

SoS Consultation 2 – Lies, Damned Lies, and NSIP Solar Farms

BREAKING NEWS

The BWSF application has concluded with some positive news. PVDP is close to signing a 100 MW Power Purchase Agreement with an Oxford college.

PVDP is also in advanced negotiations with Exeter College, Oxford, to supply renewable energy to their 100MW Frieze Farm Data Centre development ...The plan is for [BWSF] to use its solar generation and connection at Farmoor substation to supply all of Frieze Farm's electricity.

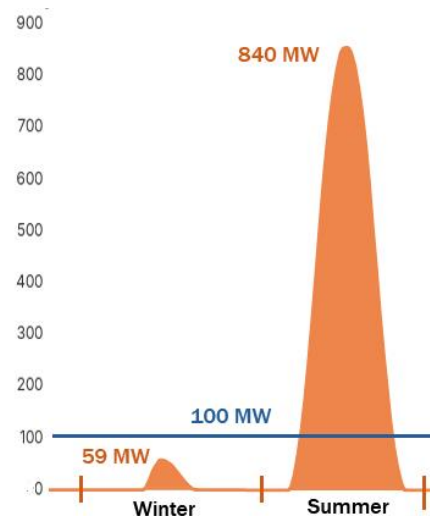
[Cover letter](#), page 6.

Datacentre computers run 24/7, 365 days a year.

Solar farms generate electricity during daylight hours. On overcast winter days, solar power is 7% of the summer peak¹ (i.e. 59 MW for BWSF).

An integral solar battery would have solved the nighttime outage problem in summer, but BWSF does not have one. In winter, it will not power the datacentre for five minutes.

Frieze Farm will obtain at least two thirds of its annual electricity from sources other than the Botley West Solar Farm.



DECOMMISSIONING MYTHOLOGY

This narrative style persists into the Annex. PVDP seeks to reassure the SoS that OCC will not end up with the responsibility for disposing of 90,000 tons of PV panels.

Discussions have taken place with dedicated PV treatment facilities and WEEE waste specialist who have confirmed that they have the current capacity for the disposal of Solar Panel waste, with up to 98% recycle rate.

We will engage further with these recycling parties ...

[Cover Letter Annex](#), page 8

As pointed out at the previous deadline [C2-027], these dedicated PV treatment facilities do not actually exist. There is no current capacity. Promising to keep talking to imaginary parties should not give the SoS any comfort.

OCC should start planning on Compulsory Acquisition to establish a new landfill site for BWSF, preferably on the Blenheim Estate [REP1-156]. Council Tax rates may have to be adjusted in order to build up a fund for the decommissioning project.

¹ e.g. GB solar peak power output, 8 Jan 2026: 1.1 GW (4 GWh); 25 Jun 2026: 14.9 GW (126 GWh). Data and graphics adapted from [EnergyDashboard.co.uk](https://energydashboard.co.uk).

Importantly, the project is still capable of making a vital contribution to meeting the Governments [*sic*] renewable energy targets and its obligations in respect of Net Zero.

