

**From:** Bojan Ivanovic [REDACTED]  
**Sent:** 01 September 2025 11:07  
**To:** Botley West Solar Farm  
**Subject:** Re: Objection to Classification of 40-Year Botley West Solar Farm as "Temporary" Development in the Green Belt

Dear Inspector,

I write once again as a local resident and Interested Party to raise formal objection to the suggestion that the proposed Botley West Solar Farm — a scheme on a land area comparable to Heathrow Airport, and unprecedented in the Oxford Green Belt — can be lawfully or credibly described as "temporary" development.

It is perhaps unsurprising that the developer clings to this convenient fiction: their "very special circumstances" case — the only legal basis on which inappropriate development may proceed in the Green Belt — is high-level, generic, and wholly unsubstantiated. It relies on vague appeals to renewable energy policy while ignoring the specific legal tests applicable to this location. In short, it is greenwash masquerading as planning justification.

**1. A 40-Year Scheme Is Not Temporary**

A development of this scale and duration will dominate the landscape for two generations, excluding it from agricultural, ecological, and public use. With roads, substations, fencing, and solar arrays in situ for 40 years, the effect is indistinguishable from permanent industrialisation of open countryside.

**2. Case Law – Dillon v Secretary of State [2010]**

The High Court has already made clear in *Dillon v Secretary of State for Communities and Local Government* [2010] EWHC 1085 (Admin) that the label "temporary" does not obviate the requirement to assess full Green Belt harm. Openness and landscape character must be examined in reality, not brushed aside by time-limited promises.

**3. Planning Statute – Town and Country Planning Act 1990**

The Act demonstrates the absurdity of this position. Under s.171B, a development becomes immune from enforcement after four years — whether from substantial completion of building works or unauthorised residential use. In law, four years may suffice for permanence. The idea that forty years is anything less is incoherent.

**4. De Facto Rezoning**

The practical outcome is not a "temporary" project, but a de facto rezoning of productive Green Belt into an industrial energy zone, with the uplift in land value accruing to its private sponsors (principally the Blenheim Estate). That uplift depends upon the Secretary of State exercising powers to override local planning protections.

This is not essential infrastructure but speculative development — an archetypal case of the Green Belt being transformed into a "grey belt" by administrative sleight of hand.

**5. Request for Disclosure of Legal Advice**

Given the centrality of classification, I request that:

- a) The Government and the Inspectorate confirm whether legal advice has been sought on whether a 40-year solar scheme can lawfully be treated as “temporary”;
- b) That such advice, or at least a summary, be published;
- c) That the developer and Blenheim Estate disclose any advice relied upon to justify their position.

This is not a procedural quibble. It is determinative of the appropriate policy framework and whether the NSIP regime can be legitimately engaged.

## 6. Conclusion

The Botley West proposal would be one of the largest Green Belt developments ever consented. Its 40-year footprint renders it permanent in all but name. To classify it otherwise is to subvert statute, ignore case law, and erode public confidence in the planning system.

Brownfield land and commercial rooftops — closer to major energy users, with lower transmission losses and no Green Belt conflict — are clearly available and superior alternatives. Their wholesale dismissal exposes the present scheme for what it is: not necessary, but opportunistic.

Once such an industrial use is established in the Green Belt, the precedent is set, and the land is functionally reclassified for future intensification. It is not merely a breach but an irreversible transformation, undermining the permanence that is supposed to define Green Belt policy.

I urge the Inspectorate to apply the NPPF and case law rigorously and to resist the mischaracterisation of this project as “temporary.”

Yours faithfully,  
Bo Ivanovic

[Redacted signature block]

On Mon, Jun 2, 2025 at 6:32 PM Bojan Ivanovic [Redacted] > wrote:

Dear Inspector,

I write as a local resident and interested party to raise serious objection to any suggestion that the proposed Botley West Solar Farm — a project of unprecedented scale in the Oxford Green Belt, spanning a land area comparable to Heathrow Airport — can be lawfully or meaningfully classified as “temporary” development.

