

[REDACTED]

From: Harry st john [REDACTED]
Sent: 14 July 2026 15:27
To: Botley West Solar Farm
Subject: Botley West Solar Farm NSIP -comments on latest responses to questions raised by the S of Sd
Attachments: HStJ Response to responses to S of S questions.docx; 25th feb2024 email to PVDP.docx

Dear Simon

I attach my comments plus copy of an email exchange I had with Mr [REDACTED] of PVDP back in 2024 which I feel show how little notice was taken of sensible suggestions before the Nov 2024 Application but only now and without prejudice, has their scheme been drastically amended - in many respects in line with my suggestions.

Can you please acknowledge this email and attachments as formally received at your end.

Many thanks

yours sincerely

Harry St John

Botley West solar farm NSIP Application for a DCO by Solar Five Ltd

Application made in November 2024; Examination May to November 2025.

Response, by Harry St John, an Interested Party and agent for an affected party, to the Secretary of State's request for comments/ responses to further questions raised by him after receipt of the PINS Examiners report and recommendations in February 2026, in the light of answers received by June 2026.

Background

My name is Harry St John, I'm a resident in West Oxfordshire, now in Eynsham and previously for 25 years in North Leigh.

I was the Local 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 2017, after a career spanning 47 years - c 35 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 of Mill Farm Lower Road Long Hanborough or as an Interested Party and member of the local public.

I spoke on the Cookes behalf at the Compulsory Acquisition related session of the Examination, and eventually welcomed the removal (in late September 2025) 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, cables or inverters will be placed on the subject land, as we had originally requested at a very early stage in the consultation and examination stages.

I made the point that my clients objection is 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 Change notification loaded onto the PINS website on 23rd September 2025**, rather than being told to do so by the S of S in making his final decision this year. This is a slightly different scenario from the norm, hence my flagging it up and I was grateful to the Inspector in recognising the point being made.

Whilst a figure has been agreed in principle by the Applicants, as yet our clients costs have not been reimbursed by the Applicants.

Comments on the latest responses by PVDP

The Cookes and I remain objectors to the scheme finalised at the end of the Examination, which, for the Cookes, will seriously compromise the rolling, open 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.

As the very recently revised proposal is made on a Without Prejudice basis, nobody can rely with any confidence on the Applicant adhering to it if they do not get what they want. Their very latest scheme is dramatically changed in scale but still purports to generate the same amount of power.

Alternative sites

It seems to me and others that applicant failed to consider the 400KV pylon line that connects Cowley substation to the East Claydon substation in Buckinghamshire.

I understand that NG are seeking to upgrade this pylon line and the substation at East Claydon in a current work programme.

A simple desk top analysis of the land classification maps along the corridor from Cowley to East Claydon shows a greater predominance of low lying poorly drained Grade 3B and 4 farm land that is to a large extent flatter than this part of Oxfordshire; furthermore there are fewer major planning constraint designations along that corridor compared to Botley West. Solar panels on flatter land are less intrusive in a landscape.

We understand connecting into the 400 KV grid pylon line is essential for the output of a large solar farm; however it was made clear at the Examination that a connection can be made anywhere suitable along such a 400KV line; **if that is the case, why was not that corridor looked at in a lot more detail by the applicants?**

Compulsory Acquisition and Funding

I 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 available.

The vast majority of the land involved will be leased to the Applicant by Blenheim related trusts etc and the Gee and Brown families respectively - all of whom, we are told, have signed binding agreements to grant long leases to the operator of the site - whether it be the Applicant or another successor party.

So whilst these three owners will, apparently, preserve their freehold land and receive a steady 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. The principal benefit here is to private interests whilst adding, being realistic, to the wider national renewable power generating capacity.

Out of the applicants budget estimate to construct the initial project - in excess of £800 million (a very preliminary estimate on their own

admission) - c.£69 million is included for compensation. However in its 2024 **unaudited** accounts, Solar Five Ltd appears to have barely any cash assets after allowing for loans outstanding from associate companies with shared directors. The tangible assets are not explained - what do they refer to?

