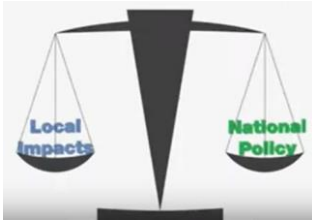
Closing Statement

Do the adverse impacts of the proposed scheme outweigh its benefits? [PA2008, s104(7)]

Understandably, this examination has focused on the environmental consequences of the BWSF proposal. Among many unresolved issues is whether our landscape would be visually more appealing as a succession of lakes of black glass stretching to the horizon, or as discrete parcels of land isolated by high hedges.
The OHAs and other IPs have spoken eloquently on these issues.



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The other arm of the s104(7) scales aims to quantify the technical merits of the proposal, specifically as they comply with the objectives of National Policy and related government statements.

Power Rating

The Applicant has declined to share its analysis (if any) of the projected peak output power of the BWSF proposal. The ExA did not request this information. The 840 MW figure, used for GHG calculations and elsewhere, is just the number on its grid connection contract.

The uniquely tight packing of the grey boxes on the Masterplan [CR2-026] suggests that it may not have been possible to achieve the minimum installed PV capacity (1200 MWp?), once the detailed design layout was attempted.

Predictions.

Assuming the DCO is awarded, the physical realisation of this solar farm will depend to a great extent on the intentions of the next owner of the DCO. The design aspects of most concern are detailed in REP1-156 and have not, in the opinion of this IP, been addressed satisfactorily (if at all) by the Applicant. The ExA may agree with some or all of these predictions.

'Conservation grazing' was cosmetic embellishment, as reflected in the cursory endorsement from Blenheim Palace [REP1-098]. Fortunately, the DCO/ES allows north-south separation of the PV tables to be extended up to 3.0m [APP-043, page 12]; 3.0m will be sufficient to allow access for essential maintenance vehicles and tractors for grass cutting and panel cleaning. This will incur a performance penalty (25%?); the GHG calculations and $kgCO_2e$/MW numbers are of course invalidated.

The year 25 panel/PCS replacement programme will be discarded. The restored energy yield is unlikely to justify the cost. It would also require hard-standing to be reserved for plant and temporary PV storage (sensibly, the construction compounds) as well as reinforcement/ widening of the internal roadways to the PCSs to accept articulated HGVs.

Ideally, the panels (now separated north-south) would be inclined at the conventional UK angle to better face the sun (35° to 40°), but this would have significant consequences for

visual impact/glare, which would exceed the scope of a DCO amendment. The reduced generation arising from the (uniquely low) 15° inclination will be tolerated.

Similarly, the perimeter should have robust security, but a wire-netting deer fence is stipulated in the ES. It will be necessary to monitor the theft rate and plan replacement schedules accordingly.

The lack of maintenance facilities [REP1-156, final page[1]] was an unexplained oversight. An LPA application should resolve this.

The demise of this solar farm will ultimately be attributed to the lack of a BESS. From a commercial standpoint, it is difficult to have confidence in a BWSF lifespan beyond 15 years. On the other hand, it is not known what compensation strategy will be adopted by NESO/ofgem in the years ahead to pay generators that produce unusable renewable electricity.
It is encouraging to see that all PVDP's future UK plans specify the PV-BESS configuration (according to the TEC register). This argues, far more convincingly than this IP can, against the BESS-free architecture of BWSF.

Thank you

The ExA should be thanked warmly for its attempt to incorporate a decommissioning fund into the DCO [PD-015, PC002]. Decommissioning and a likely landfill complex will impose further disruption on the residents and the environment. It would have been a relief, at least, to know that this was not to be supplemented with a hefty invoice for the OHAs.

Related Concern

The Planning Inspectorate may have become a victim of its own success. The volume of completed solar DCO examinations is commendable, but public confidence has eroded: there is – rightly or wrongly – an increasing perception among successive IPs, APs and objector groups that the examination achieves little more than adjusting some boundaries and correcting inconsistencies and typos in the voluminous documentation.

IPs and APs attending the East Yorkshire hearings in May 2024 were all but resigned to the inevitability of the examination outcome. Compelling arguments were presented to the ExA in an attempt to protect the cherished environment, but with little or no expectation of success.

Ten months later and twenty miles to the south-west, the Fenwick hearings started. The same Applicant and legal representation were seated at the table.
The seats in the public area were empty (Prelim, OFH, ISH1, CAH, ISH2, ISH3).

[1] Ignore page numbers in this document. Two submissions were amalgamed at the point of website publication, resulting in page-number duplication.

