Written Summary of statements, by Harry St John made at Hearings in week commencing 6th October 2025 to the Botley West solar farm Examination before the PINS Inspectors led by Mr D Wallis

Background

My name is Harry St John, I'm a resident in Eynsham and previously lived in North Leigh.

I was the District Councillor for North Leigh between 2016 and 2024 and prior to that a parish councillor for about 15 years; I retired from being a rural Chartered Surveyor in 2019, after a career spanning 47 years - about 35 of those years spent based in and working in Oxfordshire and adjoining central England counties. So I probably know the local patch better than most.

I have made representations at each stage of this Examination either on behalf of Mr and Mrs Cooke, Affected Parties of [redacted] Long Hanborough or as an Interested Party and member of the local public. The Cookes have lived at [redacted] and have enhanced their immediate environment in many ways as can be seen on site.

Compulsory Acquisition Hearing

I spoke on the Cookes behalf and welcomed the removal from the Draft DCO and plans (see Change notification No 2 item 4) those fields (close to the Cookes property) that are subject to restrictive covenants in favour of the Cookes over Blenheim's freehold. As a result no solar panels or inverters will be placed on the subject land, as we had originally requested.

I made the point that our clients objection to those fields being included in the original application back in November 2024, is now clearly a successful one (having read the Govt. Guidance on costs in such NSIP examinations) even before any final decision is taken - **as the applicant has now removed the subject land voluntarily from the draft DCO in the recent Change notification loaded onto the PINS website on 23rd September,** rather than being

told to do so by the Inspectors or the S of S in making his final decision next year. This is a slightly different scenario from the norm, hence my flagging it up and I was grateful to Inspector Wallis in recognising the point made.

Naturally the Cookes remain objectors to the remaining scheme which would seriously compromise the rolling, rural and riparian landscape views that their property commands over this wonderful stretch of the Lower Evenlode valley, before it joins the Thames near Eynsham.

Funding

As well as seeking that removal, we had questioned the justification for granting such draconian powers of compulsory acquisition to a private company that still appears to lack the necessary financial weight to undertake such a project - Policy guidance states the applicant must show a compelling need in the public interest to acquire land compulsorily and to demonstrate appropriate funds to meet any compensation claims arising are readily availble.

The vast majority of the land involved will be leased by Blenheim and the Gee and Brown families respectively - all of whom have signed binding agreements to grant long leases to the operator of the site - whether it be the Applicant or another party. So whilst they will preserve their freehold land (as there will be no need to exercise any CA powers over their land), and receive a substantial rental income for c 40 years, everyone else is faced with losing their freehold if the DCO is granted. That seems an unjust way of implementing what Parliament intended in the 2008 legislation - public need for public benefit.

(An interesting point was made by Prof Rogers about whether or not someone may indeed exercise the CA powers and take the freeholds of all owners - maybe something Blenheim might not have bargained for?).

Out of a budget estimate in excess of £800 million (a very

preliminary estimate on their own admission) £69 million is included for compensation and the Inspectors have rightly asked for a detailed breakdown of this figure.

However in its 2024 **unaudited** accounts, Solar Five Ltd appears to have barely any cash assets after allowing for loans owed/ to associate companies with shared directors. The tangible assets are not explained - what assets do they refer to?

I suggest that the Examination team should seek specialist accountant advice on the financial standing of the applicant Solar Five Ltd and their consultant adviser PVDP, given the complicated cross lending and shared directors between the various companies some of whose accounts are out of public inspection being based in Cyprus and PVDP being a German company.

The S of S will need to be totally confident that the applicant can undertake or attract sufficient third party investors to deliver this project if approved. No such robust or reliable evidence has been produced as one might reasonably expect at this stage. Saying there has been initial contact with funders/investors etc is largely meaningless. If they could show provisional/in principle commitments from such organisations to invest/lend, subject to the S of S granting approval of the DCO, and the usual due diligence checks, this might have carried more weight. But none have been produced in evidence.

To grant consent for a project of this magnitude on such a tight timetable which then fails to deliver because the applicant simply is not properly prepared with the funding, would be massively embarrassing for all concerned.

Timing

I question the latest project timetable indicated by the applicant for various reasons.

- No clear binding date for the generating station to connect to the Grid has been secured or agreed; because the current Oct 2027 connection date is clearly not deliverable now, as NGET have

said they are unlikely to get consent and complete construction of their main Sub Station until late 2029.