I humbly suggest (as have others) that the Examination Inspectors or Secretary of State teams 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 directorships between the various companies - some of whose accounts are beyond UK public scrutiny because they are based in Cyprus and PVDP being a German company.

The S of S will need to be 100% confident that the applicant can indeed undertake or attract sufficient third party investors to deliver this project, if he decides to approve it. No such robust or reliable evidence has been produced as one might reasonably expect by this stage.

Saying there has been initial contact with fund/investors etc is largely meaningless. If they could show provisional commitments from such organisations to invest, eg subject only to the S of S granting approval of the DCO, and it can be shown that the usual due diligence checks have already been completed, this might have carried more weight. But none have been produced in evidence at the Examination as far as I am aware. Likewise there remains little clarity on funding in their latest response to S of S.

To grant consent for a project of this magnitude on such a tight (arguably now quite unrealistic, as explained below) timetable, which then fails to deliver on schedule because the applicant simply is not properly prepared with the funding and has not factored in the very restricted supply of labour and materials, would be massively embarrassing for all concerned.

Timing

I question the latest project timetable put forward by the last deadline of the Examination and in the latest responses, for various reasons listed below:-

- As highlighted by both the Examination members and the S of S, no clear date for the NG sub-station to connect to the Grid has been secured/agreed; because the current October 2027 connection date is clearly not deliverable as NGET have now said they are unlikely to get consent and complete construction of their main Sub Station **until late 2031.**
- Such uncertainty would surely be a major obstacle to potential investors who are generally risk averse - if the solar farm cannot connect to the Grid, it can generate no income to fund any loan interest.
- The applicants timetable, shortly before the Examination closed, stated work could be starting on site in late 2026, assuming approval in spring 2026, and they would complete two years later in late 2028.
- Clearly that is now impossible as no Ministerial decision is now likely before the autumn of 2026. It would be unlikely for any work to start before late spring /summer 2027 at the very earliest.
- **Much has been made about the land on which the panels will stand will be growing grass on which sheep will then graze. However as most of the land is currently arable and growing an arable crop this summer 2026, the land cannot be sown to grass until after harvest 2026 unless it was undersown with grass in a spring sown arable crop.**
- **I suggest that any robust grass crop cannot be properly established until the autumn of 2027 at the earliest. If approved in autumn 2026, any construction period starting in mid to late 2027 will inevitably see periods of wet ground conditions, and inevitable consequential damage to soils, land drainage and thus any grass that might have been sown in late 2026 to mid 2027 in the relevant fields.**

- If grass crops are not well established, it will then be almost impossible to cultivate or sow grass seed in between the panel arrays and **so that puts in doubt the whole concept of grazing with sheep satisfactorily after the solar farm is built** - if indeed anyone can manage a large flock of sheep scattered in amongst the countless thousands of solar panels whose lower edge may prevent fully grown ewes passing let alone grazing underneath - a detail I raised in my earlier representations.
- NGET, we were informed, had only just carried a pre application discussion with the Vale of White Horse DC whose officer said at the later Examination hearing that the NGET's current **draft sub-station** 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 still remains to be assessed.
- The S of S might struggle, like many, to understand why this fact was not known to the applicant and factored in to their plans, given they say they have been in "close regular" contact with NGET over the last 3 or 4 years.
- The continued lack of concrete evidence at a late stage in the Examination from NGET, looked like a vital missing piece in the jigsaw puzzle, given they are the kingpin in this whole project - they have to agree to any connection to their Grid, and deliver the sub-station to their specification on their timetable (now stated as 2031) - **not the Applicants**.
- NGET's involvement with this Examination has been minimal which is truly hard to understand for a project of this magnitude. Their speed of response to the applicant does seem to have been slow in the light of what the applicant has said.
- To raise c £800million plus, obtain competitive estimates, sign all the necessary contracts, source the vast quantity of materials required and obtain the outstanding detailed approvals in the stated timescale, is no longer credible.
- At about the same time, work will be starting on the proposed 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.
- **In short these two other massive construction schemes will further distort the local demand for skilled labour and hired**

equipment and inevitably add to already congested road conditions around the A40 Eynsham roundabout and Lower Road/ B4449. With so many highways or verges being dug up to lay cables, the traffic jams can only be imagined.

