Raywood, Simon

From: Bojan Ivanovic [redacted]
Sent: 13 September 2025 19:43
To: Botley West Solar Farm
Subject: Re: Botley West Solar Farm - application should be rejected

To Planning Inspectorate:

While I thank the Inspectorate for its letter, it provides absolutely no new information, and in substance it appears to be yet another exercise in buying time and running the statutory clock down, rather than engaging meaningfully with the issues raised. This approach further undermines public confidence in the integrity and proper purpose of the examination process (under the Planning Act 2008).

Below, I will respond to each aspect of your short email individually and also highlight some key issues that were entirely overlooked, whether intentionally or not.

0. Jurisdictional Issue: NSIP Qualification Based on Artificial Aggregation of Non-Contiguous Sites

Before ANY consideration of procedural timetables or the substantive examination, it is essential to determine whether this project is lawfully before the Secretary of State.

The BWSF scheme appears to have been **artificially aggregated from non-contiguous land parcels solely to meet the size threshold** for designation as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008 (s.14, s.15). **This approach creates substantial legal and policy risks and appears to be a deliberate act of manipulation.** NSIP status is intended for projects that are functionally and geographically integrated, delivering a coherent, unified infrastructure purpose. Established guidance from the Infrastructure Planning Commission and Planning Inspectorate confirms that aggregation should reflect **genuine operational necessity.** This strategy of aggregating non-contiguous parcels to avoid local scrutiny is a clear case of intentional manipulation, using distant approval channels to override community input in a profoundly undemocratic way.

Of particular concern, repeated written requests for confirmation have yielded no legal opinion from the developer, the Planning Inspectorate, DESNZ, or DEFRA regarding the legality of this aggregation. Yet the project continues along approval routes for which it is arguably ineligible, raising substantial concerns about procedural and statutory compliance. If any such opinion exists, it must be disclosed immediately. If not, the examination proceeds on an untested assumption of jurisdiction, creating a significant risk of procedural unlawfulness and judicial review.

Solar energy is inherently modular, and there is no operational need to pool non-contiguous sites. Furthermore, the electricity generated is not correlated with any nearby large energy user, meaning the scheme necessitates unnecessary and extensive national grid expansion, alongside battery storage infrastructure with its own technical, financial, and environmental/other risks, none of which appear to have been adequately considered. Normal planning practice assesses solar developments on single or contiguous parcels, ensuring efficiency and proportionate infrastructure.

Here, the aggregation appears motivated not by technical necessity, but by a desire to maximise Blenheim's landholding potential through rezoning arbitrage, facilitated by lobbying at senior levels. This approach contravenes the statutory purpose of NSIP designation, which is to identify projects of genuine national significance, rather than speculative land assembly.

Grounded in s.35(1) and s.37(1) of the Planning Act 2008, there is a strong argument that the Secretary of State must first determine whether this artificial aggregation falls within the lawful scope of NSIP status before any procedural or substantive examination proceeds.

Allowing the examination to continue while this foundational jurisdictional issue remains unresolved would be wholly inappropriate and procedurally unsafe.

1. "The Inspectorate did publish [my] email dated 22 May and include it in examination and we are therefore not able to respond to each point individually at this time, separately from the examination."

Merely "publishing" a representation does not discharge the duty to engage with its content. There is no legal bar preventing the Inspectorate from seeking clarification or commissioning legal advice at this stage. The Planning Act 2008 does not require the Inspectorate to remain passive until the very end of examination. Indeed, it envisages an active inquisitorial process, where relevant issues are identified and tested as they arise. Thus, claiming that no points can be addressed "at this time" is a self-imposed procedural restraint not supported by legislation — it has the **practical effect of running down the clock and avoiding contemporaneous engagement with important legal issues.**

2. "If statutory timescales are followed exactly… a decision and the publication of the Recommendation Report would be expected to take place in May 2026…"

This framing is misleading. **The statutory timetable is an outer limit, not a required period of inaction.** The Inspectorate can expedite stages when evidence is available or issues are clear, and only pauses the clock when genuinely necessary. By treating the outer limit as fixed, **the current process effectively facilitates a *fait accompli***, allowing the project to advance while affected parties remain in prolonged uncertainty. This approach appears to be a deliberate strategy to **slow-walk substantive engagement, ensuring decisions are effectively predetermined rather than thoroughly examined**.

3. "The Examining Authority will be considering important and relevant topics… The relevant Secretary of State… will be involved in the process due to the responsibility… as decision maker."

