

Submission ID: 37064

Please find attached my submission regarding PVDP's claims of experience in developing solar projects and their response to ExA WQ1 - question 1.5.27

Dear Inspectors

I am responding to PVDP's answer to ExA WQ1 number 1.5.27 regarding their previous experience in developing solar farms.

Their answer states:

"980MW have been developed in the following six projects in Japan: Ukujima solar farm with a total capacity of 480 MW, Onikobe solar farm with a total capacity of 183 MW, Kawasaki solar farm with a total capacity of 56 MW, Yamagata solar farm with a total capacity of 58 MW, Akita solar farm with a total capacity of 40 MW, Green Academy solar farm with a total capacity of 40 MW.

The applicant had raised the funds for the development in some cases, including construction finance and had enabled the acquisition by entity continuing and completing the construction and commissioning of the projects."

This carefully worded answer fails to tell the true story of their experience in developing solar farms.

Throughout the ES documents, PVDP have always given the impression that projects they have been involved with have been seen through to completion, for example, in this statement on previous experience in ES Chapter 1: Introduction, paragraph 1.3.1 (Ref EN010147/APP/6.3)

"PVDP has been successfully developing solar assets in Europe and Japan for the last 18 years, with 1.0GW built to date."

But this is not the case. The only project of similar size (though still only a little over half the size of BWSF) is Ukujima solar farm. It should also be noted that the population of Ukujima island is approximately 1,000 compared with approximately 26,000 living within 1.5km of BWSF.

As an article from Mainichi, Japan's National Daily (May 14, 2023) makes clear, this project - originally approved in 2013 - has still not been constructed and may never be. In 2018 PVDP left the project due to the time needed to secure leases for the large amount of land needed. Thereafter, the project suffered multiple delays. It would appear that flaws in PVDP's original design have contributed to the delays.

The full Article from Mainichi follows at the end of this response.

I would respectfully urge the ExA to give serious consideration to the very limited evidence of any success for PVDP in getting a project successfully developed even as far as the start of construction and certainly not for any project approaching the size of BWSF. This track record throws considerable doubt on their ability or intention to see the BWSF proposal, if approved, through to construction let alone completion.

1. Please could ExA ask PVDP for a further response to this?

My fear is that, in the worst case scenario, if not properly financed, the BWSF site could be started and then abandoned with infrastructure scattered around the site but never connected (as in Ukujima) with the countryside ruined and no electricity being generated either. I would expect that Blenheim Estates (BE) should be worried about this too.

2. Please could ExA ask BE what arrangements or contracts are in place with PVDP to safeguard against this?

With thanks
Yours sincerely

Rosemary Lewis

Full article Mainichi, Japan's National Daily (May 14, 2023)

In March 2013, plans were approved to build an approximately 480,000-kilowatt plant with around 1.5 million solar panels on Ukujima island in Sasebo, Nagasaki Prefecture. Lying at the northernmost point of the Goto Islands, a group of islets off Nagasaki Prefecture in southwest Japan, the roughly 25-square-kilometer island's primary industries are fishing and livestock farming.

There were high hopes for the facility, which would be among the country's largest solar plants. The plans were approved the same year the government began offering a fixed price, or feed-in tariff (FIT), contract system to promote renewable energy projects. Yet, 10 years later, the plant remains unused.



In accordance with plans to grow feed for livestock in part of the planned mega solar project area in Sasebo, Nagasaki Prefecture, pasture grass growth is seen being monitored beneath solar panels at the site in March 2023. The panels are not connected to a power grid, as the plant has not started operating. (Photo courtesy of a resident)



A mountain of construction materials is seen at the site of the planned solar power mega project on the island of Ukujima in Sasebo, Nagasaki Prefecture, in November 2022. (Photo courtesy of a resident)

Plans for the project were originally led by a German solar power developer and included Japanese companies such as Kyudenko Corp. based in the city of Fukuoka. **However, the German company left the project due to the time needed to secure leases for the large amount that of land needed.** Thereafter, the project suffered multiple delays.

Plant worker housing was completed at the end of 2022, and panels and other materials are now being delivered to the island. However, the prospects for laying transmission cables between it and mainland Kyushu are uncertain, so core construction work cannot get underway. Without the cables to deliver power, the project is not viable.

According to Nagasaki Prefecture regulations, construction within its harbors requires agreement from fishery cooperatives that have fishing rights in those waters. In May 2020, 10 cooperatives, mainly based in Sasebo, opposed the project claiming it would negatively impact the fishing environment. While Kyudenko has continued intermittent negotiations with the groups, the situation seems to be at an impasse, with the electric utility unable to get their unanimous consent.

One group which has made its opposition clear is the nonprofit "Ukujima no Seikatsu o Mamoru Kai" (Association for the protection of life on Ukujima). Chairman Jouei Sasaki said, "If trees need to be removed to make way for the solar panels, disaster risk increases. I have doubts as to whether the project can guarantee the safety of the island's residents."

Meanwhile, some islanders want to see the project move forward. The island's population has shrunk to less than one-sixth of the roughly 12,000 who called it home immediately after World War II. Economically challenged due to the aging population, a woman who runs a coffee shop near the ferry terminal said, "At this rate, the town will die out. I want the mega solar project to breathe some life into the island."

The government is setting time limits for long-unused facilities to go online, and may revoke their FIT rights if certain conditions are not met. For the plant on Ukujima, the above-market price of 40 yen (about 30 cents) per kilowatt hour has a set period of 20 years, starting from October 2020. This means that the more time is put off for the solar plant to go online, the smaller the profit the project will generate.

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