

Dear Secretary of State

Botley West Solar Farm (BWSF): EN010147

I am a member of the Steering Group for the Stop Botley West (SBW) campaign with responsibility for Community Liaison but I am submitting this response in a personal capacity and a resident of Church Hanborough.

In my roll with SBW I have met hundreds of local residents affected by the proposal for the Botley West Solar Farm (BWSF) and now count many as personal friends. Over the past 4 years I have observed their tears (literally in some cases) of frustration and their anger at the lack of engagement or respect afforded them by the Applicant. 1200+ registered as Interested Parties (IPs) at the pre-application stage and, like me, many have responded on multiple occasions throughout the Examination and, now, to the Secretary of State (SoS) providing well evidenced and honest responses in a timely manner. In contrast the applicant has delayed, obfuscated, ignored and played down the concerns of many relying entirely on their mantra of climate crisis alone to justify their ill thought out and poorly designed proposals.

Residential Visual Amenity Assessment (RVAA) and buffer size

One example of poor design and is their sub-standard methodology and assessment of the RVAA and decisions on buffer size between properties and panels.

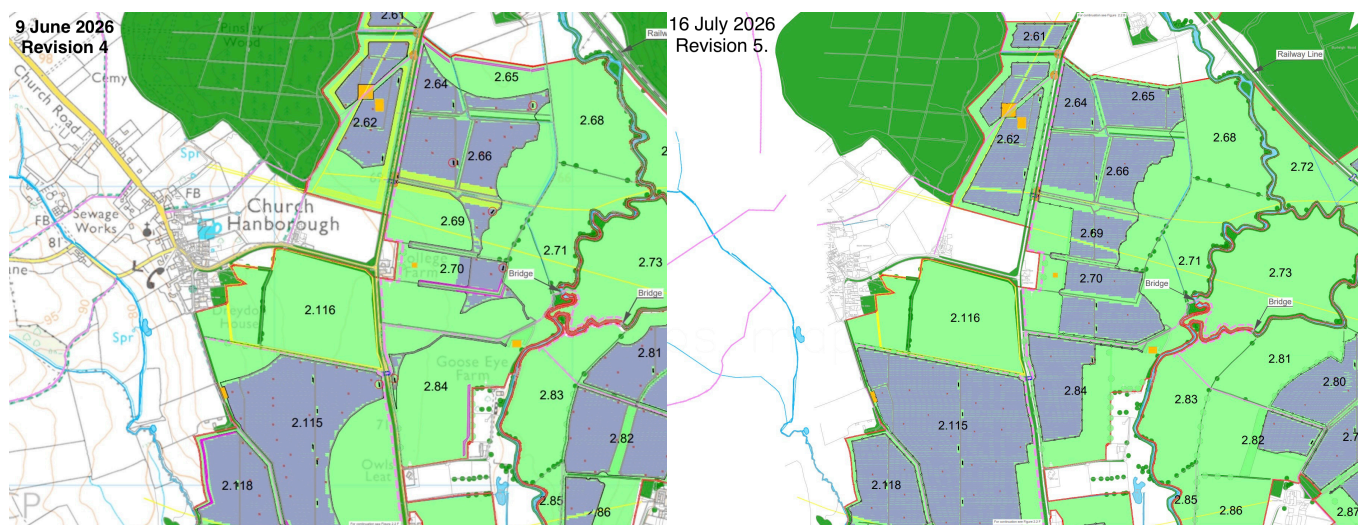
I have visited many of the most affected residents living nearest to the site, seen for myself the view looking outwards from the properties and observed the existing boundary and the presence or absence of existing screening vegetation. I have photographic evidence of this which was submitted during the examination. [SBW Community Impact Report, REP2-081]. This contradicts, in many cases, the “observations” of the Applicant’s consultants - made using desktop assessments only without visiting a single property.

After the examination, the Applicant “got rid of - stood down” (their words) consultants RPS and appointed a new company, Icení. This seems an extraordinary thing to do so late in the process. It suggests that even they doubt the assessments and conclusions of their former experts. Further, none of the reports made by the second company have been formally examined by the Government appointed Inspectorate. Claiming shortage of time (despite having had 6 months to carry out the RVAA requested by the Examiners) the Applicant asked for an extension of time which was refused by SoS Miliband but went ahead anyway with their late submissions of 16 July. This makes a mockery of the whole planning process. Icení attempted a revised RVAA but, with time still limited, they again used only desktop observations and relied on the data supplied by the previously heavily criticised and discredited company RPS.

