



24 June 2026

Begbroke & Yarnton Green Belt Campaign (BYG)

Further comments on PVDP`s Response to Secretary of State Consultation 1-20.3, re Botley West, Green Belt and VSC.

Dear [REDACTED]

On 15 June last, Begbroke & Yarnton Green Belt Campaign (BYG) submitted *Comments on PVDP`s Response to Secretary of State Consultation 1-20.3* to your office.

We (BYG) are now sending this further submission commenting on the Applicant`s assertion made on page 36 of their submission.

The assertion reads as follows:

`Green Belt has influenced the design and layout of the project, but it has not been an overriding factor in the strategic site selection process. Its influence has come in the detail design and layout and ultimately justified by a balance of harm versus benefit using VSC and the positive presumption afforded to it by its CNP status`.

We believe the Applicant is mistaken in invoking CNP status to argue that the planning harm that would be caused by the Botley West project is overridden by VSC. We contend as follows that VSC cannot be applied.

1. There is no legal definition of what constitutes VSC. National Policy establishes them as a balancing test to determine whether normally inappropriate development should be permitted on land enjoying Green Belt protection. VSC will not apply 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 National Planning Policy Framework (NPPF) includes the following in respect of renewable energy (paragraph 160):

‘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.’

In our submission of 15 June, we covered the requirement arising from case law that alternatives must be considered when VSC is being applied. We established very clearly that - as Botley West could have been sited anywhere in England - there is no case to be made that alternatives were not available.

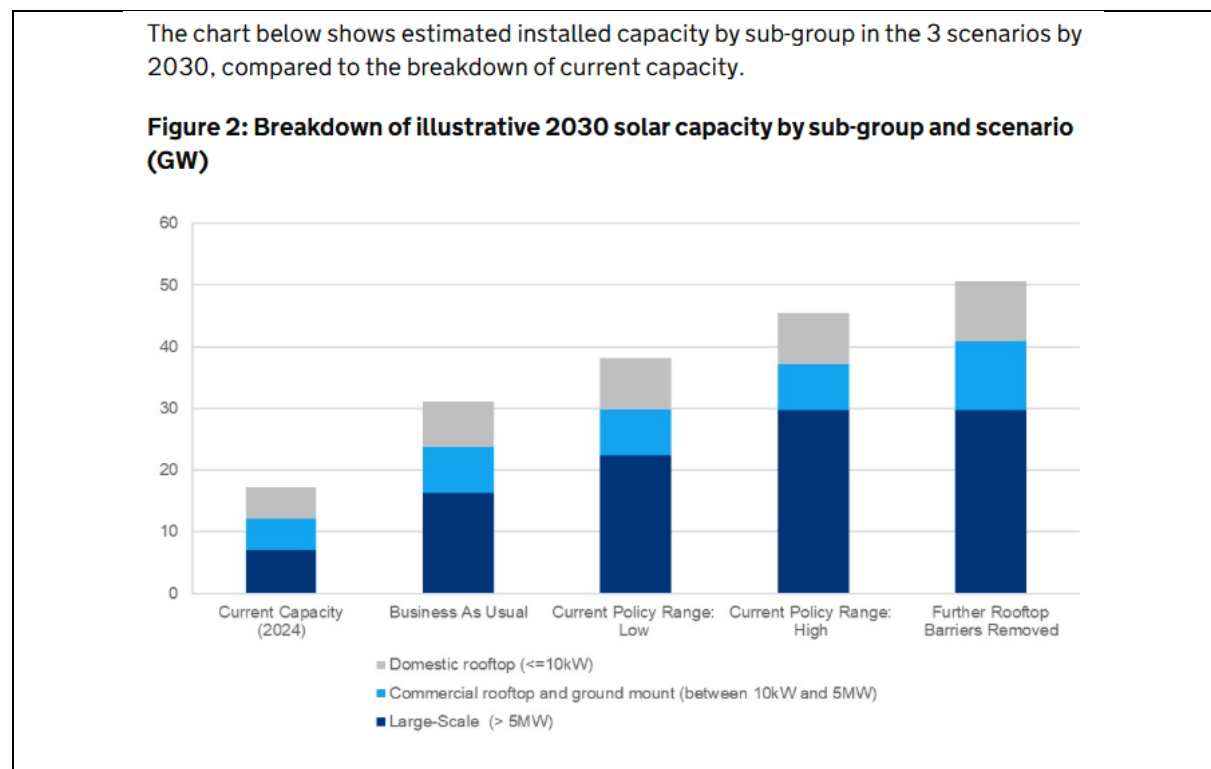
2. The NPPF includes an additional requirement that must also be met before invoking VSC. That is the test in 155 (b) which states that:

