

Botley West Solar Farm Project – Written Representations on behalf of Siemens Healthcare Limited

Introduction

1. These written representations are made by JLL on behalf of Siemens Healthcare Limited (UK Company registration number 09567186, referred to below as “Siemens”), as the owner of the relevant land (referred to in this submission as “Siemens’ Land”).

2. We refer the Examination to the Response made by JLL to the consultation closing on 28 July 2024 and to the Interested Party submission made by JLL on 19 February 2025.

3. These representations concentrate on the key issue of the proposed cabling route and its impact on access to Siemens’ facility. Siemens’ position is otherwise reserved in regard to the content of the DCO application documents.

4. These representations repeat the concerns set out in our earlier submissions but also ask additional, specific questions of the Applicant as to the due diligence it has undertaken in relation to the cabling route options at this location, its justification for inclusion of the option over Siemens’ land, and whether the applicant has calculated and is capable of paying the compensation liabilities which would result from serious disruption to Siemens’ business.

Siemens’ Interest

5. Siemens Healthineers is the world leader in the design and manufacture of superconducting magnetic resonance imaging (MRI) magnets for medical applications. The superconducting magnets produced at the Siemens Healthineers Magnet Technology factory at Eynsham are solely for use in MRI systems. Siemens manufactures different sized superconducting magnets at the site, with field strengths ranging between 0.55 Tesla and 7 Tesla.

6. Siemens has operated the facility in Eynsham since 1984 and is one of the largest employers in the west Oxfordshire region. The company employs a total of around 600 employees on site.

7. In regard to the operational running of the facility, the site is currently operating at maximum capacity, 24 hours a day, 7 days a week, including bank holidays and the Christmas period.

8. Siemens’ facility in Eynsham takes delivery of parts and components for its manufacturing process by articulated lorries and large vans 4 - 6 times per day. Completed super conducting magnets are mainly transported to Germany for further assembly but also to end customers globally. Due to the size of the products, this can only be done by articulated lorry, 2 – 3 times per day. These traffic movements take place across a 24-hour period. Wharf Road is the sole access road to the Siemens’ facility for these incoming and outgoing deliveries and for its employees. It is therefore imperative that this access road remains unobstructed at all times so as not to disrupt its operations.

Siemens’ Land within the proposals

9. It is proposed as part of the Project to use land owned by Siemens to install cabling. The Order Limits identifies the requirement for an easement along Wharf Road which will run east from the junction with the B4044 along the length of the road and across the facility’s rear car park at the eastern end of Wharf Road, all of which are within Siemens’ ownership (Title No. ON129217). Part of Wharf Road is adopted by Oxfordshire County Council and the remainder is a private road. Siemens needs uninterrupted access over the entire road.

10. PVDP and their advisors have since confirmed that the cabling route that passes along Wharf Road through Siemens’ security gates and into the rear car park is to be removed, leaving the preferred route on Siemens’ Land which is along Wharf Road, entering adjoining land shortly before the security gates. Whilst this change is welcomed by Siemens, it does not resolve the central issue: interference with Siemens’ continuous access to its facility via Wharf Road. Siemens’ major concern over disruption to operations remains, with the consequent risk to the supply of MRI scanners.

11. The Order Limits identifies two, alternative cabling route options:

- a. Siemens’ Land; or
- b. Cassington Road.

Cable Route Option Studies

12. The proposals do not provide adequate criteria for the choice between the two options, including the weight that will be given to the risk of disruption to Siemens’ facility and the resultant cost. Siemens’ advisors, JLL, requested this information on a call on 5th September 2024 between JLL, Ardent and PVDP. On the call it was agreed that PVDP would provide an analysis of the pros and cons of each option.

13. At the point of submitting these representations, Siemens and their advisors, JLL, are yet to receive analysis of both options. JLL have continually requested for this information to be provided via email on: 23rd September 2024, 18th November, 25th November, 11th December and 19th December 2024, and 6th January 2025. 6 March, 7 April and 7 May 2025. Considerable further engagement will be necessary in this regard so that it can be evidenced that all options have been exhausted prior to further engagement.

14. At the Specific Issue Hearing on 15 May 2025 Christopher Lapointe, planning expert for the Applicant, promised to submit to the Examination:

And we’ve said in the submitted documents that we would hope to be able to, ... report back to you, a more, a narrower version of that corridor, uh, following some further investigations in terms of land and in terms of ongoing discussions with relevant, landowners and other matters. ... and so that’s the approach we’ve taken from an EIA point of view. And during the course of the examination, we hope that we will be able to narrow the corridor so that, uh, uh, we would try and avoid taking powers, um, for the whole corridor.

Transcript 00:23:21:07 - 00:23:59:13

15. Hisham Trabelsi, electrical engineer and technical project manager for the Applicant, added:

So we started some of the non-intrusive surveys and as we continue our project, we will begin the intrusive surveys, depending on having, for example, access rights and agreements with the with the landowners nearby the cable route. So we are continuing this step by step, and as the project will continue, we will try to reduce as much as possible the cable options.

Transcript 00:26:13:03 - 00:26:38:23

16. Given that Siemens highlighted to the Applicant as early as June 2024 the severe disruption which could be caused by interference with access to its factory, we are surprised and disappointed that the Applicant has not only not provided its optioning study on the cable route options, but it has not even completed the surveys needed to evaluate those options.

17. In our view, the cable routes are an integral part of assessing the impact of the project as a whole. It is late in the day, the Examination having begun, for the Applicant not to have provided the final design of its routes. We request that the Applicant provides the final design as soon as possible.

18. We request that the Applicant places the highest priority upon providing Siemens with the optioning study. The Applicant should also provide full details of the investigations including surveys it has carried out on the Cassington Road route so that the Examiner and Siemens are made aware of the nature of any alleged impediments to the adoption of that route.

Compensation

19. By engaging with the Applicant at the earliest opportunity and taking part in this Examination, Siemens is making all reasonable efforts to avoid the eventuality, but if the Applicant's exercise of rights of access over Wharf Road interrupt the operation of the business Siemens will be entitled to full compensation for any loss it suffers, both injurious affection (diminution in the value of its land) and disturbance (business losses). Given the potentially calamitous impact interruption to access could cause to Siemens' supply chain (as explained at paragraph 10 above) this could represent a very substantial liability for the Applicant.

20. We request that the Applicant provides Siemens with details of the advice it has taken in regard to compensation liabilities and the funding it has available to meet those liabilities.

Conclusion

21. In conclusion, Siemens Healthcare Limited, as a major employer and critical manufacturer in the west Oxford area, has significant concerns about the proposed DCO application's potential impact on their manufacturing operations. It believes that given the disproportionate harm use of Wharf Road for cabling could cause, rights over Siemen's land should be removed from the DCO.

22. In the first instance, Siemens requests that the Applicant provides the following information as discussed above:

- a) Final design of cabling routes.
- b) Route optioning study
- c) Full details of investigations and surveys informing selection of preferred route
- d) Details of compensation advice received
- e) Applicant's funding of compensation liabilities

23. Siemens will wish to make further written representations and raise further questions during the Examination.

John Davies

Director, Compulsory Purchase

JLL

4 June 2025