



Specialising in Landlord & Tenant, Forensic Science, Expert Evidence and Procurement

FAO: John Wheadon

Head of Energy Infrastructure Planning Delivery

Department of Energy Security and Net Zero (DESNZ)

3-8 Whitehall Place

London

SW1A 2AW

29th May 2026

Via Email Only: BotleyWestSolar@planninginspectorate.gov.uk

Dear Mr Wheadon,

BOTLEY WEST SOLAR FARM (EN010147)

Submission on behalf of Mr Dustin Dryden: [REDACTED]

Residential Visual Amenity, RVAA Deficiencies and the Requirement for a 250m Buffer

(In response to the Secretary of State's Request for Information dated 14 April 2026, as amended 28 April 2026 - paragraphs 26 - 29)

1. Introduction

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

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 home and

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agricultural holding lie within 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 **residential visual amenity**, including the adequacy of the Residential Visual Amenity Assessment (RVAA) and the issue of appropriate separation distances between residential properties and the proposed development.

2. Context of the Secretary of State's Questions

Paragraphs 26 - 29 of the Request for Information raise a number of fundamental concerns, including:

- the **late submission and revision** of the RVAA;
- the fact that Interested Parties were **not afforded a proper opportunity to comment** on that material;
- that **not all residential properties were assessed**; and
- the potential need for a **minimum buffer distance of 250 metres** between residential curtilages and the operational solar array.

These points go beyond matters of detail. They indicate that the assessment of residential amenity was **incomplete and insufficiently tested** during the Examination.

3. Goose Eye Farm as an Extreme and Materially Affected Receptor

Goose Eye Farm represents one of the most significantly affected residential receptors within the scheme.

Under the current layout:

- the property and its curtilage would be **surrounded by solar panels on multiple sides**;

- the relationship between the dwelling and the development is characterised by **close proximity and enclosure**, rather than separation;
- the cumulative visual impact arises not from a single parcel, but from the **combined effect of multiple surrounding parcels**.

This is not a case of moderate or peripheral impact. It is a case of **systematic residential enclosure**.

4. Deficiencies in the RVAA

The Secretary of State has identified serious concerns regarding the RVAA. Those concerns are well-founded.

In relation to Goose Eye Farm:

- the RVAA was introduced **late in the Examination process** and subsequently revised;
- there was **no meaningful opportunity** for affected parties to test or challenge its conclusions;
- the assessment does not adequately reflect the **degree of enclosure and cumulative impact** experienced at the property;
- it fails to provide a clear and robust **property-specific evaluation** of the lived experience of the development.

In these circumstances, the RVAA cannot be relied upon as a sound basis for assessing residential visual amenity.

5. Failure to Assess the Reality of Residential Experience

A proper RVAA should address:

- the **outlook from principal rooms and private amenity space**;
- the **sense of enclosure or openness**;
- the interaction between the property and surrounding land uses over time;

- the cumulative effect of infrastructure, fencing, lighting, access tracks and maintenance activity.

In the case of Goose Eye Farm, these matters have not been adequately assessed.

The proposal would fundamentally alter the character of the residential environment, transforming a rural dwelling into one **enclosed within a large-scale industrial landscape**.

This is a qualitative change which cannot be dismissed as moderate or acceptable through generic assessment methodology.

6. The Requirement for a 250m Buffer

The Secretary of State has specifically raised the potential for a **minimum 250 metre buffer** between residential curtilages and the operational solar array.

Mr Dryden has consistently advocated for such a buffer throughout the Examination process.

The justification for this is clear:

- a meaningful separation distance is the only reliable way to **avoid unacceptable residential visual impact**;
- screening and planting cannot mitigate the effects of **proximity and enclosure**, particularly over the lifetime of the development;
- a consistent buffer provides **clarity, certainty and fairness** in the treatment of affected properties.

In the case of Goose Eye Farm, a buffer of this nature is necessary to:

- prevent the effective encirclement of the property;
- maintain a degree of openness and rural character;
- avoid long-term harm to residential amenity; and

- ensure that the scheme responds appropriately to the presence of a highly sensitive residential receptor through design, rather than relying on mitigation after the event.
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6A. Illustrative Effect of a 250m Buffer

To assist consideration of this issue, a plan is attached showing Goose Eye Farm and an illustrative 250 metre offset from the farm curtilage. The plan demonstrates the practical implications of applying the separation distance identified by the Secretary of State and previously recommended during the Examination process.

