

Planning Act 2008

**Application by Rosefield Energyfarm Limited for an order
granting development consent for the Rosefield Solar Farm**

(EN010158)

NOTE OF SUBMISSIONS AT ISSUE SPECIFIC HEARING 3 (ISH3)

and COMMENTS ON THE APPLICANT'S RESPONSES TO

SECOND WRITEN QUESTIONS

on behalf of the

Claydons Solar Action Group (CSAG)

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AGENDA ITEM 1 – NEED, SITE SELECTION AND ALTERNATIVES

1) Helen Hamilton on behalf of CSAG drew attention to the inconsistency between the application documents, which say there will be no overplanting, and those made by Mr Gillett for the Applicant at ISH3 that there would be an unspecified level of overplanting.

CSAG referred the ExA to footnote 98 of NPS-EN3 (which is similar in terms to footnote 92 of the 2024 NPS). Footnote 92 says: *“Such reasonable overplanting should be considered acceptable in a planning context so long as it can be justified and the electricity export does not exceed the relevant NSIP installed capacity threshold throughout the operational lifetime of the site and the proposed development and its impacts are assessed through the planning process on the basis of its full extent, including any overplanting”*

CSAG noted that the Applicant has not provided any justification for overplanting.

The application does not meet the requirements of paragraphs 2.10.70 and 2.10.71 of the 2024 NPS, which say:

“In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include:

- *the type, number and dimensions of the panels;*
- *layout and spacing;*
- *the type of inverter or transformer; and*
- *whether storage will be installed (with the option to install further panels as a substitute).*

2.10.71 Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.

CSAG also noted that the Applicant had not provided the baseline date used in its calculation of capacity, which will be relevant to assessment of overplanting. This information is now requested under Action Point 1.

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2)CSAG noted the Applicant’s evidence about another DCO case (Pear Tree Hill) in which the Secretary of State had determined that BESS constituted associated development to solar proposals. However, it was not known whether there was already substantial provision of BESS adjacent to the Pear Tree Hill site as would be the case here. It is also unclear whether the open letter from OFGEM and DESNZ raising concerns about “*a high volume of battery storage projects advancing to Gate 2 relative to the capacity ranges set out in the Clean Power 2030 Action Plan*” was considered during the examination of that case. The letter was submitted into this Examination by CSAG at deadline 2 (REP2-102)

CSAG referred to the already permitted Statera development, immediately adjacent to the Order Limits and the Statkraft BESS, for which Buckinghamshire Council had the previous week resolved to grant planning permission.

CSAG advised that it would submit evidence that the Statkraft BESS constitutes longer term storage over 12 hours. It appears that it is the Statera scheme – East Claydon Storage – which has received a minded-to decision from OFGEM, awarding a cap and floor agreement for a scheme providing 500MW of storage over 12 hours. See Table 3 on page 47 of Appendix 1: **OFGEM Minded-to decisions – Long Duration Electricity Storage, June 2026.**

Although not on the agenda for the ISH, CSAG noted that several residents who had asked the Examining Authority to visit their properties, had not been visited on the Accompanied Site Visit (ASV), although two residential properties with very limited or no visibility of the site had been included on the ASV.

ITEM 3 – ECOLOGY AND BIODIVERSITY

1. Agenda Item 3(a)(i) update on discussions and late changes to scheme: Mr Woodfield for Claydons Solar Action Group (CSAG) expressed concern about the late changes the hearing had just heard about that were apparently being made to the scheme (removal of panels from the B-fields) without the input of e.g. Buckinghamshire Council and CSAG. He noted that while the prospect of removal of panels from fields B6-B8 was a welcome (if overdue) change in terms of reducing the potential impact on Bechstein’s bats, CSAG couldn’t really

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comment on whether it resolves the issues of concern without seeing the detail. He referenced the earlier meeting with Buckinghamshire Council, CSAG, NE and the applicant, held on teams outside the formal Examination on 25 June 2026, where this had been first mooted and said he expected to have seen something before this hearing so that this hearing could have been as productive as possible. He stated that he failed to understand why Buckinghamshire in particular have been kept out of the process of discussions, and asked for a fulsome explanation beyond just commercial sensitivity. He offered that the lack of transparency has been a bit of a running theme, for example to do with the Bechstein's issue, noting references to HS2 studies which are still not before this examination and reference to the results of monitoring that's also not before this examination. He offered that it's most unsatisfactory for robust decision making and for the Examining Inspectors' task to sift through all of the various bits of evidence to be told "you'll get it when we're good and ready" this late in the examination. He ended by expressing a partial welcome that this change has been made, though it could have been made a year ago, and expressed concern that it's been made so late in the day. Beyond that, he said, we'll have to reserve our position until we've seen the detail.

