

**Application by Photovolt Development
Partners (“PVDP”) on behalf of Solar
Five Limited (the “Applicant”) for an
Order Granting Development Consent
for the Botley West Solar Farm**

**Submission for Examination Deadline 5
12 September 2025**

Siemens Healthcare Limited

**Response to Applicant’s Deadline 4
Response (Response to the ExA’s
second written questions and requests
for information (EXQ2))**

Introduction

1. These written representations are made on behalf of Siemens Healthcare Limited (UK Company registration number 09567186, referred to below as “Siemens”).
2. We refer the Examining Authority (“ExA”) 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, which outline previous concerns raised by Siemens in relation to the proposed cabling route and the impact this would have on access to Siemens’ facilities. We also refer the ExA to our response at Deadline 4 [REP4-080].
3. This submission principally focusses on the Applicant’s responses to the ExA’s second written questions and requests for information (EXQ2) issued on 22 August 2025, in particular the responses submitted to the following questions raised:
 - a. Question 2.7.14: the ExA notes an outstanding disagreement between the applicant and Siemens Healthcare Limited. Both parties are requested to consider whether the differences could be solved via bespoke protective provisions, and, if so, work urgently on drafting these. In response to this question, inform the ExA what is being done, when and why.
 - b. Question 2.16.1: ...Siemens Healthcare – Can you explain how the business operates on a day-to-day basis in terms of its demands on the highway network and when certain activities (deliveries) occur that require the network to be as clear as possible?
4. This submission also considers and responds to the Cable Optionality Report [REF4-039]
5. Siemens’ position is otherwise reserved in regard to the content of the DCO application documents.

Question 2.7.14

Protective Provisions

6. Siemens considers that bespoke protective provisions could resolve the differences between the parties and should be included within the DCO. The reasons requiring the same are set out in detail in its Deadline 4 submissions [REP4-080] from paragraphs 11 to 18, which shall not be repeated for the purpose of this response.
7. The Applicant has denied the need for protective provisions in its response [REP4-037]. They say this is because they are not necessary or justified. Siemens do not agree. The Applicant refers to significant mitigation proposed to Siemens to be secured under the DCO Requirements, to ensure that any potential impact of Siemens will be suitably protected. Siemens is not aware of any mitigation offered which requires Wharf Road to stay open to traffic with suitable traffic management systems, or there being any mechanism for doing so that would replace the need for protective provisions.
8. The Applicant has stated that Wharf Road will stay open. Siemens needs to be confident that this is the case. The primary position is that the Cassington Road routing option should be chosen. Absent this, protective provisions are required for Siemens to ensure that this major local employer is able to continue to operate.
9. Siemens have highlighted the apparent risks with the proposed works to Wharf Road in its submissions [REP4-080]. Notably that although the proposed works will engage an area which is adopted highway, the works suggested are not typical highways works. They are

much greater in extent and potential impact than the typical maintenance works required to Wharf Road.

10. Whilst the Applicant has suggested that suitable traffic management works will be put in place, and that at least one lane of Wharf Road will remain open, the proposed DCO does not secure this.
11. Protective provisions are necessary to protect specific parties, who would be subject to unacceptable impact if the protective provisions are not agreed. Whilst the current provisions in the DCO concerning road closures may be sufficient for less sensitive uses, Siemens have highlighted [REP4-080] the significant risk to their operation if there is disruption to access.
12. In order to address this risk, protective provisions which require all reasonable endeavours to co-ordinate the execution of the works in order to ensure the safe and efficient operation of Siemens' factory and/or operations are necessary. To support this it is also necessary to include compensation and access requirements.
13. The Applicant clearly hopes (as does Siemens) that these works can be undertaken in such a way as to avoid significant disruption to Siemens' factory. However hope is not sufficient, the DCO needs to secure the necessary protections. There is also concern that the scale of the project means that there is a real risk that keeping Wharf Road open would not be achieved as currently drafted. Accordingly to reduce risk the Applicant should route the cable via Cassington Road. If this is not agreed, then protective provisions are required to provide greater certainty that works will be undertaken so as to secure the joint aim (with the Applicant) that Wharf Road stays open to traffic and that this does not cause significant disruption to Siemens.

Question 2.16.1

14. Siemens remains significantly concerned regarding the proposed works and how they will be undertaken. In Siemens opinion, the most appropriate way to overcome these concerns and to limit the impacts to Wharf Road and its accessibility is for the proposed works to be relocated and undertaken along Cassington Road.
15. No mitigation has been provided or proposed which addresses these concerns.

Cable Route Option Studies

16. Our Deadline 4 submissions [REP4-080] highlighted that we had not been provided the Cable Route Options Study. This was submitted at Deadline 4 [Rep4-039] by the Applicant.
17. Our response to this document is set out at Appendix 1.
18. Siemens do not consider the Options Appraisal provided by the Applicant at [REP4-089] sufficiently deal with these concerns and do not appropriately deal with the Road Management requirements in order to provide the assurance which is necessary for Siemens regarding access to its factory.
19. Siemens rely on the Options Appraisal prepared by JLL, which is appended to this response at [REP4-039].
20. In summary we are concerned that the risk of significant economic impacts are fully considered (indeed the section of socio-economic effects states that no socio-economic effects are anticipated), despite the potential significant disruption to Siemens.

