



Head of Energy Infrastructure Planning and Innovation

Department of Energy Security and Net Zero
3-8 Whitehall Place, London, SW1A 2AW

15 June 2026

Dear Sir,

Botley West Solar Farm (EN010147), Secretary of State RFI

Accompanying this letter is our critique of the Applicant's Response to the Secretary of State, document ref. EN010147/APP/20.3 of 9.6.26.

We have primarily focussed this response on those topics which have been the subject of our submissions during the Examination.

We have taken each topic in the order presented by the Applicant, highlighting the Applicant's paragraphs on which we wish to comment in red.

This submission should be read in conjunction with our other submission C1-005 [EN010147-002442-C1-005 - DESNZ EN010147 Response.pdf](#) which also includes important topics for consideration by the Secretary of State.

Yours faithfully,

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Chair, Begbroke & Yarnton Green Belt Campaign (BYG).

IP no. ██████████



15 June 2026

Begbroke & Yarnton Green Belt Campaign (BYG)

Comments on PVDP` s Response to Secretary of State Consultation 1-20.3, Botley West S of S Response 9.6.26 of 11 June 2026.

The primary focus of these comments is on those topics which have been the subject of submissions made by BYG during the Examination of the Botley West project.

*We have taken each topic in the order presented by the Applicant, highlighting the Applicant`s paragraphs on which we wish to comment in **red**.*

1. Alternatives and Site Selection

Our previous submissions on this topic RR-0092, REP1-090, REP1-091, REP3-085, REP5-057 and REP7-058 were based on the information provided by the Applicant during the Examination process. They covered in detail what we considered to be the failure of the Applicant to adequately assess alternative sites. It is difficult to imagine a site that would be more problematic than that proposed for Botley West, which makes this inadequacy particularly egregious.

The Further Information provided by the Applicant in response to the RFI has not changed our conclusion on this issue. Below we set out our comments on the Further Information and explanations provided. The Applicant's text is shown in red.

1.1 The Applicant opens discussion of site selection as follows:

` Paragraph 4.3.9 of NPS EN-1 sets out the base position that the NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. In otherwise (sic), the overarching NPS does not impose any general obligation on the Applicant to consider alternatives. However, NPS EN-3 does include solar-specific policy in relation to site selection, which naturally incorporates an element of alternatives.`

Clearly, any responsible solar farm developer would not rely on the absence of specific requirements in an NPS to justify the choice of such a challenging site. That said, EN-3 does indeed set certain criteria to be followed, as set out in paragraphs 2.10.10 and following. For example:

While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible. 'Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (2.10.21).

It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land (2.10.23).

By selecting the Botley West site, these stipulations have been disregarded by the Applicant. The SoS will undoubtedly take this into account.

1.2 More significant is that these comments by the Applicant fail to mention the obligations under case law that an SoS must address when minded to approve an application. These obligations arise when it needs to be argued that Very Special Circumstances (VSC) outweigh other considerations, for example when otherwise unacceptable development will take place on Green Belt land, or harm will be caused to heritage assets. These principles are very clearly set out in Case No: C0/4844/2020, *between The Queen on the application of SAVE STONEHENGE WORLD HERITAGE SITE LIMITED, and SECRETARY OF STATE FOR TRANSPORT, heard by THE HON. MR JUSTICE HOLGATE* ([Save-Stonehenge-judgment-FINAL-CO-4844-2020-30-07-2021.pdf](#)).

In paragraph 242 and following, the case law history establishing when alternatives must be considered as a material consideration are very clearly summarised. In the Stonehenge case, it was judged that the SoS had failed to carry out his own assessment of alternatives, despite this being a material consideration (see paragraph 283). Exactly the same situation is present in respect of the Botley West Application: VSC would have to be invoked to override the planning harm to Green Belt and heritage assets. Alternative sites therefore become a material consideration.

