



**To: The Secretary of State for Energy Security and Net Zero
FAO Mr Ben Million, Head of Planning
Department for Energy Security and Net Zero
3 – 8 Whitehall Place
London SW1A 2AW**

**Via Botley West Solar Farm Case Team
By Email only to:- BotleyWestSolar@planninginspectorate.gov.uk**

04 October 2026

Dear Secretary of State,

Re: Botley West Solar Farm (“BWSF”) DCO Application– EN010147

**Response to Consultation dated 04/09/2026 on the Applicant’s July 2026
material**

**Representation by Hanborough Parish Council –
Interested Party No. [REDACTED]**

1. This is the response of Hanborough Parish Council (“HPC”) made at the further invitation of the Secretary of State (“SoS”) to Interested Parties dated 04/09/2026. HPC notes the content of that invitation letter, and in particular the expression of intent that there should be no more substantive or unsolicited submissions made by the Applicant, Photovolt Development Partners (“PVDP”) acting on behalf of SolarFive Limited (“SolarFive”) (“the Applicant” or “the Developer”).
2. In HPC’s previous response to the SoS dated 16/07/2026, we sought to draw attention to the Gunning Principles as a necessary part of a reasonable and appropriate approach to the decision-making process. HPC is grateful that the SoS has now made it clear to the Applicant that due process needs to be followed, and we trust that that will now happen. We are mindful in particular of the possible further use of the so-called Rochdale Envelope procedure and hope that such approaches will come

within the direction of the SoS that no further submissions shall be made by the Applicant.

3. HPC represents one of about a dozen local communities which will have or will experience direct impact if the BWSF Application is allowed to proceed. HPC represents a community consisting of the two villages of Long Hanborough and Church Hanborough and which together amount to some 3,500 residents. The Parish of Hanborough is therefore not a small village.
4. For Hanborough, this Application is not an abstract national infrastructure proposal located somewhere beyond the parish. Approximately 30% of the entire land area of Hanborough Parish lies within the application's boundary. The proposal would therefore have a profound and lasting effect on the landscape, environment and communities for which this Parish Council has direct responsibility.
5. In addition, Hanborough Parish sits astride a significant local road network, principally the A4095, which connects to larger conurbations to the west and to the east as well as linking to major trunk roads (the A40 and A44 and also indirectly the A34).
6. The scale of the BWSF Application must be understood in that local context. What is being proposed is an industrial-scale energy installation extending across a very substantial part of a rural parish, with solar panels, electrical infrastructure, substations, cabling, fencing, access routes and associated development imposed across a landscape which is currently predominantly agricultural and rural in character. Part of HPC's land area is within the Oxford Green Belt.
7. HPC recognises the importance of increasing renewable energy generation and addressing climate change. However, national need does not remove the requirement for an individual project to be properly designed, properly assessed and demonstrably acceptable in its particular location.
8. HPC therefore continues to insist that the processing of this Application, for one of the largest ground-mounted solar PV installations proposed for the UK as a whole must be subject to stringent due process and transparently correct assessment. It remains a significant concern to HPC that the Applicant has continued to default in its attention to

timetabling requirements, including the submission of a Revised Masterplan Development and Rationale document dated July 2026 (document ref:- EN010147/APP/21.7), produced on behalf of the Applicant by Icen, a firm who appear to have replaced the Applicant's previous consultants, RPS Ltd.

Different scheme to that originally presented:

9. HPC has a number of continuing concerns about specific issues. We set these out below in no particular order of priority. But as a preliminary and general point we consider that the issues together are so different to the DCO Application as originally presented that it seems to us that the position now is really for a different scheme altogether, and one which was quite significantly not included in the Examination conducted during 2025 by the Planning Inspectorate.

Extensive red-line boundary is excessive and unjustifiable:

10. HPC draws attention to one particular issue as a strong illustration of this concern. The Revised Masterplan referred to above in paragraph 5 now discloses, at page 4 a significant reduction in both the land area proposed to be used for the installation of solar PV panels, down by some 120.2 hectares (321 acres), and a purported reduction in the generated output of electrical energy down from the original much cited 840MWp to a lower figure of 620MWp. Those are significant figures in their own right, but also must have an effect on the design and layout of the BWSF project.
11. HPC is greatly concerned that this reduction in installation size and generation capacity does not seem to have any impact on the overall red-line boundary of the Application. We do not understand why this is so: we do not see why the overall size of the BWSF project remains the same, so that it would remain subject to the general control of the Applicant / Developer rather than being allowed to remain as it currently is - land in general agricultural use, growing a range of crops (more than adequately) and forming part of the significant overall landscape in this part of Oxfordshire.
12. In our view, there is no justification for on the one hand reducing the land area purportedly needed for the BWSF scheme, and on the other hand retaining control of that land but not for renewable electricity generation.