This statement merely reiterates the statutory position and provides **no substantive information on how the Inspectorate is currently fulfilling its duties**. It also confirms indirectly that **no engagement with the Department for Energy Security and Net Zero (DESNZ) has taken place despite the central relevance of the questions raised. The Examining Authority cannot prepare a coherent recommendation if core policy and legal positions are left deliberately undefined until the Secretary of State makes a final decision.** This is exactly the form of institutional buck-passing that creates the appearance of shielding the Department from having to adopt potentially controversial stances during examination.

4. "Whilst we have not directed the questions raised to the Department for Environment, Food and Rural Affairs… arm's length bodies… will have had the opportunity to see your comments."

It is astonishing that while Net Zero is overseeing this scheme, departments such as DEFRA—responsible for the protection of the Green Belt and valuable farmland—appear to be sidelined, effectively removing local and expert oversight from the decision-making process.

This is not an acceptable substitute for actually obtaining **a formal position from DEFRA or its agencies**. "Having the opportunity to see" comments is not the same as being asked to respond to them, and **the Inspectorate has the procedural tools to compel engagement where matters are material to the determination**. This again suggests **a conscious decision to avoid commissioning legal or policy input**, ensuring that any controversial matters are simply rolled forward to the Secretary of State rather than resolved in examination — which **undermines the purpose of the examination itself.**

To date, neither the Inspectorate, DESNZ, nor DEFRA has made any attempt to scrutinise or challenge the developer's "green" narrative, despite having 'constructive knowledge' that many claims represent marketing spin rather than evidence-based statements or projections. These parties are therefore in a position to recognise the misrepresentations and manipulations actively disseminated by the developer. The developer repeatedly implies—without substantiation—that the scheme will lower consumer electricity bills, deliver realistic energy production, preserve the "best and most versatile" agricultural land, and constitute "very special circumstances" justifying PERMANENT Green Belt release, yet it provides no evidence of how this project will credibly reverse climate change in Oxfordshire or the UK, or help food security. This lack of scrutiny risks allowing untested promotional claims to drive decision-making rather than rigorous, evidence-led assessment.

None of these assertions have been independently and credibly tested or evidenced, and they fall far short of the stringent conditions that would be required to justify MASS REZONING and industrialisation of Green Belt land for what is, on any objective view, for BLENHEIM and its affiliates' long-term COMMERCIAL BENEFIT. Permitting these assertions to remain unexamined creates the impression that the Inspectorate and associated Departments are prioritising the developer's messaging over their statutory duty to conduct impartial and rigorous scrutiny.

5. Mandatory Rigorous Assessment of Conflicts of Interest and Homeowner Impacts
Simultaneously, there is substantial evidence indicating reductions in property values of up to 5–10%, and in some instances higher, in the vicinity of newly constructed solar farms and associated infrastructure, with the **impact generally correlating to proximity**. This constitutes a material planning consideration under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and established planning case law. **The Examining Authority is therefore duty-bound to assess this issue rigorously**, particularly given the **significant potential for conflicts of interest arising from the competing interests of the applicant and affected homeowners**. Robust econometric research, including studies by the London School of Economics (Tang & Gibbons, 2024) and the Lawrence Berkeley National Laboratory (2023), demonstrates that: Residential properties within 200–300 metres of new overhead power lines or pylons can experience price reductions of up to 8–10%. Properties within approximately 1.2–1.5 km of such infrastructure show average reductions of around 3.6–3.9%. Properties within 0.5 miles (800m) of large-scale solar farms exhibit reductions averaging ~1.5%, with localized impacts of 4–6% in certain jurisdictions.

Blenheim's proposed 25-meter buffer zones from solar panels and associated infrastructure are wholly inadequate to mitigate these impacts. Such minimal measures, along with tokenised community gestures, are insufficient to protect homeowners from material financial loss, leaving affected residents exposed to significant devaluation of their properties. The Examining

Authority must therefore give full and transparent consideration to the impacts on property values without delay, as this is a substantial and entirely predictable issue even at this stage of the examination.

This evidence shows that material harm to residential property values is a foreseeable and evidenced planning impact of this type of infrastructure. It is not open to the Examining Authority simply to ignore it or defer its assessment until the decision stage.

Accordingly, the Inspectorate should either seek formal evidence on this point from DESNZ (and/or DEFRA), or commission independent valuation and planning evidence to assess it during the examination.

6. "Please can you confirm whether it is your intention… to be considered as a submission to Deadline 5…"
Yes, it is my intention that my email dated 3 September 2025 be treated as a submission for Deadline 5. However, if the Inspectorate only acknowledges submissions without engaging with their content until the end, **the process risks becoming a procedural formality** rather than a genuine forum of inquiry.