1.3 The Applicant then goes on to discuss potential substation capacity and suitability.

` In that context, initial searches for substation transmission entry capacity were conducted using the National Grid Electricity Transmission (NGET) online search tool, since discontinued. This enabled the searcher to ascertain the generation headroom at a particular substation. Once a substation was identified as having potential capacity, an application for a pre-application call was made

to NGET and the likelihood of success of a connection application was discussed with NGET connection engineers. This directly aligns with NPS EN-3 which recognises that the “*capacity of the local grid network to accept the likely output from a proposed solar farm is critical to the technical and commercial feasibility of a development proposal*” (our emphasis) – see paragraph 3.10.35. Paragraph 3.10.38 of NPS EN-3 continues to provide that “*applicants may choose a site based on nearby available grid export capacity*”. The Applicant identified several substations that might have capacity.’

‘Where the land team were confident that there were landowners near the substation interested in letting their land for a solar farm, a pre-application call was booked. The search tool indicated that there might be capacity at Northfleet. The substation in effect was land locked and the land team had no success with landowners near or adjacent to the substation, therefore it was decided not to request a pre-application call and the location was no longer considered a feasible option. Pre-app calls were held to discuss Feckenham (Worcs), Bulls Lodge (Essex), Wymondley (Herts) and Rayleigh (Essex). None of these were successful in finding entry capacity. The first pre-app call that elicited an enthusiastic response from NGET was Cowley, where spare capacity was identified at the substation and in the 400 kV line from Cowley to Walham. However, NGET decided not to invest in Cowley. A second call resulted in the offer of a new substation at Farmoor to use the overhead line headroom. A connection application was submitted to NESO and the offer of connection at Farmoor was secured.’

In these two paragraphs, the Applicant belatedly attempts to present a more professional approach to site selection than that which was summarised in their submission APP-042, as shown below:

‘The Project site evolved over a period of several years, beginning in July 2019. From the outset, the general location, overall size, and then the precise project boundaries, have been influenced by the availability of a suitable grid connection, voluntary landowner negotiations, commercial viability, national planning policy, and environmental constraints. In 2019, as part of the Applicants general site search exercise, discussions were held with National Grid to identify where their priorities lay in order to meet demand and manage the UK electricity supply network. Following a review of the Transmission Network Usage System (TNUoS), managed by National Grid as the Electricity System Operator (ESO), and regulated by Ofgem, it was clear that the South East remained an area where demand was greatest.’ (5.6.4 and 5.6.5)

However, APP-042 also provides confirmation that site selection was actually *restricted* to the South East, a fact now glossed over by the Applicant. In our various submissions as listed at the top of this response, we have established that there were absolutely no grounds for such a restriction. Indeed, this is now borne out by the Applicant itself. In its current proposals for the following sites on the NESO Transmission Entry Capacity (TEC) register ([Transmission Entry Capacity \(TEC\) register | National Energy System Operator](#)), the South East is clearly not their priority.

Bradford Solar Farm	SolarFour	Staffordshire Connection Node A 400kV Substation	960
Cottered-PVDP	SolarNine	West Anglia Connection Node D 400kV Substation	520
Ludgershall Bicester Solar Farm-PVDP	SolarFour	Chiltern Connection Node C 400kV Substation	500
New Marton Solar farm - PVDP	SolarFour	Cheshire Connection Node A 400kV Substation	780
PVDP Scarning	SolarFour	North Anglia Connection Node C 400kV Substation	650
PVDP Woodbridge	SolarSeven	South Anglia Connection Node E 400kV Substation	610
Welbeck-Newark Solar Farm - PVDP	SolarTen	High Marnham 400kV Substation	710
Woburn Solar Farm	SolarThree	Dunstable 400kV Substation	840

The Applicant also now omits to make any reference to the substations which were identified as having capacity but which were claimed as also having Green Belt implications. In APP-042, these were covered in the following paragraph:

‘Whilst the Cowley substation is located within the Green Belt, all other substations examined with headroom capacity, were also located within the Green Belt, meaning that development of a project in the vicinity any of the four substations with capacity, would also fall within the Green Belt. A site without any impact on Green Belt therefore, was not available to the Applicant (5.6.9).’

These three further substations were Mannington, Laleham and Iron Acton. No detailed information has been provided by the Applicant about these substations. The Applicant made no investigation as to whether or not the use of Green Belt land would be significant, or whether the sites would generally be less harmful to heritage assets and agricultural land.

