

## Raywood, Simon

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**From:** Bojan Ivanovic [REDACTED]@gmail.com>  
**Sent:** 13 May 2025 11:27  
**To:** Botley West Solar Farm  
**Subject:** Re: Botley West Solar Farm - Open Floor Hearing 1 slot  
**Attachments:** Bo Ivanovic - written submission 13.5.25.docx

Dear Mr Raywood,

Unfortunately, I am no longer able to join this evening's hearing via Teams. I am therefore submitting a written statement in lieu of my attendance (attached).

### 1. Flawed Consultation Process

- Manipulation of NSIP Classification for Private Gain since Non-Contiguous Land Parcels Aggregated Illegitimately
- No Legal Justification for National Infrastructure Status- Developer-Led Process Lacks Transparency and Integrity
- Deliberate Exhaustion and Marginalisation of Local Opposition
- Bias Within the Inspection Framework
- Government-Led Intimidation and Dismissal of Objectors
- Ignored Impact on Property Values/ No Assessment of Visual Pollution on House Prices

### 2. Mischaracterisation of the Project

- The Fiction of "Temporary" Development
- 40 Years Is Permanent for Affected Residents and Green Belt
- A Shift from Farming to Industrial Land Banking
- Greenwashing to Mask Financial Motivations

### 3. Environmental and Flood Risk Concerns

- Existing Flood Risk Already Documented
- Increased Surface Runoff from Proposed Development
- Destruction of Natural Water Absorption by Farmland
- Poor Drainage Infrastructure Aggravates Risk

### 4. Community Representation and Legitimacy

- Unauthorised Advocacy by Conflicted Community Groups
- Sustainable Woodstock's Affiliations Undermine Credibility
- Only Democratically Elected Parishes Represent the Community

### 5. Energy Strategy Misinformation

- UK Climate Unsuitable for Large-Scale Solar
- Neglect of Superior Renewable Alternatives
- Solar Generation Ineffective in Local Conditions

### 6. Misuse of Green Belt Land

- Botley West Represents Permanent Industrialisation
- Unjustified Claims of 'Very Special Circumstances'
- Death by a Thousand Cuts: Erosion of the Green Belt
- The "Grey Belt" Rebranding Is Deceptive

## 7. Economic and Financial Manipulation

- No Reduction in Consumer Energy Bills - Project Driven by Land Value Uplift, Not Net Zero
- Public Subsidies Mask True Developer Profits
- Hidden Costs Passed to Consumers Through Green Levies

## 8. Lack of Accountability and Transparency

- Opaque Corporate Structures and Offshore Interests
- [REDACTED] Legal Entities Used to Conceal Profit Chains
- Superficial Environmental Assessments and Data Gaps

## 9. National vs Local Interests

- No Genuine National Significance
- Project Sited Far from Energy Users
- Better Alternatives Ignored for Developer Profit

Regards,  
Bo Ivanovic

Mob [REDACTED]

On Tue, May 13, 2025 at 11:09 AM Botley West Solar Farm  
<[BotleyWestSolar@planninginspectorate.gov.uk](mailto:BotleyWestSolar@planninginspectorate.gov.uk)> wrote:

Dear Bojan,

Thank you for your comments regarding opportunities to speak and raise the matters of interest to you.

While we can take, with prior notice, video submissions we would need to take account of accessibility regulations. We have relevant advice on this on our advice pages, specifically [Nationally Significant Infrastructure Projects: Advice for submitting representations or comments](#).

We have a slot for you to speak at Open Floor Hearing 1 this afternoon and early evening. This is currently at 18:10 this evening. If this time is not convenient, we can try to move it forward or back a little bit. There is no requirement for you to attend from the beginning but from a time that is convenient for you. I suggest using the break shortly before your slot if attending in person or using the joining instructions you received by email to join virtually. If joining virtually, please do so with your camera switched off and with your microphone muted.

I hope this will help you to have the opportunity to raise the matters you wish to raise.

Kind regards,

Simon



Planning  
Inspectorate

**Simon Raywood** (He/His)

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[www.gov.uk/pins](http://www.gov.uk/pins)

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Members of the Inspectorate, of the Council, and those following these proceedings from Westminster

This developer-led consultation exemplifies a process that is both fundamentally flawed and manifestly biased. It has fallen egregiously short of the standards of transparency, balance, and public engagement that any credible exercise in democratic planning ought to meet.