7. Final Observation – Appearance of External Influence and Corporate Overreach
While I make no formal allegation and have no direct evidence, the Inspectorate's overall approach creates a strong appearance of undue influence—whether political at the highest levels or from the developer's interests. The process has been presented as properly conducted, yet in practice its substance has been lacking from the outset, leaving local residents treated unfairly and long-standing Green Belt protections undermined. This approach gives the impression of corporate overreach by Blenheim and its affiliates, facilitated by procedural inertia and what appears to be deliberate deferral, insulating DESNZ and DEFRA from engaging with legal and policy questions, avoiding independent legal scrutiny, and allowing the statutory clock to run down. Such a course is inconsistent with the Planning Act 2008's front-loaded, inquisitorial, and evidence-led examination process. I respectfully request that the Examining Authority either direct the relevant Departments (and their arm's-length bodies) to respond to the legal and policy issues raised, including the evidence on property value impacts, or commission and publish independent legal advice so that all parties may engage with it BEFORE the Recommendation Report is prepared. Only through such measures can the examination fulfil its statutory purpose and avoid the perception that the Inspectorate is shielding the decision-maker from proper scrutiny.

I further request that this letter be formally accepted as a submission and included on the public record of this examination.

Sincerely,
Bo Ivanovic

On Fri, Sep 12, 2025 at 7:11 PM Botley West Solar Farm <BotleyWestSolar@planninginspectorate.gov.uk> wrote:

Dear Mr Ivanovic,

Thank you for your email and for your patience in waiting for a response.

The Inspectorate did publish your email dated 22 May and include it in examination and we are therefore not able to respond to each point individually at this time, separately from the examination. If statutory timescales are followed exactly, with no early completion of stages of the process or extensions, a decision and the publication of the Recommendation Report would be expected to take place in May 2026, around one year from the commencement of the examination stage.

The Examining Authority will be considering important and relevant topics and will formulate their report to the Secretary of State based on the information provided to the examination. The relevant Secretary of State for this case is the Secretary of State for Energy Security and Net Zero. Therefore, whilst these questions have not been directed at this time to the Department for Energy Security and Net Zero, they will be involved in the process due to the responsibility of the Secretary of State as decision maker. Whilst we have not directed the questions raised to the Department for Environment, Food and Rural Affairs, to date, arm length bodies of the Department are involved in the examination process and therefore will have had the opportunity to see your comments.

Please can you confirm whether it is your intension that your email dated 3 September 2025, to be considered as a submission to Deadline 5 of the examination.

Kind regards,

Simon

Planning Inspectorate

Simon Raywood [redacted]

Case Manager – National Infrastructure

Planning Inspectorate

[redacted]

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From: Bojan Ivanovic [redacted]
Sent: 03 September 2025 10:09
To: Botley West Solar Farm <BotleyWestSolar@planninginspectorate.gov.uk>
Subject: Re: Botley West Solar Farm - application should be rejected

Dear Planning Inspectorate,

I am writing yet again to follow up on my detailed submission of 22 May 2025, which appears to have gone unanswered. I would be grateful if you could confirm when I can expect a response, and whether the Department for Energy Security and Net Zero (DESNZ) and DEFRA will also be providing replies to the questions I addressed to them.

For ease of reference, my 22 May letter raised, among other matters:

1. Legitimacy of NSIP aggregation of over two dozen non-contiguous parcels of land, and whether this represents a misuse of planning procedures.

2. 40-year project duration, effectively a de facto rezoning of Green Belt land. This proposal clearly entails the loss of Green Belt land, where the test of "Very Special Circumstances" has not been demonstrated (e.g. as highlighted in Historic England's response).

3. Misleading public claims about the project's capacity (840MW "enough for 330,000 homes"), without transparent performance data.

4. Flooding risks, supported by photographic evidence of recent flash flooding in Worton and Cassington.

5. Visual pollution and property values, referencing the 2018 LSE study showing a 4–6% decline in nearby property prices (another 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). The proposal fails to provide adequate buffers, with a minimum of just 25m for residential properties—significantly less than any other NSIP project—while also omitting a Residential Visual Amenity Assessment.

6. Food security, agricultural land loss, and lack of rooftop/brownfield strategy, requiring clarification from DESNZ and DEFRA.

7. DEFRA's role in biodiversity claims and agricultural displacement, including oversight of misleading ecological and "dual-use" farming assertions. Furthermore, the applicant now admits that 42% of the land is Best and Most Versatile (BMV) agricultural land, currently productive and directly contributing to UK food security, yet still targeted for removal.

Given the scale of this project and the gravity of the concerns, I respectfully request a clear timetable for when substantive answers will be provided. At present, it appears that the serious questions raised are being left to disappear into a bureaucratic void.

I look forward to your urgent clarification.