Consequently the RVAA report was flawed and many properties were still wrongly assessed. Nevertheless, Icení have introduced an “outline Residential Visual Amenity Plan” with buffers

reduced to 100m with little prospect of extending them towards the 250m proposed in their 9 June submission and to be finalised post consent, were that to be granted. This is totally unjustified. By the Applicant's own admission the project is still viable, albeit marginally, with 250m buffers for all properties so why reduce all to 100m? It is also undemocratic to finalise buffer sizes post consent when it is beyond public scrutiny and the local council responsible for delivering it have said it is unworkable. [C1-024, C2-218, C2-200]

This latest change reducing most buffers from 250m to 100m was only introduced for the first time on 16 July 2026. This is a devastating blow to many residents who had been lead to believe that the 250m figure would be the final plan and who see this change as unjustified and grossly unfair. The affect on properties is illustrated in the in just one section of the 13 page Masterplans below:



Application decided on Merit?

Not one of the interested parties now responding to the SoS would deny that climate change is a huge issue but that does not mean that every application, regardless of merit, needs to be approved, especially in view of so many other installations being proposed throughout the country. Indeed SoS Miliband in a televised interview in October 2025 said "There has to be a proper process that we follow" and "each project is decided on merit".

It would be hard to find a less meritorious application or more inappropriately sited proposal in the UK or even in Europe than BWSF.

Consider these facts:

1. BWSF lies within the setting of a UNESCO world Heritage site, Blenheim Palace.*
2. It is adjacent to the country's largest pilot flight training airport.*
3. 25,000 residents in 15 villages/hamlets + 2 towns lie within 1.5 km of the red line boundary
4. Over 150 properties lie with 25m of the site's red line boundary
5. 70% of the site lies within Oxford's Green belt
6. 42% of the site is BMV agricultural land
7. 100+km of footpaths pass through or adjacent to the site

8. The NGET substation needed for connection does not yet exist, its location is not decided and it does not yet have planning approval. It will not be built until Q4 2031 at the earliest.[C2-169]
9. BWSF does not appear in the TEC register as having either Gate 1 or Gate 2 approval
10. The steeply contoured Central and Southern sites are highly visible and prone to flooding.*
11. The Central site area is under consideration to be a SSSI due to the presence of endangered species of bats of international importance present on the site.*

* Notes:

- Issues with ICOMOS (advisory body to UNESCO) remain unresolved. [C1-021] , [REP4-052]
- Two flight training schools have serious concerns about trainee pilot safety [C2-210], [C2-176]
- The Applicant denies panels exacerbate flooding contradicting much recent scientific evidence provided [C2-162], [C2-169]
- SSSI consideration confirmed by email from Natural England in May 2026 [C1-162]

It would also be hard to identify an Applicant less appropriate to be granted a DCO.

Consider these facts.

1. They have not published Accounts since 2015
2. They have no proven experience of delivering a Solar Farm*
3. There have been allegations of Russian money backing the Application. * (denied by PVDP)
4. They have been criticised by the Examiners for failure to answer questions, to carry out requested tasks and for dismissing other IPs points of view.*
5. They have been criticised by the Secretary of State for missing deadlines and late submissions
6. They have been criticised by all the local District Councils, working together as Oxfordshire Host Authorities (OHA) for unworkable proposals and failure to respond to OHA arguments for design changes.*
7. They have tried to delay many significant decisions (eg buffer sizes) until after the grant of the DCO contrary to the Democratic process.

