From: Bojan Ivanovic [redacted]
Sent: 20 April 2026 00:44
To: [redacted]
Cc: [redacted]
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

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[redacted]

Our ref: TOB2026/06285
Your ref: TOB2025/15339

29 April 2026

Dear [redacted]

Thank you for your email of 20 April, about Botley West Solar Farm. Your correspondence has been passed to me for response.

As I hope you will appreciate, the Secretary of State receives significant volumes of correspondence on a daily basis, and, regrettably, is unable to respond to each one personally. Therefore, I have been asked to respond.

I can confirm that your email will be treated as a representation and will be carefully considered alongside all matters that are relevant to the decision-making on the application for development consent in accordance with the Planning Act 2008.

Given the Secretary of State's quasi-judicial role in taking decisions on applications for development consent for energy infrastructure proposals, it would not be appropriate to comment on specific matters related to the proposals, as this could be seen as prejudicing the decision-making process.

Yours sincerely,

William Iheji
DESNZ CORRESPONDENCE UNIT