- NGET, we were informed, have only just carried a pre application discussion with the Vale of White Horse DC whose officer said on Thursdays hearing that the NGET's current **draft substation** proposal also included a 800MW+ battery storage facility that might be located west of their sub station - in effect taking the cumulative impact of the combined facility to altogether different level which remains to be assessed.
- People might struggle to understand why this was not known to the applicant given they say they have been in close regular contact with NGET over the last 3 or 4 years.
- The applicants latest timetable states work would start on site in late 2026, assuming approval in spring 2026, and they would complete the project two years later in late 2028.
- Because a revised connection licence date has not been forthcoming, the consequential uncertainty would surely be a major obstacle to potential investors/lenders who are risk averse - **if the solar farm cannot connect to the grid, it can generate no income.**
- To raise c £800million, obtain competitive estimates, sign all the necessary contracts, source the vast quantity of materials required and obtain the final outstanding detailed approvals in that short timescale, is, in my experience, stretching credulity.
- At about the same time, work is likely to be starting on the A40 improvements and the initial construction of Salt Cross garden village (c.2200 new homes and community facilities - just to the west of Lower Road where it meets the A40). Two massive construction schemes that will absorb local labour, resources, HGV availability and all three would combine to seriously compromise the local highway system.
- The continued lack of concrete evidence at this late stage in the Examination from NGET, looks a serious missing piece in the jigsaw puzzle, given they are the kingpin in this whole project - they have to agree to the connection and deliver the sub-station to their specification on their timetable **not the Applicants.**
- If they are all working together so closely, why are we all largely still in the dark and nothing firm is signed up in the way of reliable rather than hearsay evidence?

- NGET's involvement with this examination has been minimal which is truly hard to understand for project of this magnitude. Their speed of response to the Applicant does seem to have been slow.
- Much has been made about the land on which the panels will stand will be growing grass which sheep will then graze. However as most of the land is currently arable and, one assumes, will be growing an able crop this spring/summer 2026, the land cannot be sown to grass until after harvest (July/August 2026) unless it is undersown with a spring sown arable crop. Is that the intention of the landowners?If work is due to start on site in autumn 2026, I suggest that a robust grass crop cannot be properly established until the spring/summer of 2027 at the very earliest. The construction period will inevitably see periods of wet ground conditions, and inevitable consequential damage to any grass that is growing.

General

Looking back at the Inspectors questions in PD-008 and PD-012, the applicants responses have not always been as detailed as one might expect. In reply to Q1.5.10 they state " all land in the Order limits is required for the project(ie 840MW solar power generation) and they do not expect any reduction in the Order limits at a later stage - and yet at the end of September 2025 they removed over 200 acres of panels (enough to generate 40 to 50MW!). However at last week's hearing they said they could still generate the 840 MW planned from the reduced area!
So at which point were they actually representing the truth?

The Inspectors have seized rightly on this substantial reduction so late in the proceedings - demonstrating an early failure to mitigate the obvious landscape impacts on the setting of the WHS, local residents in Bladon and the safety issues near the Oxford Airport runway/flightpath plus about 12 acres removed around Mill Farm - all of which suggestions were pointed out to the applicant by many in the early 2024 consultation period - well before the November 2024 DCO application.

We all noted and share the Inspectors exasperation at the

Applicants failure on so many fronts to provide information in a timely and succinct fashion, let alone making a significant change to the project so late in the day. This must surely have a bearing when it comes to the matter of awarding costs.

In particular, many of us were shocked that the applicant had not produced the residential amenity assessment reports which one of their team had undertaken but are still to be produced for examination. There is a strong suspicion that the information may still be desk top assessments, given no affected householders have had a visit from any specialist valuer or similar.

Conclusion

I think it is fair to summarise this application by the **maximising** of the amount of paperwork (much of it repeating the legislation/ policies over and over again) to overwhelm lay people trying to comprehend what it all involves, and consistently seeking to **maximise** the extent of the Order limits/site area and thus the potential MW output and financial benefit for the applicant and the three main landowners principally Blenheim estate interests.

In complete contrast, the applicant and their team **minimise** any concession to affected parties, the quantum of community benefit, any consideration to local knowledge and well reasoned arguments from those equally or more expert in their field - in some cases in a frankly cavalier fashion.

The questions 10 and 11 raised by the Inspectors in their further information request to the applicant on October 14th speak volumes. The applicant claims to know better than anyone else when clearly they do not.

Mr Muhamed, Counsel for Stop Botley West, admirably summarised it all very succinctly. I wholly endorse his summing up.

This ill thought through project should be recommended for refusal by the Inspectors and we all hope the S of S sees fit to agree with such advice.

Harry St John
19th October 2025