The plan illustrates that the introduction of a 250 metre buffer would affect a number of surrounding development parcels and would require a consequential review of the layout of the scheme in the vicinity of Goose Eye Farm. This is significant because it demonstrates that residential visual amenity is not simply a matter of additional planting, screening or mitigation. Rather, it goes directly to the spatial design of the Proposed Development.

The plan also demonstrates that the issue is capable of objective assessment. If the Applicant maintains that a lesser separation distance would be sufficient, it should be required to demonstrate this through a robust, property-specific RVAA supported by clear evidence explaining why Goose Eye Farm should be treated differently from the approach contemplated by the Secretary of State.

The existence of a readily identifiable design solution further reinforces the conclusion that the current layout is not an inevitable consequence of the site constraints. It is the product of design choices which have prioritised development extent over the protection of residential amenity.

7. Implications for Scheme Design

The application of a 250m buffer (or any separation distance capable of avoiding unacceptable harm) would have direct implications for the scheme:

- it would require the **removal or reconfiguration of surrounding development parcels**;
- it would reduce the overall developable area;
- it would necessitate a **material redesign of the scheme**.

This reinforces the point that residential amenity is not a peripheral issue. It is central to the acceptability of the scheme.

8. Relationship to the Secretary of State's Wider Questions

The issues raised in paragraphs 26 - 29 are closely linked to those in paragraph 24.

If the scheme has been designed in a way that results in unacceptable residential enclosure at Goose Eye Farm, then:

- landscape and visual considerations have not properly informed the design;
- the mitigation hierarchy has not been applied;
- the assessment of impacts is unreliable.

The RVAA deficiencies therefore support the broader conclusion that the scheme is **not design-led in any meaningful sense**.

9. Process Clarification

For the avoidance of doubt, this submission is made on the basis that Mr Dryden will be afforded a fair opportunity to review and comment upon any responses provided by the Applicant to the Secretary of State's Request for Information before any determination is made.

Given the nature and extent of the additional material now sought, such an opportunity is necessary to ensure that Interested Parties are able to engage meaningfully with the evidence on which the decision will rely.

10. Conclusion

The Secretary of State's questions confirm that the assessment of residential visual amenity is incomplete and unreliable.

In the case of Goose Eye Farm, the current scheme would result in an unacceptable degree of residential enclosure which has not been properly assessed or justified.

A minimum 250 metre buffer between the curtilage of Goose Eye Farm and any solar infrastructure is necessary to avoid unacceptable harm. If such separation cannot be achieved, the scheme would require material redesign.

In the absence of a robust, property-specific assessment demonstrating acceptable residential amenity, the Proposed Development cannot be regarded as acceptable in planning terms.



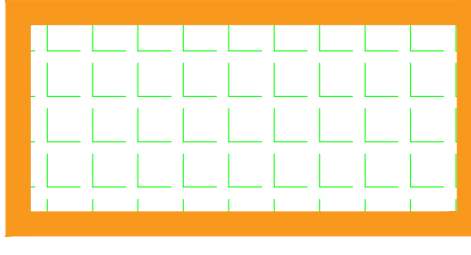

We are sending this response, as requested, to the PINS Botley West email address and would request that whoever receives it passes it immediately to John Wheadon at DESNZ. We are sending a copy by post to Mr Wheadon at 3-8 Whitehall Place. We are sending email copies to Martin McCluskey, Minister for Energy Consumers, our local Members of Parliament, the leader of West Oxfordshire, our District Council and other interested parties.