Over the last two years, there has been no real transparency, no good-faith engagement, and no willingness to meaningfully address concerns raised by residents. In fact, the process has felt designed simply to exhaust, outmanoeuvre and outspend local opposition.

Even those appointed by government to act as impartial inspectors have, from the outset, demonstrated a troubling absence of neutrality—most notably in their uncritical acceptance of the applicant’s characterisation of the project as “temporary,” a classification which carries significant legal and planning implications and ought to have been subjected to far more rigorous scrutiny.

This undermines faith in the planning system when objections based on existing laws, reason, evidence, and lived experience are swept aside with bureaucratic disdain.

We must also be mindful of the political posturing and subtle intimidation tactics being employed behind the scenes. When high-ranking government officials label objectors like myself as “NIMBYs,” or worse, imply that we could pose a “threat to national energy security” (as reported in *The Guardian*), it exposes just how disconnected they have become from the concerns of the public.

This is a classic case of weaponising patriotism to silence dissent.

It is funny how those accusing us of being “NIMBYs” aren’t the ones facing a visually polluting solar industrial zone right outside their windows. Instead that’s our community’s burden, with no visual buffer zone in sight.

I am not a threat. I am a resident and a citizen, exercising a legitimate and constitutionally protected right to raise concerns about a development that would irreversibly alter the environment in which my family and I live.

If being a so-called “NIMBY” means objecting to a scheme that poses a direct and foreseeable flood risk to my immediate community, then so be it.

The flood risk in the Worton and Cassington areas is neither speculative nor abstract—it is a documented and recurring issue. The Blenheim-owned slopes that rise above Yarnton Road have already contributed to flooding incidents, which have disrupted local infrastructure, including foul water treatment plants and road access.

The proposed solar infrastructure on the sloped terrain, next to the Jericho and Worton farms, which already acts as a natural funnel, would significantly diminish the land’s ability to absorb and retain water.

Unlike active farmland, which naturally acts as a sponge through its soil and vegetation, the development would introduce impermeable surfaces and ground compaction.

Combined with inadequately maintained drainage channels, such as partially blocked ditches and undersized culverts, this would increase surface runoff, directing more water into already vulnerable low-lying areas. The result would be a worsening of the existing flood risk, further endangering homes, essential services, and public health.

It is entirely reasonable—indeed, responsible—for any resident to scrutinise a project that will permanently alter the physical, emotional, and financial aspects of the place they call home.

I am here today because I also refuse to accept advocacy or financial negotiations on behalf of myself, my family, or my immediate neighbours from various community action groups, such as Sustainable Woodstock in relation to the Botley West Solar Farm (BWSF). This group is not authorised to represent local parishes and should not be treated as a proxy for community sentiment.

Sustainable Woodstock is, in fact, a known affiliate of the [REDACTED], [REDACTED], Blenheim, and Photovolt Development Partners (PVDP). Although it appears to have scrubbed its public profile, over the recent years it has accepted in-kind contributions and is therefore conflicted. Its involvement undermines the legitimacy of any consultation process that claims to reflect genuine local opinion. Only democratically accountable local parishes can speak credibly on behalf of affected communities.

Let's begin with the most insulting fiction of all—that this is a “temporary” development.

A 40-year industrial-scale energy facility is not “temporary” by any honest definition of the word.

For most of us, including myself, 40 years is the rest of our lives. None of us here will be there to see any decommissioning, assuming it ever happens.

This isn't a pause in agriculture. It's a permanent shift away from farming and toward industrial land banking.

And make no mistake: the endgame here is not clean energy.

It is land value uplift.

Once agriculture is driven out and the solar optics have done their job, the land will be primed for "reclassification"—industrial, commercial, or "affordable" residential development, all conveniently aligned with Blenheim's longer-term interests.

The fact is that the project sponsor will enjoy 40 years of risk-free, subsidised income, courtesy of a hidden environmental tax on consumers, and will then walk away with an exponentially inflated asset.

Over the last two years, I have written more letters than many to a wide range of individuals and organisations, both in Westminster and locally, but it did not move a needle.

The project remains unchanged, and despite widespread opposition, it continues to be steamrolled undemocratically.

This is a classic case of corporate overreach, with the voices of local residents and communities being disregarded in favour of private profit funding a huge and sustained lobbying effort on all levels, and to all major parties to improve its chances.

The administrative ping pong that I have been subjected to date has been exhausting.

