

From: Paul HTST Bird [REDACTED]
Sent: 22 June 2026 09:02
To: Botley West Solar Farm
Cc: [REDACTED]
Subject: Dear Case Team,

Categories: SoS Consultation 2 Response

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Dear Case Team,

I write in connection with the Secretary of State's further information exercise in respect of the above application (EN010147 — Botley West Solar Farm), following the written ministerial statement of 26 March 2026 and the Secretary of State's letter to the Applicant and named Interested Parties of 14 April 2026.

I am Paul Bird, Campaign Director of Harvesting the Sun Twice [REDACTED] and Director of Dual Harvest Agrivoltaics Limited (Co. No. 17218316).

I hold over 40 years of mechanical engineering experience and have a background in Lincolnshire arable farming.

I was not a registered Interested Party in the examination of EN010147, the registration period having closed on 28 February 2025 prior to my engagement with this specific application.

I understand that the Applicant's responses to the Secretary of State's questions were due by 23:59 on 9 June 2026, and that those responses will shortly be published with a subsequent window for other parties to respond. I intend to participate fully in that response window.

However, I write now to formally place on the record two bodies of evidence that are directly material to the Secretary of State's consideration, both of which post-date the close of examination and were therefore not before the Examining Authority:

1. A formal written admission by the Department for Energy Security and Net Zero (DESNZ), dated 28 April 2026 (reference TOB2026/04355), confirming that the Land Use Framework and Spatial Strategy for Energy Planning treat solar as preventing food production as a 'framework outcome, not a market outcome' — and that agrivoltaic technologies 'may have an important role to play' in reconciling energy and food production on the same land.

2. Field trial evidence published in 2025 and 2026 demonstrating that Vertical Bifacial PV (VBPV) — a proven alternative solar configuration — retains 70–85% of agricultural productivity on the same land as the solar installation, with crop yields at or above reference levels at commercial scale.

I respectfully request that the attached covering letter and technical submission (document reference VBPV-UK-REP-2026-06-13-001-V1) be accepted as additional documents and published on the project page of the Planning Inspectorate's NSIP website, in the interests of ensuring the Secretary of State has access to the most complete and current evidence base before making the decision.

I am happy to provide any further information or clarification.

Yours faithfully,

Paul Bird
Campaign Director, Harvesting the Sun Twice
Director, Dual Harvest Agrivoltaics Limited



Paul Bird
Campaign Director
Harvesting the Sun Twice

13 June 2026

Planning Inspectorate Case Team
Botley West Solar Farm (EN010147)
BotleyWestSolar@planninginspectorate.gov.uk

Re: EN010147 — Botley West Solar Farm: Submission of Technical Evidence for the Secretary of State's Further Information Exercise

Dear Case Team,

I write in connection with the Secretary of State's further information exercise in respect of the above application, following the written ministerial statement of 26 March 2026 resetting the decision deadline to 10 September 2026, and the Secretary of State's letter to the Applicant and named Interested Parties of 14 April 2026.

I am Paul Bird, Campaign Director of Harvesting the Sun Twice (harvestingthesuntwice.org), a UK-wide technical advocacy campaign promoting Vertical Bifacial Photovoltaic (VBPV) agrivoltaic systems as an alternative configuration to conventional tilted solar on Best and Most Versatile (BMV) agricultural land. I hold over 40 years of mechanical engineering experience, most recently as Senior Mechanical Design Engineer at Ocado Innovation Ltd, and have a background in Lincolnshire arable farming. I am also Director of Dual Harvest Agrivoltaics Limited (Co. No. 17218316), an independent agrivoltaic consultancy.

I was not registered as an Interested Party during the examination of EN010147, the registration deadline having closed on 28 February 2025 prior to my engagement with this specific application.

I am aware that the Secretary of State's further information letter of 14 April 2026 poses over 70 questions to the Applicant, with responses due by 9 June 2026, after which those responses will be published and other parties invited to comment. I will participate fully in that subsequent response window.

However, I write now to formally place on the record a body of technical and policy evidence that is directly material to the Secretary of State's consideration of this application, and which post-dates the close of examination. I respectfully request that this letter and the accompanying written submission be accepted as additional documents and published on the project page of the Planning Inspectorate's NSIP website, in the interests of ensuring the

Secretary of State has access to the most complete and current evidence base before making the decision.