If land is genuinely unnecessary for the development, there is no obvious justification for retaining it within the red-line boundary. It should be removed so that the extent of the authorised development is clear and cannot subsequently be expanded within a broad consented area.

13. So, the application remains insufficiently defined. HPC is concerned that important elements of the final development remain uncertain despite the extensive examination process and the Applicant's subsequent submissions.

Incomplete residential visual assessment:

14. The latest outline Residential Visual Amenity Plan (oRAP) and Masterplan Revision 5 are particularly concerning. The latest Masterplan appears to establish a 100-metre default separation between residential properties and solar infrastructure, compared with the 250-metre default position presented in Masterplan Revision 4 following the Examiners' consideration. The basis for this substantial reduction has not been adequately demonstrated.
15. More importantly, the latest approach appears to defer important decisions about the final relationship between individual homes and the solar development until after consent has been granted. For residents of Hanborough Parish, these are not minor matters of detailed design. The distance between their homes and a large industrial solar installation can materially affect visual amenity, outlook and the experience of living beside the development.
16. HPC does not consider that matters capable of materially affecting the level of residential and environmental harm should be left to be determined after development consent has been granted. The Secretary of State should know clearly what is being authorised and what its consequences will be before consent is given.

Impact on landscape and heritage:

17. The impact on Hanborough's landscape and heritage is fundamental. The proposal would introduce an extensive industrial infrastructure into a rural landscape which forms an important part of the setting of Hanborough and the surrounding villages. HPC remains concerned that

the Landscape Character Assessment requested by ICOMOS has not been undertaken and that matters raised by ICOMOS remain unresolved.

18. The relationship between the development and the Blenheim Palace World Heritage Site and its wider setting is of particular importance, and we believe is unique in the UK. This cannot reasonably be regarded as a peripheral issue. The scale of Botley West means that its effects will extend well beyond individual development parcels and will alter the character and experience of the wider landscape.
19. HPC believes the Secretary of State should have the necessary landscape and heritage evidence before making a final decision. Important outstanding assessment work should not be deferred until after consent is granted. That is not the way this system should be working.

Ecological importance:

20. The ecological importance of Hanborough's landscape must be given greater weight. The environmental consequences of Botley West are particularly significant for Hanborough Parish. A substantial part of the proposed development lies within the landscape associated with Pinsley Wood and the wider Three Rivers area, which contains a mosaic of habitats of considerable ecological value. Evidence referenced during the process indicates that the area supports at least 14 species of bat, including the rare Bechstein's bat. The area has also been put forward for consideration by Natural England as the potential Three Rivers Site of Special Scientific Interest.
21. HPC recognises that potential SSSI designation does not itself determine the outcome of the application. However, it is a significant indication of the ecological importance of the area and should be properly considered in determining whether this development is appropriate.
22. The potential designation as an SSSI reinforces the need for a precautionary approach. HPC is also concerned that an adequate Arboricultural Impact Assessment has not been provided, despite the presence of numerous mature, veteran and notable trees across the wider site. The ecological value of these trees and their associated habitats cannot be reduced to a calculation of Biodiversity Net Gain.

23. Biodiversity Net Gain is not a substitute for avoiding or mitigating damage in the first place when important ecological features can reasonably be protected. HPC considers that claims of enhanced BNG is really just a way of accepting that compensation is required for the damage which projects such as this BWSF will do.

Loss of habitats:

24. The potential loss and fragmentation of important habitats matter locally. The scale of the proposed solar installation means that its effects will extend beyond the individual panels. Fencing, access tracks, electrical infrastructure, construction activity and changes in land management can fragment habitats and alter the ecological function of the landscape.
25. This is particularly important around Pinsley Wood and the wider network of woodland, hedgerows, mature trees and watercourses. The Parish Council is concerned that the proposed mitigation does not adequately address the potential for long-term fragmentation and disturbance.
26. For Hanborough, these are not simply ecological features on a plan. They form part of the landscape and natural environment immediately surrounding our communities.

Flood risk and water management:

27. Flood risk and water management remain unresolved. HPC is concerned that the latest proposals have not resulted in sufficient withdrawal of panels and associated infrastructure from areas where significant flood-risk concerns have been identified. Detailed concerns have been raised during the process by local authorities and specialist hydrological advisers.
28. Where credible evidence identifies a risk, avoidance should be the starting point wherever reasonably practicable.
29. HPC does not consider that potentially harmful infrastructure should remain in locations of concern on the assumption that subsequent mitigation will adequately resolve the problem. Given the importance of the River Evenlode and associated watercourses to Hanborough Parish, the protection of the parish's water environment is particularly important.