Moreover, the developer’s claims of “very special circumstances” — the ONLY legal basis on which inappropriate development may be permitted in the Green Belt — are unconvincing, extremely vague, high-level, and completely unsubstantiated.

Their justification relies heavily on generic green credentials and broad policy rhetoric, but fails to demonstrate why this particular project, in this protected location, must override one of the most enduring land use protections in English planning law. In short, it is greenwash in both tone and substance.

### 1. A 40-Year Development Is Not Temporary in Any Practical or Legal Sense

A project of this scale and duration will dominate the landscape for two generations, removing vast tracts of open countryside from public, ecological, and agricultural use. With roads, fencing,

substations and solar infrastructure in place for 40 years, this development will functionally and visually urbanise Green Belt land for the lifetime of most residents.

## 2. High Court Case Law – Dillon v Secretary of State [2010]

The High Court in Dillon v Secretary of State for Communities and Local Government [2010] EWHC 1085 (Admin) made it clear that so-called temporary developments still require full assessment under Green Belt policy, stating: “The temporary nature of a permission does not negate the requirement to assess the actual harm to the Green Belt.”

Even where a proposed use is time-limited, the real-world impact on openness, landscape character, and Green Belt purposes must be fully and rigorously examined.

## 3. Legal Definition of Permanence in Planning Law – Town and Country Planning Act 1990

The Town and Country Planning Act 1990 further illustrates the legal absurdity of calling a 40-year scheme “temporary.”

Under the Act, a development becomes immune from enforcement action after:

4 years from substantial completion of building works (Section 171B(1)), or

4 years of unauthorised use as a single dwelling house (Section 171B(2)).

In other words, after only 4 years, a development may be deemed de facto permanent for legal purposes.

It is therefore INCOHERENT to argue that a 40-year development — TEN TIMES that threshold — does not constitute PERMANENT change in planning terms.

## 4. This Is a De Facto Rezoning for Private Gain

It is plainly evident — even at this 'early' stage — that the true intent behind the Botley West Solar Farm proposal is not the delivery of a time-limited green energy solution, but the PERMANENT transformation of productive Green Belt land into an industrial energy zone, with the resulting exponential uplift in land value accruing primarily to its private sponsors, primarily the Blenheim Estate.

This uplift is contingent on the Secretary of State for Energy Security and Net Zero exercising quasi-judicial powers to override local democratic control and planning protections.

If allowed, this would amount to a de facto rezoning of Green Belt land — not for essential infrastructure, but for speculative development — creating a precedent whereby the Green Belt becomes a “grey belt” by default.

The National Planning Policy Framework is unambiguous: the Green Belt exists to protect the countryside from encroachment and to preserve its openness and permanence.

It is clear even at the outset that the Botley West proposal will not achieve this — on the contrary, it threatens to undermine the Green Belt’s core purpose and erode its status across England.

Crucially, both the Government and the Planning Inspectorate have constructive knowledge of all the above: the relevant statutory framework, the applicable case law (Dillon), and the policy tests embedded in the NPPF.

Given that, it is difficult to understand why there appears to be such determination to push forward a CONTROVERSIAL scheme that runs counter to long-standing legal protections — unless the outcome has been pre-judged or driven by other non-planning considerations.

## 5. Request for Disclosure of Legal Opinions

I respectfully request that:

- a) The Government and Planning Inspectorate confirm whether they have obtained preliminary legal advice on whether a 40-year solar development in the Green Belt can lawfully be treated as “temporary.”
- b) That such advice — or at least a summary — be published in the public interest.
- c) That the Blenheim Estate (as primary landowner and sponsor) and the developer disclose any legal advice they have procured to support their interpretation of the development as 'temporary'.

The legal classification of this scheme is NOT a PROCEDURAL TECHNICALITY — it is FUNDAMENTAL FROM THE OUTSET in determining the correct policy framework, the appropriate planning route (whether through the Nationally Significant Infrastructure Project regime or a more proportionate local planning process), and the rigorous standards that must apply to inappropriate development in the Green Belt.

