

Ben Million
Head of Planning
Department of Energy Security and Net Zero
3-8 Whitehall Place
London SW1A 2AW

16 July 2026

Dear Mr Million,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by PhotoVolt Development Partners (PVDP) on behalf of SolarFive Limited (“the Applicant”) for an Order granting Development Consent for the proposed Botley West Solar Farm (“the Botley West Solar Farm”)

I am writing on behalf of CPRE Oxfordshire in response to the invitation to comment as an Interested Party on the responses received to the Secretary of State’s information request dated 14 April 2026 (re-issued 20 April and 28 April).

The following is based on the responses provided which have been published on the Botley West Solar Farm project page of the National Infrastructure Planning website: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010147>.

Introduction

CPRE Oxfordshire believes that renewable energy is desirable in principle, but not at unacceptable cost to the countryside, our rural communities, or to the economy.

We support renewables but where greenfield sites are proposed, projects must:

- Benefit the rural economy.
- Be supported and/or owned by local communities.
- Bring net benefits to wildlife.
- Avoid/minimise loss of productive agricultural land.
- Avoid use of designated land such as Green Belt, and elsewhere to avoid/minimise impact on landscape, tranquillity and cultural heritage.

To ensure that further renewable energy provision is brought forward rapidly, but in a manner that is sensitive to broader environmental, landscape and heritage constraints, CPRE Oxfordshire is in

favour of a county-wide strategy, supported by public consultation and engagement, setting out the amount and spatial location for renewables projects.

CPRE Oxfordshire is concerned about solar farms in the countryside for the significant visual harm and industrialisation of the landscape this brings and is opposed entirely to such development in the Green Belt.

CPRE Oxfordshire will support developments on the roofs of new and existing buildings, or in other sites (outside of designated areas) where the visual impact is minimal and there is no significant loss of land for agriculture, recreation or biodiversity.

Further information on our position can be found here: <https://www.cpreoxon.org.uk/wp-content/uploads/2023/01/CPRE-Oxon-Renewable-Energy-Position-Paper-Jan-2023-FINAL.pdf>.

Our previous representations have focused on the key concerns of a continuing lack of data on soils and Best and Most Versatile (BMV) land, despite repeated requests, as well as the impacts on the Green Belt and the inadequate public consultation process.

For the purposes of this response, we are focusing on the Secretary of State's Question 7:

The Secretary of State notes that there is no substantive information in the Environmental Statement Chapter 5 Alternatives regarding how Best and Most Versatile Land ("BMVL"), mineral resources, Blenheim Palace World Heritage Site ("WHS"), London Oxford Airport, land within Flood Zones, and the Green Belt influenced the site selection, nor whether these locational disadvantages were factored into the strategic equation. The Applicant is requested to provide evidence on how these locational factors were taken into account. In doing so, the Applicant is requested to have regard for NPS EN-1 paragraphs 4.3.9, 4.3.10 and 4.3.15.

CPRE Oxfordshire's Response to the Applicant's Answer on Green Belt:

The Applicant tries to downplay the impact on the Green Belt and refers to new policies which may not be relevant to this application.

The Applicant's reference to "the latest NPS EN-1, December 2025" may not be relevant since the Secretary of State states clearly in Paragraph 6 of their "Request for Information" letter (dated 14 April 2026) that the National Policy Statements to use for this application should be the January 2024 version not the more recent 2025/26 version.

It could be that the guidance on Green Belt is also not applicable since this is also new. They say, *"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"* and then go on to justify using Green Belt because only villages border the site.

However, at the time they were choosing the site in 2022 or earlier, this clarification on Green Belt rules had not been made to exclude villages of which there were over 12 additional hamlets not considered in their choice of site.

The Central site stretches almost from the City of Oxford to the historic town of Woodstock and the "village" of Kidlington on the Eastern edge which has recently become a town.

Furthermore, a concern which appears to have been overlooked by the Applicant is the proximity of Oxford's Green Belt, right up to the walls of the Palace and Parkland, which is specifically cited as key to protecting the setting of the Blenheim Palace World Heritage Site (see Blenheim Palace World Heritage Site Revised Management Plan 2017 Appendix III: Setting Study 9.5.67 [REP1-037]).

The Management Plan states, *"The setting of the site will be protected through Policy EW1 and also through other designations: Cotswolds Area of Outstanding Natural Beauty, Ancient Woodland, Oxford Green Belt and Conservation Areas at Woodstock and Bladon."*

The Applicant claims to have worked with Historic England and Blenheim Palace to gain a clear appreciation of setting. However, the above has not been taken into account. Furthermore, in Paragraph 5.04 of the same document [REP1-037], it states, *"large-scale development (particularly those of a non-residential nature which tend to be bulkier and non-vernacular, for example industrial development; wind turbines; solar farms, etc.) could detrimentally influence the character of the adjoining rural areas"*.

Protection will therefore be lost if the development proceeds in the Green Belt setting of Blenheim Palace. The importance of the Green Belt was also made clear in a Heritage Alert raised with ICOMOS by Stop Botley West [REP1-113] which pointed out that *"The proposed development is contrary to the obligations of the WHS Management Plan 2017"*.

Concluding remarks

We strongly believe the Applicant's assessment is flawed and reiterate that while we support renewable energy in principle, this should not come at an unacceptable cost to the countryside, our rural communities, or to the economy.

In particular, where greenfield sites are proposed, as in this case, we believe projects must avoid or minimise loss of productive agricultural land, avoid use of designated land such as Green Belt, and avoid or minimise impact on landscape, tranquillity and cultural heritage.

As perhaps the only such project proposed for Green Belt in England, it is important that a precedent is not set which will lead to similar developments impacting Green Belt in future.

We understand the Applicant has since offered to reduce the number of back panels in some areas and uses this as justification for why there will be less impact on the Green Belt. This offer is not guaranteed with the Applicant already planning to make further adjustments should they be granted the Development Consent Order.

Based on the above, we ask the Secretary of State to reject this application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Gilleard', with a long horizontal flourish extending to the right.

Marcus Gilleard
Director