

Simon Raywood

From: Bojan Ivanovic [REDACTED]
Sent: 18 June 2026 12:03
To: Botley West Solar Farm; secretary.state@energysecurity.gov.uk
Subject: Urgent Response – Objection to Continued Progression of Botley West Solar Application
Attachments: 95950.jpg

To the Secretary of State and Planning Inspectorate (de facto acting as a PO Box only).

This highly controversial application should have been clearly refused at an earlier stage.

Instead, despite overwhelming unresolved concerns raised repeatedly by residents, statutory bodies, and interested parties, it has been allowed to continue through repeated extensions, revisions, and opportunities for amendment that appear designed to force an otherwise unacceptable scheme into approval.

I am writing as an interested party, a resident of a property at the north-east end of Worton (Yarnton Road, Cassington), directly affected by the proposed development.

Having followed this process for years, I am deeply alarmed at what feels like a consultation process that no longer functions as a genuine examination of evidence.

Key assessments remain incomplete, yet decisions are being pushed forward as though the missing information is an inconvenience rather than a fundamental failure of the application.

Flooding is the clearest example.

Residents, including myself, have submitted repeated photographic evidence of surface-water flooding and drainage stress in and around our homes. Yet these concerns continue to be dismissed or inadequately addressed.

The Applicant's flood strategy has not meaningfully changed.

Of particular concern is the failure to remove or properly reassess the solar infrastructure on the upstream hillside above our community at the Jericho Farm on Yarnton Road (see attached map with red arrows).

This land already funnels water toward Worton Farm/Jericho Farm during heavy rainfall. It is not theoretical, it is visible and experienced in real time.

During flash flooding events, our private community foul-water treatment plant is already under severe pressure and has had to be switched off to prevent damage on numerous occasions.

Further alteration of the land through industrial development/predictable land compaction and loss of cultivated agricultural buffering will inevitably worsen these conditions.

These risks are entirely foreseeable, yet they are being treated as secondary.

The proposal to introduce buffer changes only AFTER consent is granted is thus extremely troubling and UNACCEPTABLE.

It removes residents from the final decision entirely. It feels like the application is being adjusted just enough to pass, rather than properly tested and fairly judged.

Aviation safety concerns have also not been adequately addressed. The proposed solar panels on the hillside adjacent to Yarnton Road sit beneath the approach path to Oxford Airport. The risk of sunlight reflection causing pilot glare has not been properly examined, despite the clear alignment and elevation involved.

Peer-reviewed UK research (Maddison, Ogier & Beltrán Hernández, Land Economics) demonstrates that utility-scale solar farms can result in statistically significant reductions in nearby residential property values of approximately 5% within 750 metres, driven primarily by visual and landscape disamenity effects (clearly applicable to the Jericho Farm properties).

This is directly relevant to the proposed development, yet its implications for local property values and long-term residential harm have not been properly considered.

From Yarnton Road, we will see industrial solar infrastructure across the hillside. This is a PERMANENT TRANSFORMATION of landscape and character. It is impossible to reconcile with how this area currently lives and functions.

It is also extremely concerning that the cable routing through Yarnton Road continues to be pursued, despite earlier objections and the availability of ALTERNATIVE connection routes via Bladon and Begbroke that appear to have been insufficiently explored.

This contributes to a cumulative and unnecessary industrialisation (intentional greying) of protected Green Belt land.

What is happening here feels less like balanced planning and more like a determination to make the scheme proceed regardless of unresolved harm: environmental, visual, agricultural, and residential.

This is not acceptable. The process is not working as it should.

For these reasons, I urge the Secretary of State (and the Inspectorate) to refuse this application outright.

At minimum, it should not proceed until all flood-risk evidence, landscape impacts, aviation safety concerns, infrastructure routing alternatives, and socio-economic effects have been fully and transparently assessed in a way that allows meaningful public scrutiny.

Yours faithfully,
Bo Ivanovic



----- Forwarded message -----

From: **Bojan Ivanovic** [REDACTED]

Date: Tue, 9 Dec 2025, 11:23

Subject: Re: A response from DESNZ to your recent query - DESNZ ref: TOB2025/15339

To: DESNZ Correspondence <correspondence@energysecurity.gov.uk>

Cc: <secretary.state@energysecurity.gov.uk>, Botley West Solar Farm

<BotleyWestSolar@planninginspectorate.gov.uk>, Calum Miller MP

[REDACTED] >

Dear [REDACTED]

I am writing yet again because, although the submissions deadline has now passed, the Inspectorate has NOT requested ANY further information on the genuine flooding risks affecting Worton—particularly along Yarnton Road near Cassington.

Neither the developer nor the Inspectorate has followed up, even as conditions on the ground continue to demonstrate the severity of the problem. After a long drought, just a few days of rain combined with autumn leaf fall were enough to block the culvert yet again, highlighting how little resilience the current drainage system has.

I must again express grave concern regarding the Botley West proposal, specifically its reliance on outdated hydrological data in assessing flood risk in our locality.

It must be plainly stated that Yarnton Road, in Worton, continues to experience frequent and significant flooding even under current conditions.





Of particular concern is the impact this has on the nearby foul water treatment plant (communal plant for [REDACTED] which is often compelled to cease operations during such episodes in order to prevent reverse flow and subsequent mechanical failure.

This is not a matter of conjecture, but a persistent and well-documented issue. This means that residents cannot use showers, laundry machines, etc.

The proposed development of the vast Botley West industrial solar zone—on protected Green Belt farmland—across the sloping fields adjoining [REDACTED] would, in essence, form an extensive impermeable catchment, channelling water with increased force and speed into an already vulnerable area.



The addition of a solar farm in such close proximity would only heighten these vulnerabilities.

Without regular ploughing and planting, the fields would definitely compact, reducing infiltration and increasing runoff. This would surely place even greater pressure on an area already struggling to cope with existing water flows.

To proceed without fully addressing these pressing hydrological issues—particularly those affecting the Yarnton Road area—would constitute a serious oversight and, in our view, a clear failure of duty.

Regards,

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 [REDACTED]

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



EN010147-00263...

inspectorate.gov.uk

