue. Grey lines indicate county and Unitary Authority boundaries. Oxfordshire (outlined in green) is mostly in region T8. Red stars indicate NSIP-scale solar projects. A recently announced project at Holsworthy Beacon in N. Devon is indicated by a star but, as yet, there is no indication of its capacity (hence it does not feature in this analysis).

Map 2 (below). UK Distribution network regions, D1 to D8, outlined in red. Oxfordshire is mostly in region D7.



All the above must change with renewable energy in the mix, where generators may be connected to many different points in both the Transmission and Distribution systems, and where electricity may flow in either direction, both to the consumer and into the Transmission system for use elsewhere. Thus, renewable energy requires a complete 're-think' of how to generate and distribute electricity. Large-area solar projects originally of >50MW capacity (now >100MW) fall under the NSIP planning regime and are likely to seek connection directly to the Transmission network. Smaller, 'sub-NSIP' projects are likely to be connected to the Distribution network.

The task of organising all the changes required in our shift to renewable energy was given to the National Energy Systems Operator (NESO), which recommended to the Government the Transmission/Distribution mix to achieve Net Zero of the electrical supply by 2030, as envisaged in the Clean Power 2030 report. NESO's recommendations came in the form of the 'Clean Power 2030 Action Plan: Connection Annex' that appeared in two rather different editions, in December 2024[4] and April 2025[5].

NESO's first iteration of the Action Plan identified separate renewable energy targets for each of the Transmission (Tx) and Distribution (Dx) Regions. These targets for 2030 and 2035, given here in Annex A, were presumably determined on the basis of the existing network arrangements, the known flows of electricity across them and with a view to making electricity supply more 'local' to places of demand, thus reducing the stress on the Transmission network. The total national (Tx+Dx) solar target for 2030 in Annex A is 47,000MW, 77% of which was to be provided by the more local, Distribution networks (Dx) and only 23% by the national Transmission network; by 2035 the total target in Annex A is 69,400MW, 75.5% to be provided by Dx. The dominance of Distribution (Dx) in the national targets implies an expectation of numerous, smaller-scale solar projects rather than large-area, NSIP-scale projects directly connected to the Transmission network, Tx.

Oxfordshire is in Transmission Region T8 and in the very differently-shaped Distribution Region D7 (maps 1 and 2). It is therefore difficult to determine how much Oxfordshire might be expected to contribute to the total capacities allotted to its respective Transmission and Distribution Regions.

In April 2025, NESO produced an updated version of its Action Plan Connection Reform Annex[5] with an additional Table (Annex B here) giving a combined 2035 (Tx+Dx) target for each Transmission Region, with an explanation that the increasing numbers of large-area NSIP-scale projects coming forward required removing the restriction on their numbers implied by the earlier Action Plan's *c.* 25% limit on them. Effectively, NESO is no longer able to control the mix of small and large projects and must deal with them on a 'first-ready, first-served' basis; it is suggested that favouring larger, NSIP-scale projects will more rapidly deliver the target capacities the Government desires.

Here we question just how much the Dx networks were under-delivering their 2030 and 2035 targets. We are therefore also questioning whether the shift in favour of large-area, Tx network-connected projects is justified. We ask four questions:

1) Are there any signs that smaller Distribution-level projects were under-delivering against the original Action Plan 2030 targets? If not, any switch to favouring the larger, Transmission-level projects is unjustified.
2) How much Transmission-level capacity is currently in the system and does it overshoot the 2030 targets? If so, large projects will have displaced the smaller Distribution level projects that NESO favoured in its December 2024 version of the Action Plan.

3) What is the current total (Tx+Dx) capacity by Tx Region and how do the figures compare with the Action Plan's 2035 targets by Transmission Region, Tx?
4) How does the current (Tx+Dx) capacity compare with what might have been the Action Plan's 2030 targets by Transmission Region, Tx?

Those last two questions are needed because pushing back the delivery date of any target to 2035 draws attention away from the fact that current capacity may already exceed the 2030 target. It is, of course, much less likely that current capacity reaches or exceeds 2035 targets, so there will appear to be more of a shortfall that may be used to justify the development of many more projects than are currently necessary. The development time to delivery of an operational ground-based solar project is quite short (of the order of less than 5 years), so that we can delay meeting 2035 targets until we know what is the actual situation in 2030.

