

# Botley West Decommissioning Plan (Rev 3) and Funding

## The Plan

In the latest revision of its decommissioning strategy [[REP6-049](#), page 54], the Applicant has moved on from PV panel sale [[REP4-037](#), page 15] and has reverted to panel recycling.<sup>1</sup>

The Applicant believes that 80% of PV solar panels by weight (48.3kT out of 60.3kT) is valuable metal (copper, silver, aluminium), which the recycling centre(s) will return to the Applicant. Together with the copper cable and stainless-steel mounting structures, sale of these will fund the entire decommissioning exercise.

One of the entries in the calculation table has a referenced source: decommissioning cost is [approximately] from a DESNZ publication.

- 1) In reality, 75% of the weight of a PV panel is glass, which has virtually zero reclaim value.
- 2) The mounting structures are not made of stainless steel but of galvanised steel (ES chapter 6), which has one tenth the scrap value of stainless.
- 3) Arithmetic has proved problematic, again. The '2025' numbers add up correctly; the '2070' numbers do not.
- 4) The DESNZ report (by ARUP) obtained its data by sending out questionnaires to nine solar farm project developers (similar to PVDP; para 6.8.4). Four decommissioning estimates were accepted. PV recycling organisations were not consulted, presumably because the focus of the ARUP report was LCOE, which excluded decommissioning cost.
- 5) The elephant returning into the room is the Applicant's recycling facility. The Outline Decommissioning Plan [[REP4-031](#), page 8] now states that photovoltaic panels will be recycled by WEEE-compliant authorised reproprocessors, as listed in the Decommissioning Waste Management Plan (DWMP), compiled from entries in the Operational Waste Management Plan where appropriate.

Could the Applicant propose some candidate UK PV reproprocessors for its list?

At this late stage in the examination, it will be up to the ExA to determine if these are well-presented enterprises that give the DESNZ confidence, or if there is some actual PV reprocessing machinery behind the glossy websites. The ExA might enquire about recycling cost, precious-metal yield and the practice of returning recovered metals to the customer.

(BWSF is an uncostered landfill project.)

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<sup>1</sup> Hopefully the ExA has read [REP5-116](#) rather than just the extract in REP6-049.

## The Fund

Pinsent Masons (acting for the Applicant) [REP6-051] rejected the DCO amendments requested by the ExA in the Schedule of Changes [PD-015].

PC002 would have secured funding for the decommissioning. The ExA's request adopted the language of Requirement 27 of the Oaklands Farm solar [dDCO/rDCO](#).

Pinsent Masons elaborated on the reasons why PC002 is superfluous.

To an Interested Person lacking PM's legal expertise, these make no sense at all.

1) *[It] does not meet the tests required by the DCO Guidance and reiterated in national policy [and it would be] contrary to the DCO Guidance and national policy*

NPS and guidance statements are silent on the matter of decommissioning funding.

They neither require it nor prohibit it. There is no 'test.'

2) *Under Requirement 14, decommissioning must be implemented in accordance with a decommissioning plan approved by the LPA substantially in accordance with the outline decommissioning plan*

Req 14 secures the procedure for decommissioning. It says nothing about its funding.

3) *[Article 34] is expressly referred to by the SoS in Oakland Solar Park in reaching the decision that a separate funding requirement would not be necessary*

Article 34 just ensures that a 'transferee' inherits the decommissioning obligations of the Applicant.

4) *the Funding Statement includes a cost estimate which "covers all aspects of the Project", including decommissioning*

It's an estimate. It is highly unlikely that the Applicant and its funding streams will be around when the decommissioning invoice is presented.

5) *the SoS does not consider that imposing a separate decommissioning fund requirement to be [sic] necessary.*

This was true. The Oakland Farm [DCO](#) was published in June 2025. The SoS had deleted Requirement 27.

## Interested Person's Suggestion

If BFSF closes down prematurely due to commercial failings, SolarFive Ltd will file for liquidation, and its shareholders will no longer be liable. In the absence of a decommissioning fund, our councils will pick up the tab.

The ExA should submit the Recommendation that, in its opinion, best satisfies the objectives of government publications while minimising the project's 'adverse effects.'

The SoS retains the right to overrule any ExA recommendation.

A 'recommended DCO' (rDCO) might be helpful as an Annex to the ExA's Recommendation.