

**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 6
20 October 2025**

Siemens Healthcare Limited

**Providing written summaries of oral
submissions at CAH (8 October 2025)
and response to Applicant’s Deadline 5
Response**

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] and Deadline 5 [REP5-134].
3. This submission principally focuses on Siemens’ oral representations at the Compulsory Acquisition Hearing (‘CAH’) on 8 October 2025 and provides a response to the Applicant’s Deadline 5 submissions [REP5-005].
4. Siemens’ position is otherwise reserved in regard to the content of the DCO application documents.

Oral submissions at CAH

5. These submissions have been prepared as a summary of the oral submissions presented by Mr Ben Standing, Partner at Browne Jacobson LLP and Mr Andre Lindeboom, Finance Director at Siemens Healthcare Limited at the CAH.
6. The submissions made focused in particular on the proposed inclusion of Wharf Road (“WR”) within the Order limits, to be used for the laying of cables to service the proposed solar farm.

Siemens' operations

7. Siemens Magnet Technology is a global healthcare provider operating from a number of facilities. The Wharf Road facility (‘the facility’) is one of only two such factories operated by Siemens worldwide.
8. The facility produces approximately 2,000 superconducting magnets each year, primarily serving the European, American, South American, and African markets.
9. Employing approximately 600 people, of whom approximately 90% are locally recruited. With the facility currently benefitting from 24-hour access, 365 days per year.
10. Siemens has real concerns regarding the proposals for cabling along Wharf Road and the potential impact it will have on the facility, namely unexpected road closures and delays to the production and distribution of the superconducting magnets. These have been set out fully below:

Operational requirements and constraints

Access Requirements

11. Wharf Road is fundamental to the facility being the single road providing access to the Siemens facility. The site is bounded by allotments and Wharf Stream, meaning there is no alternative access route.
12. The facility generates approximately 500-600 vehicle movements on a weekly basis, comprising both incoming materials and outgoing finished goods.

13. All vehicles, including those accessing the car park, must use Wharf Road to reach the rear of the factory where operations are conducted.

Time-Critical Nature of Operations

14. It is important that any delays to the manufacturing and distribution process are mitigated as far as possible. For context, the magnets manufactured at the facility contain liquid helium. Once these magnets are disconnected from power, the helium begins to boil off as the magnet warms, resulting in the loss of the helium. This creates a critical operational requirement to transport magnets as quickly as possible to their destination (for example, to Germany for cooling).
15. Any disruption to the transportation process has a direct and immediate impact on the product and the business. Transportation is therefore a key material planning consideration for Siemens' operations.

Concerns regarding the DCO

Lack of Certainty Regarding Road Closure

16. The wording of the DCO as currently drafted identifies Wharf Road as an area where work can be undertaken. Therefore, this already introduces a risk to the road network which could lead to it being consequentially closed.
17. In addition, this risk is further amplified by the current Part 3 of the draft DCO which contains powers to close roads, demonstrating that this is a possible eventuality. Whilst the Applicant believes they can manage the works such that Wharf Road stays open, there is nothing currently in the draft DCO that secures this position. The Applicant agreed with the position.

Absence of Adequate Survey Information

18. From the information provided by the Applicant, it is understood that there are currently no surveys of Wharf Road and therefore, no complete understanding of what will be encountered during the works or precisely how the project will be undertaken, which could subsequently lead to the need for road closures.
19. Whilst the Applicant's intention might be to keep Wharf Road open, if something is found during the works that means they have to close more of the road, this will create a significant issue for Siemens.

Risk and Impact of Road Closure

20. There is a real risk that Wharf Road might have to be closed during the works, even a closure of a few days would have a big impact on Siemens' operations.
21. Based on current rough estimates, a closure of three weeks of the facility could result in losses of £100 million or more. The impact would be significant both financially and locally, given the 600 employees, the majority of whom are local residents.
22. The risk posed is extremely significant on a global level, given the facility's role in the worldwide supply chain.

Engagement with the Applicant

23. Siemens has been raising its concerns and the associated risks since approximately June 2024.

24. Siemens requested an optionality report to understand whether and how its concerns had been weighed in the balance.
25. The optionality report was eventually provided at Deadline 4, however, there are concerns with the report which we have raised both in Siemens Deadline 5 submission and at CAH1.
26. It is understood that the optionality report is interim in nature and that a final decision on routing has not yet been made. The reasons for the Applicant's request for flexibility are understood. However, Siemens has real concerns regarding the content and conclusions of the optionality report.