21. The Cable Route Options Study is based on the assumption that traffic movement will be maintained. Maintaining traffic movement is very important for the operation of Siemens' business. The Cable Route Options Study states that cables will be laid pursuant to the street works powers under Part 3 of the DCO and in accordance with the permit scheme (see paragraph 2.4.8 of REP4-039). These powers do not provide any certainty that Wharf Road will not be closed (either due to technical reasons, or because this is later preferred by the Applicant). They also do not provide any certainty that the proposed traffic management options will be suitable.
22. The lack of certainty regarding both the road closure and traffic management is not reflected in the options appraisal. If this risk were accurately reflected, it is considered that option 2, which uses Cassington Road would be preferred.

Next Steps

23. As stated in their earlier response, Siemens remains committed to working with the Applicant to explore the Cassington Road and Wharf Road cable routing options. Siemens has met with the Applicant and its agents on several occasions in order to understand and engage with both proposed cabling route options. However despite these meetings Siemens considers there remains a significant risk to the operation of its facility on Wharf Road
24. Siemens is willing to engage with the ExA and Applicant to consider whether the potential impacts of the works on Siemens' business operations could be addressed through the protective provisions and will continue to discuss alternative route options and solutions with the Applicant going forwards. As noted above, Siemens considers that these impacts could be avoided by choosing the Cassington Road or other alternative cabling route.

Browne Jacobson LLP
12 September 2025

Appendix 1 – Optionality Report Analysis

Optionality Report Analysis

We have reviewed Botley West Solar Farm Cable Optionality Report (14.4 Cable Optionality Report, August 2025 - EN010147/14.4) by the Applicant. The document provides an assessment of four critical areas along the Botley West Solar Farm's cable corridor. These optionality areas span from the Northern Site near Wootton to the Southern Site around Swinford Bridge. The cable opportunity that is of relevance in our analysis and response is covered under Cable Optionality 4 (Land between the Central and Southern Sites east and south of Eynsham around the Swinford Bridge).

The Applicant has determined that Option 1 is strongly preferred over Option 2 from both environmental and engineering perspectives, despite both routes requiring voluntary landowner agreements that remain unsecured.

We have extrapolated the table below from 14.4 Cable Optionality Report - EN010147/14.4 pages 28-29. Commentary has been provided in response to the factors that the Applicant has not considered nor factored into their analysis. In this context, and without prejudice to Siemens' objection to the requirement of an easement over their land, we deem that this commentary is of key relevance when analysing the two options.

Topic	Cable Optionality Area 4 – Option 1	Cable Optionality Area 4 – Option 2	Siemens Commentary
Traffic and Transport	<p>Potential to install the cable within the verge or footway which would retain two-way vehicle movement along Wharf Road, however, may require on-street car parking to be temporarily suspended to maintain pedestrian provision safely.</p> <p>If cables were installed within the carriageway, one lane of Wharf Road might need to be temporarily closed, however, traffic movement could be maintained, on-street car parking may have to be temporarily suspended depending upon the precise location of the cables, whilst pedestrian provision could be retained.</p>	<p>Expected to require a closure of Cassington Road to facilitate HDD compounds.</p> <p>Given the cul-de-sac nature of Cassington Road, this would close vehicular access to the residential properties and businesses along it as well as Eynsham Cricket Club. Emergency vehicle access would not be able to be maintained.</p>	<p>Option 1</p> <ol style="list-style-type: none"> 1. The Applicant's reference to '<i>potential to install the cable within the verge...</i>' is an insufficient response without adding more context. The applicant must be required to provide adequate certainty on this point and this stage of design. It was mentioned by John Watkins (construction manager for PVDP) that the cabling could be restricted to the verge, allowing two lanes to remain open. If the verge can be used to lay the cable, then the Applicant must provide these assurances and explore further the ability to do this so that it can be confirmed with Siemens. This would be critical to include within the protective provisions as set out previously by Siemens in our representations dated 22.08.25. Since the Optionality report has been provided, we have had sight of document 250903 Botley West Siemens 275kV, outlining two potential routes for Wharf Road. Upon review, we deem that the information provided within contradicts the analysis provided in this Optionality report with specific reference to the comments made in reference to retaining two-way traffic control. The Applicant needs to provide further evidence of the impacts to Wharf Road and Siemens' operations. 2. The Applicant's reference to 'traffic movement could be maintained...' is not sufficient. This raises major concern for Siemens around lack of certainty and evident lack of construction management to