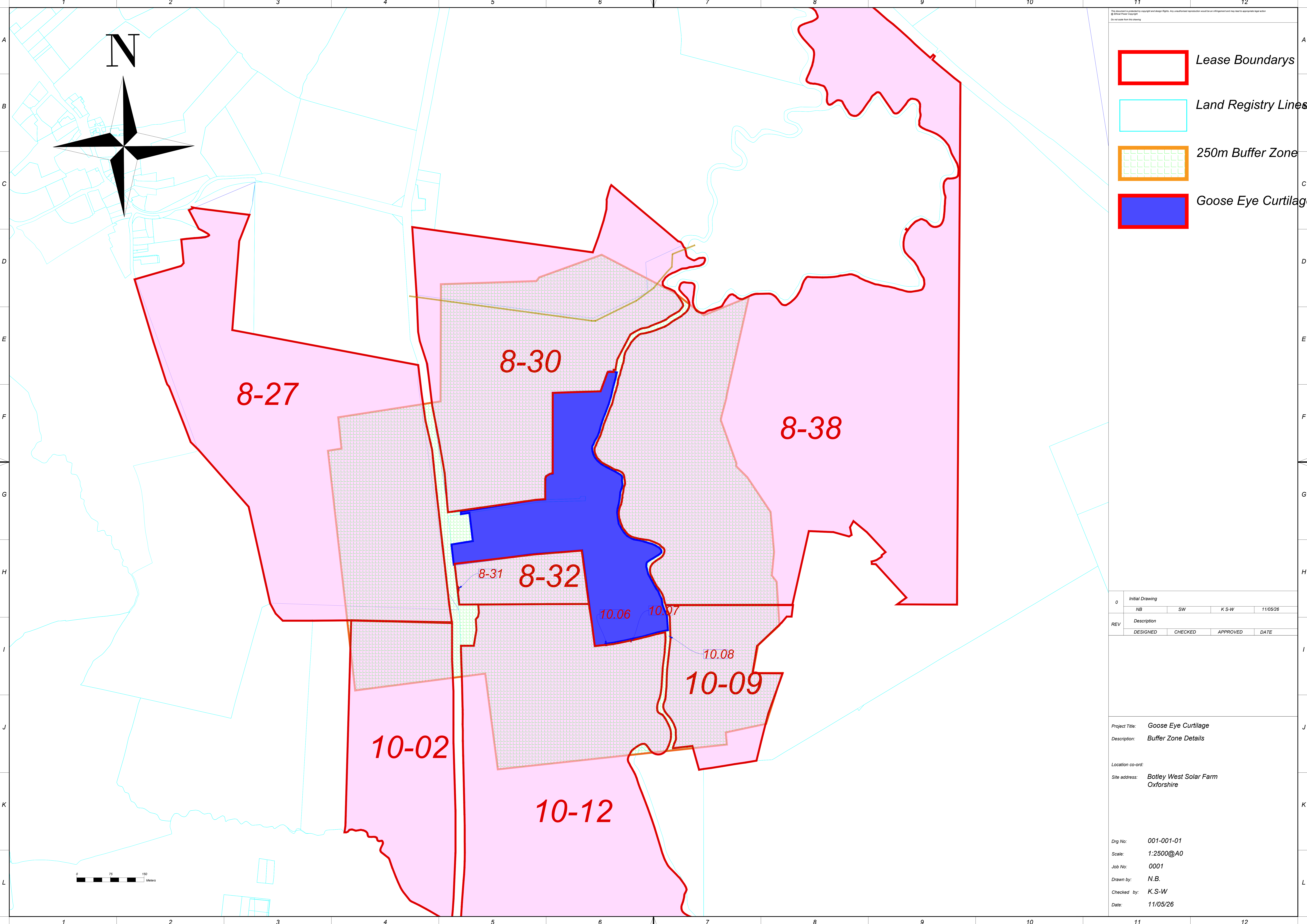
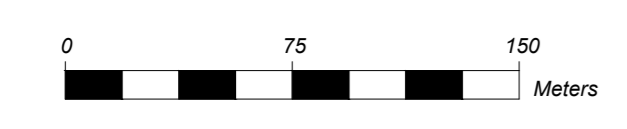
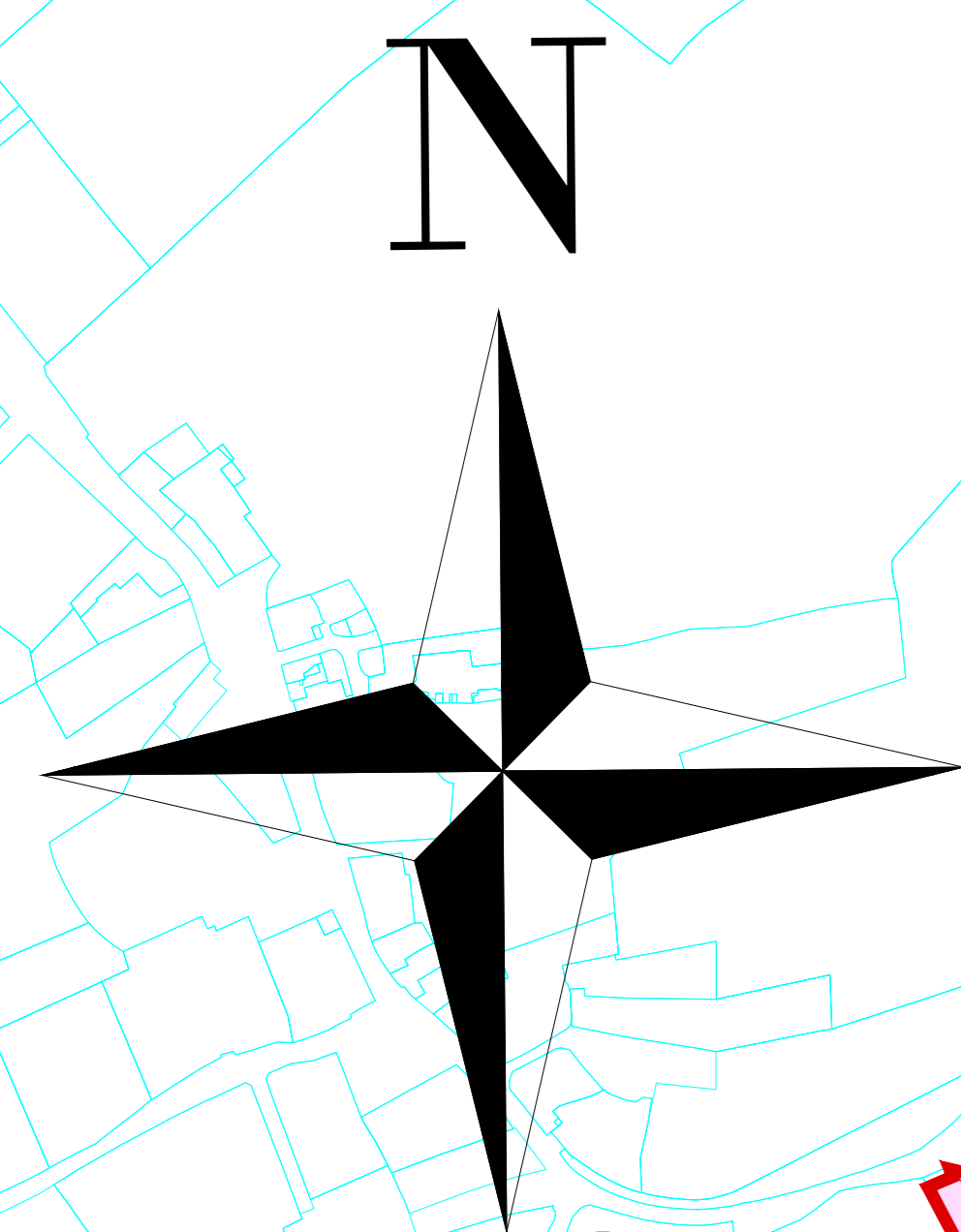
Yours sincerely,



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

ENC: Map – Goose Eye Curtilage + 250m buffer zone.

-  Lease Boundaries
-  Land Registry Lines
-  250m Buffer Zone
-  Goose Eye Curtilage



0	Initial Drawing			
	NB	SW	K.S-W	11/05/26
REV	Description			
	DESIGNED	CHECKED	APPROVED	DATE

Project Title: **Goose Eye Curtilage**
 Description: **Buffer Zone Details**
 Location co-ord:
 Site address: **Botley West Solar Farm**
Oxfordshire

Orig No: 001-001-01
 Scale: 1:2500@A0
 Job No: 0001
 Drawn by: N.B.
 Checked by: K.S-W
 Date: 11/05/26