It therefore remains our view that the statement made by Mr. Peter Gerstmann in an interview with *The Times* newspaper - that “*finding a good landlord*” in the Blenheim Palace estate was “*one of the key factors in choosing the site in Oxfordshire for the mega-solar farm*” (see BYG’s RR-092, Appendix 1) - provides the basis for their decision to site Botley West next to the Blenheim Estate. The Applicant’s focus as far as alternatives are concerned was not to investigate, but simply to develop arguments as to why consideration of any possible alternatives could be disregarded.

The Applicant concludes by stating that *‘In policy terms (NPS-1 para 4.3.15), the Applicant has fulfilled its obligation in reporting the reasonable alternatives they have studied’*.

Our comments above demonstrate that this statement is wholly inaccurate.

1.4 On pages 23/4 of its Response, the Applicant goes on to describe the process that led it to the Farmoor substation.

‘It was therefore decided to focus on substations with a higher likelihood of a successful connection. The Applicant had already held a pre-app call with NGET on the Cowley substation which had indicated that NGET had both the need for power at that location and a spare bay to connect us. The Applicant therefore decided to focus on Cowley. NGET were very clear that the local grid in Oxfordshire was at capacity and in need of reinforcement, meaning that they were willing to invest in substation assets in the area. They also had a need to replace the buried 400kV cables at Hinksey Meadows, on the Cowley to Walham 400kV line.’

This is really a quite extraordinary statement when contrasted with the following statement by the Applicant on page 9 explaining why the Cowley connection is not an option.

‘Across all four criteria, the Farmoor connection is assessed as materially preferable to the Cable Route to Cowley. The Cable Route to Cowley carries an indicative cable cost alone of approximately £150 million — approximately 21% of the total project cost, compared to less than 0.5% for the Farmoor connection — making the Cowley connection financially unviable as a standalone cost item. The route is also 50 times longer than the Farmoor connection, passing through the Oxford Historic Core Conservation Area, a designated Area of Archaeological Interest with possible medieval and Roman remains, Grade I and II listed buildings, the Oxford Meadows SSSI, and Oxford Green Belt, with no Bilateral Connection Agreement with NGET in place.’

It is wholly inconceivable that such an expensive and harmful connection as is presented by Cowley would have been considered unless there was a very strong incentive already in place, such as a landowner agreement. Without such an explanation, Cowley makes – and made - no business sense.

If the SoS is minded to approve the Application, case law will clearly oblige him to carry out his own detailed assessment of alternative sites. As a minimum, these would include Mannington, Laleham and Iron Acton. The more reasonable conclusion would be to recognise that, since there was no justification for restricting the search to the South East, Botley West could have been located anywhere in England, where less planning harm would be caused. The Application should therefore be refused on these grounds alone.

1.5 Having explained the background to the substation selection the Applicant later sets out the approach taken in respect of Green Belt land.

‘The Applicant did not rule out development in the Green Belt, in principle, for a number of reasons, including:

In 2019, when the search started, there was nothing in policy that would rule out, in-principle, development within the Green Belt, providing a Very Special Circumstances (VSC) case could be made. It was considered that VSC were available to the Applicant, and the key VSC argument was the national urgent need for this type of infrastructure;

The Applicant considered that the design and layout of the project would be able to ameliorate its impact upon openness with careful siting and/or screening of the development;

It was decided that the development would be made temporary and reversible, primarily because the land could then revert back to a site without major development within it and thus retain in full the purposes of Green Belt in this location;

In July 2024, over a year prior to submission, the policy position changed which helped underpin the Applicants decision to persist with development in the Green Belt - that being Government policy designating NSIP’s as Critical National Priority (CNP) infrastructure, thus benefitting from the presumption that where a planning balance judgement is to be made e.g. the merits of a VSC case, that the test will have been met;

Then in February 2025, the approach to assessing openness in Green Belt was clarified to mean that it was towns not villages where the judgement of openness should be assessed. Policy up to that point assumed one could use the location of villages when assessing impact of new development upon openness. This policy change had the effect of making it slightly easier to accommodate the development within its Green Belt location as the towns in the area were much more spread out leaving larger tracts of land between them when judging the impact of openness between the towns.’

