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Sent: 02 November 2025 16:40
To: Botley West Solar Farm
Subject: Closing Statement – Botley West Solar Project

Closing Statement — Interested Party Submission
Botley West Solar Farm (PVDP) DCO Application
Deadline 7 November 2025

I write as an interested party with grave concerns about the Botley West Solar Project (BWSF). My family and virtually all our neighbours have engaged extensively throughout this Examination, and the picture that emerges is of a project being rammed through to enable an extraordinary financial arbitrage—achievable only by the stroke of a quasi-judicial pen from the Secretary of State, with minimal checks and balances. The process feels entirely pre-determined and undemocratic, leaving the local community frustrated, disenfranchised, and questioning whether the application is even legally valid (potentially *ultra vires*). What is more certain, the proposal will result in *de facto* permanent rezoning for industrial, or later residential or other uses, undermining long standing statutory protections of the Green Belt and setting a concerning legal and planning precedent.

1. Black Box Process and Government Oversight

The Government, DEZNS, DEFRA, and the Planning Inspectorate have allowed this project to proceed as a black box, withholding essential policy documents and legal opinions before the final closing submissions, preventing meaningful public scrutiny or legal challenge. This is not procedural neutrality—it is intentional institutional opacity.

It is shocking that DEFRA is effectively watching from the sidelines while fertile, productive Green Belt farmland is being industrialised. Both DEZNS and DEFRA have constructive knowledge that many of the Developer's public claims are grossly exaggerated, particularly regarding installed versus realistic generation capacity, and projected household equivalence that ignores England's dark winters and limited solar yield. Despite this awareness, no corrections or contextual clarifications have been issued, effectively allowing misleading data to stand unchallenged.

Meanwhile, the Developer—a mere screen for Blenheim and its affiliates—has been allowed to ignore repeated requests for better, more realistic information, supplying only selective, high-level greenwash propaganda, and scrubbing out anything that contradicts the narrative.

This includes failing to provide, among other things: complete Residential Visual Amenity Assessments (RVAA), accurate mapping and photography, realistic visual, heritage, and landscape impact analysis, definitive decommissioning plans, definitive cable routes through Eynsham and across the Thames, National Grid substation details, 3rd-party battery storage assessments, cumulative impact studies, and project funding transparency. They have repeatedly refused to

answer questions for which they lack strong arguments, while publicly stating they feel “confident” the project will be approved in its current form—presumably due to behind-the-scenes lobbying with the Secretary of State.

2. Jurisdictional Issues and Rezoning Financial Arbitrage

Locally, there are no large energy users (e.g., large data centres or flat-roof warehouses requiring chillers) that would justify this scale of generation. Solar is modular and can be deployed at any size from a few panels to hundreds of acres.

The aggregation of non-contiguous parcels to meet NSIP thresholds is therefore a premeditated manipulation strategy, deliberately shifting decision-making to Westminster and circumventing local democratic scrutiny. No legal opinions have been provided to clarify that this aggregation is not ultra vires or unlawful, leaving the legitimacy of the entire application in question.

This strategy is designed to facilitate a rezoning financial arbitrage, allowing Blenheim to transform protected farmland into industrial energy land at vast profit. While the 40-year rental stream offers a long-term income, it pales beside the multi-billion-pound windfall arising from *de facto* rezoning. According to leading UK real estate agencies (Knight Frank, Strutt & Parker, Savills), agricultural land in Oxfordshire averages £8,000–£15,000 per acre, residentially zoned land can reach £500,000 per acre, and industrial or energy-infrastructure land exceeds £1.8–£2.5 million per acre. Applied to approximately 2,471 acres, the uplift from agricultural to industrial classification could exceed £4 billion—achieved solely through ministerial consent under quasi-judicial powers.

3. Consultation and Procedural Defects

We see and feel that the consultation has been form without substance, marginalising local residents and imposing fatigue, financial, and time burdens that neutralise opposition. Frustrated by the lack of genuine engagement, I even attempted to contact the Secretary of State directly to plead our case but was formally rebuffed by his correspondence unit—another example of an intentionally opaque process designed to shield decision-makers from accountability.

4. Misleading 40-Year “Temporary” Classification

The 40-year classification as temporary is not only not credible, but somewhat insulting and condescending. It is a clear case of intentional manipulation, introducing illusory legal safeguards solely to circumvent Green Belt protections.

