



FAO: John Wheadon
Head of Energy Infrastructure Planning Delivery
Department of Energy Security and Net Zero (DESNZ)
3-8 Whitehall Place
London
SW1A 2AW

4 June 2026

Dear Mr. Wheadon,

BWSF/your ref. EN010147

In our previous letter dated 22 April 2026, we highlighted those areas in your letter EN010147 of 14 April (and as subsequently amended and clarified) where we considered that the questions asked were deficient. For the Secretary of State to reach a defensible decision, we suggested that *‘further and specific attention will need to be paid to these in determining the merits of the case’*.

One of those areas pertained to national security. It is in this respect that we think it necessary and timely to provide further information.

In paragraph 5 of our letter, we made the following point:

National Security. In EN-1, 4.16.8, it is stated that the SoS is not obliged to consider security issues if the relevant bodies have confirmed that this has been addressed. If no such confirmation has been received it is therefore incumbent for this to be considered by the SoS. We would not expect to see questions to the Applicant on this topic in such a letter, but we will, of course, be interested to see if this matter has been properly addressed. The background of the Applicant was covered in some detail in RR-0092. Furthermore, the copies of Private Eye submitted at REP1-095 provide supporting evidence that a detailed investigation into the background of the individuals behind this project, and the source of their funding, is required.

You are no doubt familiar with our Relevant Representation (RR-0092) submitted to the Examining Authority in February 2025; in particular, para 2.3 of Section 2 (Funding) in which we stated the following:

There is considerable information in the public domain regarding ██████████ and the network of companies which make up their holdings. Significant information is available from discovery documents filed in April 2022 with the United States District Court, Southern District of New York (Case No22 Misc) (Appendix 2). This filing was in connection with a claim by the Moscow bank, PJSC `Uralsib`, that ██████████ had misappropriated money from a Russian gold mining public company called OJSC `GK Amazarkan`, a company which the bank had financed (see Appendix 2, para. 25). The document was filed by the US lawyers, Kellner Herlihy Getty & Friedman LLP who acted for the investigators hired by Uralsib, JSC INGTORGSTROY.

██████████ is the late husband of ██████████. As indicated in our submission RR-0092, ██████████ was responsible for solar projects in Japan in which ██████████, now the director of Photovolt and SolarFive Ltd, was also involved. ██████████ died in 2022 but previously initiated the Botley West project. The claim by Uralsib bank that ██████████ (and, after his death, his widow ██████████) should bear subsidiary liability for the failure of Amazarkan eventually failed because it was proved that the bank missed the deadline for filing the claim. These allegations against ██████████ were therefore never tested in court.

It has now come to our attention that further developments in the Russian courts will undoubtedly bring the allegations against ██████████ into sharp focus. Creditors who lost money when Amazarkan filed for bankruptcy are now seeking to recover their losses from Uralsib, on the basis that the bank failed to monitor Amazarkan's financial position. [It is notable that one of the creditors making a claim is the Federal Tax Service of Russia.]

Uralsib's defence lies in its claim that the funds of the company were misappropriated. The original allegations made against ██████████ will now almost certainly be covered in detail during the ensuing legal process. This may well present subsequent difficulties for the SoS if the background of the individuals behind the project, and the sources of their funding, have not been fully investigated before the decision on the Application is made.

Yours faithfully,

██████████
Chair, Begbroke & Yarnton Green Belt Campaign (BYG)

PINS Ref. ██████████

NOTE. The full details of the Russian court processes are available at ██████████ ██████████ and the relevant documents relating to the long-running case are found by entering A78-4056/2015. The filing dealing with the claims now being made against Uralsib is that dated 21 May 2026. [Google translation will change the text to English.]