Unresolved associated infrastructure:

30. The project remains dependent upon unresolved associated infrastructure. The proposed National Grid substation remains unresolved, with no planning application yet submitted by National Grid Electricity Transmission.
31. The Applicant has referred to a potential connection date of Winter 2031. However, HPC is concerned that there appears to be no clear provision preventing construction of Botley West from commencing before the necessary infrastructure has received the required planning consent. The solar installation and its grid connection are fundamentally interconnected.
32. HPC considers that the Secretary of State should have clarity about the infrastructure necessary to make the project function before granting consent for the project itself. This point was made very clear by the Examining Authority during the PINS examination of the Application for a DCO. Despite that, no answer was ever provided by the Applicant, or, for that matter by NGET either, and so far as we at HPC can see, no credible answer has been given since.
33. HPC would add that since the Developer first made its application for a DCO, the progress across the UK of other NSIP-level ground-mounted solar PV projects has continued at an ever-increasing rate. Any original argument about the special need for this Botley West project as a vital addition to the UK renewable electricity generation capability has lost traction, and increasingly makes this project, in this location and at this size, and impacting so many, look unnecessary.

Decommissioning arrangements:

34. Decommissioning must be properly secured. Botley West is proposed as a temporary development, yet its scale means that its eventual removal and restoration are matters of considerable importance to Hanborough Parish. The Examiners recommended appropriate provision for decommissioning, including financial security.
35. HPC remains concerned that the arrangements do not provide sufficient certainty that adequate funds will actually be available when decommissioning is required. A future requirement to prepare a

decommissioning plan is not the same as having secure and enforceable financial provision for carrying it out. The DCO should provide for that security before construction begins.

Claimed minimum viability – conflicting assertions

36. The claimed minimum viable capacity requires evidence. The Applicant has asserted that 935 MW represents the minimum economically viable size of Botley West (Ref. C1-087). HPC considers that such an important assertion should be supported by transparent evidence, particularly where it is being relied upon to justify retaining panels in locations where environmental or other impacts might otherwise be avoided.
37. The Secretary of State should not accept an asserted viability threshold without adequate substantiation. If a smaller scheme could materially reduce environmental, landscape or residential impacts, the evidence supporting the claimed need for the full scale of the project becomes particularly important.

Other unresolved issues:

38. Other unresolved matters demonstrate the wider problem. HPC is also concerned that a number of other matters remain unresolved, including:
 - the proposed community food-growing areas;
 - the potential effects of the panel layout on trainee pilot operations;
 - the continued inclusion of the proposed cycle path along Lower Road despite the Applicant previously indicating that it would be removed;
 - outstanding minerals and waste matters; and
 - unresolved issues concerning the proposed acquisition of roadside verges.
39. Individually, these matters may appear capable of resolution. Taken together, however, they demonstrate the extent to which important aspects of the proposed development remain uncertain even at this late stage.
40. In addition, a significant late change to the justification for the proposed development has emerged. Hanborough Parish Council is particularly concerned by the Applicant's disclosure, for the first time in its covering letter of 16 July, that it is in advanced negotiations with Exeter College

Oxford to supply renewable electricity from Botley West Solar Farm to the College's proposed Innovation Quarter (EXOq) and its High Performance Computer and Data Centre near Kidlington.

41. The proposed facility is understood to require between 50MWe and 100MWe of electricity on a more or less continuous basis, representing a potentially substantial proportion of the output of Botley West.
42. This is not a minor detail: it materially changes the context in which the claimed public benefits and justification for the scheme should be considered. A proposal originally presented in terms of supplying electricity to a very large number of homes would, if a substantial proportion of its output is instead committed to a specific commercial or institutional development, produce a markedly different distribution of benefits. Yet the environmental and community costs of the scheme would remain essentially unchanged: the impacts on Hanborough Parish, local livelihoods, landscape and biodiversity, the setting of the Blenheim Palace World Heritage Site, aviation interests and flood risk would still be borne locally.
43. In the Council's view, it is unacceptable for such a significant change in the intended use and beneficiary of the electricity to emerge only after the close of the Examination, without the opportunity for proper examination of its implications for need, benefits, alternatives and the overall planning balance.
44. This is another material change to the project emerging at the eleventh hour and further demonstrates why the Secretary of State should not grant consent on the basis of an application whose fundamental justification and consequences remain capable of changing after the Examination has closed. It demonstrates again what we have said above: that these changes being presented after the end of the Examination show clearly that this BWSF proposal is not the project presented to the public and upon which consultation was carried out. This is fast becoming a new scheme, and one where no adequate consultation has been completed.
45. The Council considers that this late change materially weakens the case for the development and provides a further compelling reason for the DCO to be refused.