Methods

The Renewable Energy Planning Database (REPD), updated quarterly, records the various planning stages of all renewable energy projects in the UK. We use here the July edition of the REPD and extract from it only ground-mounted solar projects of less than 50MW capacity considered to be viable (hence projects recorded as 'Abandoned' or 'Appeal Refused' etc. were excluded). These 'sub-NSIP' projects will go the Local Planning Authority route for approval. The REPD records the point location of each project and, as pointed out above, it is expected that most or all of these projects will be connected to the Distribution network.

The citizen science group SolarQ has also collected information on all ground-mounted solar projects >50MW, considered to be Nationally Significant Infrastructure Projects (NSIPs), which have, are or will go through the Planning Inspectorate process of approval. The redline files of each NSIP project were digitised so that they could be brought together with the REPD database in a GIS (ESRI's Arcmap Pro©). NSIP projects are expected to seek direct connections to the Transmission network.

The Transmission and Distribution Region boundaries shown in Maps 1 and 2 were then used as 'cookie-cutters' for the sub-NSIP and NSIP data so that the total current ground-mounted solar capacity within each region could be calculated (when solar boundaries overlapped the electricity Region boundaries, the total MW capacity of the installation was assigned proportionally according to the project's redline area within each Region).

Results

Here we answer the four questions posed in the Background section

Q1. Are there any signs that smaller Distribution-level projects were under-delivering against the original Action Plan 2030 targets?

A full table of sub-NSIP capacities (from the REPD) by Dx Region is given in Annex C. The original Action Plan targets for 2030 are already exceeded in five of the eight Regions (with capacities of between 104% and 121% of the target figures). Regions D2 (Southern Scotland), D3 (NW England) and D5 (N. Wales) are currently under-target with capacities of 86%, 46% and 48% of those figures, respectively. Nation-wide, the current total of 37,360.5MW just exceeds the 2030 target figure of 36,200MW.

Although there are regional shortfalls there are no signs of a general under-delivery of smaller Distribution-level projects. Oxfordshire is in the most over-performing Region, D7, already with 121% of its CP2030 Distribution target figure of 4,600MW by 2030.

Q2. How much Transmission-level capacity is currently in the system and does it overshoot the 2030 targets?

Current NSIP-scale capacities are compared with the original Tx-level 2030 targets in the table in Annex C. Four of the eleven Tx Regions (T2, T3, T9 and T10) are currently under-delivering Tx 2030 targets; two of these (T2 and T3) more or less coincide with the Dx regions under-delivering (D2 and D3), but the other two, T9 and T10 in the South-West and South of England, cover areas (D6 and D7) where the Dx figures already exceed capacity (as mentioned in the Map 1 legend a new project at Holsworthy Beacon, N. Devon, Tx Region 9, will almost certainly exceed the CP2030 Tx regional target of 300MW). NSIP-scale projects are over-delivering on the 2030 target figures in seven of the eleven Tx Regions, by between 108% (T5) and 2,146% (T7).

The nation-wide Tx target of 10,800MW is already exceeded by the current 24,379MW capacity of NSIP projects, constituting 226% of that target figure.

The Tx capacity of Oxfordshire's Transmission Region, T8, is already 128% of the target figure and would rise to 247% if Botley West is approved.

Q3. What is the current total (Tx+Dx) capacity by Tx Region and how do the figures compare with the Action Plan's 2035 targets by Transmission Region, Tx?

The REPD data were cookie-cut to the Transmission Regions' boundaries and twinned with the NSIP data already shown by Transmission Region in Annex C, for comparison with the Clean Power Action Plan's (Tx+Dx) target figures for 2035 shown in Annex B. Current capacities in seven of the eleven Transmission Regions are between 38% and 85% of target figures, while the remainder are between 118% and 161% of their target figures, with the current nation-wide total (61,740MW) just 89% of the target figure of 69,400MW by 2035. It is hardly surprising that the range of current capacities – from 38% to 161% of target – indicates a lack of spatial planning, because there has been no spatial planning of any onshore renewables to date. But comparing present delivery to targets 10 years hence is almost bound to indicate a present short-fall and may be used as an excuse to bring forward new projects that we actually will not need in 2035. A fairly short delivery time of solar projects means we can delay such decisions until future needs become clearer.

