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Sent: 20 June 2025 13:54
To: Botley West Solar Farm
Subject: Q1.5.8 (interested party - B Ivanovic - The Granary Jericho Farm, Worton OX29 4SZ)

Critical Rebuttal to the Botley West Solar Farm Statement of Reasons — Exposing Greenwash and Community Harms

Dear Botley West Inspectorate,

I write to express serious and multifaceted concerns regarding the Botley West Solar Farm Development Consent Order (DCO) and its accompanying Statement of Reasons. Despite its presentation as a sustainable and community-beneficial project, the document serves primarily as greenwash, glossing over substantial and irreversible harms to the environment, communities, local economies, and democratic processes.

Below I outline critical reasons why the project must be reconsidered and the Statement's conclusions cannot be accepted at face value:

1. Misleading Justification of National Need and Disregard for Viable Alternatives

The Statement asserts that Botley West is essential for meeting national net-zero goals, yet it systematically ignores more sustainable, less intrusive options. Vast untapped potential exists in distributed solar installations on rooftops and brownfield sites, particularly those near large energy users such as warehouses and data centres, which would significantly reduce grid stress and transmission losses.

The UK, with some of the least favourable photovoltaic conditions globally (World Bank, Global PV Potential), is poorly suited for sprawling solar farms on productive farmland. Unlike locations such as Andalusia or parts of Italy, where solar farms are optimally located near major energy consumers, Botley West's isolated position necessitates costly grid reinforcement, new substations, and inefficient battery backup, raising costs for consumers.

2. Loss of Prime Agricultural Land and Threats to Food Security

The project threatens extensive areas of Grade 3a and 3b agricultural land—classified by DEFRA as “best and most versatile”—a vital resource for food production amid growing global insecurity. The conversion of this productive farmland into an industrial-scale solar facility represents a permanent shift away from farming towards speculative land banking.

3. Ecological Damage and Questionable Biodiversity Claims

Claims of “biodiversity net gain” are often superficial and fail to compensate for the real habitat loss. The Botley West development will fragment habitats, compact soils, disrupt hydrology, and degrade ecosystems, with token “wildlife-friendly” measures insufficient to mitigate such damage. The lack of rigorous, peer-reviewed environmental assessment and the cherry-picking of soil surveys further undermine the credibility of these claims.

4. Inadequate Mitigation of Landscape and Heritage Impacts

The scale of the project will cause profound alterations to the rural landscape, impacting multiple districts, including areas near Blenheim Palace, a World Heritage Site. Proposed visual mitigations

such as planting and bunding are minimal and will fail to prevent significant harm to cultural heritage and landscape character.

5. Centralised, Large-Scale Solar Systems Are Inefficient and Costly

Contrary to the Statement's claims, reliance on large, remote solar farms increases grid balancing costs and requires expensive infrastructure upgrades. Distributed generation remains the more efficient, resilient, and cost-effective model. The hidden economic burdens—subsidies, Contracts for Difference, grid upgrades, and backup capacity—raise electricity prices nationally, shifting costs onto consumers and taxpayers rather than lowering bills.

6. Undermining Democratic Process and Tokenistic Public Engagement

The developer-led consultation process has been fundamentally flawed, lacking transparency, balance, and genuine engagement with local residents over the past two years. The process appears designed to exhaust, outmanoeuvre, and outspend local opposition.

Furthermore, the inappropriately applied NSIP regime restricts local veto power, marginalising the voices of those directly affected. Allegations of community advocacy groups acting as proxies for sponsors with conflicts of interest (e.g., Sustainable Woodstock's ties to Blenheim and Photovolt) undermine the legitimacy of public consultation.

Even appointed inspectors have shown troubling bias, uncritically accepting the developer's characterisation of the project as "temporary"—a 40-year industrial development that few locals will see decommissioned in their lifetime. This misleading framing distorts the planning and legal implications and erodes trust in the system.

7. Deliberate Obfuscation of Flood Risk and Community Safety Concerns

The flood risk in Worton, Cassington, and surrounding areas is neither speculative nor abstract; it is a well-documented, recurring problem. The proposed solar infrastructure on sloped terrain near Jericho and Worton farms, which currently functions as a natural water sponge, would be replaced by impermeable surfaces, soil compaction, and inadequate drainage.

Combined with blocked ditches and undersized culverts, the development will exacerbate surface runoff and flood risks, threatening homes, public infrastructure—including foul water treatment plants—and public health. The Statement fails to provide thorough hydrological modelling or credible mitigation, a serious omission given increasing extreme rainfall due to climate change.

Placing underground electrical cables in known flood-prone areas raises additional safety concerns, including electric shock hazards, which the Statement inadequately addresses.

8. Misuse of the Nationally Significant Infrastructure Projects (NSIP) Framework and Green Belt Erosion

The aggregation of over two dozen non-contiguous parcels into a single NSIP application, connected only by cabling and ownership, constitutes a blatant manipulation of the planning system designed to circumvent local planning scrutiny.

The project encroaches significantly on Green Belt land, undermining long-standing legal protections and threatening the Green Belt through what can only be described as permanent industrialisation—contrary to claims of "very special circumstances." This erosion of the Green Belt is part of a broader policy shift cloaked in ambiguous and Orwellian rebranding attempts, such as the term "Grey Belt."

Tenant farmers are being displaced or pressured under Blenheim's commercial influence, further

disrupting local rural livelihoods.

The endgame here is not clean energy, but instead land value uplift for Blenheim and their affiliates. 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.

9. Financial Interests, Corporate Overreach, and Lack of Transparency

The project’s complex financial structure—with involvement from German entities and opaque Special Purpose Vehicles—appears designed to obscure true beneficiaries and evade accountability. Blenheim and its affiliates stand to gain subsidised, risk-free income for 40 years, culminating in inflated land values ripe for future industrial or residential reclassification.

Public funds and trust are exploited to support a private revenue stream, with guaranteed profits masked behind green levies paid by consumers. This financial model benefits shareholders at the public’s expense, violating principles of transparency and fairness.

10. Flawed Cost-Benefit Framing with Material Property Value Losses

An authoritative London School of Economics (LSE) study demonstrates that proximity to solar farms reduces the value of adjacent residential properties by significant margins (LSE Grantham Research Institute, 2021). This impact is wholly downplayed by the developer. Botley West will materially damage property owners through visual intrusion and loss of rural amenity.

Conclusion

Botley West Solar Farm exemplifies a flawed, damaging model prioritising private profit and superficial green credentials over genuine sustainability, community wellbeing, and democratic integrity. The project threatens irreversible environmental damage, undermines local food security, exacerbates flood risks, erodes heritage and landscape values, marginalises local voices, and imposes hidden economic burdens on consumers.

I urge the planning authorities and decision-makers to reject this project in its entirety. Approving it would signify an erosion of public trust, a disregard for democratic planning, and long-term harm to the principles of sustainable development and land use.

We deserve better, and the community will not be silenced.

Thank you for your consideration.

Yours sincerely,

Bo Ivanovic


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