Cumulative effect:

46. The cumulative effect on Hanborough Parish is such that HPC believes that the local impact of Botley West must be considered in the context of the other pressures already affecting the parish. Hanborough is experiencing substantial housing growth and continuing development pressure. At the same time, the parish is having to consider major changes to its surrounding landscape and infrastructure.
47. Against that background, the fact that approximately 30% of the entire parish falls within the Botley West application boundary is of exceptional significance. The proposal would not simply occupy land within Hanborough. It would change a substantial part of the physical environment in which our communities exist. The cumulative consequences for landscape character, biodiversity, tranquility, heritage, views, recreational routes, agricultural land and residents' relationship with the surrounding countryside must therefore be given proper weight.
48. HPC is concerned that the cumulative impact has not been sufficiently addressed. Moreover, a proposed planning application for development of up to 600 new homes by Blenheim & Partners on land immediately adjacent to the proposed Botley West Solar Farm raises a further significant concern for Hanborough Parish. Locating a large new residential community alongside a utility-scale solar installation would create an inherently poor relationship between two very different land uses. Residents could face extensive views of solar infrastructure, associated fencing, access tracks, substations and other equipment, together with potential concerns regarding construction activity, maintenance operations, glint and glare and the long-term appearance of the installation. The proximity of the two proposals also risks creating a substantial, continuous area of development extending beyond the existing settlement and into the surrounding countryside.
49. In the view of Hanborough Parish Council, it would be inappropriate to consider either proposal in isolation: the cumulative effects of up to 600 new homes alongside a solar installation occupying a very substantial area of the parish should be fully understood before either development is permitted. The juxtaposition of a major new residential development and a utility-scale energy installation would place additional pressure on landscape character, residential amenity and the rural setting of

Hanborough, and reinforces the need for a cautious approach to the proposed Botley West development.

Claimed national need vs proper and adequate applications:

50. A claimed national need does not remove the need for a suitable project to be properly presented in a transparent way. HPC accepts the importance of renewable energy generation and the national need for additional low-carbon electricity. However, the existence of a national need does not mean that every proposed development is necessarily acceptable.
51. The question for the Secretary of State is whether this project, at this scale, in this location and in its current form, has been sufficiently defined and assessed and whether its adverse effects have been satisfactorily avoided, mitigated or justified, in order to allow approval to be granted.
52. HPC does not believe that the evidence currently before the Secretary of State demonstrates this.

Conclusion.

53. Hanborough Parish Council has considered the Botley West Solar Farm proposal from the perspective of the parish and the communities it represents. Our position is clear: the application should be refused. We do not say this because we oppose the BWSF in principle, We as HPC are well aware that there are those amongst our residents, and even on our Parish Council, who are supportive of the Application.
54. But we as HPC also consider that we do have a responsibility to our residents to carefully scrutinize proposals and applications such as this BWSF project. And if we do that and find the Application wanting or defective in material ways then we raise those issues and come to conclusions about the way in which the Application for a DCO has been and is being made. As we make clear here, we consider that this Application is defective, and should be refused.
55. Approximately 30% of Hanborough Parish lies within the application boundary. The consequences of the proposal for our parish would therefore be unusually extensive.

56. HPC remains concerned about:
- the scale of the proposed development and its effect on the character of the rural landscape;
 - the unresolved relationship with the Blenheim Palace World Heritage Site;
 - the ecological importance of Pinsley Wood and the wider Three Rivers area;
 - the potential SSSI designation;
 - impacts on mature, veteran and notable trees and associated habitats;
 - flood-risk and water-environment concerns;
 - unresolved residential visual amenity issues;
 - the uncertainty surrounding the final extent of the development;
 - the unresolved National Grid connection infrastructure;
 - inadequate certainty regarding decommissioning and financial security;
 - the lack of convincing evidence supporting the claimed minimum viable capacity; and
 - the cumulative effect of these impacts on Hanborough Parish.
57. In HPC's view, too many matters capable of materially affecting the environmental consequences of the project remain unresolved. The Applicant is seeking consent for a development of exceptional scale while leaving important aspects of its final form, mitigation and associated infrastructure to be determined subsequently.
58. We have referred before in our response of 16/07/2026 to the need for the Gunning Principles to be applied to this Application. We firmly believe that, if anything the importance of those Principles has strengthened.
59. There is no sufficient basis for granting a Development Consent Order for a project which would transform such a substantial proportion of a rural parish, and indeed the other parishes and communities potentially affected by the DCO Application. The Secretary of State must be satisfied that the development being authorised is clearly defined, properly assessed and capable of being delivered without unacceptable harm. HPC does not believe that this standard has been met.
60. For the reasons set out above, Hanborough Parish Council therefore respectfully asks the Secretary of State for Energy Security and Net Zero

to refuse the Development Consent Order for the Botley West Solar Farm.

Yours faithfully,



For and on behalf of Hanborough Parish Council