Q4. How does the current (Tx+Dx) capacity compare with what might have been the Action Plan's 2030 targets by Transmission Region, Tx?

NESO's April 2025 version of its Connections Reform Annex did not provide geographically aligned targets for Tx and Dx for 2030, only for 2035 (see above). Instead, its 2030 target figures for solar are given separately for the eleven Tx or eight Dx regions (Annex A) and so first need to be put together in the same Regional framework. Since NESO's (Tx+Dx) 2035 targets were by Transmission Region only, we will use that framework here. NESO's Distribution region target figures for 2030 (Annex A) were therefore assigned to the eleven Transmission regions on the basis of the proportion of the area of each Dx Region falling within each Tx Region. For example, if 20% of a Dx Region fell in a Tx Region, the latter was given 20% of the Dx region's target capacity. This resulted in the entire Dx capacity being distributed across the eleven Tx Regions rather than the original eight Dx Regions.

The current and 2030 target capacities across those eleven Tx Regions are shown in the second Table in Annex D. Solar capacities in six of the eleven Transmission Regions are already above target figures by between 127% (T6, Eastern part of the Midlands) and 265% (T4, Eastern England across to N. Wales) and the remainder are not far behind, with the worst performance currently in Region T3, Northern England, with 58% of the target figure. Nationwide we are already at 131% of that 2030 target. In comparison with the 2035 targets above, examination of these nearer-term 2030 targets shows that solar developments across the UK are well on target, without needing any further additions to 2030, but instead requiring some regional re-assignments.

Conclusions

Massive over-delivery of NSIP-scale projects regionally, compared with NESO's original Transmission network target figures, threatens the balance of the entire electricity system. It will demand increases in the Transmission network that would not have been required under the original Action Plan and it will involve the long-distance movement of large amounts of electricity across this extended grid (and Transmission grid losses of c. 2%).

Renewable energy provides the potential for electricity to be supplied efficiently and locally by Distribution network projects. The original Clean Power 2030 Action Plan Connections Reform Annex (December 2024 edition) with Distribution network projects providing approximately three quarters of all electricity has been abandoned in favour of joint (Tx+Dx) targets where large-area NSIP-scale projects now provide far more than the originally envisaged c. 25% of solar capacity, and already make up almost 40% of it in the UK. Smaller, community-developed, -owned or -controlled projects are being displaced by large projects in which the major investors are almost always overseas. Such investors seek only to maximise shareholder dividends and are not particularly interested in the UK's Net Zero policies, to which they pay lip-service only in order to get through the planning process.

I hope the Planning Inspectorate will take a nation-wide view of the cumulative development of solar in the UK. Those campaigning against any single solar project such as Botley West are in some sort of 'inverse beauty contest' with those campaigning against other projects elsewhere, especially those within the same electricity distribution region. Getting any one project cancelled might increase the chance of others being accepted within the same region, in order to 'balance' the system according to regional plans such as NESO's. This is not the way to design an electricity system fit for the 21st Century in which those with the loudest voices, the most effective campaigns or the most expensive lawyers win out over those lacking all three.

The shift away from smaller, Distribution-connected projects such as the community-owned Southill Solar Farm[6] near Charlbury, Oxon, in favour of larger, NSIP-scale projects, such as Botley West, almost certainly resulted from lobbying of DESNZ by the solar 'industry', a fact more or less acknowledged , after 'extensive engagement' with Ofgem and 'stakeholders', by DESNZ's Minister for Energy, Michael Shanks MP in a letter to NESO's CEO, Fintan Slye[7], dated 7th April 2025 which claimed a 'misalignment' *'of increased solar project pipeline at transmission (that) was not fully reflected in National Energy System Operator's (NESO's) 2024 Future Energy Scenarios, on which NESO's Clean Power 2030 advice to us was based.'* This letter (available on DESNZ's website) is referred to right at the end of the Updated Connections Reform Annex, April 2025 edition, and amounts to saying there is far more NSIP-scale capacity being put forward for Transmission network connection than envisaged in the original plan. Rather than change the sub-NSIP/NSIP mix, DESNZ chose to change the targets to the suit the 'stakeholders' involved (probably developers), none of whom were members of the communities affected by NSIP-scale proposals such as Botley West.