This summary by the Applicant is refreshingly honest but notably revealing. As of the end of 2025, the PINS database shows that there were 26 solar projects, designated as NSIPs, in various stages of progress through the planning process. These projects are listed in the attached Appendix. It will be seen that not a single one of these projects was being developed on Green Belt land, thus demonstrating that responsible developers understand the importance of Green Belt and avoid using it. The Applicant, on the other hand, has made no attempt to find alternative sites that would obviate the need for Green Belt being used. Rather, their working assumption has clearly been that the SoS will agree that VSC applies and wave the project through. The Applicant confirms that the whole central section of the site is on Green Belt, and that overall an astonishing 69% of the site is on Green Belt.

The Applicant does not seem to appreciate, as pointed out earlier, that the SoS can only decide that VSC should be applied if he has carried out his own assessment of potential alternative sites. As shown, the project could have been sited anywhere in England. Clearly, VSC cannot be applied.

2. Infrastructure

The Applicant's Infrastructure section includes the following introductory paragraph on page 37:

'As set out in NGET's response to paragraph 9 of the Secretary of State's Request for Information, NGET is intending to submit a planning application for the new NGET substation at its preferred site outside of the Order Limits in Q1 2027. On the assumption that consent is secured in Q3 2027 (although this is of course entirely dependent on the Local Authority's determination time, so is not entirely within NGET's control), mobilisation is anticipated to commence in Q2 2028, with completion of works planned by October 2031. Regarding the fallback position within the Order Limits, this would only be progressed if consenting the substation at the preferred site pursuant to the Town and Country Planning Act ("TCPA") regime was not going to be possible. It is therefore not possible to give an entirely accurate delivery programme for this scenario as it would be dependent on the point at which NGET made a decision to no longer pursue a TCPA consent, but in any event, this would not be on a more accelerated programme than that which has been set out for consenting the substation at NGET's preferred site. This paragraph has been provided by NGET.'

This strongly contrasts to the statement provided by the Applicant in APP—043 as shown below:

'An operational period of approximately 37.5 years is proposed. October 2027 is the current grid connection offer date, although this is likely to be amended to Q4 2028. October 2028 is therefore now the assumed date of connection for the purposes of EIA assessment.'

Yet again, the information now being provided by the Applicant raises significant questions in respect of their business acumen. Having initially opted for a substation requiring cabling going through "Oxford Historic Core Conservation Area, a designated Area of Archaeological Interest with possible medieval and Roman remains, Grade I and II listed buildings, the Oxford Meadows SSSI, and Oxford Green Belt" they now appear to have chosen an alternative substation with a connection date, at best, three years later than planned but actually with no certainty of completion at all. As established in our RR-092, REP3-085 and REP4-044, this is the same Applicant that has never constructed a utility scale solar farm and whose largest site in Japan, Ukijima, was sold on with significant inherent problems (REP-060, para 2.3); despite this track record they now wish us to believe that they can be given responsibility for constructing the largest solar farm in Europe; furthermore one which is on the edge of a World Heritage site, in close proximity to numerous heritage assets, and which would harmfully impact significant swathes of Green Belt and prime agricultural land.

3. Cultural Heritage

3.1 In this section there are 17 pages dealing with the Applicant's explanations as to why the relevant consultees may have differing views on the impact the project would have on cultural heritage. In those cases where differences remain, one or other of two arguments is invoked: either that any harm 'should be outweighed by public benefits as per National and Local Policy Tests'; or 'both parties agree that this is a matter that the Examining Authority can come to a view on.' Many proposed sites will have heritage assets which need to be considered. This particular site not only has an exceptional number of individual heritage assets but is also an extremely significant World Heritage Site. A huge amount of time has already been spent on Botley West by ICOMOS, ICOMOS UK, Historic England, The Oxford Host Authorities, the ExA and Interested Parties. It is now proposed that yet further time is spent by the SoS in reviewing arguments for and against. This underlines even further that the wrong site has been selected, and

simply adds to the existing reasons why the application should be refused and no more time wasted trying to reconcile opposing views on the extent of the impact.