Flood Risk

27. The report states that the proposed route 'avoids flood zone 3 for the most part'. However, at least 50% of the route is within Flood Zone 3 and at least 10% is within Flood Zone 2.
28. The relevant Environment Agency Flood Maps are appended to this submission at **Appendix 1**.

Inadequate Balancing Exercise

29. There is no real acknowledgement in the report of the serious risk of disruption to Siemens when compared against the impact on others on the Cassington Road option, for example, the Cricket Club, a significantly smaller entity of which may be affected by the proposed works but on a lesser scale than that of Siemens.
30. The optionality report does not currently adequately address the fact that it is not known what is in the road or how the project will be undertaken, meaning the risk of disruption remains substantial.
31. Siemens therefore maintain that the position is not as 'clear cut' as the optionality report sets out.

Alternative Routes

32. Siemens will maintain that the Cassington Road option should be preferred and prioritised by the Applicant over Wharf Road due to the significant impacts which may be caused to Siemens.
33. The Applicant have suggested that using Cassington Road could result in a full road closure stopping any access for residents, local businesses and even emergency services.
34. It is understood that there is the potential however for access via an alternative route on Cassington Road. There is a previously used bridge currently stopped by a gate on the bridge which could potentially be re-opened (subject to the suitable assessments) to allow access for those affected. It is not known whether an assessment has been made regarding the bridge's capacity for emergency vehicles.
35. It would make considerable sense to explore this option more thoroughly in order to weigh the balance more fairly. The optionality report appears to gloss over the impact on Siemens and does not properly explore ways in which some use of Cassington Road could be more acceptable.

Siemens' primary position

36. Siemens' primary position is that Wharf Road should be removed entirely from the Order limits.

Siemens' alternative position if its primary position is not accepted: protective provisions

37. As highlighted in previous responses, Siemens remains committed in assisting the Examining Authority and is willing to enter into negotiations with the Applicant. Without prejudice to its primary position that Wharf Road should be removed from the Order limits, Siemens has drafted protective provisions ("PPs") as a fallback position.
38. Siemens intends to pursue the PPs as a necessary safeguard should its primary position not be accepted.

Conclusion

39. For the reasons set out above, Siemens respectfully requests that the Examining Authority:
 - a. Remove Wharf Road entirely from the Order limits (primary position); or
 - b. In the alternative, require the inclusion of robust protective provisions to safeguard Siemens' operations.
40. Given the global significance of the facility, the time-critical nature of its operations, the substantial financial and local employment impacts, and the current lack of certainty regarding the works, Siemens submits that its concerns must be given adequate weight in the decision-making process.

Response to Applicant's Deadline 5 Submissions

41. The Applicant has responded directly to Siemens submissions raised at Deadline 4 [REP4-080]. In summary, the response confirmed that the Applicant would be willing to work to agree protective provisions in a timely manner. Accordingly Siemens and the Applicant have been discussing proposed protective provisions.
42. Whilst the protective provisions remain under negotiation, the current draft provisions are below. These are still to be agreed with the Applicant, however it is anticipated that they are not far from their final form:

FOR THE PROTECTION OF SIEMENS HEALTHCARE LIMITED

1. *For the protection of Siemens the following provisions of this Part of this Schedule have effect, unless otherwise agreed in writing between the undertaker and Siemens.*
2. *In this part of this Schedule—*

"Siemens" means Siemens Healthcare Limited (company number 09567186) whose registered office is at Park View, Watchmoor Park, Camberley, Surrey, United Kingdom, GU15 3YL, or any successor company operating the Eynsham factory;

"specified works" means any part of the authorised development or activities undertaken in association with the authorised development which will or may affect access to or from Wharf Road or which may in any way adversely affect Siemens' operations at the Eynsham factory;

3. *(1) The undertaker must indemnify Siemens against all reasonable loss, damage, liability, costs and expenses reasonably suffered or incurred by Siemens by reason of—*
 - (a) the construction, operation or maintenance of any specified works or the failure of any such works comprised within them; or*
 - (b) any act or omission of the undertaker, its employees, contractors or agents or others whilst engaged upon the construction, operation or maintenance of the specified works or dealing with any failure of the specified works.*