It is becoming increasingly clear that renewable electricity will never be cheap. Although the marginal costs of production (the cost of producing an extra Watt of power) may be minimal, the system costs of any intermittent, renewable supply remains considerable, as recently outlined yet again by Dieter Helm[8]. Intermittency requires some sort of baseload provision (nuclear, gas); back-up systems for when the wind doesn't blow nor the sun shine (gas, oil); and long-duration, large capacity energy storage over our four changeable seasons. Perverse subsidies, from Feed-in tariffs to Climate Change Levies to Contracts for Difference (CfDs), also push up the costs to consumers, in the latter case for upwards of 20 years.

Inadequacies of the present network system and the unpredictability of intermittent generation involve constraints payments to Transmission generators with electricity output the system doesn't currently need; these generators are paid not to produce electricity that might overload the Transmission network. More local, Distribution network connected suppliers are not usually eligible for constraints payments – another reason why large, NSIP-scale solar projects want to connect to the Transmission rather than Distribution network.

The more over-capacity in the Transmission system, the more frequent curtailment payments required, the higher the bills to consumers.

Finally, the unit cost to the consumer at any moment in time is determined not by the average cost of production by all of the different generators in the supply mix, but by the cost of production of the most expensive producer (usually gas). For years to come, renewable energy will be no cheaper than it was when high-carbon sources produced all our electricity; in fact it will be more expensive because of those whole system costs that ensure 24/7 electricity supplies from a system with renewables as part of the mix.

Anyone designing the UK electricity supply system owes it to consumers to keep down costs at all levels and to decrease the operation of all the perverse subsidies mentioned above. A start would be a sensible regional policy on the distribution of renewable generators, including solar, driven by science rather than the solar lobby.

David Rogers, MA, D.Phil. (Oxon)

10/11/25

Annex A

Transmission connection capacities by 2030, recommended by NESO in December 2024 (from Ref. 4).

Clean Power 2030 Action Plan: Connections reform annex

Transmission connected technologies

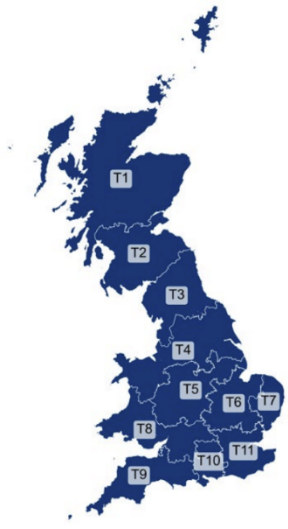
Table 2: Regional capacity breakdowns for transmission connected technologies required for 2030[20] and 2035[21]

Transmission network region	Solar (MW) 2030	Solar (MW) 2035	Onshore wind (MW)[22] 2030[23]	Onshore wind (MW) 2035	Batteries (MW)[24] 2030	Batteries (MW) 2035
N. Scotland	100	800	5,500	-	1,900	1,900
S. Scotland	600	800	8,800	-	3,900	3,900
N. England	500	1,400	-	-	800	800
N. Wales, the Mersey and the Humber	1,200	1,700	300	-	4,200	4,200
Midlands	4,000	5,200	-	-	1,300	1,300
Central England	2,100	3,300	-	-	500	500
E. Anglia	100	900	-	-	200	200
S. Wales and the Severn	1,100	1,300	1,300	-	900	900
S.W. England	300	300	-	-	400	400
S. England	200	200	-	-	100	100
South East England	600	1,100	-	-	1,700	1,700
GB total	**10,800**	**17,000**	**15,900**	**-**	**15,900**	**15,900**

Note: MW capacity figures have been rounded to the nearest 100 MW.

Table 3: Mapping of transmission network region codes to transmission region names

Transmission network region code	Transmission network region name
T1	N. Scotland
T2	S. Scotland
T3	N. England
T4	N. Wales, the Mersey & the Humber
T5	Midlands
T6	Central England
T7	E. Anglia
T8	S. Wales & the Severn
T9	S.W. England
T10	S. England
T11	South-East England



Annex A (continued)

Distribution connection capacities by 2030, recommended by NESO in December 2024 (from Ref. 4).