2. Grazing Mr Woodfield for CSAG expressed continuing concern about the applicant's commitment to grazing. He said there was continuing ambiguity about whether grazing is going to happen or not and that in order for CSAG to assess the progress that's been made in relation to the proposed changes in the B-fields, it would be very helpful to understand whether there's been progress on the applicant's part in securing grazing as something that can be formalized and formally secured as part of the DCO. He noted that the applicant seems to have backed away from a position of saying it will introduce grazing to now seemingly saying, well, grazing is not that important. He remarked that that's not a position that actually sits with the science and is not a position he believed is supported by parties such as Natural England. He said it would be very helpful to understand if in the space that's created by removing panels from these fields, uh, the grassland that's created there is going to be grazed or otherwise, because that will have a significant bearing on

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how the proposed changes to B6-B8 should be received in terms of an improvement on the scheme.

3. In response to the applicant's reply, which made reference to various remote scenarios by which grazing might not be achievable, Mr Woodfield said that it wasn't really answering the question. He reiterated that the question was, has the applicant made any substantive progress towards trying to secure grazing? He noted the issues that Ms Stirling for the applicant mentioned about practicality in the event of (e.g.) a TB outbreak, but remarked that that's a very different set of circumstances from just not really bothering to try at all. He asked again, is the applicant making any substantive progress towards trying to secure grazing so that the Examining Inspectors and everybody else around the table can have some confidence that when the applicant says it is an aspiration, it is a genuine aspiration and not just something to put into an environmental statement or a landscape management plan. In response to Ms Stirling suggesting that it was too early in the process, Mr Woodfield asked whether the applicant had even attempted to explore the feasibility, to which the answer from the applicant was no.
4. Agenda Item 3(a)(ii): Temporary construction compound: Mr Woodfield for CSAG welcomed the direction of travel on this matter towards defining a small compound remote from hedgerows and possibly now restricted to a location within either Field B3 or Field B10. He inquired whether this meant that the very, very broad flexibility that's allowed for in the works plans for the siting of that compound can now be can now be narrowed down and that there can be an amendment to those plans. He asked whether, if it was a choice between B3 or B10, whether in the context that B3 is a grassland field (and we know how important the grassland fields are to the to the local bat population) whether the location of this construction compound could be particularized so that it is sufficiently removed from field boundaries and so that the assurances just given by Ms Reason for the applicant could be given some additional credibility.

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5. Agenda item 3(a)(iii): Lack of monitoring data (construction noise and bats): (Responding to Ms Reason for the applicant making claims based on HS2 monitoring results that are not before the Examination or otherwise in the public domain): Mr Woodfield said that this was another example of the smoke and mirrors issue he had raised before (about assurances being presented into the examination by Ms Reason based on her interpretation of data that is not before it). He addressed the Inspectors, saying “I think this would be very, very useful information for you to have in front of you. And I think I've asked for this sort of information, rather than just being sort of delivered into the examination on an *ad hoc* basis, and you being asked to accept it on, on the basis of assurance and the experience of the person delivering it, I think it would be much more useful to have some concrete evidence that you could put some weight on”.
6. Agenda item 3(a)(iii) (contd): Bat Mitigation and Monitoring Strategy Dominic Woodfield for CSAG picked up on a point made by Ms Ottaway for Bucks CC in that there is a tension that remains (and which was discussed in the meeting on 25 June) between the applicant's committed statement that it is not going to remove panels in response to any monitoring outcome, and the suggestion that monitoring will be used as a tool to ensure the efficacy of the of the of the mitigation and management measures. He stated that his understanding is that the only thing is that the applicant is prepared to consider if monitoring shows that the buffers and the retain corridors aren't working in the way that they were intended is to make some tweaks to management and that the applicant is not considering or contemplating the possibility that that might in itself require that panels be removed in order to improve the efficacy of those buffers and the mitigation. [Note that Bucks CC picked up on this point after Ms Stirling for the applicant appeared to suggest that it wasn't ruled out- counsel for Bucks suggested clarity was needed upon it as it affected whether the scheme was fixed or otherwise]
7. Agenda item 3(a)(iii) (contd): Bat Mitigation and Monitoring Strategy Mr Woodfield raised two further points. He recalled that at the meeting on 25 June, the applicant had stated that there would be a need to rely upon an ongoing HS2 radio tracking programme to feed

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into the monitoring of Rosefield, but that there was a question over sequencing. He recalled that it was an action taken away by the applicant related to discussions that were being had with the Natural English Bernwood team, which were expected to happen in early July. He inquired whether those discussions had now happened and will there be full cooperation from HS2? He added a second question which was about monitoring of the efficacy of mowing versus grazing, which was going to be subject to an invertebrate study, which he had raised in the same meeting. The question was whether the baseline position for that study would be established when livestock are present so that the baseline includes cattle grazed livestock fields. He said that wasn't absolutely answered at the meeting, but was an action that was taken away and concluded that he sought an update on both of those points from the applicant.