The submission addresses two matters that I understand to be central to the Secretary of State's further information exercise:

- The food production implications of the conventional tilted bifacial PV configuration proposed, and the availability of a technically proven alternative — Vertical Bifacial PV — that retains 70–85% of agricultural productivity on the same land.
- A formal written admission by the Department for Energy Security and Net Zero (DESNZ), dated 28 April 2026 (reference TOB2026/04355), which post-dates the examination and which is directly material to the Secretary of State's assessment of the Land Use Framework assumptions underpinning this application.

This evidence was not before the Examining Authority. I submit it now in the public interest and in support of the Secretary of State's ability to make a fully informed decision.

I am happy to provide any further information or clarification. I can be contacted at harvestingthesuntwice@gmail.com or 07876 655746.

Yours faithfully,

Paul Bird

Campaign Director, Harvesting the Sun Twice

Director, Dual Harvest Agrivoltaics Limited

[REDACTED]

HARVESTING THE SUN TWICE

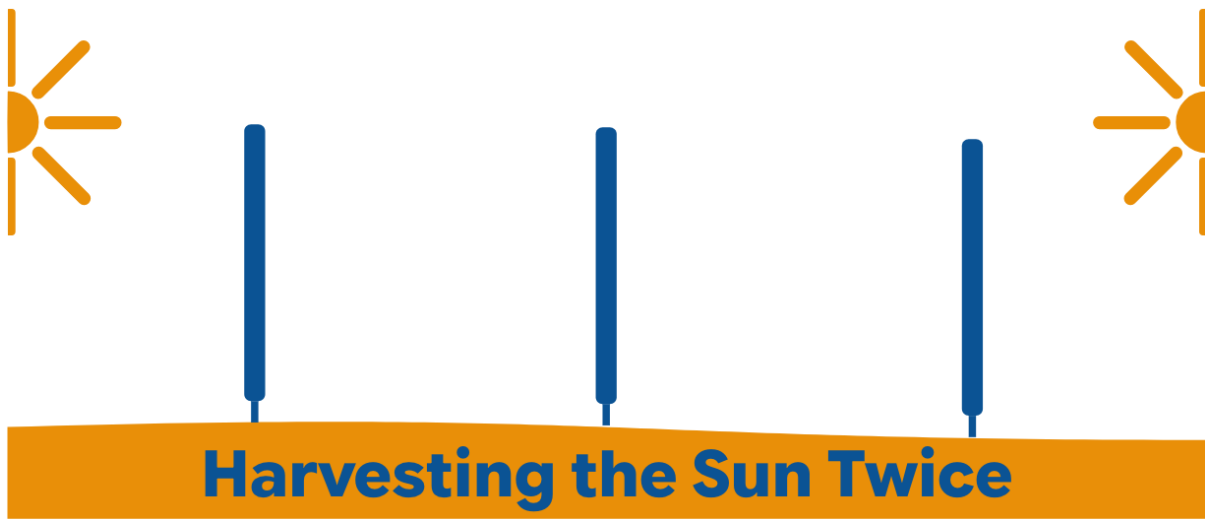


Technical Submission to the Secretary of State

Botley West Solar Farm

Planning Inspectorate Reference: EN010147

Document Reference	VBPV-UK-REP-2026-06-13-001-V1
Date	13 June 2026
Author	Paul Bird, Campaign Director
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PINS Reference	EN010147 — Botley West Solar Farm
Submission Type	Technical Evidence — Further Information Exercise



1. Standing and Introduction

1.1 This submission is made by Paul Bird, Campaign Director of Harvesting the Sun Twice (harvestingthesuntwice.org) and Director of Dual Harvest Agrivoltaics Limited (Company No. 17218316, incorporated 29 March 2026). The author holds over 40 years of mechanical engineering experience, most recently as Senior Mechanical Design Engineer at Ocado Innovation Ltd, and has a background in Lincolnshire arable farming.

1.2 Harvesting the Sun Twice is a UK-wide technical advocacy campaign focused on the promotion of Vertical Bifacial Photovoltaic (VBPV) agrivoltaic systems as an alternative to conventional tilted solar on Best and Most Versatile (BMV) agricultural land. The campaign maintains a published evidence library at harvestingthesuntwice.org and has made formal representations to multiple NSIP examinations, including EN0110013 (Droves Solar Farm, Norfolk) and EN0110002 (Mylen Leah Solar Farm, Northumberland).

