

Botley West Solar Farm – EN010147

Representation concerning the Applicant's latest submissions

From Interested Party: Lorraine Jenkins

Interested Party Registration Identification Number: [REDACTED]

Dear Secretary of State

As the “delayed” deadline for a final decision is looming, I feel compelled to write again to express my continued strong opposition to the Botley West Solar (BWS) Application. In my last submission to the Secretary of State in November 2025, I expressed my observation that the applicant held a strategic disregard for fair process. What has happened over the following months continues to validate this.

National security and provision of national infrastructure are a complex and compelling issue for the UK. Confidence in the government has to be earned through the integrity in what they do. Not every proposal for projects of National Infrastructure are merited; there are alternatives.

Security is not only about safe and secure renewable energy; increasingly we are told it's about our ability to defend the country, prioritise basic food supplies and protect our heritage and values.

It was clear during the open Examination Hearings that the application was poor in design and content, and engagement with the community and people impacted lacking. **Quite simply, under a lawful process post public examination, this application should have been refused by the Secretary of State.**

The applicant's ability to sway the argument has been facilitated by the Secretary of State's decision to go outside of process (Firstly, to provide time for a sweeping array of questions that, on the face of it, totally undermined the credibility of the original application. And secondly, to allow late representations, twice, frustrating any proper consultation).

Having been allowed time to make representations, the applicant now suggests they have responded to concerns, made modifications, and imply “we” can now place trust in their intentions. This trust extends to critical matters that remain undetermined, requesting the power to make decisions post approval. Placing “trust” in these latest representations by PDVP is not feasible. I ask the Secretary of State to consider the following significant points and to reject this application.

- The quantity of land given over to solar already in the UK suggests the current planning framework is allowing for motives of profit rather than informed spatial planning. BWS application is an immense cash cow for a single landowner, with dubious funding. PDVP claim a prior track record that suggests some pedigree in delivery, yet we know they have previously sold on projects, with the sole intention of making huge amounts of money out of this process. **The UK government must**

show that they are making a stand against exploitation under the guise of “national interest”.

- There are too many late changes in the latest representations that are not fully scoped and importantly a revised boundary of the site in its current form should be determined. Late representations also introduce a significant new “potential” link to other proposed developments in Oxford that are not fully explored, but would necessitate further major changes to the proposal. **The only way forward with integrity is to demand a fully scoped new application to determine future planning consent with full and proper examination.**
- The applicant has not proven why this application, on this scale, in this location is “critical” to our renewable energy target delivery. Solar is not the most effective means of renewables in the UK and these mega applications demand a huge cost in land use. The dispersal of community sized solar across wider geographical areas has more flexibility and reliability than one colossal solar installation; where daily the output is highly volatile being based on local prevailing conditions. **BWS application remains too huge in scale.**
- Battery installations to support this proposed mega solar site are outrageous in scale, in close proximity to the surrounding communities and connectivity to the National Grid is already under immeasurable pressure. **The logistics of connecting BWS to the National Grid in an appropriate and timely way have not been satisfied.**
- The BWS application continues to provide conflicting detail or has missing information in the latest submission. The applicants ask the Secretary of State to simply allow for the “detail” to be put in place after consent has been granted (such as for whose benefit the supply is for, design and mitigation measure such as buffer zones, logistics, costing, and decommissioning plans). **It is wholly unacceptable to allow for significant planning details to go forward at the future discretion of the applicant. This provides the scheme with a platform for future abuse of the planning process, using the protection of the National Infrastructure banner.**
- Under the BWS application, 1400 hectares land will be taken with a huge opportunity cost. We need to value and protect tenanted farms and farm land rather than allow local food production to be lost. The applicants conveniently try to discredit these farms viability. However, the major disruption to productivity for farms in recent years is this massive solar proposal already limiting activity on what has always been versatile and good farm land, used for crop and livestock. **National food security and a leaning towards a lower carbon footprint in food distribution provides a strong weight to protecting this land as productive farmland over the next 40 years and beyond.**
- Proximity to and potential impact on Oxford Airport and RAF Brize Norton remain a concerning feature of the BWS application. At a time when risk is being heightened, the applicant continues to plan the placing of millions of solar panels and infrastructure along well documented flight paths for military and civilian aircraft

from the UK and overseas. There are multiple parties that use and have an interest in both airports and that have not been engaged. The small area of panel removal adjacent to Oxford Airport and use of bird dispersal equipment appear an act of tokenism. **The Secretary of State must prioritise the safety of the UKs leading flight training facility and an important emergency facility for both UK civilian and military aviation.**

- Having being exposed by the Examination Hearing process, the applicants chose to replace their consultants PRS and appointed a new company, Icen. They have since presented modifications such as buffer areas as mitigation around ancient woodland, local residencies etc.. This is at best a lazy attempt to quell concerns over protection of nature and wildlife, preserving heritage characteristics and maintaining quality of life for people living in local communities. There are more detailed responses from local parishes and other informed parties, however, it is apparent that **the applicant has not:**

- **completed fit and proper surveys** with residents to inform an apply appropriate buffers for the overwhelming scale of impact,
- **applied their own limited stated policies** of panel withdrawal with any consistency, or,
- **taken account of the unique ecology and provided adequate protection of the extensive range of wildlife impacted** by the immense scale of the project.
- **taken full measure of the value of the surrounding land in the assessment of UNESCO world heritage site status**
- **taken adequate stock of other significant development in progress, approved, or outline proposals expected. There are no published plans as to the ability of local infrastructure to meet all the new demands being placed upon it during construction, maintenance and de-commissioning.** Indeed, there has been speculative discussions by the land owners around potentially conflicting proposals for housing development on or directly adjacent to land currently described as within the solar project boundary.

Despite being given unprecedented time to complete further representations, they fall woefully short in their grasp of their own proposals. **The Secretary of State must reflect on the low confidence level in the applicant's approach to protection and mitigation policies, and again not rely on any post approval commitment to resolve issues that would demand full and proper consultation.**

I recognise that the Secretary of State will receive multiple representations around discrepancies and challenges to the BWS application, some of which are above and others you will receive from many reputable sources. The conclusion is that BWS is too big and

panels are in the wrong place; BWS application would have a permanent impact on a huge area of farmland and surrounding villages.

There is a growing public awareness around an obligation to future generations to improve spatial planning, and I would urge you to consider this application with a broad perspective. There are better alternatives.

Given the mounting pressure to demonstrate a pragmatic, common sense approach in Government, making the decision on BWS application, with c 2,500,000 solar panels and associated storage infrastructure matters. Confidence in the application and that it presents the right way forward must be absolute.

It matters most because of transparency in vested interests, and the hidden costs of approval, not just to local communities, but in the long run to the country as a whole.

For this and future generations, I ask the Secretary of State to refuse this application and to look to improve spatial planning in the UK.

Yours faithfully

Lorraine Jenkins

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