## 5. Conclusion

The proposed Botley West Solar industrial zone would, if approved, become one of the largest developments ever granted within the Green Belt, with a 40-year footprint that is operationally and visually indistinguishable from a PERMANENT industrial energy zone.

Classifying this as “temporary” undermines legal definitions, national policy intent, and public trust in the planning system.

This position is especially indefensible given the abundance of brownfield land and commercial rooftop space — often located much closer to major energy consumers such as data centres, logistics hubs, food distribution warehouses, and industrial estates.

These alternatives are not merely available; they are significantly and materially SUPERIOR in planning, technical, and environmental terms. They offer better alignment between generation and demand, substantially reduced transmission losses, and no conflict with Green Belt protections.

Yet these clearly preferable options appear to have been ENTIRELY DISREGARDED.

Furthermore, once a Green Belt site has been industrialised at scale — under the pretext of “temporary” renewable infrastructure — it is, in practice, reclassified in land use terms. The visual

and functional shift from open countryside to energy infrastructure renders the land ripe for future intensification, including pressure for housing, mixed-use, or further industrial development.

In this sense, the Green Belt is not just being breached — it is being IRREVERSIBLY transformed, setting a dangerous PRECEDENT for national planning integrity.

I urge the Inspectorate to assess this scheme under the full weight of the National Planning Policy Framework and relevant case law, and to resist any reclassification that seeks to lower the bar for approval.

Sincerely,

Bo Ivanovic

A black rectangular redaction box covering the signature of Bo Ivanovic.

**From:** Bojan Ivanovic [REDACTED]  
**Sent:** 01 September 2025 11:14  
**To:** Botley West Solar Farm  
**Subject:** Re: Q1.5.8 (interested party - B Ivanovic - [REDACTED])

## **IMPORTANT**

Dear Inspector,

I write once again as a local resident and registered Interested Party to draw your attention to a glaring omission in the developer's case: **the demonstrable loss in residential property values arising from proximity to large-scale solar farms—an issue the developer has completely sidestepped.**

### **An Unequivocal Price Impact**

Although often downplayed, authoritative research demonstrates that properties adjacent to utility-scale solar farms suffer material devaluation. For instance, a rigorous difference-in-differences study in the Netherlands finds significant reductions in house prices of approximately 2–3% within 1 km of solar installations

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. While the Dutch context differs from ours, these figures are nonetheless compelling and unlikely to understate the impacts given Botley West's scale.

Moreover, LSE-aligned analysis of UK infrastructure confirms similarly damaging effects. A large-scale study finds that electricity infrastructure—including overhead lines, wind turbines, and solar farms—reduces house values by an average of 3.9 %, **escalating to as much as 21 % for properties within 250 m.**

These are not speculative figures. They translate into financially material losses to homeowners, losses that lie at the root of many residents' current objections.

### **The Developer's Disingenuous Stance**

Yet the developer gives this issue cursory attention, if that. Their narrative hinges on abstract "community benefit" and the pole-star of green credentials, but fails utterly to quantify or mitigate the real-world financial harm borne by long-standing local residents who bought into the countryside this scheme now threatens to industrialise.

### **Impacts to Be Taken Seriously**

Let there be no doubt: Botley West will inflict tangible devaluation upon adjacent properties through visual intrusion, loss of rural amenity, and the psychological burden of industrialisation. Homes that were purchased with open views and quiet outlooks—assets that underlie much of their value—will transition into commodities bereft of that quality within sight and earshot of vast arrays of panels, fencing, and support infrastructure.

### **Request for Inclusion in the Inspectorate's Consideration**

I respectfully urge that the Inspectorate:

**Take these quantified findings into full account when evaluating the scheme's material effects.**

**Require the developer to conduct a proper hedonic valuation analysis to assess how Botley West will impact nearby residential property values over the medium term.**

**If the developer refuses to engage substantively on this point, I ask that the Inspectorate itself consider commissioning independent valuation evidence to inform its decision.**

### **Conclusion**

Property value impacts are not peripheral to planning. They are outcomes that flow directly from amenity loss, visual harm, and landscape transformation. Ignoring this aspect is a disservice to those whose homes—and economic livelihoods—are effectively at stake.

