

I believe that any approval by the UK Government of the Botley West Solar Farm DCO application would be a major political, democratic and environmental mistake that has the capacity to embarrassingly undermine everything the current government is trying to achieve.

It would be a horrible own-goal that will haunt this government and any successive governments for decades to come if this proposal is approved.

Approval will degrade voters' belief in fair and democratic government and will render as useless the examiners' great efforts in exposing the applicant's evasiveness, half-truths, untruths, and unpreparedness.

1. A SCHEME DESIGNED FOR TAX AVOIDANCE

It is clear that the Applicant and its partner, Blenheim Estate, have woven into their business structures a combination of significant debt and offshore accounts to minimise, if not completely avoid, paying any tax to the UK government. This cannot be an appropriate relationship for the Government to contemplate - particularly at a time of peak demand for tax revenues to achieve the new Prime Minister's laudable ambitions, such as developing a social care service that is fit for purpose.

2. NATIONAL STRATEGIC ASSET HANDED TO FOREIGN SPECULATORS

If BWSF is approved, a significant proportion of the UK's strategic energy infrastructure would be handed over to foreign speculators with a worryingly questionable financial background. PVDP have no proven track record of ever staying around to build and operate a solar farm once approved. It would be a very brave political choice to grant such approval to PVDP.

3. WHO CARRIES THE CAN WHEN PVDP SELLS ON?

All the evidence points to the conclusion that PVDP has already found a partner to sell to once a DCO has been granted. This negates all the future commitments and attempted reassurances made by the developer as part of its application. If this is the case, the likely buyer should be identified and be obliged to submit the application itself, in order to inject some transparency into a frustratingly opaque application process.

4. NO CONSIDERATION OF COMMUNITY SOLAR ALTERNATIVE

Working in contravention of one of the main requirements of the NSIP planning process, the Applicant and Blenheim Estate have consistently refused to enter into any meaningful discussions about alternative sites or production models.

5. **WHY SACRIFICE PRODUCTIVE LAND FOR SPECULATIVE PROFIT?**

Your predecessor, Foreign Secretary Ed Miliband, recently addressed the UN General Assembly and urged delegates to recognise “the interconnectedness of food, water and economic resilience” and called for an urgent strategic re-evaluation of national security in light of climate change and nature loss. The UK currently produces about 50% of its own food. About 40% of the proposed solar farm is on BMV land which has produced valuable food for generations, whatever the applicant says.

The sacrifice of more than 2,000 acres of generally good quality and productive BMV arable land to satisfy the profit motives of foreign speculators who are unlikely to complete the BWSF project would surely not pass the high bar implied by ‘an urgent strategic re-evaluation of national security in light of climate change and nature loss’.

6. **WILL THE GOVERNMENT GAMBLE WITH PILOTS’ LIVES?**

Submissions from two of the pilot training schools based at London Oxford Airport, situated at the edge of the proposed solar farm central site near Kidlington, include the following from Andy MacFarlane, CEO of Leading Edge Aviation (ENO10147-002868-C2-176): “We do not believe that the aviation safety implications of the development have been adequately addressed, and we remain concerned that the proposal would materially degrade the safety environment surrounding the airport.”

He continues: “The extensive open land surrounding Oxford Airport has long been regarded as an important safety asset, particularly for *ab initio* and advanced pilot training. The proposed scale and proximity of solar panel development would erode that safety margin and make the airport less attractive as a long-term training base.”

Given the UK’s status as a leading global provider of top-quality professional pilot training, and London Oxford Airport’s central role in this important UK industry, I find it unimaginable that the UK government would take the risk of approving the BWSF application, gambling with the wellbeing, safety and lives of thousands of trainee pilots a year.

I go into more detail below .

Information that is missing and/or erroneous from the DCO

Additionally, below I list information requested by the ExA, SoS and IPs that is still outstanding, incomplete and/or wrong in matters of fact.

I was impressed by the courtesy, thoroughness and professionalism of the ExA and the PINS staff. I watched much of the live examination .

This stands in marked contrast to how the Applicant has behaved towards people and organisations that do not support the applicant and, to our collective amazement, to the ExA, PINS and now it would appear to the SoS.

To say we have been dumbfounded by the Applicant's behaviour over the past four years is to grossly underestimate its cumulative effect.

Throughout all the stages of this application, starting with so-called community consultation in the Autumn of 2022, **the Applicant has consistently demonstrated one behaviour: never answer a question if you can avoid doing so; ignore repeated requests no matter who makes them - including by the ExA; and if all else fails attempt to rewrite the question to provide – a still inadequate - response to something else while stating the project must be granted planning permission and all outstanding questions will be dealt with post consent.**

So, it will come as no surprise to the ExA and to the SoS that there remain many issues on which the Applicant has not provided information as requested by the ExA and SoS, in some cases at all, and where it has ignored contributions and questions from IPs: including our MPs, the OHA, ICOMOS, the EA, Parish Councils, businesses, residents and the community led Stop Botley West.

The list below is of unresolved issues that the applicant has refused to address.

- No assessment – indeed not even any recognition – of cumulative impacts of the proposed NGET Farmoor substation and the immediately adjacent Red House Farm solar power station
- No evidential responses to any points regarding the application's compliance with Cumnor Parish Council's made Neighbourhood Plan policies, including but not limited to Flood Risk policies, Important Views policies and Green Belt policies.

Instead, the Applicant repeatedly chose to state they had been 'noted' – an essentially meaningless comment.

- No evidence to support the Applicant's assertion that no further action on flood risk is necessary despite clear evidence to the contrary (e.g. see

Cassington Parish Council's submissions and the Parish wide Flood Risk Assessment commissioned by Cumnor Parish Council included in C2-169).