Clean Power 2030 Action Plan: Connections reform annex

Distribution connected technologies

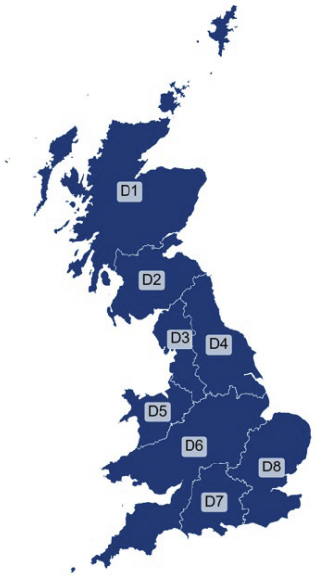
Table 4: Regional capacity breakdowns for distribution connected technologies required for 2030[25] and 2035[26]

Distribution network region	Solar (MW) 2030	Solar (MW) 2035	Onshore wind (MW)[27] 2030	Onshore wind (MW) 2035	Batteries (MW) 2030	Batteries (MW) 2035
Scottish and Southern Electricity Networks (SSEN) – Scottish Hydo Electric Power Distribution (SHEPD)	1,100	1,700	3,500	-	900	900
SP Distribution (SPD)	1,100	1,800	2,700	-	800	900
Northern Powergrid (NPg)	4,400	6,500	1,900	-	1,900	2,100
Electricity North West (ENWL)	1,500	2,300	700	-	900	1,000
SP Manweb	1,500	2,200	1,000	-	400	500
National Grid Electricity Distribution (NGED)	13,900	19,900	2,400	-	3,000	3,600
UK Power Networks (UKPN)	8,100	11,800	900	-	2,100	2,400
SSEN – Southern Electric Power Distribution (SEPD)	4,600	6,200	100	-	1,200	1,400
GB total	**36,200**	**52,400**	**13,200**	**-**	**11,200**	**12,800**

Note: MW capacity figures have been rounded to the nearest 100 MW.

Table 5: Mapping of distribution network region code to distribution region name

Distribution network region code	Transmission network region name
D1	SSEN - SHEPD
D2	SP Distribution
D3	ENWL
D4	NPg
D5	SP Manweb
D6	NGED
D7	SSEN - SEPD
D8	UKPN



Annex B

Transmission and Distribution capacities by 2035, recommended by NESO in April 2025 (from Ref. 5).

Clean Power 2030 Action Plan: Connections reform annex (updated)

Table 6: Regional capacity breakdowns for technologies with amalgamated transmission and distribution network capacities for 2035

Transmission network region name	Transmission network region code	Tx + Dx Solar (MW) 2035	Tx + Dx Onshore wind (MW) 2035
N. Scotland	**T1**	2,500	-
S. Scotland	**T2**	2,600	-
Scotland total		**5,100**	**21,200**
N. England	**T3**	5,200	-
N. Wales, the Mersey and the Humber	**T4**	9,500	-
Midlands	**T5**	13,700	-
Central England	**T6**	9,500	-
E. Anglia	**T7**	3,300	-
S. Wales and the Severn	**T8**	8,300	-
S.W. England	**T9**	5,500	-
S. England	**T10**	2,300	-
South East England	**T11**	7,000	-
England and Wales total		**64,200**	**15,800**
GB total		**69,400**	**37,000**

Note: MW capacity figures have been rounded to the nearest 100 MW.

Notice that in this Updated Action Plan the GB total (Tx+Dx) solar capacity by 2035 is the same as in the original Action Plan (Annex A tables). Combining Tx and Dx targets removes any restriction on the proportions of smaller and larger-scale projects in the regional totals.

