



Photovolt Development Partners GmbH (PVDP)
on behalf of SolarFive Ltd
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9 June 2026

Submitted by email to: "botleywestsolar@planninginspectorate.gov.uk"

Secretary of State for Energy Security & Net Zero
Department of Energy Security and Net Zero,
3-8 Whitehall Place,
London
SW1A 2AW

Dear Secretary of State,

The Infrastructure Planning (Examination Procedure) Rules 2010

Botley West Solar Farm - Application for an Order granting Development Consent

Applicant Response to Request for Information

We refer to your request for information from the Applicant by letter dated 20 April 2026, in respect of the above project. The Applicant welcomes the opportunity to respond to the matters raised.

This letter and accompanying submissions respond to all questions raised by the Secretary of State directed at the Applicant.

Overall Context of Response

The Applicant asked the Secretary of State for an extension of time to respond to the request for information dated 20 April 2026 (the "RFI"). The purpose of this was to allow sufficient time to work collaboratively with the OHA's to develop and update the landscape assessment, as requested in the RFI. Some progress was made in this regard, but the decision to refuse the extension of time has, regrettably, cut this short. For example, there has been insufficient time for the OHAs to respond to the work undertaken by the Applicant. Therefore, the Applicant has had to decide what, if anything, further it could do in the time available to move forward positively in the hope of narrowing its differences with OHAs and other Interested Parties.

During the time available, the Applicant has actively engaged with:

1. The OHAs on landscape matters, as well as on ecology and waste matters;
2. Historic England on heritage matters;
3. The Environment Agency on drainage matters;

4. Thames Water and Network Rail, with regard to Property Agreements and Protective Provisions;
5. NGET to discuss matters relating to the main substation; and
6. Various landowners to discuss land matters as well as gaining access for surveys.

A more detailed record of the Applicant's approach to responding to the RFI and related communications with the OHAs in respect of landscape matters is set out in the Applicant's Response to the Secretary of State paragraph 24 question.

Given the short timescales, the Applicant has taken the unilateral decision to propose significantly increased buffers between residential properties and the Project. This revised Project replaces the Applicant's previous Without Prejudice Offer. This new approach has not been discussed with the OHAs and Interested Parties, as was intended, but nevertheless seeks to respond positively to previously expressed concerns.

This proposal emerged after the Applicant employed a new firm of landscape architects (Iceni Projects) experienced in other solar NSIPs, as a means by which the differences of professional opinion which underpin many of the matters in dispute between the parties and the subject of the Secretary of State's questions, might be narrowed or resolved. Iceni commenced an update to the RVAA and LVIA but has been unable to complete that work before the deadline set by the Secretary of State. Notwithstanding this, the work that Iceni has been able to undertake has helped the Applicant decide how key landscape matters can be addressed and so help inform judgement on what if any further adjustments might be made by the Applicant.

As a result of that work the Applicant is now proposing a new Requirement (No.15 - Residential and Visual Amenity Plan) to secure increased buffer distances from residential properties to the proposed development.

This decision sets the context for many other changes in effects of the Project on its receiving environment, all beneficial, apart from reduced flexibility and function of the Project.

The new Requirement proposed by the Applicant is set out below:

Residential and visual amenity plan

15.—(1) No part of the authorised development may commence until a written residential and visual amenity plan has been submitted to and approved by the relevant planning authority for that part, or where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities.

(2) The residential and visual amenity plan must set out:

(a) the minimum distances proposed between Work No.1, Work No.2 or Work No.3, as applicable, of the authorised development and adjacent residential dwellinghouses;

(b) the justification for the inclusion in, or exclusion from, the plan, as the case may be, of residential dwellings adjacent to the authorised development; and

(c) the justification for the minimum distance proposed.

(3) The minimum distance referred to in sub-paragraph (2) must be no less than 100 metres and must not exceed 250 metres, unless otherwise agreed with the owners of residential dwelling.

(4) The residential and visual amenity plan must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates.