Yours sincerely,
Bo Ivanovic

On Thu, May 22, 2025 at 11:59 PM Bojan Ivanovic [redacted] wrote:

Dear Planning Inspectorate,

My name is Bo Ivanovic, and I live in Worton—directly next to the proposed solar industrial zone, which is comparable in size to Heathrow and lacks any meaningful buffer. I do not have access to costly legal representation in this situation, which feels very much like a David versus Goliath battle. In addition, the Planning Inspectorate is based two hours away in Bristol, so I cannot easily visit in person for assistance or clarification. This is a serious concern for me. **If the project is approved—as it appears to be getting steamrolled through from Westminster despite strong and united local opposition—it will undoubtedly harm my family's wellbeing, our community's quality of life and will also significantly reduce the value of my property due to unmitigated visual pollution and flooding risks.**

I respectfully ask the Inspectorate to carefully consider each of my comments and questions. I have grouped them as best as possible given my limited access to the legal and consultancy resources typically required in such complex planning processes. Frankly, this process already feels designed to exhaust, outmanoeuvre, and outspend local opposition rather than to genuinely engage with substantive concerns.

Today, I received the letter from you regarding the Examination Timetable and Procedure. The contents of this letter are open to **multiple interpretations**, and **I am concerned about making any missteps in responding** in light of the above. Given the strength of my convictions and the very real possibility of the worst-case scenario becoming a reality, I have decided to do everything in my power to make my position clear from the outset. **At the open hearing on the 13th of May, I offered brief comments at both the beginning and end of the morning session concerning 'procedural' matters.** I later supplemented these with a written statement, which I drafted over the prior weekend, which addressed both procedural and other substantive concerns. Due to time constraints, I was unable to separate these into two distinct submissions. **Unfortunately, it feels that most emphasis is being placed on procedural form rather than on the substantive issues at stake.**

During that same hearing, a lady—whom I believe to be from the Inspectorate—stated that **any discussion of the project's merits during the procedural session would be promptly**

interrupted. This is troubling, as procedural and substantive matters are often closely interlinked, and such a rigid division risks silencing legitimate concerns.

Over the past two years, I have submitted numerous well-researched, clearly argued, and extensively referenced letters concerning both the process and the merits of the project. To date, these efforts have yielded no results. **I am now concerned that, as an individual without expensive legal representation, my voice will be drowned out amid the complex exchanges between larger, better-resourced parties—particularly if my contributions do not conform precisely to internal bureaucratic form and expectations.**

Nonetheless, in this context, I wish to formally notify the Inspectorate that **I do not authorise any advocacy or financial negotiations on my behalf by community action groups, esp. Sustainable Woodstock,** which is widely believed to be affiliated with Blenheim and actively coordinating with the Developer. **Only democratically accountable local parishes can speak credibly on behalf of affected communities.**

Further compounding this issue is the **use of your transcription system during meetings. I must advise that I will not participate in any future sessions where this system is used to record my input. It has failed to capture key details, including the correct spelling of local village names, road names, and even my own name. Moreover, it has fragmented my statements into disjointed sentences that misrepresent the clarity of my speech.** This is deeply concerning, especially as some members of the audience confirmed that my delivery was clear, convincing and coherent.

I must once again raise a serious concern regarding the integrity of this process from the outset. It remains unclear which of the Developer's arguments have already been accepted and which remain subject to proper scrutiny. I contend that this project should not have even passed the basic applicability test for NSIP approval process, and that each parcel of land involved ought to have been considered individually at the local level under different planning approvals (i.e not NISP). The failure to do so undermines the proper exercise of planning oversight and calls into question the legitimacy of the current process.

Rather than pursuing local planning approval for each parcel individually, Blenheim and its affiliates deliberately aggregated over two dozen non-contiguous land parcels—connected only by cabling and common ownership—into a single NSIP application. **This manoeuvre, and the legal precedent it relies upon, constitutes a blatant manipulation of the planning framework, evident to any objective observer.** To date, **no legal opinions have been submitted to support the validity of this approach**, despite multiple written requests, **yet the approval process continues to advance along this legally inappropriate path.**

The failure to address these concerns now undermines proper planning oversight and calls into question the legitimacy of the entire process from the outset. **Has the Inspectorate already concluded that such aggregation is acceptable and not an abuse of existing planning procedures?**

If the aggregation of non-contiguous sites is deemed acceptable merely because they are connected by electricity cables, one must ask: where is the logical boundary? By that reasoning, could all solar panels in the UK, if linked through the grid, be treated as a single nationally significant project? **Such a precedent would not only stretch the intent of NSIP legislation but effectively nullify the role of local planning in large-scale energy developments.**

I must also respectfully **request that the Inspectorate clarify its preliminary position as to whether the proposed 40-year project term** is being treated as a procedural matter or a merit-based one—since it plainly implicates both. From a procedural perspective, such an unusually long duration should have immediately attracted heightened scrutiny during the NSIP eligibility assessment, particularly as it amounts to a **de facto permanent rezoning—without any candid acknowledgment of that effect**.