DEFRA, the department that ought to have been responsible for this project given its location and adverse impact on local agriculture, has redirected me to various other government ministries without stating its position—initially to the Ministry for Levelling Up, Housing and Communities, then to the Department for Business, Energy and Industrial Strategy, and ultimately to the Department for Energy Security and Net Zero.

Each redirection has been nothing more than a diversion tactic, designed to avoid addressing the real concerns raised by those of us directly impacted by this project.

In my opinion and many others in our community, Botley West is a project born of intentional deception because from the outset the sponsors were aware that it would not pass the necessary scrutiny of the existing planning procedures, hence they had to implement a radically different strategy.

Branded as the "Botley West" solar project, it is only tangentially connected to Botley, and in truth sprawls across more than a dozen tranquil Cotswold parishes far to the north, whose identities and landscapes are being quietly sacrificed under a misleading label.

The proposed solar industrial zone the size of Heathrow, presented as an environmentally-driven initiative, is nothing more than a thinly veiled financial arbitrage scheme, of gigantic proportions.



This application is not merely cynical—it is legally and procedurally deficient. The documentation is, misleading, selective and wholly inadequate to support a project of this scale.

Even at the high level, there are some glaring controversial issues that if unchallenged will set a dangerous precedent for future abuse.

In order to bypass the existing relevant local planning approval procedures, Blenheim and its affiliates took the decision to aggregate over two dozen non-contiguous land parcels into a single NSIP application, connected only by cabling and ownership.

This is a blatant manipulation of the planning framework evident to any objective observer. No legal opinions have been provided to substantiate the validity of this legal precedent.

The use of this national infrastructure designation as a cover for what is essentially a private speculative development is a fundamental distortion of its intended purpose.

But the question remains: Is this project genuinely of positive national significance? The answer, upon careful and objective consideration, is clearly no.

For example, the World Bank's comprehensive study, 'Global Photovoltaic Power Potential by Country,' identifies the UK as having some of the "least generous conditions for photovoltaic (PV) development" of any country globally.

While I encourage everyone to read this report at their leisure, it's hardly a revelation to conclude that Oxfordshire is not Andalusia.

Solar panels, particularly during our short, cloudy winter days and over the course of long, dark nights, generate precisely zero energy—leaving us reliant on more reliable and predictable sources that don't vanish with the setting sun.

Whilst tidal, wind, and geothermal energy are demonstrably more predictable and cost-effective sources of green energy, and even assuming that some limited contribution from solar energy could be justifiable in certain specific contexts, the proposed project cannot be considered an efficient or sustainable green initiative on a comprehensive basis.

It is not only in the wrong place, but also brings significant negative environmental, social, and financial consequences.

Even for this developer, this project marks a significant departure from their prior proposals. It is being located on productive agricultural land, whereas all their previous projects and approvals were for sites in remote, uninhabited areas or on brownfield rooftops—locations far removed from residential communities, and with minimal impact on agricultural land.

This significant shift from disused sites to productive Green Belt farmland unmistakably signals that the underlying motivations of this proposal are not centred on addressing climate change or enhancing local energy provision. Rather, it appears to be driven by a strategy to maximise the financial value of Blenheim's land portfolio, through a subtle yet substantial alteration of land use rights.

The sponsors of this project, together with certain government representatives, are also advancing a misleading narrative regarding the purported necessity of Botley West to fulfil its Net Zero strategy.

This narrative fundamentally ignores and fails to consider objectively superior alternatives, which should have been properly evaluated before permitting this project to progress to such an advanced stage.

The developer has demonstrably disregarded viable alternatives, such as vast expanses of brownfield land and industrial rooftops, which are in much closer proximity to large-scale energy users.

These sites would require less costly expansion of the National Grid, are far better suited for solar energy applications, particularly for powering chillers when such electricity is directly needed, and do so without the need for expensive and inefficient battery backup facilities.

Why? Because this project is about maximising Blenheim estate's long term financial value rather than maximising the Green Net Zero reform that is genuinely in the country's interest.

Let's state one important and undeniable fact: Botley West is an Encroachment on the Green Belt.

Let's call this project what it really is: large-scale, permanent industrialisation of Green Belt land.

The developer is cynically attempting to use lobbying efforts to sway the Secretary of State's quasi-judicial powers, with the goal of completely overturning established planning rules. Their claim of "very special circumstances" to justify encroachment into the Green Belt is not only grossly exaggerated but also utterly unconvincing, serving as a blatant attempt to bypass long-standing legal protections and local planning authorities.