Yours faithfully,  
Bo Ivanovic

[REDACTED]

On Fri, Jun 20, 2025 at 1:53 PM Bojan Ivanovic [REDACTED] > wrote:

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

[REDACTED]  
[REDACTED]  
Mob [REDACTED]

**From:** Bojan Ivanovic [REDACTED]  
**Sent:** 01 September 2025 11:04  
**To:** Botley West Solar Farm  
**Subject:** Re: Q1.5.8 'Botley West Solar Farm Project' - Objection

Dear Sir/Madam, BWSF Inspectorate,

I write yet again as a registered Interested Party in the Botley West Solar Farm proposal. My family, along with others, reside at Jericho Farm directly adjacent to the proposed development along Yarnton Road.

The very fact I must repeat myself is telling. The developer has shown little inclination to engage substantively with local residents, preferring instead to leave questions unanswered. One might conclude they enjoy rather effective lobbying support at the highest levels, since neither the Department for Energy Security and Net Zero, DEFRA, nor indeed the Inspectorate itself appear to have taken any meaningful step to intervene. Time drifts on, deadlines approach, and the developer is permitted to proceed untroubled by scrutiny.

My objections are twofold:

**1. Flooding Risk (Recurrent, Known, and Studiously Ignored)**

The land surrounding Jericho and Worton Farms is prone to significant and recurrent flooding, most notably along Yarnton Road. This is well documented. Yet, despite repeated submissions, the matter is treated as a minor inconvenience rather than a material planning concern.

The developer proposes solar installation on sloping agricultural fields—parcels 9-08, 9-13, 9-16 (also described in certain documents as 2.57, 2.58, 2.59 and 2.60). These already direct water downhill towards Yarnton Road. Under current agricultural use, runoff is bad enough. Once compacted by industrial infrastructure, infiltration capacity will all but vanish, and even moderate rainfall will accelerate into dangerous surface flooding.

The evidence, including photographs previously submitted, shows flash floods shutting down foul water treatment facilities, leaving homes without sanitation for days. This risk is further exacerbated by Oxfordshire County Council's habitual neglect of drainage maintenance—culverts blocked, ditches overgrown, watercourses obstructed.

It is foreseeable, it is documented, and it is ignored. I therefore ask the Inspectorate directly: do the materials already lodged suffice to establish this risk, or will some further (and presumably more dramatic) evidence be required? And when, precisely, will that determination be made?

**2. Compulsory Acquisition of Green Belt Land (A Transparent Abuse of Process)**

The developer also seeks compulsory acquisition of rights over parcels 9-06 to 9-12, along with the power to extinguish or suspend private rights, all under the pretext of laying cabling.

This is unnecessary. A viable route exists via path 7-17, avoiding homes, flood-prone land, and established rights. Its rejection suggests the objective here is not efficiency but the creation of a permanent infrastructure corridor under the cloak of renewable energy.

These parcels lie within the Green Belt, in a known floodplain, adjacent to residences. Cabling through submerged ditches is not merely questionable but dangerous—introducing the risk of electrocution during floods when access is already compromised.

It is difficult not to see this as part of a wider political manoeuvre: the creeping reclassification of protected land into so-called “grey belt”—a phrase without legal foundation, but convenient for those intent on salami-slicing the Green Belt into something altogether less defensible. The NSIP process, meanwhile, is wielded as a blunt instrument to override local objections.

#### Conclusion

Accordingly, I urge the Inspectorate to:

- 1) Take proper account of the very real flooding hazard in the Worton area;
- 2) Reject outright the proposed compulsory acquisitions over parcels 9-06 to 9-12;
- 3) Recognise this application as part of the wider pattern of Green Belt attrition by stealth;
- 4) Affirm that NSIPs cannot be used as a convenient end-run around local safety, environmental integrity, and long-standing planning protections.