Annex C

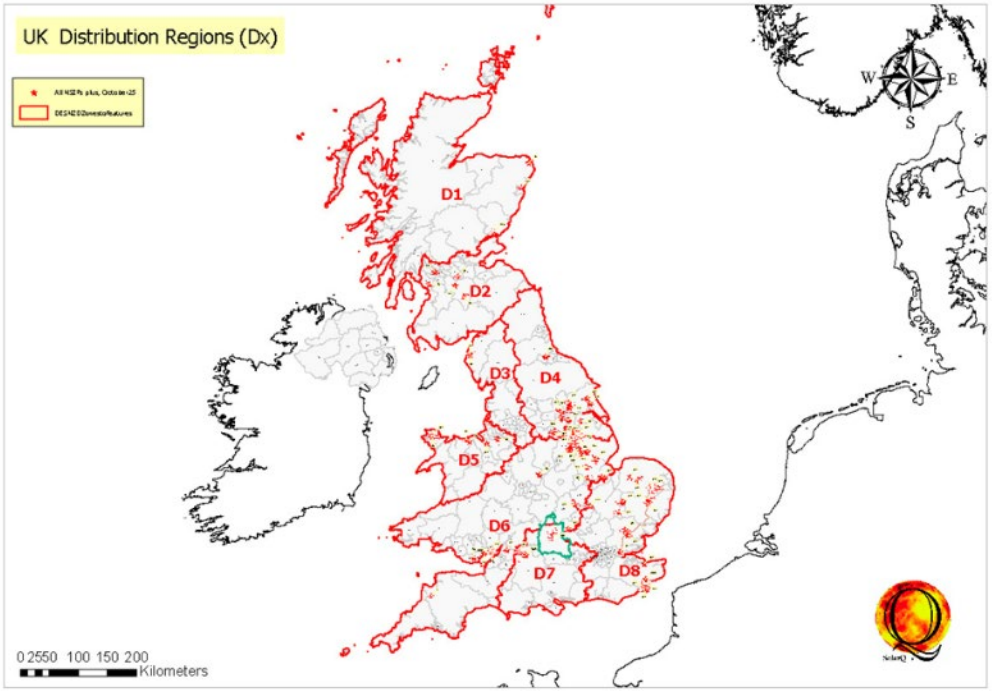
Distribution Region, Dx, analysis

Analysis of sub-NSIP (July 2025 REPD) projects by Distribution Regions, Dx. Capacities at various stages of the local planning process contribute to the totals shown in red. The December 2024 Clean Power 2030 Action Plan Dx targets are shown in the next column, and whether they already exceed those targets, and by how much, in the final two columns. Targets are already exceeded in five of the eight Dx Regions, including that for Oxfordshire, D7, at 121% of the target figure (row highlighted in yellow). The national target of 36,200MW is also already exceeded by the current total of 37,360.5MW (last row in the Table).

by Dx Region, subNSIP only

Sum of PartMW| Developm 1

DxRegion	Application Submitted, MW	Application Refused, MW	Revised, MW	Awaiting Construction, MW	Under Construction, MW	Operational, MW	Grand Total, MW	CP2030 Dx Solar target by 2030, MW	At or above Target in 2025?	% of target
D1	239.5	184.7	115.9	557.8	81.2	52.2	**1,231.3**	1,100	Yes	112%
D2	365.5		5.0	474.8	109.7	25.7	**980.8**	1,100	No	89%
D3	295.4	71.2	35.2	105.4	23.6	165.5	**696.2**	1,500	No	46%
D4	1,105.2	119.3	207.3	2,606.3	238.6	361.6	**4,638.2**	4,400	Yes	105%
D5	165.2	58.9	41.0	172.8	65.6	218.3	**721.8**	1,500	No	48%
D6	2,527.8	1,516.0	478.2	5,726.8	740.6	4,061.1	**15,050.5**	13,900	Yes	108%
D7	857.4	188.9	169.9	1,840.5	487.8	2,044.1	**5,588.6**	4,600	Yes	121%
D8	1,767.4	723.8	530.0	2,652.2	586.9	2,192.9	**8,453.1**	8,100	Yes	104%
Grand Total	**7,323.3**	**2,862.7**	**1,582.5**	**14,136.5**	**2,334.0**	**9,121.5**	**37,360.5**	**36,200**	Yes	103%