3.2 On page 46 of this section, there is a further, specific paragraph that needs to be challenged, as set out below:

‘The Project requires land to be leased from The Blenheim Estate and this results in an increase in monies available for the maintenance of the world heritage property, therefore enabling enhancement of the significance of the Blenheim Palace WHS. Very little archive material would be produced for the Project, thus it is not reasonable for the Project to directly develop any archive capacity. However, the increased monies available for the maintenance of the world heritage property could be used for the further development of archive capacity at Blenheim Palace and/or the access to that archive. The potential for visual and noise effects regarding the WHS is considered within the updated Heritage Impact Assessment (Rev 2). The design of the Project includes enhanced access to land within the setting of the WHS through the provision of permissive footpaths. The Project is therefore fully compliant with the policy set out in paragraph 5.9.13 of NPS EN-1 (2023).’

Neither Blenheim Palace nor the Applicant have provided any proof that there would be any guaranteed benefit to the Blenheim Palace WHS. Assertions were made at various times in the Examination process; each time these were challenged by BYG. Our last submission in this respect was REP6-074, which received the following response from the Applicant in REP7-046:

‘Blenheim Palace is a separate organization from the Applicant and the Applicant cannot comment on Blenheim Palace Heritage Foundation financial matters. However, the two following paragraphs from [REP5-062] are key: • "As a consequence of the receipt of the rents from the Solar leases (both indirectly via the turnover rent paid by VUT, and directly from rents paid by the Solar Developer to the Maintenance Fund), the amount that the Maintenance Fund pays towards the Heritage Property is expected to increase from £88,000 to approximately £440,000 per annum. " (paragraph 3.1) • "These assumptions are subject to confirmation of the final drawdown areas to be included in Solar leases and the detailed commercial performance of the Botley West scheme once operational but represent a reasonable assessment based on the proposals and economics circumstances today." (paragraph 3.2) This indicates the likely increase in funds to be made available, but explains why a binding commitment to that particular increase cannot be committed to at this stage.’

In the context of the scale of the project the amounts being quoted are derisory and, in any event, not guaranteed. There is therefore no guaranteed benefit to the WHS from the project. Any such claims should be disregarded.

4. Soils and Agriculture

In para 30 on page 87, reference is made to a SoS request for an updated Soil Management Plan from the Applicant to restore land quality on decommissioning. We would simply draw your attention to the submission from James Price, REP6-094 in which he made the following points.

‘Dear Planning Inspectorate,

In response to PVDP’s answer to D4 REP4-037, page 94 some context needs to be shown. Firstly the response given by PVDP is clearly an AI response to a simple question whereas I am writing with extensive knowledge of this subject matter, indeed I would be classed as a professional given my 25 years’ experience not only of this situation but also of the specific ground that is being discussed.

Their response has some merit in that "Leaving land fallow is a practice which has formed part of agricultural rotations for centuries as it enhances soil quality through natural restoration processes" but the key word in this statement is "rotations" As a regenerative farmer I practise a wide crop rotation and indeed nearly all farmers in the world have a crop rotation whereby we grow different crops in the same field in each subsequent year. Wikipedia states "Ancient Near Eastern farmers practiced crop rotation in 6000 BC, alternately planting legumes and cereals" and gardeners will do the same, it is one of the most basic practices when it comes to crop or land husbandry. But this all relies on growing different crops each year, If you grow the same crop year after year then this is a monoculture. The solar panels cannot have anything other than the same crop underneath them year after year so the ground will not be fallow as stated but will become a monoculture. This is the exact opposite of what is being claimed and is extremally detrimental to soil health and quality.

The other major issue which is being ignored is the damage that the installation of the panels will do to both the soil structure but also to the drainage schemes that are established under the surface. In the post war period the government recognised the importance of food security in the UK and grant funded the installation of hundreds of thousands of miles of drainage deep under the soil to allow the ground to be used to grow crops. Most of the land that is being put forward by PVDP for the solar development has these land drains underneath the surface and by driving their piles into the ground to support the panels they will destroy these systems. Not only will this make the ground unfarmable when, and if, the panels are removed in 40 years but for the duration of the project the soil will sit waterlogged and anaerobic over the winter months. Pioneering work by the Allerton Project in Leicestershire has shown that compacted wet soils emit elevated levels of nitrous oxide, a greenhouse gas 300 times more potent than carbon dioxide. They are currently funding a research project to update land drains in a field to monitor not only yield but also weed burden, soil health and environmental metrics.