Sincerely,



On Wed, Jul 16, 2025 at 12:46 PM Botley West Solar Farm  
<[BotleyWestSolar@planninginspectorate.gov.uk](mailto:BotleyWestSolar@planninginspectorate.gov.uk)> wrote:

Dear Bojan,

Thank you for your email and your query.

The applicant has notified the Examining Authority of their intension to make a request for changes for the scheme, but these changes have not been formally submitted. Please note that the proposed changes to the application have not yet been examined. The Examining Authority will decide on whether to accept the applicant's change request in due course and on receipt of further supporting information.

I am not able to comment on the position being taken by the Examining Authority on this matter. However, I would like to reassure you that the Examining Authority considers relevant and important matters as part of the examination process.

Please can I clarify whether it was your intension that your email below should be put forward as an Additional Submission or a submission for Deadline 3, or indeed that it was intended for it not to be treated as a formal submission to the examination.

Kind regards,

Simon



Planning  
Inspectorate

**Simon Raywood** [REDACTED]

Case Manager – National Infrastructure

**Planning Inspectorate**

T [REDACTED]

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**From:** Bojan Ivanovic [REDACTED]

**Sent:** 15 July 2025 07:07

**To:** Botley West Solar Farm <[BotleyWestSolar@planninginspectorate.gov.uk](mailto:BotleyWestSolar@planninginspectorate.gov.uk)>

**Subject:** Re: Q1.5.8 'Botley West Solar Farm Project' - Objection

Dear Sir/Madam, BWSF Inspectorate,

I note that Botley West has made certain adjustments to its proposed scheme.

However, it is apparent that my previous objections — specifically those concerning the demonstrable and material risk of flooding — have not been adequately addressed, nor does it appear that the supporting evidence I submitted has been given due consideration.

In particular, I refer to the significant flooding risk in the vicinity of Jericho Farm Barns and along Yarnton Road, which has been evidenced and raised previously.

I therefore seek clarification on the Planning Inspectorate's position with respect to this specific objection, and whether the matter has been properly assessed within the current iteration of the proposal.

Regards,

Bo Ivanovic

On Fri, 20 Jun 2025, 18:07 Bojan Ivanovic, [REDACTED] wrote:

#### Q1.5.8 'Botley West Solar Farm Project'

Dear Sir/Madam, BWSF Inspectorate,

I write as a registered Interested Party in the Botley West Solar Farm proposal. I, along with my family and several other families, reside at Jericho Farm, directly adjacent to the proposed development zone. Our homes lie along Yarnton Road, in close proximity to multiple sub-parcels of the proposed solar industrial zone.

I submit this letter as a formal objection to the development, particularly with respect to:

**a) The unacceptable flooding risk posed by the development; and**

**b) The developer's application for compulsory acquisition of rights over Green Belt land, which represents a strategic and dangerous attempt to circumvent planning protections.**

#### **1. Flooding Risk: A Known, Recurrent, and Ignored Hazard**

The area surrounding Jericho Farm and Worton Farm is subject to frequent and significant flooding, particularly along Yarnton Road. Despite numerous submissions from myself and others, there has been no meaningful engagement from the developer, the Planning Inspectorate, or the relevant authorities on this critical issue. I am compelled to reiterate and expand upon the facts.

The developer proposes large-scale solar installation across sloped agricultural fields (including 9-08, 9-13, and 9-16) that directly funnel water down towards Yarnton Road, exacerbating an already precarious drainage situation. These fields, under current agricultural use, already contribute to existing runoff that overwhelms local infrastructure during storm events. **When the land is compacted under solar infrastructure, it will lose its natural infiltration capacity—the soil will cease to act like a sponge—converting moderate rainfall into high-velocity surface runoff.**



Photographic evidence I previously submitted demonstrates the impact: flash floods have led to the closure of our community foul water treatment facility, which must be shut down to prevent reverse flow and mechanical failure. This renders basic residential functions—such as using toilets, showers, or washing machines—unavailable for extended periods.









