

Phone: [REDACTED]

25th September 2026

Unique Reference number is: [REDACTED]

REF: EN010147 Batley West Solar Farm Representation: Final Feedback

Dear Secretary of State

Further to my submissions to the Inspectorate on 11th September 2025 and 10th November 2025, I would like to feedback on PVDP's late submission.

My overall view is that PVDP struggled throughout the process and have been ill-prepared for this application, leaving significant gaps in the knowledge and data required to make proper judgements. The result has been a poorly proposed late submission, beyond the agreed deadlines.

The application exposed a striking lack of meaningful consultation with residents and councils, as well as PVDP's inexperience; the company has yet to build a single solar farm. Many questions remain on the background to PVDP, notably the sole shareholder, Russian citizen Yulia Lezhen, widow of Dmitry Glukhov, the Russian businessmen, accused of corruption in a New York court case in 2022. Mr Glukhov was the primary beneficial owner of a goldfield development company that borrowed \$58 million from Uralsib bank. The litigating company said that there was never any goldfield to be found. It looked for infrastructure but did not find it. It alleged that the company was, in fact, a front to syphon off assets. It further said that it was not the only one, and that there were dozens of such companies, of which PVDP was one. **How can we allow Russian money to be greenwashed through our economy here in the UK?**

Evidence for funding for the Botley West Solar Farm is merely the unaudited accounts of the German company through Mrs Lezhen and her partner Peter Gerstmann operate, where they have set up 12 'Solar' businesses. There are also reports that the management team at Blenheim have received multimillion pounds share incentive payments from PVDP. This questions any evidence given by Blenheim in this proposal.

It is therefore understandable that many residents now see the project less as a serious, deliverable proposal than as a speculative financial exercise built around selling on an approved application. For the local community all we ask is for transparency and honesty in this process.

1. Areas of concern posed by the new planning submissions;

- A 250m buffer zone was agreed with the Examiners. This was a compromise to the 500m buffer which would properly reflects a suitable gap between properties and the industrial nature of the solar panels, and is used in similar sized mega-solar farms, e.g. Sunnica Solar Farm where buffer zones were between 0.27km to 1.2km. The size of the buffer zone should reflect the sheer size of the application.
- The principal concern is the introduction of an "outline Residential Visual Amenity Plan" (oRAP) [CI-108] and new Masterplan revision 5 [CI-111] in which the default buffer now offered and drawn is 100m (compared with the 250m default recommended by Examiners and previously shown in the Applicant's 9 June masterplan revision 4 [CI-051] "with additional offsets up to 250m applied

where needed". It's not clear how this "need" would be assessed post consent when it will be beyond public scrutiny.

- The Applicant's amended Schedule 2, requirement 15 in the DCO states that the 100m buffer minimum will be used as "the starting point which has been amended to require the final plan to be substantially in accordance with this outline plan." This implies that very few buffers will be increased to anything near 250m. This contradicts the Applicant's 9 June submissions in which the starting point was the 250m maximum to be adjusted downwards in some cases. This is a significant and unjustified change compared to the Applicant's submissions of 9 June in which the Applicant admitted that the Installation would still be viable, albeit marginally, with a panel area using a 250m buffer.

2. Unresolved issues still not addressed. These include:

1. Red-line Boundary. At least 300 hectares of land stated now by the Applicant not to be used for panels. The certainty that this land won't be used for panels should be secured by moving the red-line boundary. It can then be returned to agricultural use
2. Heritage and Landscape. The Landscape Character Assessment requested by ICOMOS has not been undertaken and issues raised by ICOMOS remain unresolved.
3. National Grid Substation. Location still not decided, no planning Application yet submitted by NGET who say earliest connection date is Winter 2031. No clause in DCO to say BWSF build cannot start until substation has planning consent.
4. Decommissioning fund. ExA recommended DCO should ensure a decommissioning fund (as well as a plan) is in place before construction starts. Not done.
5. Viability. The Applicant has not justified its claim for a 935MW minimum 'economically viable' size for BWSF and rejected Oxfordshire Host Authority's proposals for a smaller installation.
6. Flood Risk. No further panel pull-back to mitigate flood risk despite well evidenced responses from Cassington and Cum nor Parish Councils and their Hydrology Experts. See REP7-068, REP7-077, C2-162 and C2-169
7. Ecology and Bio-diversity net Gain. Arboricultural impact assessment still not done. Skylark compensation strategy unworkable.
8. Special Site of Scientific Interest (SSSI). A large part of the central site is now on the list of SSSI designation proposed development, named The Three Rivers potential SSSI site based on the presence of the rivers and river valleys in the region. This needs to be considered.
9. Community food growing - no further mention. These areas should be removed from the red-line boundary. See REP5-072, REP5-093 and REP6-076
10. Trainee pilot safety is at risk with the current panel layout. Oxford Airport has reported putting solar panels in the surrounding fields would have a major effect on safety. This includes:
 - Single engine planes are at higher risk of emergency landing when the engine fails, changing a normal crash landing onto crop fields into a fatal crash when solar panels are in place. The area to which the crash would be considerable.
 - Increased bird strike. Converting crop fields into solar panels would drive birds onto the neighbouring Airport. The surrounding fields have considerable bird habitat. I witness each year flocks of Canadian Geese gathering over months, along with populations of Gulls and Crows.
 - Further panel removal near the airport is essential. See C2-210 and C2-176

11. Proposed cycle path along Lower Rd still shown on Masterplan despite verbal agreement to remove from the Application (during the Examiners' Site Inspection on 7 October 2025).

12. Minerals and Waste. Oxford County Council (OCC) are still in disagreement with the Applicant regarding these issues.

13. Acquisition of roadside verges. This is another unresolved disagreement between the Applicant and the OCC.

Finally, another area which has not been agreed is the Community Fund, if the proposal is to move forward. As mentioned in my introduction, PVDP has been very generous to key stakeholders, so would expect the same approach for residents who carry the main burden of the development. The annual payment should be around £4.2m, following a government white paper, suggesting developers could pay communities £5,000 per megawatt (MW) per year.



David Foster