The failure to thoroughly assess and transparently address these protections at the earliest stages of the process constitutes a serious procedural and substantive oversight, undermining the statutory purpose and public confidence in the Green Belt policy framework. A 40-year industrial-scale energy installation **cannot reasonably be described as "temporary."** This conflation of procedural leniency with substantive approval risks rendering the statutory safeguards **meaningless**.

Also, when will the inspectorate start to intervene to force the developer to clarify clear manipulations and misrepresentations in their public statements?

The developer's key claim that Botley West will provide "**840 MW of clean, affordable power to the National Grid, providing enough electricity for the equivalent of 330,000 homes**" is **clearly misleading**. Yet, this claim has remained unchanged for two years, and the government has not required the developer to correct or clarify it.

The public is NOT being told that 840 MW figure refers to 'installed' capacity, not actual generation.

In the UK, solar farms typically produce only 10–12% of their capacity on average due to weather variability and the absence of nighttime production. Output during winter months is substantially lower. **Without energy storage or grid balancing, which this project lacks, the system cannot reliably supply power to the claimed number of homes, especially during peak demand.** So the "homes powered" figure is simply marketing and political spin, not an operational

fact. Furthermore, **despite written requests, the developer has failed to provide hourly or seasonal output data**, or real-world performance examples from comparable UK solar farms. **This refusal suggests an awareness that such data would expose intentional public manipulation.**

Given that my written requests have been ignored, I ask: what procedural steps can the Inspectorate take to compel the developer to provide this critical data? The government has a duty to ensure public information is accurate and transparent, especially on matters of national energy infrastructure.

It is necessary, in the interests of procedural clarity and fairness, that the Inspectorate explicitly and publicly identify which matters have been reviewed and determined—whether accepted, rejected, or deemed still open to submissions—so that all parties may engage with the process on an informed and equitable basis.

I understand that current planning regulations in the UK do not permit developments that increase flooding risks, for obvious reasons. Normally, Oxfordshire County Council would be responsible for informing the Planning Inspectorate about the likely impact of the proposed Botley West Solar Farm on local flood risk. As I am not sure that they have and will do so, I have already submitted **my own photographic evidence** to you taken in Worton from the Jericho Farm Barns driveway along Yarnton Road towards Cassington, **clearly documenting a flash flood event that resulted in the closure of our community foul water treatment facility.** This establishes that flood risk in the Worton and Cassington areas is neither theoretical nor speculative—it is a recurrent and demonstrable issue. The elevated, Blenheim-owned terrain above Yarnton Road that acts as a natural funnel—verifiable through Google Earth—has directly contributed to previous flooding incidents, causing disruption to essential infrastructure and public access routes.

The proposed solar installation on this sloped ground, adjacent to Jericho and Worton Farms, would dangerously further impair the land's natural infiltration capacity. This, when combined with poorly maintained drainage infrastructure, including obstructed ditches and undersized culverts, would materially increase surface runoff into already flood-prone areas. **This proposed development in my immediate vicinity therefore poses a foreseeable and significant aggravation of an existing flood hazard, with direct implications for residential safety, public health, and infrastructure resilience.**

Accordingly, **I request clarification from the inspectorate: does the submitted photographic evidence suffice to establish the seriousness of this risk, or will additional documentation be required? If the latter, please specify what further evidence is deemed necessary and when that determination will be communicated.**

In addition to increased flood risk, **visual pollution from large-scale solar developments as a legitimate concern** not only in terms of mental health and community well-being, but also as a **tangible financial issue—particularly in relation to impacts on local property values.** Specifically, I would like to know whether the Inspectorate acknowledges **the findings of the 2018 study by the London School of Economics**, which analysed over 600 solar farms and 5,000 nearby properties. **The study concluded that proximity to large solar farms may reduce nearby property values by approximately 4% to 6%**, and that the size of the installation has a greater impact on property prices than its energy-generating capacity.

When will we know if the Inspectorate will recognise 'visual pollution' from large-scale solar farms as a legitimate issue not only in terms of community wellbeing and mental health, but also in terms of potential financial harm, particularly to local property values? Are you aware of the 2018 study by the London School of Economics, which analysed over 600 solar farms and 5,000 nearby properties, concluding that proximity to large solar farms can reduce property values by approximately 4% to 6%?

Since I have previously written to the Department for Energy Security and Net Zero and have not received any substantive responses to my questions, I would like to take this opportunity to formally request assistance in this matter:

Priority Questions for the Secretary of State and Department for Energy Security and Net Zero

1. On Land Use Policy and Food Security
Given the government's stated commitment to both energy security and food production, what policy rationale justifies the continued approval of large-scale ground-mounted solar installations on **productive agricultural land**, especially when the **Climate Change Committee has identified a need to protect domestic food resilience**?