**The issue is compounded by Oxfordshire County Council's chronic under-maintenance of local drainage infrastructure.** The culvert on Yarnton Road, [REDACTED] has not been serviced and cleaned in years. Ditches are overgrown, culverts are clogged, and vegetation now obstructs essential water channels. Flash floods, once occasional, are becoming commonplace, yet **OCC continues to understate the hazard, presumably due to financial constraints.**



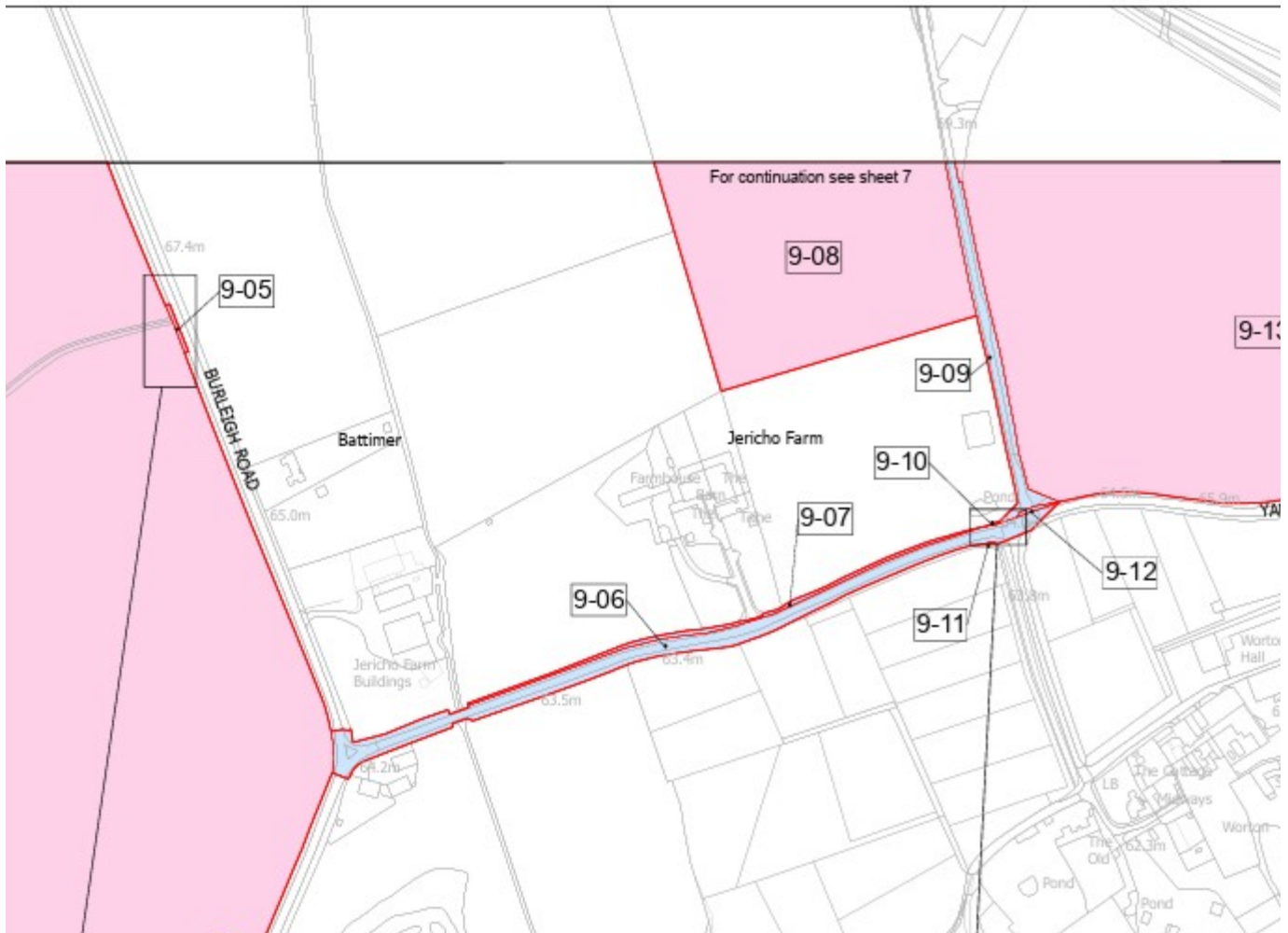
**In such conditions, the Botley West development would be recklessly aggravating an already hazardous situation, posing foreseeable and material risks to:**