Neither the Government nor agencies have provided any legal opinions from credible law firms or government legal counsel to support the claim that this is not *de facto permanent*. Case law: *Dillon v Secretary of State* [2010] confirms that “temporary” does not remove the duty to assess Green Belt harm. Statute: s.171B TCPA 1990 shows that four years, not forty, is considered significant for enforcement—making this a *de facto* permanent industrialisation.

5. Green Belt, Brownfield Alternatives, and “Grey Belt”

It is shocking that the Developer is being allowed to proceed on productive Green Belt farmland when clearly superior brownfield alternatives exist near large energy users. These alternatives are being ignored simply because they do not fit Blenheim’s narrative, and the Government’s willingness to continue this consultation nonetheless is indicative of corporate overreach.

The project contributes to a death by a thousand cuts of Green Belt protections, undermining longstanding statutory safeguards while creating the appearance of compliance. Prime Minister Keir Starmer’s recent references to “grey belt” demonstrate a lax interpretation of Green Belt protections at the highest level, facilitating legal loopholes that could allow incremental industrialisation and development on previously protected land.

The Developer, acting on behalf of Blenheim, is intentionally “greying” the Green Belt with unnecessary order requests to inflate the project area and maximise the rezoning financial arbitrage. Cable routes and substations could be routed more efficiently, but they have been designed deliberately inefficiently to extend the project footprint.

6. Flood Risk

Currently plowed farmland absorbs rainfall and mitigates flash flooding. Under this proposal, land will be compacted and hardened beneath solar panels, reducing permeability and increasing surface runoff. This will inevitably worsen flooding risk for nearby residents, many of whom already experience documented sewage and foul-water infrastructure failures.

7. Buffer Zones and Landscape Harm

The proposed buffer zones are grossly inadequate. A 250-metre separation is not credible for an installation of this scale in such a picturesque and sensitive part of the Cotswolds. A minimum of 1,000 metres would be far more appropriate to preserve visual and heritage character, yet this has been ignored in favour of developer convenience. The result would be overwhelming industrial dominance of an otherwise rural and historic landscape.

8. Energy Strategy and Consumer Impact

This project will not materially lower the effective price of electricity, which remains among the highest in the world. No credible calculations have been published. The Developer’s figures are based on installed capacity, not actual generation. DEZNS and DEFRA must be aware that solar in southern England typically achieves only 10-12% efficiency, with very low output during dark winters.

Furthermore, the project demands intrusive, very expensive, and objectively unnecessary National Grid expansion and extensive battery storage facilities. It is disconnected from major consumers and designed for Blenheim’s financial benefit, not optimal net zero energy strategy.

9. Visual, Amenity, and Zero-Sum Impacts

The project represents a zero-sum game. Blenheim and its affiliates will reap multi-billion-pound windfalls over the coming decades, while my family and virtually all our neighbours will face declines and stagnation in property values, permanent loss of amenity, and degraded mental wellbeing.

Empirical studies, including the LSE's 2018 review of 600 UK solar farms, found average property value declines of 4–6% within proximity of large installations, with worse outcomes for schemes of this magnitude.

10. Corporate and PR Structure

Blenheim and its affiliates have orchestrated a coordinated PR campaign, including Sustainable Woodstock (an affiliate of the Duke of Marlborough), with clear conflicts of interest. Even local MPs are notably restrained, constrained by party lines, and unable or unwilling to reflect genuine local opposition.

The unnecessarily complex cross-border corporate structure is intentionally opaque, designed to obscure the true sponsors and ultimate beneficiaries.

Conclusion

This proposal is bad planning masquerading as energy policy. It represents the industrialisation of productive Green Belt farmland, designed to deliver extraordinary private profit to Blenheim and its affiliates under a cloak of “Net Zero.” The process has been opaque, selective, and procedurally biased, ignoring viable alternatives and denying the public meaningful engagement.

I therefore urge the Examining Authority to recommend outright rejection of this application. At a minimum, all Green Belt and high-quality agricultural land should be excluded from the project boundary.

Public trust in national planning and energy policy depends on transparency, evidence, and fairness—all of which have been missing in the case of Botley West.

Bo Ivanovic