2. On Ignored Rooftop and Brownfield Potential
Why has the Department **failed to publish or act on a comprehensive national rooftop and brownfield solar deployment strategy**, despite the well-established advantages of such approaches in terms of land efficiency, cost, and grid proximity?

3. On Infrastructure Planning and Grid Efficiency
Why are solar developments still being approved in remote rural locations, requiring costly grid extensions and increasing transmission losses, when colocating solar with major energy

consumers (e.g., logistics hubs, data centres, cold storage facilities) would offer immediate gains in efficiency, grid stability, and ROI?

4. On Lack of Brownfield Assessments by Developers
In the case of the Blenheim-affiliated development and others like it, why is there no requirement for developers to produce a detailed and verifiable brownfield site alternatives assessment **prior** to application submission? Is the government aware that bypassing such assessments **enables speculative land use manipulation under the guise of Net Zero delivery**?

5. On Suspected Land Speculation and Planning Reclassification
What safeguards are in place to prevent renewable energy projects from being used as a mechanism for long-term land **rezoning**, particularly in sensitive planning zones? Does the Department recognise that developments of this nature risk eroding public trust in both climate policy and planning integrity?

6. On Comparative International Approaches
Why has the Department not considered the legislative approach adopted by Italy, which has prohibited ground-mounted solar on agricultural land and is instead prioritising deployment in proximity to major infrastructure and industrial zones?

7. On Misleading Public Claims
a) **Despite repeated public statements that solar will reduce electricity prices**, does the Department acknowledge—based on its 'constructive knowledge' and evidence such as Financial Times reporting on **Contracts for Difference, grid costs, and green levies—that large-scale solar is unlikely to lower overall consumer bills**? If not, please provide the evidence supporting claims of net savings once all system costs are accounted for.

b) The Botley West developer's public claim of delivering "840 MW of clean, affordable power to the National Grid, enough to power 330,000 homes" appears to be significantly overstated—**realistic output is likely closer to ONE-TENTH of that figure when factoring in intermittency and seasonal variations.** Given this discrepancy, it is questionable whether the project genuinely qualifies as 'nationally significant' at all. Why has the Department echoed this claim without rigorous scrutiny, and what measures will be implemented to ensure that all public statements on renewable energy are grounded in transparent, verifiable, system-wide data?

8. On Departmental Accountability and Due Diligence
Despite repeated written inquiries, including requests for legal opinions, brownfield viability assessments, and proper output modelling, the Department has failed to provide substantive responses. **At what point will it formally acknowledge the procedural and evidentiary gaps in its current support for developments such as Botley West?**

9. On Transparency and Due Process in Project Evaluation
a) Will the Department commit to publicly disclosing the full criteria and methodologies used to assess the environmental and strategic suitability of large-scale solar projects, including requirements for **lifecycle emissions analysis, impacts on food systems, and comprehensive alternatives assessments?**

b) Furthermore, **will the Department ensure sufficient time is allocated for rigorous, independent studies to be completed**, or is there a risk that approvals will be expedited to pre-empt or circumvent negative findings from reputable sources that may not align with the government's policy narrative?

10. On Visual Impact, Property Values, and Heritage Conservation
Does the Department formally recognise that large-scale solar farms and their associated infrastructure generate significant visual intrusion, as consistently reported by local communities, and that this "visual pollution" materially depresses property values? Specifically, in cases like Botley West, situated near UNESCO World Heritage sites and villages with protected character, how does the Department justify permitting industrial-scale developments within such nationally and internationally significant landscapes? Why are these projects not instead prioritised in uninhabited locations or designated industrial zones where adverse impacts on heritage, landscape, and residential amenity would be minimised?

Priority Questions for DEFRA

DEFRA possesses the authority and capacity to hold solar developers accountable but has chosen to remain notably silent, reflecting a concerning lack of engagement on these critical matters. Developers frequently claim that farming activities can continue alongside solar installations, however, in practice, this almost never occurs. The shade from panels, fencing, and related infrastructure significantly disrupts traditional agriculture. Although grazing by low-intensity livestock such as sheep may theoretically be possible, it generates only a fraction of the income previously obtained from crop production or other farming activities. This conclusion is supported by a 2021 University of Reading study demonstrating that income from grazing under solar panels is minimal and fails to compensate for agricultural losses. (Source: University of Reading, Centre for Agricultural Innovation, "Solar Farms and Agricultural Productivity," 2021)