The new requirement secures an increased buffer range that will give the opportunity for reduced landscape impacts (i.e. a minimum of 100m to a maximum of 250m), whilst retaining sufficient flexibility to ensure that viability is also protected (i.e. it is not necessary to secure a blanket 250m buffer because there will be circumstances where a lesser buffer is appropriate). The residential and visual amenity plan submitted to discharge the Requirement is subject to the approval of the relevant planning authority and therefore independent assessment and control is retained.

The clause at sub-paragraph 15(3) 'unless otherwise agreed with the owners of residential dwellings' is to reflect that the Applicant and certain residential property owners have entered into private agreements that confirm that reduced buffers are agreeable. It is therefore not necessary or proportionate to require at least 100m buffer zones from those properties.

The Applicant is still able to honour its connection agreement of 840MW but the effect on electrical output in terms of KWh and MWp can be seen in the Applicant's Change Process Table - Project Amendments since Submission highlighting Application of Mitigation Hierarchy [SofS RFI – Applicant Response - Appendix B].

This proposal is in recognition of the subjective test in national policy, which states that "*there may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function*" (paragraph 5.10.26 of NPS EN01). The Applicant recognises the comments made by the ExA during Examination and the SofS post-Examination and so has built in this revised commitment to satisfy this test even if the SofS consider that exceptional circumstances apply. In other words, the Applicant has incorporated an increased loss of function as a result of the increased buffer commitment.

In respect to all other matters full responses to relevant paragraphs of the Secretary of State's letter are found in the Applicant's full response submitted alongside this cover letter.

Response Documents

In light of the above, the Applicant submits, or intends to submit the following documents:

New deliverables:

- **Cover Letter** – EN010147/APP/20.1
- **Environmental Statement Addendum 2** – EN010147/APP/20.2
- **SoS RFI – Applicants Response** – EN010147/APP/20.3
 - Appendix A: Change Process Plan
 - Appendix B: Change Process Table - Project Amendments since Submission highlighting Application of Mitigation Hierarchy
 - Appendix C: Letter of No Impediment Natural England's Wildlife – Dormouse
 - Appendix D: Letter of No Impediment Natural England's Wildlife - Great crested newt
 - Appendix E: Botley West Soakaway Testing Report_V1
- **Outline Skylark Compensation Strategy** – EN010147/APP/20.4

Updated documents (clean and tracked where necessary);

- **Guide to the Application Rev 12** – EN010147/APP/1.3
- **Works Plans Rev 4** – EN010147/APP/2.3
- **Land Plans Rev 4** – EN010147/APP/2.4 3

- **Final Draft Development Consent Order Rev 10 – [REP7-006] – EN010147/APP/3.1** (NB: the SI Template version will follow. Due to the validation process required, this was not completed in time.)
- **Explanatory Memorandum Rev 10 – EN010147/APP/3.3**
- **Land and Rights Negotiation Tracker Rev 10 – EN010147/APP/3.6**
- **Statement of Reasons Rev 3 – EN010147/APP/4.1**
- **Book of Reference Rev 7 – EN010147/APP/ 4.3**
- **Consents and Licenses Required Under Other Legislation Rev 1 – EN010147/APP/5.2**
- **ES Figure 1.2: Illustrative Masterplan Overview Rev 4 - EN010147/APP/ 6.4**
- **ES Figures 2.1a to 2.4c: Illustrative Masterplan Rev 4 - EN010147/APP/ 6.4**
- **ES Appendix 7.4 Heritage Impact Assessment Rev 2 - EN010147/APP/ 6.5**
- **ES Appendix 7.5 Settings Assessment Rev 4 - EN010147/APP/ 6.5**
- **ES Appendix 8.3: Strategic Arboricultural Impact Assessment & Method Statement Rev 2 - EN010147/APP/ 6.5**
- **ES Appendix 9.15: Veterans Tree Survey Report Rev 1 – EN010147/APP/ 6.5**
- **Outline Code of Construction Practice Rev 7 – EN010147/APP/7.6.1**
- **Outline Landscape and Ecology Management Plan Rev 8 – EN010147/APP/7.6.3**
- **Outline Decommissioning Plan Rev 3 – EN010147/APP/7.6.4**
- **Outline Layout and Design Principles Rev 7 – EN010147/APP/7.7**
- **Schedule of Changes to the draft DCO Rev 9 – EN010147/APP/8.3**
- **Schedule of Changes to the Book of Reference Rev 6 – EN010147/APP/8.4**
- **Status of Negotiations Rev 1 - EN010147/APP/18.4**

Other Matters

The Applicant would also wish to confirm:

1. Since the close of Examination and as part of Phase 1 of the NESO Connections Reform, the Project has received a Gate 2 protected connection offer (as applied for). This confirms that the Project is very much a critical national priority to achieve energy security and decarbonisation in line with national policy. The effect of not granting consent for the Project, would be the loss of 840MW of generation capacity from the pre-2030 pipeline.