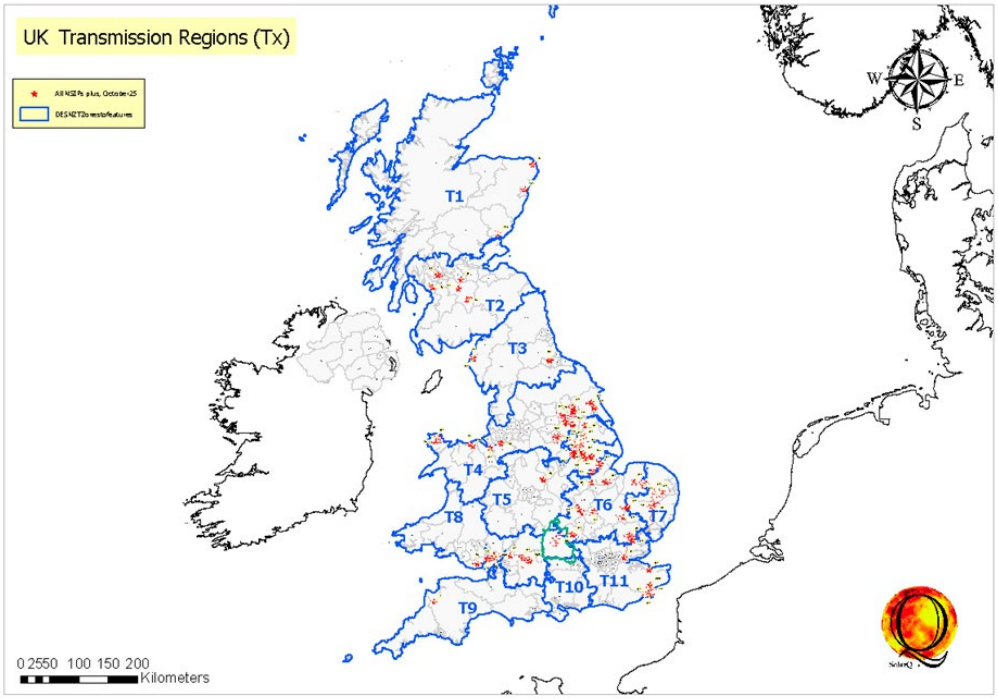
Annex C (continued)

Transmission Region, Tx, analysis

Analysis of NSIP projects by Transmission Region, Tx, figures in red. The December 2024 Clean Power 2030 Action Plan Tx targets are shown in the next column, and whether they already exceed those targets, and by how much, in the final two columns. Targets are already exceeded in seven of the eleven Tx Regions, including that for Oxfordshire, T8, at 247% of the target figure (row highlighted in yellow). Even in the absence of Botley West, the total T8 capacity would be 128% of the target.

by Tx Region, NSIP only

TxRegion	Total NSIP, MW	CP2030 Tx Solar target by 2030, MW	At or above Target in 2025?	% of target
T1	236.5	100	Yes	237%
T2	393.0	600	No	66%
T3	430.0	500	No	86%
T4	6,902.5	1,200	Yes	575%
T5	4,317.7	4,000	Yes	108%
T6	5,086.2	2,100	Yes	242%
T7	2,146.0	100	Yes	2146%
T8	2,712.0	1,100	Yes	247%
T9	0.0	300	No	0%
T10	0.0	200	No	0%
T11	2,155.4	600	Yes	359%
Grand Total	24,379.2	10,800	Yes	226%



Annex D

CP2030 Action Plan targets for 2035

Current capacities of sub-NSIP and NSIP ground-mounted solar projects by Transmission Region Tx and their totals (in red). The CP2030 Action Plan's 2035 targets for (Tx+Dx) combined are shown in the next column (the Updated Action plan does not give separate Dx and Tx targets for 2035), and whether current capacities are at or above those targets in the last two columns.

by Tx Region, subNSIP and NSIP and Action Plan 2035 targets

	'Dx'	'Tx'	Jul-25			
TxRegion	Total subNSIP, MW	Total NSIP, MW	GRAND TOTAL MWp	CP2030 Solar target (Dx+Tx) by 2035, MW	At or above 2035 Target in 2025?	% of target
T1	836.8	236.5	1,073	2,500	No	43%
T2	993.7	393.0	1,387	2,600	No	53%
T3	1,567.3	430.0	1,997	5,200	No	38%
T4	8,373.4	6,902.5	15,276	9,500	Yes	161%
T5	3,421.4	4,317.7	7,739	13,700	No	56%
T6	2,860.9	5,086.2	7,947	9,500	No	84%
T7	668.9	2,146.0	2,815	3,300	No	85%
T8	7,569.5	2,712.0	10,282	8,300	Yes	124%
T9	6,471.9	0.0	6,472	5,500	Yes	118%
T10	2,987.7	0.0	2,988	2,300	Yes	130%
T11	1,609.0	2,155.4	3,764	7,000	No	54%
Totals	37,360.4	24,379.2	61,740	69,400	No	89%