Claims by solar developers that their projects enhance biodiversity are widely promoted in marketing materials, such as those on [redacted] but these assertions are highly misleading. Solar farms typically create uniform **monoculture landscapes with limited ecological value, resulting in soil degradation, habitat fragmentation, and facilitation of invasive species**. Environmental benefits are usually limited to superficial landscaping designed primarily to meet planning requirements rather than to deliver meaningful ecological improvements. This concern is echoed in a **2023 UK Centre for Ecology & Hydrology report, which highlights that such biodiversity claims are often exaggerated** and require rigorous, long-term monitoring. (Source: UK Centre for Ecology & Hydrology, Biodiversity and Solar Farms: Realities and Risks, 2023)

Developers frequently promote solar farms as drivers of sustainable business and local benefits, including employment and community resources. However, the reality is far less promising. Construction jobs tend to be temporary and primarily filled by external contractors. **However,**

tenant farmers are often displaced, resulting in the permanent loss of valuable agricultural skills in the affected area. Once operational, solar sites require minimal maintenance, and community benefit promises tend to be token gestures intended to fulfil planning conditions. Meanwhile, local residents frequently experience declines in property values and the erosion of community character. **A 2020 report by the Institute for Energy Economics and Financial Analysis reveals that economic gains predominantly flow to developers and investors, while local communities bear the social and economic costs.** (Source: Institute for Energy Economics and Financial Analysis, 2020)

1. Loss of Agricultural Skills and Community Impact
Does DEFRA acknowledge that large-scale solar developments risk permanently displacing farming families and causing an irreversible loss of valuable agricultural expertise? What assessment has been made of the social and economic impacts on rural communities where farmers are forced to relocate or permanently leave agriculture due to land conversion for solar projects?

2. Reconciliation of Agricultural and Green Belt Land Loss with Food Security
How does DEFRA justify the ongoing loss of productive agricultural and **Green Belt land—effectively facing imminent death by a thousand cuts due to corporate-driven industrialisation and urban development**—for solar farms, given its **statutory duty to protect sustainable food production, Green Belt integrity, and national food security?**

3. Prioritisation of Rooftop and Brownfield Solar
Why does DEFRA not require mandatory, comprehensive assessments of rooftop and brownfield solar options **before permitting development on greenfield farmland?**

4. Prevention of Speculative Land Rezoning and Lack of Transparency
What policies and enforcement mechanisms does DEFRA have to prevent solar projects being exploited as tools for speculative land value inflation and rezoning, particularly in cases like the Blenheim-affiliated development? Why is DEFRA visibly silent on these critical issues despite their clear relevance to the department's mandate and the urgent risks posed by current solar deployment policies?

5. Protection of Biodiversity and Rural Landscapes
What measures does DEFRA enforce to prevent ecosystem fragmentation, biodiversity loss, and irreversible alteration of rural landscape character caused by solar farm developments on sensitive or protected land?

6. Alignment with International Best Practice
Has DEFRA considered adopting policies similar to Italy's ban on ground-mounted solar farms on agricultural land? If not, what is the rationale for diverging from such internationally recognised approaches that protect food security?

7. Soil Health and Post-Project Land Restoration
What requirements are in place to ensure soil health is protected throughout the lifespan of solar projects and that land is properly restored to full agricultural productivity upon decommissioning?

8. Water Management and Flood Risk Mitigation

How does DEFRA ensure solar farm developments do not exacerbate flood risk or disrupt natural water runoff, particularly in vulnerable rural areas?

9. Integration of Food Security into Energy Planning
How does DEFRA factor the impact of agricultural land loss from solar developments into national food security models and future food supply targets?

10. Community Consultation and Ongoing Compliance
What measures does DEFRA mandate to guarantee meaningful consultation with farming communities and local residents prior to approval, and what powers does it have to monitor and enforce compliance with environmental and agricultural safeguards post-approval?

Conclusion

I remain resolute and committed to standing up for my community, my family, and my home—no matter the pressures or political machinery that may seek to wear us down. This project represents a fundamental misuse of planning frameworks, a distortion of public policy, and an erosion of local democratic accountability. It risks setting a dangerous precedent—undermining Green Belt protections, misallocating public funds, and reducing countryside to a stage for speculative development, cloaked in the language of environmentalism. The long-term objective here is not the delivery of clean, sustainable energy. It is the pursuit of a huge land value uplift. Once agricultural activity has been displaced and the optics of renewable energy have served their purpose, the land becomes primed for reclassification—whether industrial, commercial, or 'affordable housing'.

Given the gravity of these matters, I sincerely hope that I will receive clear, candid and comprehensive responses to the concerns I have outlined.

On Tue, Apr 22, 2025 at 4:49 PM Bojan Ivanovic [redacted] > wrote:

> Dear Mr Raywood,

Thank you for your email.

Please disregard my previous email. Kindly note that the video was attached in error and should be disregarded.

