

Dear Secretary of State

Botley West Solar Farm: EN010147

It is disappointing that the Applicant's late submissions have been accepted, thus causing further delay in the decision for Botley West and requesting yet another response from Interested Parties.

I am a supporter of the Stop Botley West campaign and fully endorse the comprehensive SBW submission of 16 July 2026 [[C2-161](#)]. I am concerned that despite these new proposals the Application *is still irretrievably flawed*. Too many essential questions remain unanswered and the Applicant seeks to defer too many important decisions until after any development consent is granted when they will be beyond public scrutiny and challenge.

Additional comments:

1. Areas of concern posed by the new submissions

- The principal concern is the introduction of an "outline Residential Visual Amenity Plan" (oRAP) [[C1-108](#)] and new Masterplan revision 5 [[C1-111](#)] in which the default buffer now offered and drawn is 100m (compared with the 250m default recommended by Examiners and previously shown in the Applicant's 9 June masterplan revision 4 [[C1-051](#)] "with additional offsets up to 250m applied where needed". It's not clear how this "need" would be assessed post consent when it will be beyond public scrutiny.
- The Applicant's amended Schedule 2, requirement 15 in the DCO states that the 100m buffer minimum will be used as "the starting point which has been amended to require the final plan to be substantially in accordance with this outline plan." This implies that very few buffers will be increased to anything near 250m. This contradicts the Applicant's 9 June submissions in which the starting point was the 250m maximum to be adjusted downwards in some cases. This is a significant and unjustified change compared to the Applicant's submissions of 9 June in which the Applicant admitted that the Installation would still be viable, albeit marginally, with a panel area using a 250m buffer.

2. Unresolved issues still not addressed. These include:

1. **Red-line Boundary.** At least 300 hectares of land stated now by the Applicant not to be used for panels. The certainty that this land won't be used for panels should be secured by moving the red-line boundary. It can then be returned to agricultural use
2. **Heritage and Landscape.** The Landscape Character Assessment requested by ICOMOS has not been undertaken and crucial issues raised by ICOMOS remain unresolved.
3. **National Grid Substation.** The location is still not decided, no planning Application has yet been submitted by NGET who say earliest connection date

is Winter 2031. There is no clause in the DCO to say BWSF build cannot start until the substation has planning consent.

4. **Decommissioning fund.** ExA recommended DCO should ensure a decommissioning fund (as well as a plan) is in place before construction starts. This has not been done.
5. **Viability.** The Applicant has not justified its claim for a 935MW minimum 'economically viable' size for BWSF and rejected Oxfordshire Host Authority's proposals for a smaller installation.
6. **Flood Risk.** There is no further panel pull-back to mitigate flood risk, despite well evidenced responses from Cassington and Cumnor Parish Councils and their Hydrology Experts. See REP7-068, REP7-077, C2-162 and C2-169.
7. **Ecology and Bio-diversity net Gain.** The Arboricultural Impact Assessment is still not done. Skylark's compensation strategy would be unworkable.
8. **Special Site of Scientific Interest (SSSI).** A large part of the central site is now on the list of SSSI designation proposed development, named The Three Rivers potential SSSI site based on the presence of the rivers and river valleys in the region. This needs to be considered.
9. **Community food growing.** There is no further mention. These areas should be removed from the red-line boundary. See REP5-072, REP5-093 and REP6-076
10. **Trainee pilot safety** is at risk with the current panel layout. Further panel removal near the airport is essential. See C2-210 and C2-176
11. **Proposed cycle path** along Lower Road is still shown on the Masterplan, despite verbal agreement to remove from the Application (during the Examiners' Site Inspection on 7 October 2025).
12. **Minerals and Waste.** Oxford County Council (OCC) are still in disagreement with the Applicant regarding these issues.
13. **Acquisition of roadside verges.** This is another unresolved disagreement between the Applicant and the OCC.

I respectfully request the Secretary of State to refuse outright the grant of a DCO for this Application.

Yours faithfully,

Katharine Lloyd Owen, IHBC (full)
Oxford