Seven of the eleven Transmission Regions are currently below target (last column, figures <100%). Setting targets far into the future justifies more capacity being developed now than is necessary to reach nearer-term targets (see analysis according to estimated 2030 targets below). The greatest current over-capacity (161%) is in Region T4, Eastern England across to N. Wales. Oxfordshire is within Transmission Region T8 (highlighted in yellow), with current capacity at 124% of the 2035 target assuming Botley West is approved, or 108% without Botley West. The range of target capacities reached – from 43% (T1) to 161% (T4) - indicates a lack of an overall spatial plan at the regional level.

CP2030 Action Plan targets for 2030

As above for the current capacities of sub-NSIP and NSIP ground-mounted solar projects by Transmission Region Tx. The CP2030 Action plan targets for 2030 are shown separately for Transmission and Distribution projects (Tx and Dx) in the next two columns and their total in the column following (headed *'Estimated (Tx+Dx) 2030 target'*). The last two columns check whether current capacity exceeds these targets, and by how much.

by Tx Region, subNSIP and NSIP and Action Plan 2030 targets

	'Dx'	'Tx'	Jul-25					
TxRegion	Total subNSIP, MW	Total NSIP, MW	GRAND TOTAL MWp	CP2030 Tx target for 2030, MW	CP2030 Dx target for 2030 by Tx Region, MW	Estimated (Tx+Dx) 2030 target, MW	At or above 2030 Target in 2025?	% of target
T1	836.8	236.5	1,073	100	1,073	1,173	No	92%
T2	993.7	393.0	1,387	600	1,127	1,727	No	80%
T3	1,567.3	430.0	1,997	500	2,961	3,461	No	58%
T4	8,373.4	6,902.5	15,276	1,200	4,561	5,761	Yes	265%
T5	3,421.4	4,317.7	7,739	4,000	5,140	9,140	No	85%
T6	2,860.9	5,086.2	7,947	2,100	4,144	6,244	Yes	127%
T7	668.9	2,146.0	2,815	100	1,947	2,047	Yes	137%
T8	7,569.5	2,712.0	10,282	1,100	5,288	6,388	Yes	161%
T9	6,471.9	0.0	6,472	300	4,532	4,832	Yes	134%
T10	2,987.7	0.0	2,988	200	1,776	1,976	Yes	151%
T11	1,609.0	2,155.4	3,764	600	3,650	4,250	No	89%
Grand Total	37,360.4	24,379.2	61,740	10,800	36,200	47,000	Yes	131%

Current capacities are obviously the same as in the Action Plan 2035 table above. The CP2030 Distribution Region targets shown in the first Table of Annex C were distributed across the eleven Transmission regions proportionally (see text). Their sum (bottom row, 36,200MW) therefore equals that shown in Annex C. With the exception of T3 (Northern England), total current capacity is either within reach of the 2030 targets or already exceeds them (by up to 265% in T4). Oxfordshire is within Transmission Region T8 (highlighted in yellow), with a current capacity of 161% of the 2030 target assuming Botley West is approved, or 140% without it.

[1] REP1_169. Written summary of oral submission given at the Hearings during the week commencing 12th May 2025. Date Wednesday 14th May, Open Floor Hearing 2 (OFH2)
[2] https://www.eci.ox.ac.uk/sites/default/files/2022-09/PazCo-final.pdf
[3] Clean Power 2030 Action Plan: A new era of clean electricity
[4] https://www.ashford.gov.uk/media/rjzp4omk/3-23-clean-power-2030-action-plan-connections-reform-annex.pdf
[5] https://assets.publishing.service.gov.uk/media/67f3b417d3f1efd2ce2ab8a5/clean-power-2030-action-plan-connections-reform-annex-update.pdf
[6] https://southillcommunityenergy.coop/southill-solar
[7] https://www.gov.uk/government/publications/clean-power-2030-action-plan-solar-capacity-update-letter-to-neso/clean-power-2030-action-plan-solar-capacity-update-letter-to-neso-7-april-2025
[8] https://www.thetimes.com/article/ceee0ab6-20c6-40e6-8291-fcae03d0a7e6?shareToken=79e5b0f7aeecde452d125e8a500ec26a