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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**

**9<sup>th</sup> June 2026**

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

Dear Mr Wheadon,

**BOTLEY WEST SOLAR FARM (EN010147)**

**Seventh Submission on behalf of Mr Dustin Dryden, [REDACTED]**

**Reliability of the Application and Outstanding Evidential Gaps**

*(Further submission in response to the Secretary of State's Request for Information dated 14 April 2026, as amended 28 April 2026)*

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Introduction;

This is the seventh submission made on behalf of Mr Dustin Dryden in response to the Secretary of State's Request for Information.

Previous submissions have addressed specific topics including:

- landscape design;

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- residential visual amenity;
- compulsory acquisition;
- scheme scale and viability;
- the practical operation of Goose Eye Farm; and
- the long-term viability of an existing agricultural holding.

This submission addresses a broader question.

What does the Secretary of State's own Request for Information reveal about the state of the application that was before the Examining Authority?

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The Significance of the Request for Information;

Requests for clarification are not unusual in major infrastructure projects.

What is unusual is the breadth of the matters on which further information is now sought.

The Secretary of State has requested further material relating to:

- landscape and visual effects;
- residential amenity;
- alternatives and scheme scale;
- viability;
- compulsory acquisition;
- agricultural land;
- heritage;
- ecology; and
- other aspects of the Applicant's case.

These are not peripheral matters.

They are among the principal components of the planning case advanced in support of the Proposed Development.

The Request for Information therefore raises an obvious question.

Why has it proved necessary to revisit so many central aspects of the application after the Examination has concluded?

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A Pattern Rather Than Isolated Issues;

Any single evidential gap may be explained.

Any single omission may be capable of correction.

However, the Request for Information does not identify a single issue.

It identifies a series of issues across multiple disciplines.

Viewed collectively, a pattern emerges.

Questions are being asked about:

- whether the scheme is the right size;
- whether its impacts have been adequately assessed;
- whether compulsory acquisition powers are justified;
- whether key assumptions concerning viability are supported by evidence;
- whether mitigation measures are adequate.

Those questions do not point towards a settled and fully evidenced proposal.

They point towards a proposal whose underlying justification remains under examination.

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The Importance of Interconnection;

The issues identified by the Secretary of State do not exist in isolation.

The application has consistently been presented as a carefully balanced scheme.

If that is correct, changes in one area are likely to affect others.

For example:

- a reduced scheme may alter landscape impacts;
- altered landscape impacts may affect residential amenity;
- changes to layout may affect land requirements;
- changes to land requirements may affect compulsory acquisition powers;
- changes to any of those matters may affect the overall planning balance.

The significance of the Request for Information therefore lies not only in the individual questions asked, but in the possibility that the answers may have wider consequences.

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The Position of Interested Parties;

The Secretary of State has requested substantial additional information from the Applicant.

That information will plainly be relevant to the eventual determination of the application.

Mr Dryden has proceeded throughout on the assumption that Interested Parties will have a fair opportunity to review and comment upon any material submitted in response before it is relied upon for decision-making purposes.

That expectation is particularly important where the information sought relates to matters that go to the heart of the Applicant's case.

The more significant the additional information becomes, the greater the need for transparency and meaningful scrutiny.

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Confidence in the Evidential Basis of the Application;

The purpose of this submission is not to argue that the Proposed Development should be refused simply because further information has been requested.

The issue is a narrower one.

The Request for Information itself demonstrates that important aspects of the application remain under active consideration.

The Secretary of State is not merely seeking clarification of drafting points or minor technical details.

He is seeking information concerning matters that are central to the justification for the development.

That inevitably affects confidence in the proposition that the application, as examined, provided a complete and reliable evidential basis for decision-making.

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Conclusion;

The Secretary of State's Request for Information is significant not only because of the questions it asks, but because of what those questions reveal.

Across multiple core topics, further information is now required before a final decision can be reached.

Taken individually, each issue may appear manageable.

Taken together, they suggest that important elements of the Applicant's case remain unresolved.

The question raised by this submission is therefore a simple one:

- ***whether the application as examined provided a sufficiently complete and reliable evidential foundation for development consent to be granted?***

The Secretary of State's own Request for Information indicates that this question remains open.



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Mr Dryden assumes that any material submitted by the Applicant in response to the Request for Information will be made available for comment before a decision is taken and would welcome confirmation that this remains the intended process.

We are sending this response, as requested, to the PINS Botley West email address and would request that whoever receives it passes it immediately to John Wheadon at DESNZ. We are sending email copies to relevant public representatives and interested parties.

Yours sincerely,



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