

[REDACTED]

From: Bojan Ivanovic [REDACTED]
Sent: 04 September 2026 19:50
To: Botley West Solar Farm; secretary.state@energysecurity.gov.uk; DESNZ Correspondence
Cc: Calum Miller MP
Subject: Re: A response from DESNZ to your recent query - DESNZ ref: TOB2025/15339

Dear All,

Yet again, today I received an “All Interested Parties – Invitation to comment” on the Botley West Solar Farm Project.

Yet again, we are invited to comment as “interested parties”, while the core issues already raised receive little or no substantive response. The developer’s latest “amended” documents are, at first glance, difficult to take seriously. The supposed concessions are laughable, dressed up in fancy words but giving no meaningful ground whatsoever. In my view, the application should have been rejected long ago for its inadequacies.

Instead, the developer continues to be given more time and increasingly inexplicable opportunities to bend the rules, while effectively being left to mark its own homework despite showing little evidence of good-faith engagement with interested parties.

1. From the outset, the developer’s approach has appeared calculated. By assembling separate, non-contiguous parcels into one application, it has effectively chosen the planning regime in which the project will be decided, and, in doing so, effectively chosen the decision-making route and decision-maker.

This is not a minor procedural detail. It has taken what are, in substance, separate / modular solar developments out of the normal local planning system and into the national NSIP regime. If allowed to stand, this risks setting a deeply troubling precedent: developers could assemble otherwise separate developments **specifically to cross the applicable NSIP threshold and replace local planning scrutiny with a distant national decision.**

In this case, that means placing a huge Green Belt development before decision-makers in London, many miles from the communities and landscape affected. Given the increasingly hostile attitude in London towards long-standing Green Belt protections, it is difficult not to question whether this was part of the attraction of the chosen structure. The cumulative effect appears to be a strategy of quietly diluting those protections, **progressively “greying” the Green Belt through one supposedly exceptional development after another, until the protection exists largely on paper. Death by a thousand cuts, one per cent at a time.**

2. There is also a rather obvious elephant in the room which, despite repeated submissions, nobody appears willing to acknowledge: the extent to which Blenheim and its affiliates stand behind the developer and the interests that may ultimately benefit from the project.

Even an amateur looking at the situation can see that Blenheim sits on a very substantial portfolio of prime real estate in the vicinity of Oxford, including land proposed to be contributed

to a project of a scale comparable to Heathrow. It is therefore difficult to understand why the wider interests and potential benefits arising from this inevitable land transformation have received so little/zero scrutiny. This is potentially a very substantial transfer of land value, **potentially running into billions of pounds**, arising from a public planning decision and benefiting those private interests. Yet this potentially enormous private gain, the longer-term land-use implications and the consequences for surrounding property owners remain conspicuously unexamined. Approval by the Secretary of State, through the exercise of **quasi-judicial decision-making powers**, would therefore in practice establish a **de facto permanent change in the effective use of this land, from agricultural land within the Green Belt** to an industrial-scale energy development, with the associated inevitable “greying” of the Green Belt.

3. The developer’s reliance on a nominal 40-year lifespan as evidence that this is somehow not a permanent change of land use remains particularly unconvincing. Forty years is effectively a generation. Indeed, speaking personally, I will almost certainly be dead by the time those 40 years are up. For the communities affected today, it is hardly a genuine definition of “temporary”. Nor is “40 years” some magic legal dividing line between temporary and permanent. The UK legal system can, depending on the context, treat land-use rights, planning consequences or arrangements as effectively permanent even where they have existed for far shorter periods. **Even 4 years can be legally significant.** 40 years certainly cannot simply be dismissed as temporary because that is the period proposed by the developer.

During those 40 years, the land would be taken out of its existing agricultural use, its character would be fundamentally altered, land values could change, and a substantial industrial-scale energy installation would become an established feature of the landscape. Nor is it convincing to assume that the land will simply revert to its previous state after 40 years. The precedent, infrastructure, changed character of the land and potentially increased land values could make further development easier to justify. **Over time, this will surely facilitate further industrial, residential or commercial development.**

4. The Government also appears reluctant to engage with the wider consequences for local residents. Peer-reviewed research by Maddison, Ogier and Beltrán, published in Land Economics, found a **5.4% reduction in relative property prices for properties within 750 metres south of operational solar farms above 5MW in England and Wales.** That is a material local impact which should not simply be ignored, particularly given the scale of this proposal and the potential for suppressed future appreciation.