[Cover Letter](#), page 6

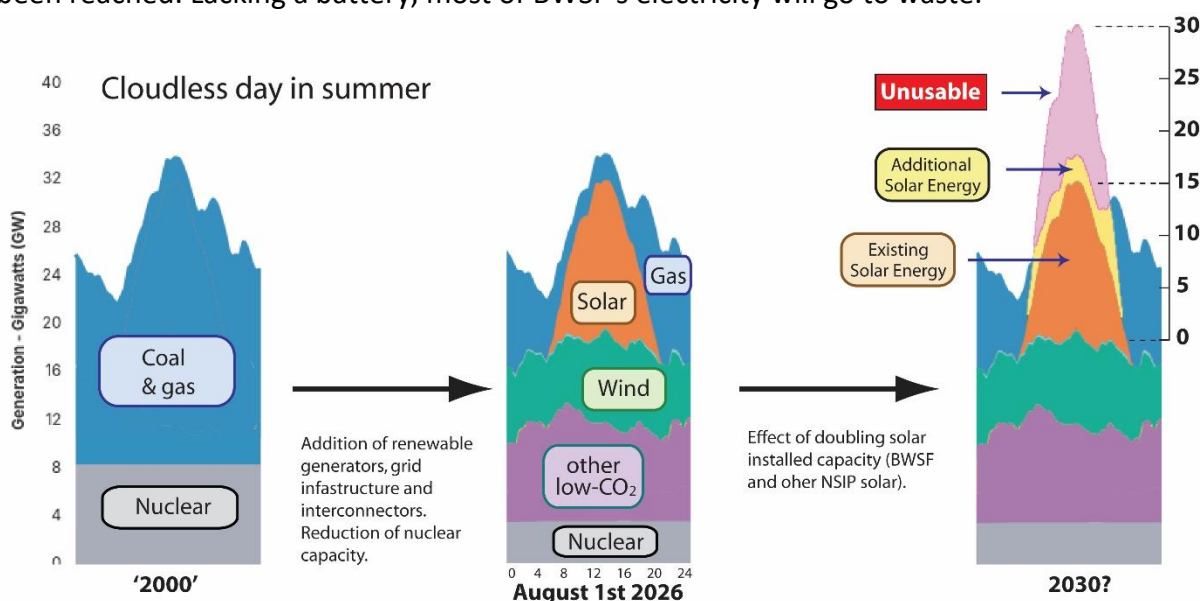
Maybe not.

Remarkable progress has been made in displacing the coal-based generation of the twentieth century with renewable technologies, principally Wind and Solar.

On a typical summer's day in 2026, almost all of our electrical energy is obtained from renewables (see diagram).² Thanks to its flexibility, natural gas is used to 'make up the difference' to the Demand curve. According to PVDP's cover letter, Britain now has the highest electricity prices in the G7.

BWSF and the other consented solar NSIPs form the next tranche of solar generators. DESNZ expects the Solar installed capacity to rise from 17 GW (2024) to at least 45 GW (2030).³

Unfortunately, increasing the installed Solar capacity (e.g. from 15 GW to 30 GW in this diagram) results in the production of unusable energy, now that the Demand threshold has been reached. Lacking a battery, most of BWSF's electricity will go to waste.



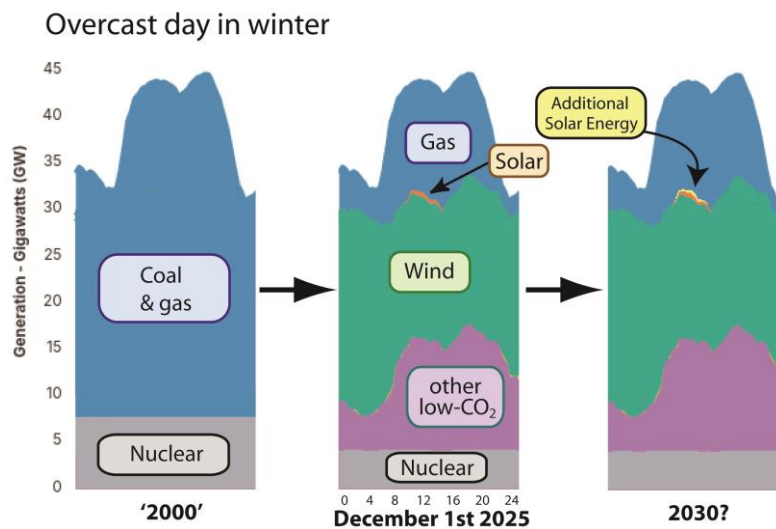
New NSIP Wind will have an even greater impact. DESNZ anticipates a 45 GW increase in installed capacity. This will push not just the Solar NSIPs but also Existing Solar (and indeed much of the Wind itself) well up into the **Unusable** zone on a typical summer's day.