Unusually, the Botley West communities had the resources to present a comprehensive defence case. The result resembled an adversarial examination, with legal representation and expert witnesses appearing for both sides at the hearings.

This strategy is not an option for typical remote rural communities.

Solar DCO decisions up to Nov 2025	
DCOs consented	14
DCOs declined	0
Decided	14

Interested Person's Suggestion

The Board of the Planning Inspectorate should be reflecting on the success rate of the solar DCO proposals. This and the diminished public confidence must surely lead it to question whether the Inspectorate's current practice is

> *protecting and enhancing the Planning Inspectorate reputation for professionalism, effectiveness, integrity and efficiency*.[2]

England is almost certainly alone in scrutinising proposed electricity generating stations by examination panels that do not even consult a qualified engineer, let alone include one. This cannot be considered compliant with the Inspectorate's promise to

> *Ensure cases are handled by people with the right level of experience and expertise*.[3]

The Board might consider referring itself to an independent authority, such as a High Court Judicial Enquiry, in order to identify any procedural weaknesses and restore public confidence in the Inspectorate for future solar farm DCO examinations.

[2] A responsibility of the Board in its framework document.
[3] Planning Inspectorate Customer Charter: *Our promises to you*

Epilogue – Cleve Hill Update.

One NSIP solar farm is now supplying electricity to the grid.

The first solar DCO was awarded in 2020 to Cleve Hill Solar Park. Following the sale of the company/DCO, obtaining a CfD subsidy and subsequent fundraising, construction commenced in 2024 and completed earlier this year [REP1-157, page 4].

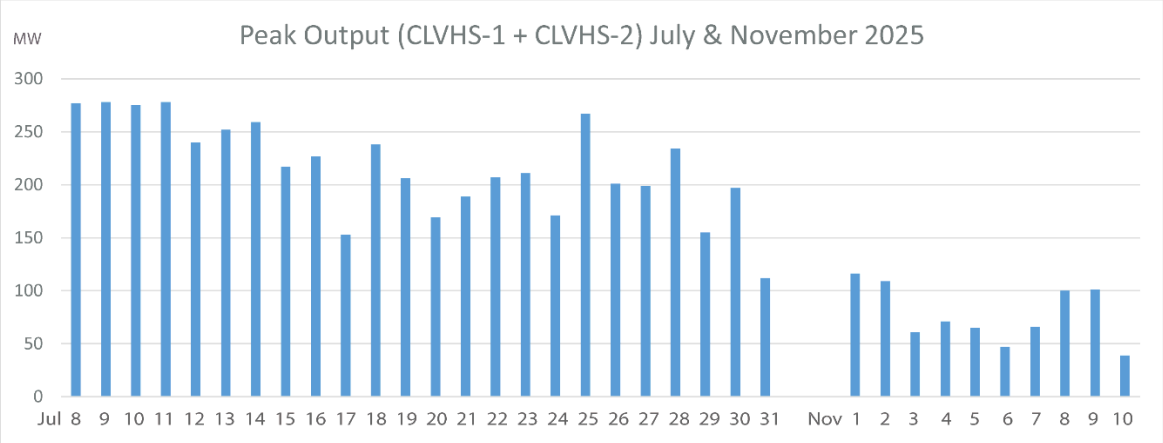
The Cleve Hill connection at the NG substation was configured to full power on 8th July. This was coincidentally the day of peak output for UK solar PV in 2025, thus opening a window onto Cleve Hill's real-world performance.

The Applicant promised unsubsidised electricity with a peak "in excess of 350 MW."

The ExA predicted an output of between 300 and 400 MW [ExA Recommendation, 5.3.13].

Based on school Physics and the solar incidence angle to east-west panels in the UK, one would expect the peaks to be below 300 MW [REP1-157, page 5 *Looking forward*].

Results



Peak output exceeded 250 MW on six days over this study period.[4]

Conclusion

Solar DCO applicants may not be entirely candid in their performance claims (or their long-term intentions).

Quantifying the 'benefits'[5] of a solar farm proposal at examination would be enhanced by the presence of an electrical engineer with expertise in solar technology – or at least advice from a Physics student with an internet connection.

Postscript Of the other consented solar NSIP projects, one has sold its DCO; none (?) has reported the start of construction.

[4] Data from Elexon.co.uk Balancing Mechanism records. Cleve Hill BMUs: CLVHS-1 & -2. Maximum power typically at SP26 (11.30–12.00Z). Maximum Export Limit: 112+205=317 MW.
[5] e.g. for NPS EN-3 (2023) 2.10.17 (acres per MW). Paragraph number varies with NPS edition.