5. The latest published map leaves another important issue unresolved. The two hillsides above Jericho and Worton Farms are still very much included and, in effect, form **a natural funnel for flash-flood runoff towards the community** and the foul-water treatment plant below. That plant already has to be shut down during flash floods, as **repeatedly documented in photographs submitted to the process. The concern is therefore not hypothetical.** Compacting the land on the adjacent hillside and ceasing regular ploughing once the panels are installed could **materially increase runoff into an area that already has a known flooding problem.**

6. Furthermore, the proposed routing of cable infrastructure along Yarnton Road, when on the face of it the cables could instead follow the solar development itself via Worton Heath and Begbroke, unnecessarily extends the project’s footprint and further contributes to the **progressive “greying” of the Green Belt.**

7. The Government should also be asking what the realistic net, all-in benefit of this project actually is to consumers and electricity prices. Headline generation capacity is not enough. The

assessment needs to account for year-round contribution, intermittency, National Grid reinforcement, battery storage and other supporting infrastructure, together with the costs ultimately borne by consumers. Whether the project delivers any meaningful net reduction in electricity costs after all of this is taken into account is a fundamental question the Government should already be addressing. **This is difficult to reconcile with the Government's constructive knowledge** of what is, in our view, little more than the developer's PR spin.

8. The clearest indication that there has been little genuine Government engagement with the substance of local concerns is that the fundamental questions raised repeatedly in my correspondence and submissions from November 2025 to June 2026 (and prior) remain largely unanswered. Those questions include the project's permanent, in-substance change of land use; the developer's unconvincing reliance on a 40-year lifespan to avoid the implications for Green Belt protection; whether the project is properly before the current decision-maker; whether the Examination is lawfully constituted; the aggregation of non-contiguous parcels to meet NSIP thresholds; the opaque project and ownership structure; **the independence and adequacy of the alternatives assessment; and the apparent lack of proper scrutiny of suitable brownfield locations outside the Green Belt.** These are **not peripheral objections.**

Yet when the Government recently sought further information and clarification from the developer this summer, most of the specific questions I had raised were not carried forward, with the request remaining limited and narrowly framed. While the Department has said that it has "acknowledged" my points, it has refused to explain precisely what it has acknowledged or to what extent. The Planning Inspectorate, meanwhile, having apparently completed its substantive work some considerable time ago, now operates, de facto, as little more than a PO Box for the Department for Energy Security and Net Zero, a description difficult to dismiss when a member of the Inspectorate has acknowledged that this has effectively been its function since last year. When substantive matters are raised directly, the Department appears instead to retreat behind its 'correspondence' unit.

Taken together, these are not signs of meaningful engagement with the issues. They are evidence of a process in which concerns are acknowledged procedurally but not substantively addressed. I therefore ask the Department to reread my earlier correspondence in full and demonstrate, through its response, that these questions have actually been considered rather than simply acknowledged.

I appreciate that I have repeated many of these points, perhaps more times than anyone would ideally wish to read them. But I have repeated them for one simple reason: they remain unanswered. Perhaps, by continuing to repeat them, I may finally be properly heard, and the substantive issues considered on their merits. At the moment, the whole process increasingly looks like a foregone conclusion.

Sincerely,

Bo Ivanovic

A black rectangular redaction box covering the signature area.

On Tue, Jun 16, 2026 at 10:51 PM Bojan Ivanovic <ivanovic@gmail.com> wrote:

Subject: Re-Submission of Unaddressed Matters for Direct Consideration by the Inspectorate

Dear Sir/Madam,

I am forwarding the attached correspondence along with a series of relevant questions that, despite their importance, have not been adequately addressed—or in several cases, addressed at all—by the Developer, DEZNS.

Given DEZNS's position that responsibility for these matters rests with the Botley West Inspectorate, and the Government's somewhat cryptic acknowledgment of my concerns (without specifying what, if anything, has actually been acknowledged), I am left with no clear indication that these issues have been meaningfully considered within the appropriate channels.

Accordingly, and in the interests of clarity, accountability, and procedural efficiency, I am now directing these questions to the Inspectorate itself. I trust this will allow them to be considered in the forum where responsibility is said to properly reside, rather than continuing to circulate between parties who appear to acknowledge them in principle while deferring them in practice.

I look forward to a substantive response addressing the points raised.

Sincerely,
Bo Ivanovic

[REDACTED]

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

From: **Bojan Ivanovic** [REDACTED]
Date: Mon, 20 Apr 2026, 00:44
Subject: Re: A response from DESNZ to your recent query - DESNZ ref: TOB2025/15339
To: DESNZ Correspondence <correspondence@energysecurity.gov.uk>, <secretary.state@energysecurity.gov.uk>, Botley West Solar Farm <BotleyWestSolar@planninginspectorate.gov.uk>
Cc: Calum Miller MP <calum.miller.mp@parliament.uk>

Dear Secretary of State,
DESNZ 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

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