* Notes:

- The Applicant's claim to have developed the 480MW Ukujima Solar Farm in Japan has been shown to be false. They sold this project in 2012 before construction started. It has still not been built. [REP3-114]
- A series of articles in Private Eye have explored the credibility and financial background of one of the only two directors of PVDP - Yulia Lezhen - and her Russian husband, Dmitry Glukhov (now deceased). They raised questions about ownership, litigation in the US regarding a failed gold-mining scheme and the provenance of money used in future investments like PVDP. [Private Eye: "Marlborough light" and "Lezhen learned" June 2023]. The Applicant has denied this.
- One example of the Examiners' criticism is in Qu10 of their Rule 17 letter of 14 October 2025 [PD-017], where they described the Applicant's responses as:

“being very dismissive of anyone’s view but your own. Given that the view on residual effects is shared by the Host Authorities, Historic England and many of the Interested Parties (IP’s), The ExA find it extraordinary that you have just repeated your approach and methodology, when this has been questioned on numerous occasions both in writing and in the previous hearings. Many of the IP’s as well as the host authorities and Historic England have made valid professional judgements that should be considered as such. Please could you explain why you still consider your approach to be correct and everyone else’s approach to simply be subjective opinions that would not materially affect your assessments?”

- The Oxfordshire Host Authorities criticisms have been detailed and compelling during the Examination and in their response to the Applicant’s submissions of 9 June. [C2-200]. They conclude:

“The Oxfordshire Host Authorities maintain that the Applicant has not provided sufficient evidence to demonstrate that significant landscape, visual and residential amenity impacts have been avoided, minimised, or mitigated. While proposed residential buffers and some panel removals are welcomed as modest improvements, the OHA consider that the scheme remains development-led rather than landscape-led, and that the Secretary of State lacks an updated and robust evidence base on the actual landscape and visual effects of the scheme.”

The Planning Balance.

Over the past 4 years, the Applicant has proposed various “Benefits” to the Community put forward to balance the negative impact. These have mostly been abandoned or shown by the Community to be inappropriate, unworkable, unwanted or unnecessary.

1. Discounted Electricity - scrapped
2. Education Facility - scrapped due to totally inappropriate siting with dangerous access and no plans to manage it.
3. Community Food Growing - discredited as some areas are to be used for private commercial growers and the remaining areas are far too big to be properly managed as allotments of which there are already enough in the proposed locations.
4. Community Benefit Fund of £50,000 per year, increased under pressure to c£450,000 but still just £20 per household within the consultation zone of 22,000 properties
5. New or enhanced footpaths - limited benefit as they will be surrounded by panels
6. New cycle path. Badly designed. A better one is already planned by the local Council.
7. The oft quoted benefit that “BWSF can supply clean energy to 330,000 Oxfordshire homes” is no longer true. The Applicant has recently announced it is to supply a data centre directly with a significant percentage of its output - so the benefit is to a private company and not for the benefit of the local community or the public in general.

The loss of these benefits pales into insignificance when compared to the major negative impacts of the proposal. Can National Interest really outweigh the multiple negative impacts of damage to the setting of a UNESCO World Heritage site and other heritage assets, the risk to life for trainee pilots and their instructors at the adjacent airport, the overwhelming and oppressive views from many residences, the loss of productive agricultural land, the industrialisation of Oxford’s

Greenbelt, the risk of increased flooding, the threat to wildlife and farmland birds, the loss of public amenity for footpath users and visitors to the area and consequential economic cost to Blenheim Palace and local businesses.

Conclusion.

The unprecedented number of questions asked by SoS Miliband [C1-001] after the Examination points to the many significant unresolved issues effectively extending the examination beyond its allotted time giving rise to these further consultations and the delay in decision. Subsequent submissions from the Applicant - including the most recent late ones - have failed to answer many of these questions satisfactorily as the Applicant has had to “retro-fit” new untested design plans to their original flawed Application.

The Applicant’s many changes to the design since the end of the Examination amount to a completely different proposal requiring a significant reduction of the red-line boundary and a re-examination of the whole application. This could only be done by withdrawal - or rejection - of the scheme and re-submission. However, in the light of so much criticism of even the amended design from so many quarters, the Applicant would be well advised to look for a more appropriate site elsewhere.

The SoS has made every possible allowance to the Applicant and has now clearly stated that further “unsolicited submissions from the Applicant should not be made”. So this is finally the end of the line for the Applicant. The SoS is left to make their decision based on incomplete and missing evidence and, with so many unresolved issues, that approval should be impossible. The Applicant has not made the case to show that critical national priority would outweigh the many well evidenced negative impacts of this proposal in deciding the planning balance.

A decision based on merit must surely mean the Application for a DCO be refused.

I urge the Secretary of State to make the honest and fair decision and refuse the grant of a DCO in this exceptional case.

Rosemary Lewis

Interested Party [REDACTED]