By letter dated 1st June 2026, the Secretary of State for Energy Security & Net Zero has assessed Solar Five Ltd's application for a Contracts for Difference Allocation and confirmed that it is an eligible generator in respect of Botley West Solar Farm. The letter is attached and states that:

"...The project is likely to make a material contribution to the development of supply chains in line with Regulation 9 of the Electricity Market Reform General Regulations 2014 and the Supply Chain Plan Guidance Document published in October 2025. You can therefore present this letter to the NESO as your Supply Chain Plan statement in respect of the generating stations mentioned above. This statement of approval is valid for 9 months from the date of this letter..."

2. As further evidence of the eagerness of the Applicant to bring this project to market and achieving ready to build status asap, it is actively discussing offtake supply agreements including discussing Heads of Terms for the supply of 50 MW via private network to a science park to be built by Exeter College by 2030 (3km from the Applicant's site).

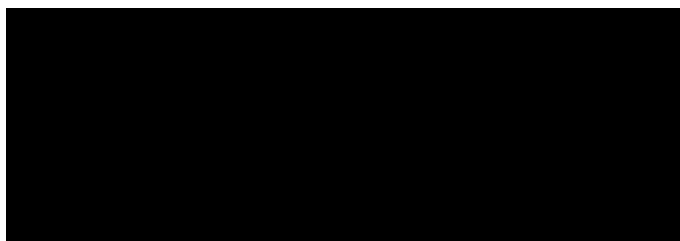
3. The Applicant has noticed an error in the Land Plans submitted at Deadline 7 [REP7-005], in that those plans do not show any colouring for Plot 9-08. The plot was correctly coloured pink in the previous version of the Land Plans [CR2-006]. The inconsistency has resulted as a result of a data error when exporting the data from the GIS software in updating the plans between Change Request 2 and Deadline 7. The definition of "Order land" in the draft DCO [REP7-006] means "*the land show coloured pink or blue which is required for, or is required to facilitate, or is incidental to, or is affected by the authorised development shown on the land plans and described in the book of reference*". The intention is for each plot to be coloured either pink or blue and align with the description in the book of reference. In the book of reference [REP7-013], Plot 9-08 states: "Permanent acquisition of 28574 square metres of agricultural land, trees and shrubbery; north of Yarnton Road and south west of operational railway (Cotswold Line), Cassington, West Oxfordshire" (our emphasis) and Thames Water is recorded as an occupier, which means it has received the usual notices about the nature of the interest to be compulsorily acquired. Therefore, it is clear from the book of reference that the power to permanently acquire Plot 9-08 has been sought. The absence of pink colouring on the land plans at Deadline 7 is errata arising from a system error as part of the update from the version submitted at Change Request 2. The Applicant has rectified the inconsistency in the updated set of Land Plans submitted alongside this letter.

The Applicant is happy to discuss or clarify any of the points raised in its submission. It is hoped that with these additional submissions it will provide

- (a) more common ground can be achieved with the OHA's;
- (b) the concerns of Interest Parties will be more satisfactorily be addressed; and
- (c) ultimately clarify the information before the Secretary of State on the effects of the Proposed Development.

In light of the above and accompanying documents, the Applicant considers that the Secretary of State has all of the information before him to make a decision. On that basis and pursuant to the Applicant's case summarised in its Closing Submissions [REP8-001], we respectfully conclude that the DCO should be made in the terms sought.

Yours sincerely,



(On behalf of the Applicant)

Photovolt Development Partners GmbH (PVDP) on behalf of SolarFive Ltd.