This application constitutes the latest move in what can only be described as a slow-motion policy assassination of the Green Belt. Each passing day sees another portion of it erode, cloaked under the guise of “sustainable” development, contributing to a death by a thousand cuts.

For the Government and the developers, it is far more convenient to exploit ambiguous grey areas and promote demonstrably false and unsubstantiated propaganda, rather than openly repealing the long-established legal protections of the Green Belt policy.

While the developer and the Government may try to pull the wool over our eyes, we will at least make an effort to push back with facts and valid arguments.

Given their vast financial resources, measured in the hundreds of millions of pounds, and their unchecked influence within government, it is abundantly clear that any resistance to this proposal will face an immensely formidable challenge.

This proposal does not merely stretch the rules—it tears through them.

Once the panels go in and farming is lost, the land will no longer qualify as Green Belt in any meaningful sense, despite repeated by highly unconvincing assurances to the contrary.

The recent push to rebrand Green Belt as a “Grey Belt” is also nothing short of Orwellian.

Blenheim has already begun altering the conditions on the ground by removing tenant farmers from the proposed site and subtly influencing the remaining tenants through the leverage of powerful commercial relationships.

Whilst the UK government appears to have declared an all-out assault on farmers, the Italian government has taken a far more reasoned approach, opting to ban solar farms on productive agricultural land.

Furthermore, Italy has chosen to support solar projects in proximity to major energy consumers, such as the installation of 55,000 solar panels near Fiumicino Airport. In stark contrast, our area lacks any significant energy users, meaning this project would require the construction of a new substation and an expensive, yet entirely unnecessary, connection to the national grid.

Another piece of propaganda being advanced is the claim that this project will result in reduced consumer energy bills.

The claim that solar energy from the Botley West Industrial Zone will reduce costs is little more than a convenient hype, masking a development that will, in fact, increase costs elsewhere in the system. The reliance of solar energy on grid-balancing infrastructure and backup capacity inherently raises network costs and long-term system expenses—factors conspicuously absent from this application, likely omitted for strategic reasons.

These costs, along with subsidies like feed-in tariffs and contracts for difference, are added to energy bills through green levies—functioning as concealed taxes.

This is not mere speculation but is, in fact, a well-established reality, as highlighted in numerous publications, including the Financial Times'

article, “The Hidden Costs of Renewable Power,” which outlines the additional financial burdens imposed by integrating renewable energy sources into the national grid.

These hidden costs are not borne by developers, but by millions of ordinary consumers via mandatory green levies. This is not energy reform—it is a disguised redistribution of wealth from the public to private investors.

What’s truly offensive is that these financial beneficiaries enjoy guaranteed profits backed by public subsidy, while simultaneously claiming to act in the national interest.

The reality is that public funds and public trust are being exploited to support a private revenue stream that would be impossible to justify in a properly transparent system.

The current consultation documentation obscures the real commercial interests and sponsors.

The involvement of German legal entities and other SPVs in this project is far from coincidental. It is a carefully orchestrated and strategic move aimed at obscuring the true profitability of the venture and concealing the full list of financial beneficiaries. Blenheim and its numerous advisors, while undeniably central to the project, are intentionally kept in the shadows—positioned to avoid scrutiny and evade any unwelcome attention.

The complex financial structure—opaque, unnecessarily transnational, and immune to accountability. It’s a model that may serve shareholders,

landowners, managers and advisors very well, but it leaves the British public paying the price—literally.

This application is using Flawed Environmental Assessments. Key soil surveys have been cherry-picked, some conveniently omitted, enabling the developer to sidestep inconvenient data.

The so-called “environmental review” is superficial at best, with no serious engagement with independent, peer-reviewed science. The entire assessment appears designed to reach a predetermined conclusion, rather than to uncover any genuine environmental truth.

#### Conclusion:

While I hold no illusions about the influence of corporate interests and the ability of powerful entities to push through their agendas in this David vs Goliath situation, I want to make it very clear: I will not give up until the very end. I will continue to stand firm in defence of my community, my family, and my home—regardless of the pressure or the political machinery working against us.

This project is a profound misuse of planning regulations, a distortion of public policy, and a betrayal of local democracy. It is a clear attempt to undermine the Green Belt, to exploit public funds for private gain, and to turn rural communities into sites for speculative investment under the guise of environmentalism.

I urge you to reject this proposal in its entirety.

To approve it would be to endorse the erosion of public trust, the marginalisation of local voices, and the long-term damage it would do to the very principles of sustainable development and proper land use.

We deserve better. And we will not be silenced.