1.3 The author was not a registered Interested Party in the examination of EN010147, the registration period having closed on 28 February 2025. This submission is therefore made as additional technical evidence for the Secretary of State's consideration during the further information exercise initiated by the written ministerial statement of 26 March 2026 and the Secretary of State's letter of 14 April 2026.

1.4 The submission addresses the configuration of the proposed solar array and its food production implications — matters that the Secretary of State's further information exercise has placed at the centre of the decision. It introduces post-examination evidence that was not before the Examining Authority.

2. The Further Information Exercise and Its Relevance

2.1 The Secretary of State's letter of 14 April 2026 posed over 70 questions to the Applicant, requiring responses by 23:59 on 9 June 2026. The scale and scope of that exercise — described by the MP for Oxford West and Abingdon as revealing 'an unprecedented number of gaps in information' — indicates that the Secretary of State is conducting a substantive reassessment of the application rather than a procedural review.

2.2 The Botley West proposal covers approximately 1,400 hectares in West Oxfordshire, Cherwell and the Vale of White Horse Districts. It uses conventional tilted solar panels in a fixed south-facing configuration — the standard UK ground-mounted configuration. According to the applicant's own environmental statement, approximately 62% of the land surveyed is Grade 3b agricultural land, with a significant proportion of Grade 3a.

2.3 The core concern of this submission is that the Secretary of State is being asked to approve a 40-year commitment of agricultural land to a solar configuration that is not the only technically viable option — and that a proven alternative exists which would allow the same land to simultaneously produce both energy and food.

KEY PROPOSITION

The food production impact of Botley West is not an inevitable consequence of solar energy generation. It is a consequence of the specific panel configuration chosen. The Secretary of State's further information exercise provides the opportunity to require the Applicant to address this distinction.

3. Material New Evidence: DESNZ Written Admission (Post-Examination)

3.1 On 28 April 2026 — four months after the close of examination in EN010147 — the Department for Energy Security and Net Zero (DESNZ) issued a formal written response to the campaign (reference TOB2026/04355, author: Adrian Collins, DESNZ Policy Official). This response constitutes new material evidence that was not before the Examining Authority and has not been considered in the Recommendation Report.

3.2 In that letter, DESNZ confirmed that the Land Use Framework for England (CP 1545, March 2026) and the Spatial Strategy for Energy Planning (SSEP) treat solar energy as preventing food production:

DESNZ Written Admission — Reference TOB2026/04355 (28 April 2026)

The Department confirmed that the Land Use Framework and SSEP assume solar prevents food production as a 'framework outcome, not a market outcome.' The Department further acknowledged that agrivoltaic technologies 'may have an important role to play' in reconciling energy and food production on the same land.

3.3 This admission is directly material to the EN010147 determination for the following reasons:

- The Applicant's case for the necessity of the tilted bifacial configuration rests, implicitly, on the assumption embedded in government planning policy that solar and food production are mutually exclusive. The DESNZ admission confirms this is a policy assumption, not a technical fact.
- The Land Use Framework's designation of agricultural land as 'in conflict' with solar is predicated on conventional tilted configurations. VBPV was not modelled as a scenario, as DESNZ has now formally admitted.
- The Secretary of State is therefore being asked to approve a 40-year consent on the basis of a policy framework that its own department has acknowledged is not technology-neutral.

3.4 The campaign has written to DESNZ requesting an independent update to the Land Use Framework modelling with VBPV included as a named scenario. That request remains open.

The Secretary of State may wish to require the Applicant to address the DESNZ admission as part of the further information exercise.

4. The Technical Alternative: Vertical Bifacial PV

4.1 Configuration Distinction

The Botley West proposal uses conventional tilted monofacial or bifacial photovoltaic panels fixed at approximately 30–35 degrees from horizontal, facing south, in east-west rows. This is referred to in this submission as TBPV (Tilted Bifacial PV). This configuration covers the ground beneath and between panel rows substantially or completely, preventing standard arable cultivation for the asset life.

Vertical Bifacial PV (VBPV) deploys panels vertically — at or near 90 degrees from horizontal — in east-west facing pairs. The panels are mounted on posts at inter-row spacings of approximately 8–12 metres, allowing standard agricultural machinery to pass between rows. The agricultural land between rows remains fully accessible and productive.

