

Dear Simon

My reference; [REDACTED]

I would be grateful if you would bring the following comments to the attention of the Inspectorate for the assessment of the Botley West Solar Farm:

A Industrialisation and alternative use of agricultural land

1. The proposed Solar Farm will remove 840 hectares of agricultural land from the national and local economies. It has been successfully and profitably farmed as arable land for many centuries right up to October 2022, when the application for the Botley Solar Farm and a different function for the land were proposed.
2. It is extraordinary and negligent that as of 23 October 2025 the Applicant had not provided details of *'the quantity of agricultural land required for the proposed development'* which you request in your letter (point 1) of that date.
3. In the Applicant's response to the Rule 17 Letter, 14 October 2025, is the statement in Land Use (3): *'It is clear from this overlay that the location of the areas of the Project falls almost wholly within Grade 3 with some potential Grade 4 land....'* but the Applicant has apparently not supplied evidence of this claim, and therefore it cannot be accepted.
4. Further the Applicant claims that while a DEFRA survey shows that only 21.78% of land in West Oxfordshire is BMV Grade 1, 2, 3a, it appears to be the Applicant who has decided that *'the dominance of lower quality Subgrade 3b land is still identified through the survey work, as would be expected within this area'*.
5. The Applicant therefore makes the following claim, again without submitted evidence: *Therefore, agricultural land quality has been considered in the location of the Project area in accordance with NPSEN3. The majority of the land comprises lower quality Subgrade 3b land....'*
6. The assumption being that the land, not being fit for agricultural use, is therefore suitable and available for the industrial use of solar farming.
7. Following the use of these 840 hectares of successful and profitable agricultural land for the solar farm for the projected 40 years, driving in steel supports for the panels often to a depth of four metres will cause irreversible and irreparable damage to this agricultural land.
8. Former centuries-old valuable agricultural land will merely become available for further industrial use or brownfield sites for housing.

B Hedging and Public Rights of Way

1. The Applicant proposes hedging of either side of the PRoWs and next to properties affected directly by the fields of solar panels.
2. In the Applicant's response to the Rule 17 Letter, 14 October 2025, are the statements in Hedgerow Maintenance (11) and footpath widths (12) that the hedges will be 3m high and set in a 'footpath corridor' that is a total of 10m wide, creating between the hedges a passageway of 5m wide. This gives the width of

each of the hedges as 2.5m wide, to provide, which together with their height will 'provide sufficient screening'.

3. Here 'footpath corridor' scarcely describes the experience of what should be following a path through the countryside or wood. Instead, are passages through densely planted 3m high, 2.5m wide hedgerows, with none of the traditional views to either side of the path, and light coming only from above the high hedge.
4. The paths should instead be 15 metres wide so as not to be enclosed narrow corridors through the countryside.
5. The Applicant appears to be proposing the installation of somewhere between 70 and 130 miles of 3m high, 2.5m wide hedging for 40 years across the 840ha proposed for the Solar Farm.
6. *"Once grown hedgerows should be managed to a height of approximately 3m during operation, managed annually, accepting that hedgerows may be managed to a lower height..."* (Rule 17 Letter 14/10/25, (11))
7. Therefore, it what is being proposed is that, following the hedging reaching 3m high, presumably after about 7 years, 70-130 miles of it will be annually pruned to restrict its height to 3m.
8. The Applicant states they are willing to reduce the height of the hedges from 3m high in order to enhance views, but who will decide this and when?
9. Consequently, people walking through the countryside on PRow's will encounter annually the noise and disruption of hedge maintenance workers and traffic.
10. However, the pruning of hedges cannot occur throughout the year because of restrictions in respect of bird nesting and can only take place from September to February.
11. Again, the Applicant's projects undermine what should be residents' yearlong enjoyment of the countryside.
12. The hedging will totally redefine the landscape and countryside, limiting views solely to protect the enormous Solar Farm.
13. The hedging will not 'reinforce' the landscape, as claimed by the Applicant. It completely transforms and destroys the proposed site of its existing character of long sweeping views and undulating countryside.

## C Proximity of Solar Farm to houses.

1. The Applicant can only have put forward the proposal of a mere 75m buffer between residential properties and the Solar Farm to ensure as much land as possible is available for the Solar Farm itself.
2. A buffer of 75m breaches Residential Visual Amenity that ensures for householders 'the overall quality, experience and nature of views and outlook available to occupants of residential properties including views from gardens and domestic curtilage'.
3. The proposal of erecting a line of panels 2.5-3m high merely 75m from a residential property is a patent dismissal of RVAA that ensures visual quality of the environment that affects the living experience of people in their homes.