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 the last hearing session they said they could still generate the 840 MW planned from the reduced area!

Their latest response - albeit on a **without prejudice basis** - appears to involve reducing the area covered with panels from 843 hectares (2082 acres) to 554 hectares (1368 acres).

By my reckoning that is a 289 ha or 713 acre reduction or 34.3% reduction of the application site area. What is not clear from their response is what impact will that have on the power output of the solar farm? If they are still claiming 840MW at which point were they actually representing the true power generating capacity of the larger site, during the consultation and Examination process?

So this latest additional reduction further endorses the view that the applicant never properly addressed the key constraints and objections in their blinkered objective to maximise the solar panel area.

What they have done generally undermines the efficient and fair process for a NISP under the rules set out in the 2008 Act - as the S of S has already rightly pointed out in his recent refusal to the Applicants request for more time. The public does indeed need to have absolute confidence in the integrity of the planning process,

transparent, even handed and diligent scrutiny of timely, relevant evidence leading to a rational decision in a given timetable.

This latest proposal (made without prejudice) is a dramatic change from the original application, and is a last ditch attempt to satisfy some of the objections to the consultation and Application project.

The Applicants have in effect wasted many peoples time by including so much land unnecessarily in their draft DCO, largely because they had failed to listen to what local residents, Council planning teams and a wide range of National consultee experts were saying during the consultation stage.

We all noted and shared the Inspectors exasperation at the Applicants repeated 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. The applicant has now doubled down on this with an even larger change.

This impression was all further underlined by the S of S's April 2026 request for a very significant raft of further information which quite frankly should have been forthcoming before the main Examination came to an end.

This omission/failure by the Applicant must surely have a bearing when it comes to the matter of awarding costs, given the considerable amount of further time cost all parties have been forced to incur.

In particular, many of us were shocked that the applicant had not produced the Residential Amenity Assessment Reports which one of their team had supposedly undertaken but are, even now, still to be produced.

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), and seeking to **maximise** the extent of the Order limits/site area and thus the potential MW output - very largely for private financial benefit for the applicant and the three main landowners - principally Blenheim Estate.

In complete contrast, whilst **minimising** any concession to affected parties, the quantum of community benefit, any consideration of or deference to local knowledge and well reasoned arguments from those equally or more expert in their field - in some cases in a frankly cavalier fashion. Only at this very late stage have they offered (albeit Without Prejudice) to reduce their scheme.

[REDACTED] Counsel for Stop Botley West, summarised the utter inadequacies of their application very succinctly at the conclusion of the Examination.

This ill thought through project has been, I surmise, recommended for refusal by the PINS Inspectors for reasons that should be clear to the S of S; despite the Applicants responses to the latest questions posed, the timing, reliable funding and many other aspects of the scheme still remain too vague and uncertain to justify approval, let alone ensure a smooth and timely delivery of such a large power generating infrastructure.

There are other better locations without the significant planning and environmental constraints that clearly outweigh the benefits in this case, that could deliver good sized solar farms that would add to the Nation's renewable power generating infrastructure.

So I respectfully request the Secretary of State to agree with the PINS recommendation to refuse this DCO application.

Harry St John
Eynsham
14th July 2026

Email from M Owen Lloyd to Harry St John 10th Feb 2024

From: **Mark Owen-Lloyd** <owenlloyd@pvdp.eu>

Date: Sat, 10 Feb 2024 at 11:40

Subject: Re: The solar power station proposal

To: harry stjoh <hetstjohn@gmail.com>

Cc: Botley West Solar Farm <info@botleywest.co.uk>

Dear Mr St John,

Thank you for your email, for coming to the Eynsham and for submitting your feedback form. Every piece of feedback is considered by the project team and will be included in our Consultation Report, which will form part of our DCO application. PINS will examine this and other matters in the public hearings they will hold later this year.

