

To: Secretary of State for Energy and Net Zero

Subject: Botley West Solar Farm Response to submissions made up to 9th June 2026

1. Absence of Electrical substation and application of Grampian clause

At present there is no electricity substation existing that is required for energy from Botley West to be fed into the National Grid

Currently, no application has been made by National Grid for such a substation and additionally there is no firm location for such a substation.

In contrast, Springwell Solar Farm was only approved on 8th April 2026 in the knowledge that the infrastructure for its National Grid connection point in North Kesteven was already fully consented for construction.

Below is an anticipated timeline required for any substation to be constructed to accept energy from Botley West:

Submission of scoping request to VOWHDC (if required)	Q3 2026
Public consultation and engagement	Q4 2026
Submission of planning application to VOWHDC	Q1-2 2027
Submission of S37 application to DESNZ	Q1-2 2027
Planning Application Determination	Q3-4 2027
S37 determination	Q4 2027
Discharge of pre-commencement planning conditions	Q4 2027 - Q1 2028
Discharge of pre-commencement S37 conditions (if applicable)	Q1 2028
Mobilisation for commencement of construction works	Q1 - Q2 2028
Completion of the works and availability for connection for	Q4 2031

Since the solar farm and the required electrical substation are at such disparate stages in development, it cannot be right to consider the substation and the solar farm as a single entity for a DCO. National Grid has not submitted any formal requests for consideration of a substation and its exact location has not been determined. Because no application has yet been made, no public consultation has occurred.

Application of Grampian Clause

Because the solar farm and the substation are separate projects, the Examination Authority proposed a **Grampian clause** (or Grampian requirement) to prevent construction of the solar farm from beginning until the substation gains planning permission. At best, planning consent for the substation can't be gained before Q1 2028, a probably optimistic date.

2. Landscape and Absence of a RVAA in PVDP's application

The applicant, PVDP, has not completed the requested updated Landscape study (including footpaths and viewpoints) or to carry out the full Residential Visual Amenity Assessment (RVAA) - i.e. the impact on local residents that the Examiners and all of us, as Interested Parties (IP), have been calling for since last summer! However they have finally conceded that further panel removal is required.

They are proposing a larger buffer for some properties, including:

- Dornford Cottage
- Shipton Slade Hamlet
- Properties east of Lower Rd, Church Hanborough
- Properties at northeast end of Yarnton Road, Cassington
- Properties between Tumbledown and Jumpers Farm, Cumnor

These are only provisional and PVDP are proposing that precise buffer sizes (between 100m and 250m) will not be finally decided until **after the Development Consent Order (DCO) is granted**. This creates a serious risk for residents, as it would prevent interested parties from being consulted or having any meaningful role in the final decision.

By PVDP's own admission, this is a "unilateral decision" and "this new approach has not been discussed with the OHAs" — the Oxfordshire Host Authorities (the joint councils). OHA, in their published submission, say they do not have the time, resources or expertise to administer the full and fair property-by-property assessment required. PVDP should have done this, at their own expense, months ago - as requested by the Inspectors during the Examination.

3.Risks to local aviation and Oxford Airport

Glint and Glare

Numerous aircraft, both fixed wing and helicopters fly over the area at quite low levels. Civilian aircraft frequently use Oxford Airport which would be extremely close to the solar farm. Oxford airport hosts some of the largest and most widely used flying schools in the UK.

Flying schools based at the airport have raised and will raise significant objections to the presence of solar panels close to the flying schools.

EFTA (Engine Failure After Take-off) is a real risk and although some solar panels have been removed, many remain in dangerous areas for EFTA.

Bearing in mind the undulating nature of the terrain upon which the solar panels will be placed, it is inevitable that glint and glare from the vast array of solar panels could have serious consequences for the student and experienced pilots of such aircraft.

As an example of what can and does happen, a light aircraft that had taken off from Oxford airport was forced to make an emergency landing on July 1st 2024 in a field that is scheduled to be occupied by solar panels next to the A44 Woodstock East, close to the Begbroke slip road.

The applicant has not adequately addressed the issue of glint and glare in their application or subsequent additional applications.

4. Botley West, Natural England Views and failure of Horlock Rules

Natural England's own submissions show that Botley West fails the Horlock Rules. The statutory conservation body has not been able to

conclude that the scheme avoids harm to designated features. Under the Wildlife and Countryside Act, that means Natural England must object — and they have.

Natural England's Evidence

Three documents in the Examination Library demonstrate unresolved ecological risk:

(The Landscape and Ecological Management Plan (LEMP) is a mandatory, site-specific document required by local authorities to ensure that new developments protect, manage, and enhance local wildlife and greenery over the long term.)

Natural England Closing Statement (D7) — Natural England confirms outstanding ecological concerns and does not accept that harm is ruled out .

Natural England SoS Consultation 1 Response (11 June 2026) — Natural England states that the applicant's revisions (including LEMP Rev 8) still fail to resolve key risks .

Statement of Common Ground – Natural England (Rev 2) — Multiple items remain Not Agreed, including hydrology, habitat fragmentation, and adequacy of the LEMP .

These documents show that Natural England has not signed off the ecological baseline, the mitigation, or the claimed “no adverse effect”.

Application of Horlock Rules

Under the Horlock Rules:

Rule 1: Likely damage = refusal. NE identifies hydrological, landscape and habitat risks.

Rule 2: If risk cannot be ruled out, assent must be refused. NE explicitly states risk remains.

Rule 3: Mitigation must remove risk, not reduce it. NE does not accept LEMP Rev 7 or Rev 8 as sufficient.

Rule 4: NE cannot balance harm against public benefit. Solar's national importance is irrelevant to NE's statutory test.

Botley West fails all four rules.

Consequences for the Secretary of State

Natural England's unresolved objections are not minor technicalities — they are statutory red lines. The Secretary of State therefore must either:

- (a) conclude the applicant has not demonstrated avoidance of harm, or
- (b) explicitly override Natural England's statutory position.

Given the evidence, the first conclusion is the only defensible one.