- a) Public safety on Yarnton Road;**
- b) Critical foul water infrastructure** [REDACTED]
- c) Residential habitability and health;**
- d) Vehicle access and infrastructure resilience.**

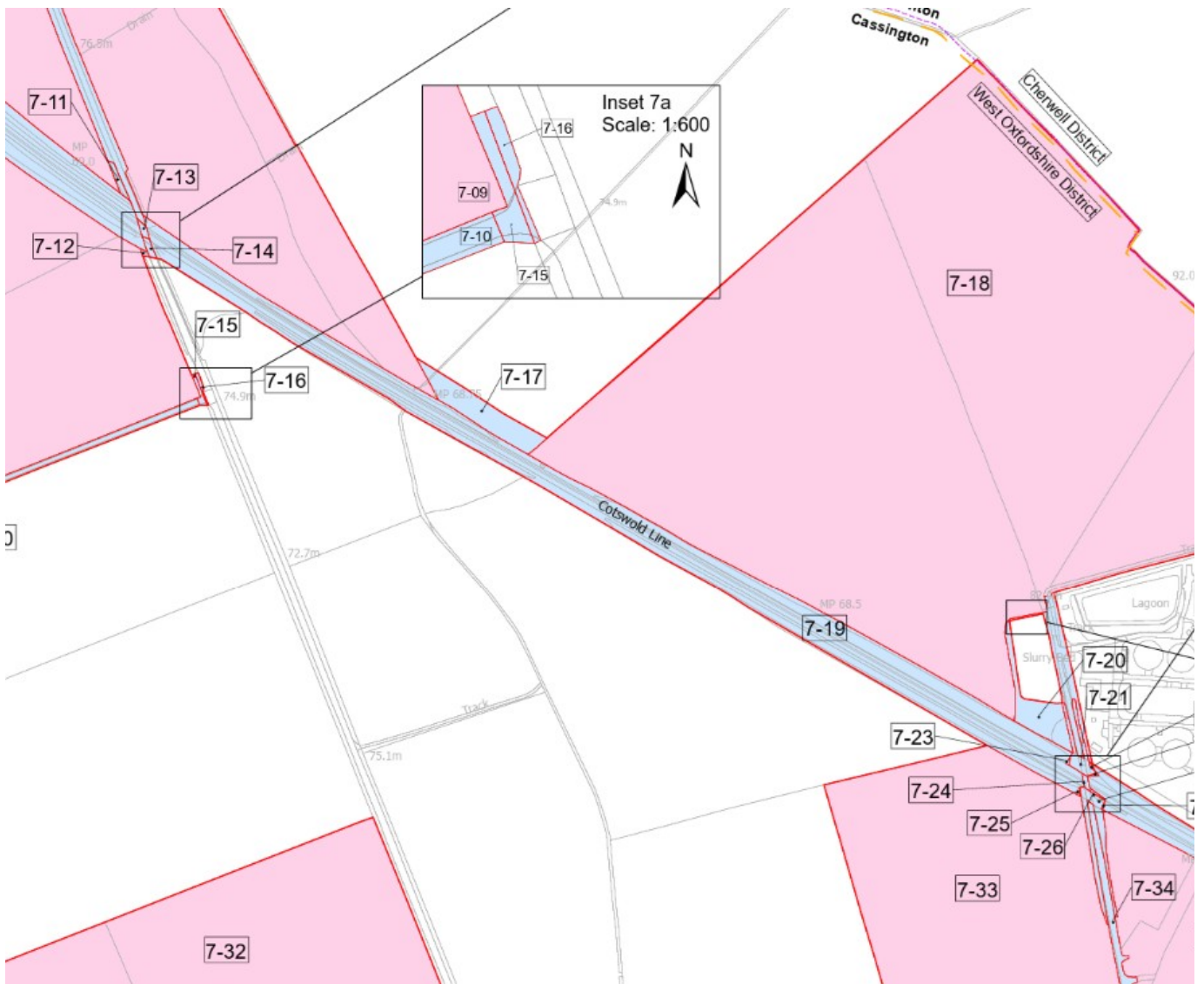
Accordingly, I request from the Inspectorate clear confirmation of whether the photographic evidence already submitted suffices to establish the seriousness of this risk. If additional documentation is required, please specify what form it should take and when that determination will be made.