			<p>ensure that the operations at the factory can be maintained. As previously stated in our representations dated 22.08.25, 04.06.25 and 19.02.25, the site is currently operating at maximum capacity, 24 hours a day, 7 days a week, including bank holidays and the Christmas period.</p> <p>Option 2</p> <ol style="list-style-type: none"> 1. It is noted the disruption that would be caused to the existing businesses on Cassington Road. However, the same consideration has not been had to Siemens, one of the largest employers within the area. The Applicant's reference to the impact to Eynsham Cricket Club is also noted. However, through previous discussions with the Applicant they have proposed to Siemens undertaking the works over a quiet period i.e. the Christmas period. Having reviewed Eynsham Cricket Club fixture list on-line for the last two seasons (2024 and 2025) their season begins in April and concludes at the start of September (this includes first, second, friendlies, youth and women teams). The timings of their fixtures would provide sufficient time for the Applicant to carry out their works during a period that would not impact on the running of the Cricket Club.
Socio Economics	No socio-economics effects anticipated.	No socio-economics effects anticipated.	<ol style="list-style-type: none"> 1. Siemens Healthcare Limited is the world leader in the design and manufacture of superconducting magnetic resonance imaging (MRI) magnets. Siemens are a critical manufacturer of MRI magnets in Europe. MRI magnets represent a crucial socio-economic factor in modern healthcare infrastructure and any impact or restriction on the ability of these to be manufactured will cause significant overall impacts to wider socio-economic factors. The Applicant's socio-economic analysis gives insufficient weight to the consequences of disruption to Siemens' operations compared to the other neighbouring land uses, which are largely residential, agricultural and leisure.
Agricultural Land Use and Public Rights of Way	<p>The length of agricultural land requiring open trenching is less than Option 1. HDD is proposed to the south of Bladon Heath and would pass under a hedgerow and the root zone of a veteran tree. Open trenching for this section is therefore avoided.</p> <p>The Outline Soil Management Plan</p>	<p>The length of agricultural land requiring open trenching is less than Option 1. HDD is proposed to the south of Bladon Heath and would pass under a hedgerow and the root zone of a veteran tree. Open trenching for this section is therefore avoided.</p> <p>The Outline Soil Management Plan</p>	<ol style="list-style-type: none"> 1. The consideration of these ancillary impacts on agricultural land does not appear to be something that should be given such strong weight on a micro level when the whole scheme depends on the use of agricultural land for delivery.

	<p>(Appendix C of the Outline Code of Construction Practice [REP3-030]) identifies that soil survey work would be undertaken to determine the topsoil and subsoil resources that would be affected within these areas to ensure that appropriate soil handling measures will be implemented within these areas.</p> <p>Potential diversion for footpath users along Cassington Road.</p>	<p>(Appendix C of the Outline Code of Construction Practice [REP3-030]) identifies that soil survey work would be undertaken to determine the topsoil and subsoil resources that would be affected within these areas to ensure that appropriate soil handling measures will be implemented within these areas.</p> <p>Potential diversion for footpath users along Cassington Road.</p>	
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General Commentary – Need for Optionality

Despite acknowledging that Option 1 would result in '*private loss*' the analysis downplays the severity of forcing a potential business closure through compulsory powers, instead emphasising technical conveniences such as simpler construction and fewer surveys.

The characterisation of Option 2's impacts as merely 'wider public impact' understates the legitimacy of using public infrastructure (roads) for public benefit projects, while simultaneously minimising the significant impact on private rights and access that are inherent in Option 1. The technical justification, while detailed, appears to serve as rationalisation for avoiding the more challenging but potentially more equitable Option 2, which would distribute temporary inconvenience across the community rather than concentrating harm on a single private entity.

The characterisation of Option 1 as avoiding flood zones for the most part suggests some flood risk interaction that appears downplayed, while Option 2's flood challenges are given significant weight, it doesn't engage in the fact that the cabling due to enter the bridlepath from Wharf Road and east is within Flood Zones 2 and 3.

Furthermore, the dismissal of traffic impacts as merely "*temporary parking suspensions*" potentially underestimates the cumulative effects of construction traffic, material deliveries, and worker access on Wharf Road infrastructure.

Summary

The analysis of the Cable Optionality Report reveals significant deficiencies in the Applicant's assessment that fundamentally undermine the case for Option 1 over Option 2. The Applicant has failed to adequately consider the substantial socio-economic impact of disrupting Siemens Healthcare Limited's critical MRI magnet manufacturing operations, which operates at maximum capacity 24/7 and represents a vital component of European healthcare infrastructure.

The technical justification appears selectively presented, with Option 1's challenges understated (including insufficient design certainty around verge installation and contradictory evidence regarding traffic management) while Option 2's difficulties seem overstated.

Critically, the seasonal nature of affected businesses along Cassington Road, particularly Eynsham Cricket Club's April-to-September operating period, demonstrates that temporary disruption could be strategically timed to minimise impact, whereas Siemens' continuous operations offer no such flexibility.

The Applicant's approach appears to prioritise technical convenience over proportionate impact assessment, concentrating permanent harm on a strategically important manufacturer rather than accepting manageable temporary disruption to the wider community. A more balanced evaluation would recognise that Option 2's temporary inconveniences are preferable to the permanent operational constraints and potential closure of a critical healthcare infrastructure manufacturer.