Ironically this includes evidence provided by the Applicant itself, whose consultants failed to demonstrate any successful infiltration tests within the DCO redline in this parish (page 118 of C1-087 as assessed by this IP on page 87-88 of C2-169).

- Applicant has ignored EA Flood Risk Zones 2 and 3 areas within the DCO redline.
- Applicant has failed to share data with the EA (C1-109) on efficacy of its proposed flood mitigation measures suggested in its Conceptual Drainage Strategy (REP4-018)
- No evidence provided by the Applicant as to their need to retain within the DCO boundary the c. 300 ha they have conditionally offered to remove panels from, save their unevidenced view that 'it would not be better served in its current agricultural use'.

This contrasts with the ExA request for the Applicant to justify retention of just 17 ha (2.5.4 in ExA 2nd Written Questions PD-012) within the DCO redline given the PINS guidance that retention should be 'no more than is reasonably required for the purposes of the development'

Without direction from the SoS to remove the 300 ha from the DCO redline, or an invitation for the Applicant to withdraw this application and resubmit with a new more tightly drawn redline, the current position leaves open post development consent

opportunities for the Applicant that have not been tested in the Examination phase, including but not limited to 'panel creep', BESS and/or private wire and additional substation connections to data centres (see section 1.5 above) etc.

Additionally, any entity (PVDP, or whoever they sell to or seek finance from) exercising their post consent ability for compulsory land acquisition within the redline, for whatever reason, would also benefit from this additional land without any further opportunity for IPs to be consulted.

- No evidential response to the OHA's position that a comprehensive farmland bird strategy should be developed (e.g. REP5-125)

- No response to Interested Parties providing photographic evidence of assemblages of large foraging birds (Snow Geese) on fields within the DCO redline so contradicting the Applicant's assertion that they do not exist.
- No evidential response to questions and concerns over the incomplete and inaccurate bat survey, including mitigation for the rarest threatened species such as barbastelle, rendering the Applicant's views deficient at best.
- No identification of, and so no assessment of impacts on, 4 areas of designated Ancient Woodland in this parish immediately adjacent to the Order Limits and on the internationally renowned Wytham Woods SSSI immediately adjacent to the Applicant's proposed site(s) for cable crossing of the River Thames
- The applicant claims to have been only able to identify 11 veteran trees that require consideration in the parish.

This a woeful dereliction of due diligence. If deliberate, it's shameful. If by accident it's another example of the Applicant's lack of interest in evidence.

- No evidence that the Applicant applied the Horlock rules for substation location choice (EN-5 para 2.9.18 and 2.9.19)
- No consistent, agreed grid connection date. Every time the question is asked, the answer changes, and NGET's answers don't agree with those of the Applicant.

NGETs C1-028 states an 'anticipated' or "target' date of Q4 2031, a slippage of 2 years since NGET's November 2025 submission (REP7-039). Even Q4 2031 must now (October 2026) be questioned as NGET has not applied for a scoping opinion to VWHDC within Q3 2026 as it stated on 9th June 2026 it would do (p2 of its C1-028).

Simultaneously, the Applicant is asking the SoS to believe the grid connection date 'is expected to be amended to 2029 as this is the construction programme NGET are working to' (REP7-039), members of the public are being informed by the Applicant's website that grid connection will occur in Autumn 2029 (image 2 below) and at Cumnor Parish Council's August 3rd meeting, the CEO of PVDP stated that (CPC minute 203/26) NGET would "connect us in 2030 with a one year fallback"

So, the question remains unanswered. What is the proposed grid connection date?

Every time this IP, the ExA, the SoS and Layla Moran MP has asked the question, there's been a different answer. Who should IPs, the ExA and the SoS believe and why?

This is why this IP, the OHA and others endorse the ExA's request for the Applicant to draft a Grampian condition in Schedule 2 for the construction of the so-called NGET substation, but...

- The Applicant has repeatedly failed to draft a Grampian clause for the construction of the Farmoor substation as requested by the ExA.
- The Applicant has failed to respond to the SoS April 2026 RFI Q19 requiring it to respond to three ICOMOS Technical Reviews, the first of which recommended that no solar power station infrastructure be put on the southern site, a position also taken by the OHA.
- The Applicant has not completed the Landscape Character Assessment requested by ICOMOS in August 2025.
- The Applicant has not provided the financial details requested by ExA. **No accounts have been published since 2014.**
- No evidential response by the Applicant to challenges on sources of funding and ownership of PVDP GmbH and other entities as raised by Layla Moran MP and others in the House of Commons.
- No plans provided for a decommissioning fund as requested by ExA.
- No evidence of any track record of PVDP delivering solar power stations of any size approaching that of BWSF, as requested by ExA – and certainly not in Japan as claimed.
- No consultation with Parish Councils or the community about the need, proposed use or location of 'Community Food Growing' or 'Educational' sites.
- No agreement between OHA (specifically Oxfordshire County Council) on minerals and waste, or on compulsory acquisition of roadside verges.
- No economic assessment of adverse impacts on the Hill End Outdoor Education Centre.

Indeed, the 100-year-old centre did not even feature on the Applicant's maps.
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CONCLUSION

In light of all these concerns and the applicant's pervasive untruths, evasiveness and disregard for evidence, approving the BWSF Solar Farm DCO application would be a major political, democratic and environmental mistake that has the capacity to embarrassingly undermine everything the current government is trying to achieve, and I urge you to turn down the BWSF DCO application.

Yours and best wishes,

Robert Gunn

Interested Party Reference number: [REDACTED]