4.2 Field Trial Evidence

The following peer-reviewed and independently verified evidence is submitted in support of the VBPV alternative:

Study / Source	Key Finding	Relevance to EN010147
<i>Szarek et al. (Applied Energy, 2026, University of Turku)</i>	79.9–82.5% PAR light transmission at 10m row spacing under VBPV	Confirms arable crop viability across the full growing season under VBPV rows
<i>Schüler et al. (Next2Sun AG, IPV Conference 2026 — Löffingen site, Germany)</i>	Wheat 111%, barley 100%, millet 132% of reference yield adjacent to VBPV; BESS utilisation 1,288 kWh/3.3 MWp	Demonstrates that crop yields equal or exceed conventional agriculture under operational VBPV at commercial scale
<i>Victoria et al. (Aarhus University, 2025)</i>	Crop yields unchanged at full scale; Land Equivalent Ratio advantage of 18–26%	LER >1 confirms VBPV produces more combined food and energy output per hectare than separate land uses
<i>Hussain & Ghosh (2024)</i>	Static bifacial VBPV outperforms tracking systems for Land Equivalent Ratio in UK conditions	Directly applicable to UK planning context; confirms VBPV superiority over tracker alternatives in UK latitudes
<i>Williams, Hashad & Zhang (2026)</i>	VBPV wind shelter effect up to 40% wind speed reduction	Additional agricultural benefit: crop protection and reduced evapotranspiration in exposed arable settings

4.3 Grid and System Benefits

VBPV panels face east and west, producing a dual-peak generation profile aligned with morning and evening grid demand rather than the midday single-peak profile of south-facing TBPV. Independent analysis indicates this reduces Battery Energy Storage System (BESS) requirements by approximately 52% compared to TBPV arrays of equivalent capacity, significantly reducing the embedded carbon and land take of associated infrastructure.

This is of particular relevance to Botley West, where the scale of associated BESS infrastructure is a material consideration before the Secretary of State.

5. The Emerging Pattern of Contested Large-Scale Solar DCOs

5.1 Botley West is not an isolated case. The Secretary of State is making this decision against a backdrop of significant and growing democratic resistance to the conventional TBPV configuration at scale:

- The Drovers Solar Farm (EN0110013, Norfolk, 500MW) — currently in examination — has had two specific action points issued by Inspector Anthony Johnson requiring the Applicant to address food production concerns and to justify the choice of solar panels over alternative technologies. The campaign has made formal written representations to that examination on the VBPV alternative.
- Meridian Solar Farm (Lincolnshire, 750MW, approximately 2,700 acres of Grade 1 and 2 fenland south of Spalding) — submitted to PINS in March 2026. The food production implications of TBPV on some of the most productive agricultural land in England are expected to generate significant opposition.
- Springwell Solar Farm (North Kesteven, 800MW, 1,280 hectares — approved 8 April 2026) — subject to judicial review by Lincolnshire County Council and North Kesteven District Council.

5.2 The common factor across all of these cases is the conventional TBPV configuration. The food security, land use, and community objections being raised are objections to the configuration, not to solar energy itself. VBPV addresses every one of these objections structurally, not through mitigation.

6. Summary and Requests to the Secretary of State

This submission respectfully asks the Secretary of State to consider the following in the determination of EN010147:

1. Require the Applicant, as part of the further information exercise, to provide a formal assessment of whether Vertical Bifacial PV was considered as an alternative configuration for the Botley West site, with reasons for rejection if so, or reasons for non-consideration if not.
2. Have regard to the DESNZ written admission of 28 April 2026 (reference TOB2026/04355) that the Land Use Framework treats solar as preventing food production as a 'framework outcome, not a market outcome', and that this admission post-dates the Examining Authority's Recommendation Report and was therefore not before the Examining Authority.
3. Note that field trial evidence published in 2025 and 2026 — since the close of examination — demonstrates that VBPV retains 70–85% of agricultural productivity on the same land as the solar installation, at commercial scale, with crop yields at or above reference levels.
4. Consider whether the grant of a 40-year Development Consent Order for a conventional TBPV configuration on agricultural land, in the absence of any alternatives assessment addressing VBPV, is consistent with the Secretary of State's obligations under the Land Use Framework and the National Policy Statement for Energy (EN-1).

SUBMISSION CONTACT

Paul Bird — Campaign Director, Harvesting the Sun Twice
Director, Dual Harvest Agrivoltaics Limited (Co. No. 17218316)

[REDACTED]
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