However, the below photograph and Google maps are of direct relevance and should be taken into consideration when reviewing the prospective approval of the Botley West solar industrial zone — including the associated power, plant and equipment — proposed to be installed on farmland fields within the Green Belt, adjacent to the Yarnton Road near Jericho and Worton Farms.

These Blenheim fields, if developed as planned, would effectively create a vast water funnel directing runoff towards our communal Jericho Farm Barns foul water treatment plant, with predictable significant adverse implications.

This project could not only result in disruption of our most basic services (sewage), (preventable) water damage to our homes, but also pose grave safety risks — including the potential for electrical hazards on adjacent private properties. In such conditions, my family (including children) and neighbours could be exposed to the very real danger of electrocution on our own driveway.

Sincerely,

Bo


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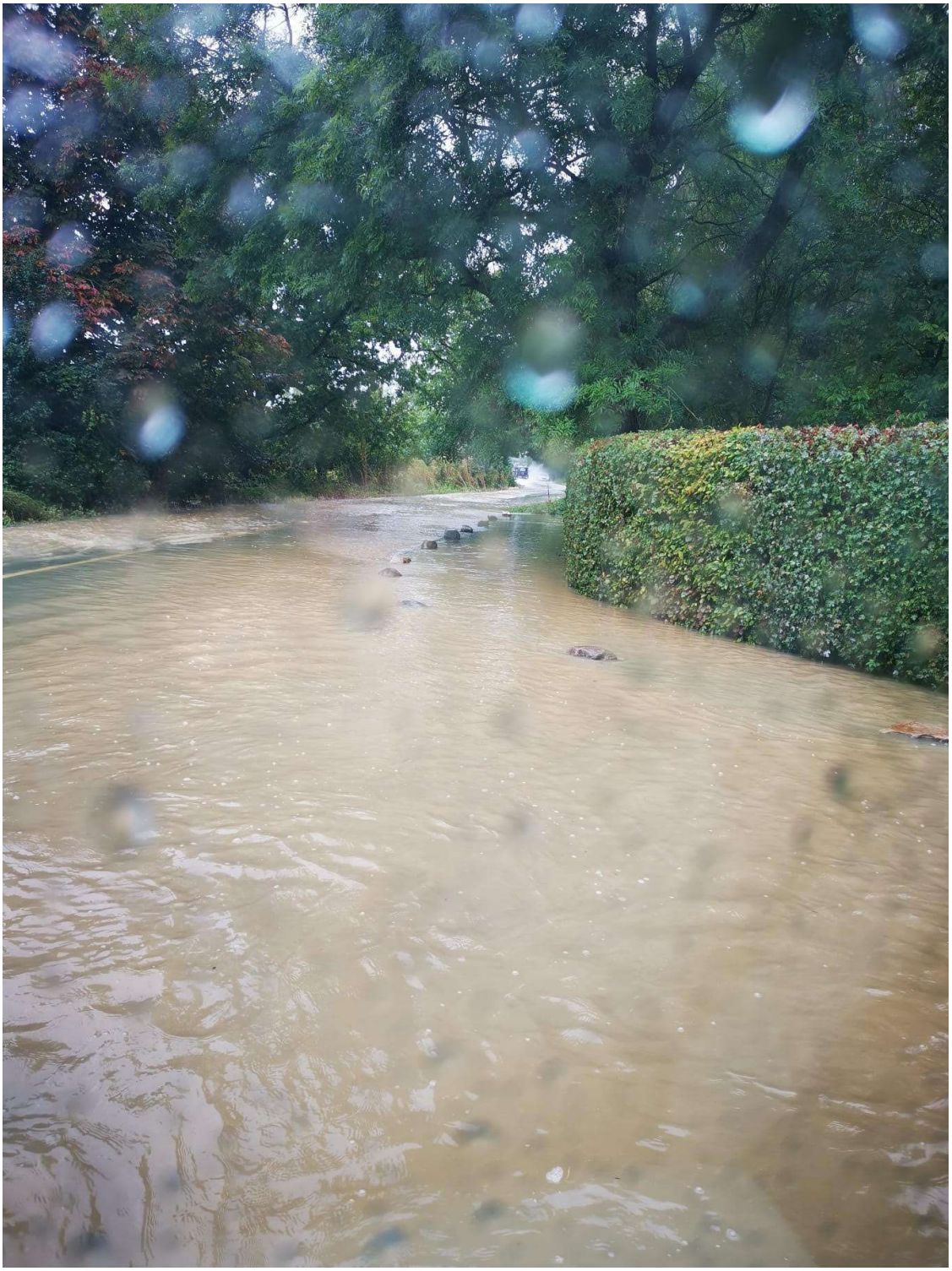


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