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**FAO: John Wheadon**

**Head of Energy Infrastructure Planning Delivery**

**Department of Energy Security and Net Zero (DESNZ)**

**3-8 Whitehall Place**

**London**

**SW1A 2AW**

**4<sup>th</sup> May 2026**

**Via Email Only:** [BotleyWestSolar@planninginspectorate.gov.uk](mailto:BotleyWestSolar@planninginspectorate.gov.uk)

Dear Mr Wheadon,

**BOTLEY WEST SOLAR FARM (EN010147)**  
**Request for Information dated 14 April 2026**

I write on behalf of Mr Dustin Dryden - [REDACTED]

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**BOTLEY WEST SOLAR FARM (EN010147)**  
**Submission on behalf of Mr Dustin Dryden**  
**Landscape Design Failure and the Application of the Mitigation Hierarchy**  
*(In response to the Secretary of State's Request for Information dated 14 April 2026, as amended 28 April 2026 - paragraph 24 and related matters)*

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## **1. Introduction**

This submission is made on behalf of Mr Dustin Dryden, owner and resident of Goose Eye Farm.

*The Studio, 10 Osborne Road, Ashcombe, Weston-super-Mare, North Somerset. BS23 3EL* 1

Mr Dryden is a Person with an Interest in Land and one of the specific addressees invited to respond to the Secretary of State's Request for Information. His property lies within the central part of the Order Limits and would, under the current proposals, be effectively encircled by solar infrastructure.

This submission addresses the Secretary of State's questions relating to landscape, visual impact and scheme design, in paragraph 24 of the Request for Information.

As indicated in other correspondence, we believe we should have the opportunity to see and comment on any and all responses to the Request for Information, from the Applicants.

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## **2. Scope of the Secretary of State's Questions**

Paragraph 24 of the Request for Information seeks clarification from the Applicant on a number of fundamental issues, including:

- whether the submitted visualisations are accurate and representative;
- how landscape and visual considerations informed the siting, scale and design of the Proposed Development;
- how the mitigation hierarchy (avoid, reduce, mitigate) has been applied; and
- identification of specific examples where landscape considerations have influenced the evolution of the scheme.

These are not matters of presentational detail. They go to the integrity of the design process and the scheme presented by the Applicants at the Examination.

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## **3. Goose Eye Farm as a Critical Test of Design Approach**

The position of Goose Eye Farm provides a clear and direct test of whether landscape and visual considerations have properly informed the scheme.

Mr Dryden has demonstrated without challenge at the Examination that:

- his home and its curtilage would be surrounded by solar development;
- the relationship between the property and the scheme is one of close proximity and enclosure, not separation; and
- the design fails to respond to the presence of a sensitive residential receptor in a rural landscape.

This is not a marginal case. Goose Eye Farm is located within the central area of the scheme and is materially affected by multiple parcels of the proposed development.

If landscape and visual considerations had been properly applied at the design stage, it would not be expected that such a prominent residential property would be left in such a position.

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#### **4. Failure to Apply the Mitigation Hierarchy**

As accepted by the Applicant, the mitigation hierarchy requires that:

1. harm is avoided where possible;
2. where avoidance is not possible, harm is reduced through design;
3. only residual impacts are addressed through mitigation measures.

In the case of Goose Eye Farm, this hierarchy has not been followed. This has tacitly been accepted by the Applicant.

- There has been no meaningful avoidance: the scheme has been laid out so as to surround the property.
- There has been no effective reduction through design: no clear buffer or separation has been incorporated.
- Instead, the approach relies implicitly on post-design mitigation (e.g. planting, screening), which cannot address the fundamental issue of proximity and enclosure.

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#### **5. Landscape Considerations Have Not Informed Siting and Scale**

Paragraph 24 requires the Applicant to explain how landscape considerations informed:

- the siting of the development;
- the scale of the scheme; and
- the layout of individual parcels.

In the case of Goose Eye Farm, the current layout demonstrates that:

- the siting of panels has not respected the presence of a residential receptor;
- the scheme has been pursued without regard to maintaining adequate separation distances;

- the layout has not been refined to avoid creating an enclosed residential environment.

The existence of a property effectively encircled by development is not evidence of a balanced design outcome. It is evidence that landscape considerations did not materially influence key design decisions.

It appears that maximising the scale of the scheme has been of greater importance to the Applicant.

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## **6. Deficiencies in the LVIA and Supporting Material**

The Secretary of State has also raised concerns regarding the reliability and representativeness of visual material.

Mr Dryden's position is that:

- the LVIA and visualisations do not adequately convey the degree of enclosure experienced at Goose Eye Farm;
- the cumulative effect of multiple development parcels surrounding the property has not been clearly or transparently presented;
- the assessment does not provide a robust basis for understanding the lived experience of the development from this receptor.

The need for further clarification at this stage reinforces the conclusion that the submitted material is not sufficient to support a sound design-led assessment.

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## **7. Implications for Scheme Evolution**

Paragraph 24 asks the Applicant to identify examples where landscape considerations have influenced scheme evolution.

In the case of Goose Eye Farm, no such examples have been demonstrated.

There is no evidence that:

- the layout has been amended to increase separation distances;
- development parcels have been removed or reconfigured to avoid enclosure;

- meaningful buffers have been introduced as part of the design.

This absence of design response is itself indicative of a failure to integrate landscape considerations into the scheme.

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## **8. Requirement for Redesign**

The Secretary of State's questions imply that the scheme may require further refinement.

In the context of Goose Eye Farm, refinement is not sufficient.

If landscape and visual considerations are to be properly addressed, the scheme would require:

- substantial separation distances between the property and solar infrastructure;
- reconsideration of the extent and configuration of surrounding parcels;
- a design approach which prioritises avoidance of residential enclosure.

This is a matter of redesign, not mitigation.

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## **9. Without Prejudice Scheme**

My Dryden has no way of knowing what the Applicant will present as an alternative scheme under the "without prejudice offer" and, therefore, cannot comment on it unless and until it is detailed. Again, we require the opportunity to comment on such scheme.

Mr Dryden's case would be fundamentally prejudiced without that opportunity. He believes the Secretary of State would not be able to make a decision on such an alternative scheme without such consultation.

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## **10. Conclusion**

The position at Goose Eye Farm demonstrates that landscape and visual considerations have not been properly integrated into the design of the Proposed Development.



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The issues identified are not limited to the presentation of visual material or the adequacy of assessment. They go to the fundamental design logic of the scheme.

The Secretary of State's own questions recognise that the relationship between landscape considerations and scheme design requires further explanation. In this case, that explanation is unlikely to demonstrate compliance with good design principles.

In the absence of a material redesign which addresses the proximity and enclosure of Goose Eye Farm, the scheme cannot be said to represent an acceptable landscape-led design outcome.

Yours sincerely,



Karen Squibb-Williams - **Barrister – Authorised to Conduct Litigation (BSB)**