4. There should be no less than 250m between the boundary edge of any part of the proposed operational solar array and any residential dwelling house (as measured from the curtilage of any private residential property or address).

D Written Parliamentary Questions tabled by Calum Miller, MP, 5 November 2025

1. The Botley West Solar Farm Application is for the largest solar farm in the UK, at 840ha and one of the largest in Europe. Its potential contribution to the provision of energy in the UK, and possibly in Europe, is enormous. As such, it must be subject to exceptional scrutiny by the Secretary of State Energy and Net Zero.
2. Following the end of the Examination and the Inspectorate's submission of their decision to the Secretary of State, his decision should be expected within the next few months.
3. Calum Miller, as MP for Bicester and Woodstock tabled the following five Written Parliamentary Questions to the Secretary of State for Energy Security and Net Zero and to the Secretary of State for Culture, Media and Sport on 5 November 2025, to which answers are expected on 12 November 2025.
4. They indicate the concern for both the structure of the two companies involved, SolarFive Ltd and Photovolt Development Partners and for the structure and governance of Blenheim Estates and of Blenheim Charitable Foundation.
5. **The project cost is purported to be about £820m.**
6. The Unaudited Financial Statement, December 2024, for SolarFive Ltd shows fF
7. Fixed Assets of £1,483,954, and the Unaudited Financial Statement, December 2024, for Photovolt Development Partners, Total Assets less Current Liabilities (£3,750,47). It is reported that Blenheim Estates had debts of £191m in March 2025.
8. It is not evident where the significant investment for the Botley West Solar Farm would come from.
9. Question 88455: What assessment has the Secretary of State (ESNZ) made of the effectiveness of (a) the National Inspectorate and (b) Nationally Significant Infrastructure Project processes to safeguard against national security risks from investment by (i) inappropriate or (ii) hostile overseas sources.
10. Question 88456: Whether the ESNZ Department has sought the advice of the office of the Financial Sanction Implementation on reported Russian-linked funding associated with the proposed Botley West Solar Farm.
11. Question 88457: What assessment the Secretary of State (ESNZ) has made of the financial viability of SolarFive Ltd and Photovolt Development Partners to undertake the development of Botley West Solar Farm
12. Question 88458: What assessment the Secretary of State (CMS) has made of the adequacy of the (a) financial structure and (b) governance arrangements of (i) Blenheim Estates and (ii) Blenheim Charitable Foundation
13. Question 88459: What assessment the Secretary of State (ESNZ) has made of the effectiveness of the Planning Inspectorate and National Significant Infrastructure Project processes in evaluating the financial viability of funding commitments made by developers of major energy projects.

## E Gunning Principles

1. The Gunning Principles are relevant because of the Applicant's apparent disregard to provide the Inspectorate with required information and their delay or neglect in responding to the ExA's requests for further documentation and details, even at this very late stage in the Hearing.
2. Clearly, the Applicant has so far not been able to ensure that the ExA, as stipulated in Gunning Principle 2, has been provided with '*sufficient information to give "intelligent consideration". The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response.*'
3. The six-month Consultation that started on 13 May 2025 has clearly satisfied the Gunning Principle 3 '*There must be enough time for consideration and response. There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation, despite the widely accepted twelve -week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation.*'

The Consultation will have lasted six months by 10 November 2025, and at no stage has the Applicant claimed to require more time to respond than was allotted. Instead, the Applicant has in many instances simply failed to respond, prompting the ExA to repeat the request.

4. The ExA has been careful, courteous and necessarily persistent in their examinations, and clearly is fulfilling the requirement of Gunning Principle 4 in giving '*conscientious consideration*' in forming their decision.

## F Conclusion

May I urge the ExA to reject the Application not only for the irreparable damage it will do to the landscape and countryside, for its impact for over 40 years on 11,000 households within 1.5km of the proposed site and on a UNESCO World Heritage Site, and on so much else, elsewhere described, and because the Applicant has failed to ensure that the ExA is able to meet the 2<sup>nd</sup> Gunning Principle.

Yours sincerely,

Penelope Marcus