“There is a demonstrable unmet need for the type of development proposed”

The purpose of this submission is to confirm, through analysis, that any claims made to justify the application of VSC on the basis of “*unmet need*” are untenable.

‘Need’ is not defined in a loose or open-ended manner. It is predicated by Government policy which has established a targeted mix of renewable energy. This mix must also recognise the constraints imposed by the weaknesses existing in the National Grid infrastructure.

3. The Government’s solar strategy was outlined in its June 2025 policy paper, *Solar roadmap: United Kingdom powered by solar*. The key components of the solar mix required to meet the Government’s 2030 objectives were set out in section 2. *Deployment Scenarios*, particularly in *Figure 2* as shown below.



The Government initially established their solar targets in the *Clean Power 2030 Action Plan (CPAP)* [clean-power-2030-action-plan-main-report.pdf](#) published in December 2024. For total solar, the target was set at 45-47GW which can be seen in Fig. 2 above.

Included in *CPAP* was the following explanatory footnote:

"In addition to the two NESO scenarios, these ranges have been informed by internal modelling and an assessment of maximum feasible deployment based on current knowledge of the project pipeline. Therefore, the range differs from the range of the two NESO scenarios in some instances. However, for solar, there is scope to exceed the 47GW upper limit, subject to system need, noting for example the potential of rooftop solar to boost deployment".

The 47GW is therefore based on the deployment capacity in the grid, together with the possibility of additional rooftop solar (since that does not have the same grid deployment constraints).

4. In the diagram above, `Large-Scale` solar represents 60% of the total mix in the projections; so 30GW is predicted for 2030 out of a total target of 50GW. For the 75GW target which the Government projects for 2035 (*CPAP*, page 17), a total of 45GW (75x60%) is therefore to be anticipated from large scale solar. And for the *Climate Change Committee's* estimate that 85GW would be needed by 2050 to achieve Net Zero, 51GW - being 60% - would be required.

5. It is instructive to then compare these targets with the details of the projects approved or being put forward for approval.

5.1 The Large-Scale solar projects currently underway and on the PINS Project List can be summarised as follows:

Already Decided

A total of 17 projects with an overall capacity of 6.2GW

Cleve Hill Solar Park	373 MW
Little Crow Solar Park	150 MW
Longfield Solar Farm	420 MW
Mallard Pass Solar Project	350 MW
Gate Burton Energy Park	500 MW
Sunnica Energy Farm	500 MW
Cottam Solar Project	600 MW
Heckington Fen Solar Park	500 MW
West Burton Solar Project	480 MW

East Yorkshire Solar Farm	400 MW
Oaklands Farm Solar Park	138 MW
Byers Gill Solar	180 MW
Tillbridge Solar Project	500 MW
Stonestreet Green Solar	165 MW
Helios Renewable Energy Project	250 MW
Fenwick Solar Farm	237.5 MW
Springwell Solar Farm	800 MW

5.2 In addition, there are approximately 28 further projects on the PINS Project list which are currently at various stages in the planning process. These projects have a combined capacity of 14GW.

5.3 There is currently around 22GW of installed solar capacity. [Solar Power Statistics 2026 | Elite Renewables](#) As shown above, projects already approved together with those already in progress should add a further 20GW (6+14GW), bringing the installed total to 42GW.