I cannot emphasise enough how detrimental this project is to the soils and biodiversity of this area. Under my care I have transformed this farmland and it is now both productive and biodiverse whilst being resilient to our current weather patterns. We have grey partridge, brown hares and numerous butterflies, birds and insects that thrive alongside our productive fields which produce food year after year for the UK. This will be destroyed by this solar development, it is nothing but a money making scheme, despite claims to the contrary.

This response was written without any reliance on AI, it has come from my experience and some readily available studies that are in the public domain.`

This submission drew the following response from the Applicant in REP7-046:

`We thank Mr Price for his comments and know that he has been a key partner for Blenheim Estate over the past 20 years, farming a number of sections of the land within the order limits for anything from two years to twenty years. He is a respected arable farmer who cares deeply about growing food. That said, there is a growing body of research which supports the benefits to soil health we have outlined within the Botley West proposal and we must respectfully disagree that rotations are the only method of restoring soil health.`

James Price is acknowledged by the Applicant to be an expert in his field. He has a detailed knowledge of the soils at risk from this project, and of farming best practice borne out by years of experience. The SoS would be well advised to consider whether he might not be in a better position to judge the potential harm to soil quality that might arise. The Applicant`s rather dismissive and vague response to his submission is unsupported by any evidence, and does little to recognise that *`importance of ensuring that robust information is available to inform the decision-making process`* to which the SoS refers in his letter to the Applicant of 8 June refusing a further extension of the RFI deadline.

5. Aviation and Socio-economics

In REP4-043, we pointed out that the removal of panels close to the southern end of the London Oxford airport runway would not remove a remaining risk to pilot, passenger and public safety in the event of engine failure arising from the lack of emergency landing sites. We provided evidence that incidents of this kind are random in nature, location and effect. It is inevitable that they would occur outside the provisional safety cone, with resulting danger to human life. We summarised the points we had raised in our REP7-060. [EN010147-002100-Begbroke and Yarnton Green Belt Campaign- Visibility of Solar Panels Oxford Airport.pdf](#).

We also note that the submission from Oxford Aviation Services (C1-025) makes it very clear that the Applicant has not engaged with London Oxford flying schools, where responsibility for the safety of their students ultimately lies. It has therefore been impossible for them to assess any potential risk to safety, or of economic harm to their business, that may arise from the project.

Appendix

Details of all NSIP solar projects on the PINS website as of the end of 2025

[Register of applications](#)

Recommended or Decided							
			Status	MW	Green B used?		
Byers Gill Solar			Decided	180	No		
Cleve Hill Solar Park			Decided	373	No		
Cottam Solar Project			Decided	600	No		
East Yorkshire Solar Farm			Decided	400	No		
Fenwick Solar Farm			Rec.	237	No		
Gate Burton Energy Park			Decided	500	No		
Heckington Fen Solar Park			Decided	500	No		
Helios Renewable Energy Proj			Decision	250	No		
Little Crow Solar Park			Decided	150	No		
Longfield Solar Farm			Decided	420	No		
Mallard Pass Solar Project			Decided	350	No		
Oaklands Farm Solar Park			Decided	138	No		
Stonestreet Green Solar			Decision	100	No		
Sunnica Energy Farm			Decided	500	No		
Tillbridge Solar Project			Decision	500	No		
West Burton Solar Project			Decided	480	No		
Under examination							
Dean Moor Solar farm			Exam	150	No		
One Earth Solar farm			Exam	740	No		
Pear Tree Hill Solar Farm			Exam	320	No		
Springwell Solar Farm			Exam	800	No		
Pre-examination							
Beacon Fen Energy Plant			Pre-exam	400	No		
Fosse Green Energy			Pre-exam	350	No		
Frodsham Solar			Pre-exam	147	Grey B	Marsh land	
Great North Road Solar			Pre-exam	800	No		
Green Hill Solar Farm			Pre-exam	500	No		
Steeple Renewables Project			Pre-exam	400	No		