I am happy to stand behind the high quality of our consultation and the PVDP, RPS, Counter Context and Ardent professionals who attended. There was no shortage of detail in the PEIR - which is a step towards the final report, the Environmental Statement. This is informed and influenced by the information we receive during our statutory consultation. We all answered very large numbers of questions. Any question that we could not answer at the time is answered subsequently, in consultation with the relevant technical expert if necessary. I would be glad to receive a list of the questions you say were unanswered so that we can provide responses.

Regards,

Mark

Mark Owen-Lloyd
Photovolt Development Partners GmbH

07775 631309

My 25th Feb 2024 email to Mark Owen Lloyd of DPVDP

Dear Mr Owen Loyd.

Thanks for your email. Apologies for not responding sooner.

I am interested to see you say there **will be** a hearing later this year so maybe you have been told already that PINS consider the proposal, as it stands, is fit to go to an examination.

I understood they have to decide the general merit of the NISP before an Inspector is actually appointed to hold the Examination of it. Maybe I have misunderstood that process- can you confirm?.

Unanswered questions - NB some I asked and some came to me in the interim.

Given the 400KV pylon line is the one with spare capacity in the National Grid, did your company investigate other potential sites along the pylon route to Gloucester where to my knowledge there are large tracts of flattish land where SFs are more suited and less visible eg at Kencot solar farm which I suspect connects to the same section of NG.

In the event of this scheme or even a reduced version of it were approved by SofS, will your Company/Partnership seek and then exercise CPO powers to acquire access for cables, drainage or access, temporary storage space etc. Nothing was said that I could spot so may have missed it. If land-owners don't wish to cooperate with your company or an operator, that would mean a separate public enquiry into the CPO and whether an Inspector agrees that it should be confirmed or are the rules different.

In practice given the vast sums of capital required to build such a SF which neither your company nor Solar Five Ltd currently have, the assumption is that you would sell the consented project to investors or similar and therefore neither operator may actually develop the project in practice and local communities will have to deal with some new company or organisation as yet unknown. Am I correct?

If I am right in that assumption, how will any promise or commitment that your company/partnership finally make (as yet no formal or binding commitment

has been made as I understand it- the Company is just "considering/exploring"etc) be secured legally and be enforceable by the State or local authority or community?

If your Company does sell on the site with consent ,What guarantees will anyone have? Whoever operates the SF will be paying Blenheim an annual rental and probably a bonus royalty based on the amount of power generated annually. BE will have, one assumes, a binding contractual commitment from the operator but the community etc - will have nothing. Perhaps you can clarify how you envisage that mechanism will work.

Why was no representative of Solar Five Ltd readily available at the exhibitions -maybe there was someone there but not obvious. They have the licence to generate electricity and the agreement with NG to connect, I understand. Is that correct? It appears to be a very small company with limited assets.

Why was there nobody from National Grid there too to answer questions?

What is the exact relationship between your Company or Partnership and Solar Five Ltd?

Are you personally a partner or an employee of PDP?

(A Number of the above questions relate to the ability of the Company/Partnership to finance and then build such a massive project. Your speciality appears to have been in the energy futures market - not, on the face of it, directly related to organising/coordinating a huge infrastructure construction scheme.

One of your engineers confirmed the panels will be angled rather flatter than other schemes and the bottom edge of the panels will be c 60cm off the existing ground level. The proposed grazing of the solar panelled fields will be by sheep but the average sheep has a shoulder height of about 90cm- so surely it will be hard for sheep to get under the lowest end of the panels where there won't be much sunlight or nutritious grass growing - what is the thinking behind that. If the base height has to be raised won't all the panels be that much higher off the ground than currently stated - ie more visible in the landscape?

I understand that recent advances in panel technology mean that perovskite silicon panels may be almost 50% more efficient in converting sunlight into electricity (c 33% efficient) than the existing panels in use (c.22%) - if that is really the case surely the scale of your proposal could be drastically reduced

and still generate the same amount of power? Given I have read this material is soon to hit the market if indeed it hasn't already, do you propose using it?

