[redacted]

From: [redacted]
Sent: 20 April 2026 00:44
To: DESNZ Correspondence; secretary.state@energysecurity.gov.uk; Botley West Solar Farm
Cc: Calum Miller MP
Subject: Re: A response from DESNZ to your recent query - DESNZ ref: TOB2025/15339

Dear Secretary of State,
DESZNS Correspondence Unit,
BWSF Inspectorate,

I am pleased to note that the government has now required the developer to respond to more than 70 additional questions concerning this highly controversial and divisive project, but it needs to do even more than that.

The developer's application is clearly inadequate and, as such, ought to have been rejected.

The extent of these further questions underscores serious deficiencies in the original submission and raises concerns regarding compliance with the long-standing Green Belt legal protections, consistency with national policy objectives to reduce the all-in end user price of electricity, and DEFRA's stated objectives to protect agricultural land and food security, and to avoid incremental erosion of the agricultural sector and Green Belt through a cumulative 'death by a thousand cuts' approach.

In my extensive correspondence with DESZNS and the Inspectorate, I was informed that my concerns had been "acknowledged," without any formal clarification of which specific concerns this referred to.

Yet virtually none of my pertinent questions have been carried forward into the new set of questions to the developer, despite their continued relevance. This appears inconsistent and difficult to reconcile.

It is evident that many more questions should have been raised, especially much earlier in the process, but were not, leaving significant and ongoing gaps in the evidential base and planning process.

The absence of pertinent questions, and the inadequacy of the additional questions addressing these fundamental issues, therefore continues to give rise to serious concerns:

1. This includes the issue of de facto and de jure 'permanent impact' of this project, and de facto and de jure permanent land-use change, where arguments that a 40-year timeframe does not constitute 'permanence' (in a clear attempt to undermine Green Belt protections and perceived as an intentional (mis)interpretation by the developer, with insufficient challenge from government) remain totally unconvincing.

Even these new questions cannot resolve the underlying concern as to whether the project is before the appropriate decision-maker, or whether the Examination is even lawfully constituted.

Jurisdiction, process integrity, and lawful competence are antecedent to any merits-based determination, yet no substantive questions appear to have been raised on these matters.

2. The deliberate artificial aggregation of non-contiguous parcels to meet NSIP thresholds, designed to manipulate and alter the decision-making process away from local stakeholders, to parties with no direct connection to the area, thereby bypassing proper local scrutiny, remains unaddressed in the recent round of questions.

3. The overall project structure remains opaque and unnecessarily complex, giving rise to concern that the layering of entities and arrangements may obscure the identification and scrutiny of ultimate beneficiaries and decision-makers within the wider scheme.

Within this context, there remains a concern that the developer may not be sufficiently financially and structurally independent from Blenheim and associated interests, such that its assessment of alternative locations may not have been conducted with the necessary degree of objectivity or robustness.

4. This gives rise to further concern that the evaluation of non-Blenheim brownfield and alternative sites may not have been subject to adequate independent scrutiny or full and balanced due diligence by either the developer or the Inspectorate.

The limited scope and narrow framing of the recent round of questions, especially relating to alternative site selection and the consideration of other options, including brownfield land, raise further concerns about form over substance.

Ample alternative locations, particularly brownfield sites (not within protected Green Belt) and those situated closer to heavy and solar-correlated energy users (such as warehouses requiring chillers), would reduce or avoid the need for National Grid expansion, as well as the need for expensive battery energy storage facilities.

However, these options do not appear to have been meaningfully assessed by either the developer or the Inspectorate, raising concern that non-Blenheim brownfield and other alternative sites have not been properly or objectively evaluated.

In addition, I would ask that particular attention be given to wider contextual concerns that have been raised regarding the conduct and cumulative effect of land-use change in the area.

5. This includes the cumulative and significant effect of land-use change across a substantial area of Green Belt land, comparable in scale to Heathrow Airport, which appears to reflect a broader pattern of intentional “greying” of Green Belt land, resulting in incremental but substantial shifts from agricultural to industrial or non-agricultural designation (which is typically associated with materially higher land values, particularly in the vicinity of Oxford).