Without any new Wind, there would have been an argument for retrofitting batteries to the solar farms (just as for rooftop solar) so their energy could be spread across 24 hours. But this would have doubled the net cost of solar to the customer.⁴

² August 2026 graphic from [EnergyDashboard.co.uk](https://energydashboard.co.uk). 'Other low-CO₂' refers to, principally, European Interconnectors and Biomass (e.g. Drax woodchip burning).

³ Table 1 in [Clean Power 2030 Action Plan: A new era of clean electricity](#) (Dec 2024). DESNZ's predictions are probably optimistic; nevertheless, any increase in wind/solar now runs into the brick wall of overproduction.

⁴ Similar to domestic solar installations, where the battery subsystem costs about the same as the PV array.



NSIP Solar overproduction is not a problem in winter, when UK Demand is 50% higher.

DESNZ's CP30 prediction for batteries is confusing. The target is 25 GW, which is the wrong units [battery capacity is measured in GWh]. In any event, the private sector is constructing batteries for fast-turnaround system-stability applications, which makes commercial sense, rather than bulk storage. (Battery income comes from selling energy, no holding on to it.)

Unavoidably, Solar and Wind generation will be subject to progressive and substantial curtailment as installed capacity increases post-2026, particularly in the summer months.

Solar curtailment

Because it is isolated from the distribution networks, domestic rooftop solar is immune to curtailment. Its energy is available over 24 hours thanks to the integral batteries.⁵

The network solar installations (typically 5 MW) are on farmland. With the erosion of their electricity income, farmers may cut their losses and return the fields to food production.

NSIP wind and solar farms are in a far better position. They hold long-term fixed-price guarantees (Contracts for Difference).⁶ Better still, they are paid for not making electricity. Last year, SSE's Seagreen windfarm off the Angus coast supplied 23% of its available energy to the grid.⁷ The remaining 77% was covered by compensation payments.

Compensation payments (estimated at just £5bn in 2025) will rise exponentially as NSIP wind/solar overproduction now starts to blossom in the wholesale electricity market.

⁵ DESNZ might invite an electrical engineer or a rooftop solar installer to join its technical team. It would be useful to learn: why battery capacity is measured in MWh (stored energy) not MW (power); why a battery is essential for a solar installation; and how you go about estimating the required battery capacity per solar farm [see e.g. [REP2-122](#)]. An accountant could explain why grid-connected batteries are being constructed to address system stability but not for wind/solar bulk energy storage (LDES).

⁶ AR7 CfDs (2026): 20 years; Solar £65/MWh; Offshore Wind £72–£216/MWh [way more than Hinkley Point C].

⁷ Due to capacity constraints in National Grid's network – an example of regional overproduction.

Solar NSIP decisions up to September 2026	
DCO applications consented	21
DCO applications declined	0
Total	21

Conclusion

So, no. BWSF will not make a vital contribution to Net Zero. It may well make no contribution at all. BWSF will enjoy commercial success for 20 years, then OCC will step in to clear it up.

Those who live here despair at the transformation of our ancient and productive agricultural landscape into a dystopian industrial complex for – upon closer examination – the printing of compensation invoices.

Related observations.

DESNZ appears to be looking at electricity system design through the same prism as that of a System Operator: an exclusive focus on GW (power), with complete disregard for when/where the GWh (energy) is made or its fate.

System Operators only understand GW. Electricity bills depend principally on GWh (supplied + discarded). At what point does grid electricity simply become too expensive for the average British consumer, either directly or via supportive taxation?

Frighteningly, no concern is being expressed over the dwindling fleet of natural gas GW that (only just) managed to keep the county's lights illuminated last winter – in the face of growing verbal abuse. Electricity demand is going to rise due to EVs, heat-pumps and now AI,⁸ while barely a single large industrial consumer is left in the UK to be priced off the grid and into receivership.

Blackouts will ultimately alert DESNZ to this oversight, but a gas plant takes five years to procure. Would it be prudent for DESNZ to focus less on the NZ and more on the ES?

⁸ Forget Exeter College's 100 MW. The French government (EDF Energy (UK) Ltd) has announced its intention to construct a 1 GW AI datacentre on land it owns at Cottam, Nottinghamshire. It won't be the last.