If you are so planning, then surely the following fields that are close to residential properties at or near to Wootton, Shipton Slade, Bladon, Lower Road nr the Hanboroughs, both those settlements and Cassington could be excluded - particularly since they already seem thoughtlessly close to so many local residents and of course many listed buildings and the World Heritage site of Blenheim Palace and Park. Your Company dismisses these real impacts as minor but they are major impacts on so many people in the wider community and their enjoyment of this magnificent landscape setting, the public rights of way and all the wildlife that abounds locally. The blight this project is causing runs to £ millions - but there is no provision for compensation in the legislation that I am aware of.

The fields in question are :-

North section

1.12, north part of 1.13, southern part of 1.17 all 1.18 near to the group of about 9 dwellings at Shipton Slade.

Central section

2.1,2,2,sw corner of 2.7 and 2.8

2.20, 2.21, 2.28, 2.33, 2.34, 2.36, 2.61, 2.63, 2.67, 2.83, 2.84,2.85, 2.97,2.100, 2.102, 2.107, 2.110, 2.111, 2.112, 2.116 and 2.117.

(Nr airport 2.14, 2.18, and 2.19 in line with the runway. - see below)

Can these fields be excluded in your final version of the DCO?

I understand Oxford Airport operators are concerned by the potential interference with radio and radar signals around their airport (and maybe Brize Norton too) - just to east of the central section of the SF. Obviously glint and glare may also be an issue especially when coming into land from the south with thousands of panels facing an approaching plane around midday. Have you commissioned a report that satisfactorily dispels any of their concerns? Obviously local residents won't want planes crashing on their homes !

As yet no adjustment seems to have been made to the panels lying in the path of aircraft coming in to land or taking off over the A44 to the south west of the main runway.

Do you believe the overall impact of over 150 inverters within the current scheme and the cumulative background noise they will generate in the vicinity of the SF has properly been reflected in your reports; the scheme covers about 10 miles of generally quiet countryside. - having heard a recording of one inverter at the SF at Shrivenham, I was surprised you did not have such a recording at any exhibition - 67 DbA is quite loud even at 10 metres. I am not a noise expert but dealt with many LCA Part 1 Claims in my career.

Photos of key views from key points and related montages with panels etc. I believe there was a plan showing about 50 or so such locations. However at the exhibition at Eynsham, only about half a dozen were actually being displayed on boards- the remaining ones were in a pile and WODC officers have reported that only about 20 were actually available at the various locations - the really important shots looking east from points 23/24 and 25 were missing completely - which means local people were not shown the impact viewed from that direction - a serious omission in my opinion as I have already put to you - to say they had not been done or were not ready seemed me well short of the level of professionalism and attention to detail one would expect on a project of this size.

This was further borne out by a resident at Shipton Slade who relayed to me that on asking various members of your team (including your self) "what was being done to ameliorate the SF impact on the homes there" and being told that none of you knew where this group of houses was! I believe at least two are listed buildings.

Another resident of Cassington, I have spoken to having received her email, went to three separate exhibitions and got different answers to various questions each Time- so not consistent as one might expect.

I think Blenheim may well have some panoramic photos taken near the top of the Column of Victory in the Park north of the Palace - if they have ask to borrow them and if they haven't then shouldn't your company commission some photos at 360° to show what can be seen from the top where John Churchill stands surveying his gift from the Nation and the Palace he built in the Park (formed out of the ancient royal hunting forest of Wychwood) way before any of it was designated as a WH site. The column is c 40 metres high on ground roughly on the 100m contour. I suspect large areas of solar panels will be visible from there. I may be wrong but such photos need to be produced before any Independent Inspector.

I don't know who owns the SF and sub station land in the South section but the rest appears to be on land owned solely by the Vanbrugh Trust aka Blenheim Estate. Obviously your Company has signed a formal agreement eg promotion or option agreement - with Blenheim but can the same be said

of the South site? Merton College were supposed to have included their land in the central section, but then decided not to sign up formally with your company. Is the southern land secured formally?

Can you expand on how community food growing will work and what benefit will it bring to whom? In the same vein how will the local electricity company work and who will benefit from the subsidised supply and to what extent? All very vague so far, to be frank.

Quite a number of issues and look forward to your response.

Yours faithfully
Harry St John