This already significantly exceeds the 2030 target of 30GW for Large-Scale solar projects. Indeed, it is very close to the 2035 target of 45GW.

6. However, what is even more significant is that the NESO TEC register, which lists all the potential projects with a grid connection contract in place, has an astonishing 464 projects with a cumulative capacity of 205GW! [The extraction of the data needed to support this has been done by *Claude ai*; a copy can be provided if required.]

This provides stark evidence of accumulated over-capacity. In fact, the Government is dealing with more projects than can possibly be handled by the Grid. The TEC register has been notorious in the past for allowing projects to remain registered despite some being phantom projects that were never going to be developed. As a result, a purging took place in 2023, and Gate categories were introduced to achieve more efficient grid connections. Projects now enter the TEC register at *Gate 1*, which provides a basic, coordinated, connection agreement. To advance to *Gate 2*—where they receive a firm, accelerated, connection date—projects must then prove that they meet strict criteria, including planning consent and security of land lease or purchase. This has resulted in more confidence in the integrity of the register.

7. To be ultra-conservative, and to eliminate any risk of double counting, one could reduce the 205GW in the TEC register by the 42GW coming through PINS; then take only 50% of the remainder to allow for projects that might not proceed. There would still be 81GW remaining. If developed and added back to the 42GW coming from PINS, this would provide for an overall total of 123GW.

This far exceeds what is being targeted and is nearly three times the 45GW thought necessary for 2035 from Large-Scale solar.

8. *Solar Energy UK* has suggested that the *Climate Change Committee's* estimated requirement of 85GW by 2050 to achieve Net Zero should be revised upward to 100GW. This would require 60GW of Large-Scale solar, less than half the 123GW conservatively calculated above. Even more striking is that, using these same calculations, the targets would still be achieved assuming that only 25% of the TEC Register projects will ever be developed!

9. As stated, these calculations are very conservative; even more so after analysing details of the projects already in *Gate 2*. NESO has an *Existing Agreements Register* which contains details of all the projects in the TEC Register which have been accepted as qualifying for *Gate 2*. [*Claude ai* has again been used to extract the solar projects in this category.] This analysis confirms that projects with a total accumulated capacity of 92GW have already been accepted for *Gate 2*. This total 92GW is just under half the current TEC Register capacity of 205GW referred to above, reinforcing the view that the TEC register is now much more reliable. As shown above, 92GW also far exceeds the 60GW required for Net Zero in 2050.

Unquestionably, therefore, the Large-Scale solar projects in the pipeline exceed government targets by a very considerable margin. `Unmet need` is no longer a credible argument for approving solar planning applications.

10. There is one further point that needs to be raised. Botley West was originally planned to have a grid connection date of October 2026 (C1-087, page 24). The project was therefore classified as a *Gate 2, Phase 1* (2030) protected connection (C1-087, page 38). National Grid (NGET) now confirms that the earliest the Farmoor substation could be available for a grid connection would be October 2031 (C1-087, page 37) meaning that Botley West now falls into *Phase 2* (2031-2035). Furthermore, NGET has divided England and Wales into separate transmission zones so that solar power connections can be evenly distributed. Botley West is included in Zone T6 (Central England). Zone T6 is one of the zones oversupplied for Phase 2 and closed to new applicants, so there is also no demand for Botley West from a zonal point of view.

11. The evidence set out above clearly demonstrates that `demonstrable unmet need` is not an argument which can be used to justify the considerable planning harm that would be brought by Botley West. Such `need` will already be more than comfortably met. Given the solar capacity already in place and in the pipeline, there is no sustainable argument for applying VSC to approve Botley West.

12. Botley West has no confirmed grid connection before 2031 at the earliest - if at all. The project has also raised a multitude of other serious planning issues and evidential delays, many of which are still unresolved following its Examination by PINS.

Common sense and good governance strongly suggest that such projects should fall by the wayside to ensure that more satisfactory projects can proceed without delay.

Yours faithfully,



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