8. Agenda item 3(b): Buffers. Responding to the applicant's justifications for continuing to measure buffers from the centreline of hedgerows and the land parcel boundary at the edges of ancient woodlands: Mr Woodfield stated that on the measuring hedgerows from the centre line point, Miss Stirling had cited DCO precedents that that's how it was done but had neglected to cite Botley West which, in the 25 June meeting, Natural England had cited as a precedent where that was not the approach that had been taken. He noted that this was a site where that approach had been taken in particular regard to Annex II species of bats, which is the same situation at Rosefield. He offered that it's important to recognize that it isn't a DCO precedent across the board, rather a case by case situation, and whilst there are examples where hedgerows measured from the centre line have been accepted, they tend to be in situations that are less sensitive than we're dealing with here. He concluded that he found it inexplicable that the applicant will refuse to move from this position, given the absolute ecological logic of measuring your buffer from the feature that you're intending to buffer, rather than some arbitrary line somewhere within that feature. On the related matter of ancient woodland buffers, Mr Woodfield noted that the 50 metre standoff in the Vale of Aylesbury Local plan is consistent with the advice from the Woodland Trust, and there's a direction of travel which suggests that that may also

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ultimately find its way into standing advice in due course. He noted to the Inspectors that they cannot put any weight on that latter point, but there are sound ecological reasons why 50m is being strongly considered as a new buffer buffer zone. And in this situation we have the same problem, which is that the applicant has measured from the edge of the land parcel rather than the edge of the ancient woodland. So if the if the buffer is 30m that the applicant is committed to, 15m of that could be taken up by woodland canopy. Whereas actually if you were to look on an aerial photograph, you would measure the the edge of the ancient woodland from the edge of the woodland canopy for obvious ecological reasons, not from some kind of arbitrary land parcel line that relates to land ownership rather than ecological function. So, if you're only going to buffer by 30m in some instances, you could actually technically only be buffering the actual feature by something like 10 to 15m. He concluded that this needs to be taken into account in considering the adequacy of the applicant's buffers.

9. Agenda item 3(b): Buffers (contd).Buffers being taken up by existing vegetation if measured from the centreline: In response to a point from Mr. Lang, Mr Woodfield offered that it's worth reiterating the point that Miss Ottaway made in the recent meeting, which was that in some situations, because the applicant is measuring from the centre line, the existing hedgerow will take up pretty much the entirety of that buffer area, which means that you will have a hedgerow hard up against the security fence, and then you end up effectively, if you take into account Mr. Lang's additional five metres, you end up effectively with a five metre buffer, not a 15 metre buffer. So again, it just comes back to this point of the kind of irrationality of measuring from the centre line.
10. Agenda item 3(d): Ground nesting [and wintering] birds: The Examining Inspectors asked CSAG to respond to the applicant providing a comprehensive response to concerns raised on ground nesting birds at ISH1 which they subsequently summarised in paragraphs 5.1 to 5.5 of REP3-065.
11. Dominic Woodfield for Claydon Solar Action Group stated that "the applicant has responded to our concerns, but I'm afraid the responses are still somewhat evasive if I can

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characterize them in that way". He noted a determination to lose a bad news story in relation to a subset of the breeding and wintering birds component relevant to the site, in a wider story which the applicant believes is a good news story for some species. He recalled that at the last issue specific hearing, he mentioned winners and losers within the bird assemblage, and remarked that the applicant is very focused on the winners, but at the detriment of really providing clarity on the implications for the losers. He noted, in that context, that he could do very little other than repeat the points made previously, which have still not had a satisfactory answer. For example, the Skylark territory density cited in the environmental statement sits at the very bottom of the known range and he does not think that's a representative characterization of the Skylark density across this site. By extension, that means that the mitigation assumptions are based on a smaller population than he believes is there. The applicant's position is that it thinks it can mitigate. It can effectively pour a quart into a pint pot. It can mitigate a large population spread across a large area into a few small grass and fields of improved habitat. He said he doesn't think that stands up to scrutiny when you look at skylark densities, and also you look at the particular characteristics of the fields where it's intended to deliver that mitigation and also the other things it now intends to do with that mitigation.