6. Within this context, any approval by the Secretary of State would, through the exercise of quasi-judicial decision-making powers, directly determine a change in land-use designation, with associated long-term implications for materially higher land rents, but more importantly, substantial land value appreciation, likely amounting to value uplifts in the order of billions of pounds, from which Blenheim and associated parties are likely to be primary beneficiaries.

7. By contrast, DESZNS has not acknowledged, nor raised new questions concerning, the predictable adverse impacts on local residential property values associated with solar projects near residential

homes, as evidenced in academic research (including studies from LSE and others), the magnitude of which may significantly exceed any proposed “community benefit.”

In this context, any premature emphasis on community benefits risks obscuring the scale of potential adverse impacts on local residents.

Rather than repeating my earlier submissions, I would respectfully urge that my extensive correspondence and multiple submissions as an interested party are re-examined in full.

While I appreciate that the government is now asking further questions, it remains the case that many important policy and other substantive issues appear still to have been omitted.

This has reinforced a view among most local residents that the controversial project is being publicly framed as though it is still under genuine review, while in practice the decision appears to be conveniently held back until after the upcoming elections, fueling concerns that procedural fairness is more appearance than reality. More broadly, there is a persistent suspicion that the outcome was never truly in doubt, and may have been effectively settled from the very beginning.

Yours sincerely,

Bo Ivanovic

[redacted]

On Fri, 21 Nov 2025, 16:58 Bojan Ivanovic, [redacted]> wrote:

> Re: Botley West Solar Farm – Response to Departmental Letter of 19 November 2025 (Ref. TOB2025/15339)
>
> Dear A. Collins,
>
> I write in response to your letter of 19 November 2025. Having reviewed its contents, I must respectfully note that it fails to engage with substantive legal, procedural, and policy issues, and seems to misrepresent the Department’s administrative and quasi-judicial responsibilities.
>
> 1. Procedural and Jurisdictional Responsibility
>
> Your letter summarises procedural steps under the Planning Act 2008 and the role of the Examining Authority. While these are relevant, they cannot absolve the Department from considering whether the project is properly before it or whether the Examination is lawfully constituted. Jurisdiction, process integrity, and lawful competence are antecedent to any merits-based decision. Deferring engagement until the ExA report risks endorsing a process that may already be *ultra vires*.
>
> It is also difficult to avoid the impression that the Department is content to rely on the possibility that the Inspectorate may not raise these questions at all, thereby positioning itself to attribute any resulting failures to others and to treat the Inspectorate as a convenient scapegoat.
>
> Invoking the Secretary of State’s *quasi-judicial role* to justify silence on these matters is a category

error. Questions of administrative and legal competence are not adjudicative and may be addressed without prejudicing impartiality. Reliance on similar precedent or prior applications cannot substitute for proper scrutiny of Botley West, including:

i) The absence of consideration of abundant brownfield alternatives before proposing a project of this scale—comparable to Heathrow—almost entirely within Green Belt land;

ii) The deliberate artificial aggregation of non-contiguous parcels to meet NSIP thresholds, designed to manipulate the decision-making process away from local stakeholders to parties with no direct connection to the area, thereby bypassing proper local scrutiny;

iii) The classification of a forty-year installation as "temporary", which is illogical to any unbiased observer.

Such matters require prompt legal and administrative scrutiny. Silence from the Planning Inspectorate does not validate legality. Courts consistently hold that failure to examine critical procedural or jurisdictional questions may render a decision unlawful.