- (2) *The indemnity in sub-paragraph (1) does not apply to the extent that any loss, damage, liability, costs or expenses are attributable to the act, neglect or default of Siemens or its officers, employees, contractors, or agents.*
- (3) *Siemens must, at all times take reasonable steps to prevent and mitigate any such claims, demands, proceedings, costs, damages, expenses or loss.*
- (4) *Siemens must give to the undertaker reasonable notice of any claim or demand against it in respect of which it may seek indemnity under this paragraph, and no settlement or compromise of such claim or demand may be made without the prior consent of the undertaker, such consent not to be unreasonably withheld or delayed.*
- (5) *If the undertaker reasonably withholds consent to a settlement or compromise under sub-paragraph (3), the undertaker may assume the conduct of any defence, settlement or compromise of the claim or demand at its own expense.*
- (6) *The undertaker must coordinate the execution of the specified works in order to ensure:*
- a. the safe and efficient operation of Siemens' operations at the Eynsham factory, and*
 - b. uninterrupted operational vehicular access to the Siemens' operations at the Eynsham factory along Wharf Road*
43. We anticipate that the final wording for the protective provisions will be agreed in advance of the close of the inquiry.
44. In addition to this, as to the concerns raised by Siemens at Deadline 4, the Applicant relies on its Cable Optionality Report [REP4-039] as justification for the need to retain optionality for each of the areas, along with the powers being sought. Siemens does not intend to repeat its concerns here, but relies on the summary of its submissions at the CAH above.

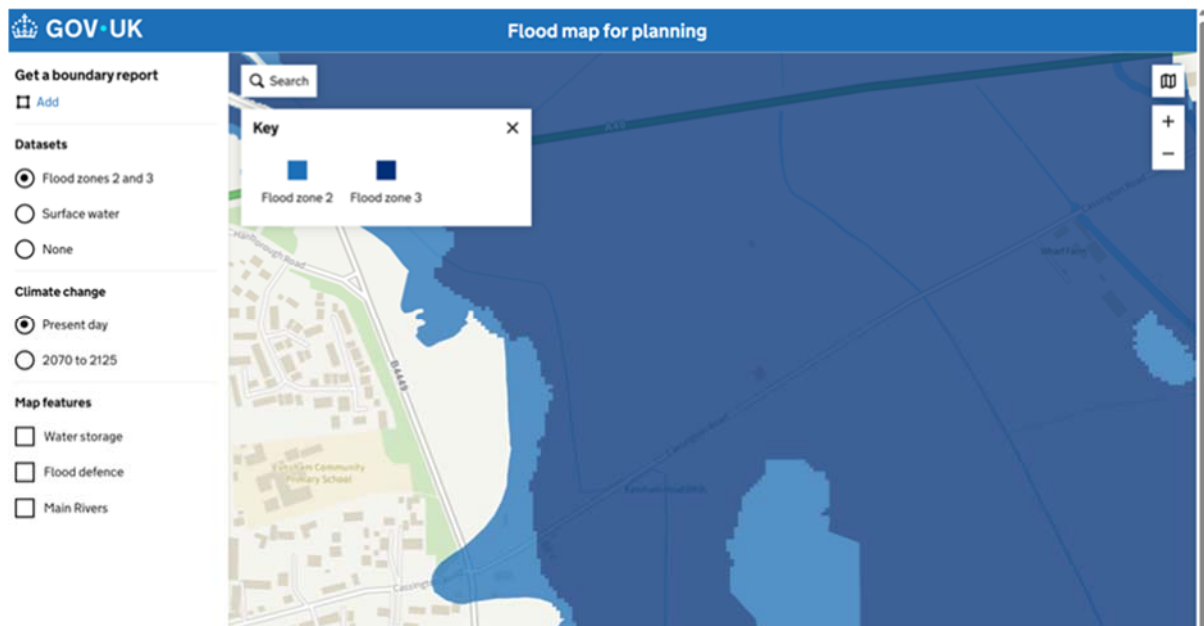
Next Steps

45. As stated in their earlier responses, Siemens remain 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
46. Siemens is engaging 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
20 October 2025

Appendix 1 – Flood Zones

Cassington Road



Wharf Road

