

John Orme  
Woodstock resident  
November 7, 2025

**CONCLUDING SUBMISSION:**

My main objections to the Botley West DCO application relate to five critical questions that have gone unanswered during the process of the ExA's public hearings.

Listening to comments during the final round of hearings, the ExA seems to have concluded that these questions have not been satisfactorily answered by PVDP, the Applicant, despite repeated requests for additional information and clarification.

This [REDACTED] approach by the Applicant makes it difficult, if not impossible, for the ExA and ultimately the SoS to make an evidence-based assessment of the balance of harm likely to be created by the application.

These are the five critical questions:

1 How can the proposed Botley West solar farm be granted a DCO, considering the serious unanswered questions about the development's significant security risks to national defence security, national energy infrastructure, and aviation safety?

The ExA has been presented with considerable evidence of risks to national defence security, energy infrastructure security and pilot safety caused by the proximity of the proposed solar development to RAF Brize Norton and London Oxford Airport, the largest pilot training centre in the UK.

The recent major solar 'glint and glare' incidents at Schiphol Airport that led to the removal by court order of a neighbouring solar farm one tenth of the scale of the proposed Botley West development, highlight the unparalleled and unmitigated safety risks inherent in the Botley West plan.

On November 5, Calum Miller, MP for Bicester & Woodstock, asked the Secretary of State for Energy Security and Net Zero what assessment he has made of "the effectiveness of (a) the Planning Inspectorate and (b) Nationally Significant Infrastructure Project processes to safeguard against national security risks from investment by (i) inappropriate or (ii) hostile overseas sources."

The SoS's answer to this and other related questions below are due by November 12.

2 How can PINS and the SoS be reassured that the NSIP planning process is adequate and relevant to assess the balance of harm related to a DCO application with national security implications?

The Nationally Significant Infrastructure Project (NSIP) planning process seems to be significantly out of step with the need to provide adequate due diligence in considering key factors such as the risk to national security and the consequential damage of other locally generated sustainability schemes when considering the overriding planning principle of the balance of harm.

Calum Miller MP has asked the SoS what assessment he has made of "the effectiveness of Planning Inspectorate and Nationally Significant Infrastructure Project processes in evaluating the financial viability of funding commitments made by developers of major energy projects."

3 Where is the evidence that supports the Applicant's claim to be a well-funded, experienced solar farm developer?

The Applicant has not been able to counter considerable evidence linking its initial funds to murky Russian sources close to President Putin. At the same time, research into PVDP's claimed expertise as a solar developer shows that the Applicant has no track record of seeing any solar farm project through to completion.

Supporting this question, Calum Miller MP has asked the SoS whether his department "has sought the advice of the Office of the Financial Sanction Implementation on reported Russian-linked funding associated with the proposed Botley West Solar Farm."

He has also asked the SoS what assessment he has made of "the financial viability of SolarFive Ltd and Photovolt Development Partners to undertake the development of Botley West Solar Farm."

4 How reliable are Blenheim Estate's stated commitments to maintain and protect the Blenheim heritage and legacy?

The Applicant's partnership with Blenheim Estate appears to be designed under the guise of renewable energy sustainability to generate long-term revenues and profits, with the main aim to reduce debt piles incurred by the Estate's multiple commercial ventures. The ExA has heard evidence that these, in turn, are propped up by the Blenheim Charitable Foundation which relies on Blenheim's UNESCO World Heritage Site status.

Calum Miller MP has asked the Secretary of State for Culture, Media and Sport: "What assessment she has made of the adequacy of the (a) financial structure and (b) governance arrangements of (i) Blenheim Estates and (ii) the Blenheim Charitable Foundation?"

5 How can Blenheim Estate risk UNESCO's removal of its World Heritage Site status from Blenheim Palace?

Blenheim Palace's WHS status will be put at risk if UNESCO finds that the proposed Botley West solar farm would breach Blenheim's commitments to protect the WHS and its setting.

It is clear that the destruction of environment and heritage surrounding Blenheim Palace's UNESCO World Heritage Site and the industrialisation of more than 3,000 acres of productive arable and green belt land (originally gifted to the Duke of Marlborough by Queen Anne in 1705 for the sole benefit of his family and heirs) creates such a risk, which UNESCO and ICOMOS are currently investigating.

These five unanswered questions illuminate such significant national security, energy infrastructure and flight safety risks that the Applicant's DCO application should be refused.