## **2. Objection to the Compulsory Acquisition of Rights over Flood-Prone Order Land: A Strategic Attempt to “Grey the Green Belt”**

**I also submit a strong and reasoned objection to the developer's attempt to obtain compulsory powers over Order Land parcels 9-06, 9-07, 9-09, 9-10, 9-11, and 9-12. These rights include temporary land use and permanent new rights, as well as the suspension or extinguishment of easements, servitudes, and private access rights—all ostensibly to facilitate underground cabling.**



This request is neither necessary nor proportionate. A viable and safer route exists via path 7–17, which avoids residential property, avoids flood-prone zones, and does not conflict with established private rights. The developer’s refusal to adopt this option suggests a strategic motive beyond efficient energy transmission.



The land over which these new rights are sought lies within a designated Green Belt, in a known floodplain, adjacent to residential homes. During flooding, the access drive to Jericho Farm and Yarnton Road become submerged (see above photos). **Installing high-voltage cabling in these ditches and culverts is not only unnecessary, but positively hazardous. It introduces the real risk of electrocution for residents navigating the area during floods, especially when the communal foul water treatment system is also impacted and access is already restricted.**

**More broadly, developer's tactic reflects a pattern of Green Belt erosion by stealth. Compulsory acquisition of new rights over multiple land parcels under the NSIP regime serves not as a functional necessity but as a strategic land transformation mechanism, enabling the incremental conversion of protected rural land into permanent infrastructure corridors.**

In this context, it is important to note that while the Prime Minister purports to uphold Green Belt protections, his own actions betray a calculated strategy of erosion by stealth—what one might describe as a death by a thousand cuts. **Central to this is the politically convenient reclassification of land as “grey belt,” a term not recognised in planning law, but coined by his party in late 2023 to circumvent established safeguards.** This so-called grey belt—encompassing disused car parks, industrial plots, and, crucially, any land deemed of “poor quality” within the Green Belt—serves as a deliberate loophole, expanding the range of developable sites under the guise of pragmatism.

**It is not a legal reform grounded in statute or policy coherence, but a rhetorical device to reframe what is plainly an incremental dismantling of Green Belt protections. Far from preserving the countryside, the Prime Minister's planning strategy, masked in euphemism, invites councils and other government agencies to redraw boundaries and reinterpret long-standing principles, ultimately enabling widespread development by administrative sleight of hand.**

**In this case, the developer appears to be exploiting the NSIP process to create a permanent new infrastructure corridor in the Green Belt under the veil of renewable energy development. This constitutes an abuse of the statutory process, a clear threat to both planning integrity and public safety, and an unacceptable precedent for future Green Belt degradation.**

### **Conclusion**

I therefore urge the Inspectorate to:

1. Give full weight to the well-documented and foreseeable flooding risk posed by the development in the Worton area;
2. Reject outright the developer's proposed compulsory acquisition of rights over B-6 through B-12;
3. Recognise the strategic nature of this application as part of a broader pattern of Green Belt erosion ("Greying" of the Green Belt) by stealth;
4. And uphold the principle that Nationally Significant Infrastructure Projects must not be used as a legal workaround to override legitimate local concerns, public safety, or environmental integrity.

Sincerely,

Bo Ivanovic

[Redacted signature]

[Redacted contact information]

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