2. Omission of Critical Policy Considerations

Your response also ignores significant public interest and policy concerns:

i) Financial uplift: The project could confer a maximum uplift to landowners (Blenheim and affiliates) of ~£4.8 billion. Even a fraction of this predictable increase should be recognised. A decision by the Secretary of State could effectively gift a private landowner billions, transferring public planning value into private hands without corresponding public benefit.

ii) Privatisation of benefits and consumer impact: The public bears all environmental, amenity, and policy risks. The project will not reduce consumer electricity prices, locally or nationally. Headline figures for household generation refer to maximum installed capacity, but effective solar yield in England is almost ten times lower, and DESNZ has constructive knowledge that both the project's benefits and generation claims are massively overstated to make it appear more beneficial than it actually is. The true impact on consumer prices, when subsidies, Contracts for Difference, and other offtake and tax benefits granted to developers are taken into account, is minimal or negligible.

iii) Property impacts: DESNZ has not acknowledged predictable declines in local residential values, as evidenced in LSE and other studies—a magnitude radically greater than any token "community benefit." All premature discussion of community benefits appears intended to obfuscate the sizeable negative impact on local residents.

iv) Green Belt and farmland: Long-standing Green Belt and productive agricultural land are at risk. Yet, current policy does not prevent farmer displacement or loss of productive land, pointing to the Government's tacit strategy of "death by a thousand cuts" undermining the Green Belt and wider agricultural sector.

v) Policy failure: No policy exists to limit abuse or manipulation of intentional "greying" of Green Belt land to increase potential future benefits from land conversion.

vi) Developer misrepresentation: Blenheim Estate and affiliates, including Sustainable Woodstock, have orchestrated a coordinated campaign to greenwash the project. DESNZ should actively challenge the developer where it has constructive knowledge of misleading claims, including

inflated maximum benefits based on installed capacity, and address manipulation of public opinion via Blenheim-affiliated organisations.

These considerations highlight the need for DESNZ, in conjunction with DEFRA, to immediately prioritise brownfield development over permanent conversion of Green Belt productive farmland.

3. Requested Legal and Policy Opinions

I request that the Department provide without delay:

i) A legal opinion on the safeguards and jurisdictional basis required to ensure that NSIP thresholds are not deliberately engineered to bypass local scrutiny, and to confirm whether Botley West's NSIP designation is lawful in light of the deliberate artificial aggregation of non-contiguous parcels. In this case, the proposed project's scale is clearly arbitrary: solar generation is inherently modular and effective at much smaller scales, there are no major proximate energy users to justify the output proposed, and the enlargement of the scheme appears to reflect *premeditated manipulation of the planning framework* intended to sideline established local planning procedures for comparable projects.

ii) Consideration of policy and land impacts, including *risks to long-standing Green Belt and productive agricultural land*, predictable farmer displacement, and any tacit strategies undermining Green Belt protections.

iii) Assessment of developer influence, including coordinated efforts by Blenheim Estate and its affiliates (e.g. Sustainable Woodstock) that could bias public consultation or the decision-making process.

These questions may be addressed without prejudicing the Secretary of State's quasi-judicial responsibilities. I further request that the Department procure and publish these legal and policy opinions promptly. DESNZ should also actively challenge the developer where it has constructive knowledge of misleading claims and address manipulation of public opinion via affiliated organisations.

Conclusion

The Department's response demonstrates an alarming reliance on procedural form over substantive scrutiny, and a misapplication of quasi-judicial reasoning to avoid proper engagement with legal and policy obligations. By failing to acknowledge predictable financial, environmental, and social impacts—including deliberate manipulations of the NSIP process, grossly overstated benefits, and predictable declines in residential values—and by continuing not to provide (esp. project-specific) legal or policy advice, the Department risks eroding public confidence in the planning process. It is both disappointing and concerning that such significant matters are treated with generic reference to process rather than addressed directly.

I therefore request a reasoned reply to each point raised, or, should the Department decline to respond, a full explanation for that decision.

Yours sincerely,
Bo Ivanovic

---------- Forwarded message ---------
From: **DESNZ Correspondence** <correspondence@energysecurity.gov.uk>
Date: Wed, Nov 19, 2025 at 3:57 PM
Subject: A response from DESNZ to your recent query - DESNZ ref: TOB2025/15339
To: [redacted]

Dear Bojan Ivanovic,

Please find attached a response to your recent query to DESNZ.

Yours sincerely,

[redacted]

DESNZ Correspondence