12. Agenda item 3(d): Ground nesting [and wintering] birds (contd): As an example he cited Field D27 as a field that was previously going to be allocated for grassland mitigation and grazing, but it's going to be a hay meadow, though it's not it's not entirely clear how this makes its trading rules and its biodiversity net again calculate calculation work. This has changed the prescription for field D27 to prescriptions that may not suit the skylarks and other species as well, and entirely left out of account another set of species, such as the wintering lapwing and golden plover, and potentially in some years, maybe some breeding lapwing, and species such as grey partridge, which will be effectively entirely displaced by the by the solar farm. No particular provision is made for any of those species unless the applicant is suggesting that field D27 will achieve all of the habitat objectives that are intended for it, and support extremely high densities of skylark over and above whatever

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use [by that species] it already receives, and will support potentially breeding and wintering lapwing, and will support potentially breeding and potentially wintering golden plover.

13. Agenda item 3(d): Ground nesting [and wintering] birds (contd): Mr Woodfield offered that it comes back to this whole 'quart into a pint pot' point about the adequacy of the mitigation. He said that he thought it would be a more honest assessment to accept, and such honesty wouldn't be fatal to the scheme in policy terms, that this scheme is going to have a net negative impact on the local skylark population and a net negative impact on the wintering lapwing and golden plover population, probably a net negative impact on the grey partridge population too. He accepted that this has to be balanced against some hedgerow species potentially doing better out of this, but contended that it's a flaw in the environmental statement to say 'let's deal with birds as a kind of generic receptor, and lose the bad news stories into a larger story that suits our narrative a bit better'. He stated that he still felt, unfortunately, that we've not really had proper engagement with this issue from the applicant, other than pointing us towards mitigation, which is intended to be all things to all men.

14. Agenda item 3(d): Ground nesting [and wintering] birds (contd): Responding to Mark Lang's comments on mitigation and impact assessment, Mr Woodfield offered that "I don't think we're going to agree on the position on this one. I think I started to hear some acceptance that there will be a net displacement effect for things like wintering golden plover and lapwing. My fundamental concern has always been that that has never been clear or front and centre in the environmental statement. And it should have been. We heard about field margin measures, hedgerow measures and what have you. Unfortunately, that's the same narrative that I discussed at the start of my submission, where that only benefits a certain set of species. The sum total of this scheme is going to be a net displacement effect for a number of bird species amongst the whole assemblage. And I think we're starting to hear some acceptance from the applicant that that's probably going to be the case. And that's really where we needed to get to on this. It's for you (the

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Examining Inspectors) to weigh up how significant that is. Mr. Lang says the numbers of golden plover and lapwing were small. I think there was an action point right from the earliest hearings where the applicant was going to go away and look at the contextual picture around those numbers, because I disputed that they were small in a Buckinghamshire context. We've never had any more information on that one, which is a bit disappointing, but I believe that those numbers are actually quite significant, at least at district level and potentially at county level for these species, which are in significant decline. So I just think the right context needs to be set around this issue".

15. Agenda item 3(d): Ground nesting [and wintering] birds (contd): Responding again to Mr Lang, Mr. Woodfield queried how Mr Lang could say it won't be a significant impact [on golden plover and lapwing] if he hasn't actually understood the context of what the numbers of these birds found on the site, how can you come to an impact assessment that's actually robust?

16. Agenda item 3(e): Biodiversity Net Gain: In response to the applicant providing an updated biodiversity net gain assessment at Deadline 4 which was REP4-058 and having heard comments on this from Bucks Council and the Mr Lang for the applicant's defence of its approach to mapping and classifying arable field margins as a continuation of the cropland of adjacent fields, Mr Woodfield emphasized his experience as a BNG practitioner and contended that Mr. Lang is just fundamentally wrong. He stated that the BNG User Guide is crystal clear on the point if you go to page 26, in the user guide, you will find that you are required to map the habitat underneath the hedgerow up to the centre line. Because otherwise what you'd end up doing if you took Mr. Lang's approach is saying whatever the width of the hedgerow is, whatever the two metres either side of it is, gets cut out of the area and the calculation effectively becomes just blank space. He stated that as BNG is a system which it is based on, scoring on the basis of area, which means that for every single field margin, you will have something like six metres times the length of that field boundary taken out of the equation and given no score at all. Or as is the case in this example, what's happened is that the applicant has simply mapped the habitat of the

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adjacent fields, which is generally cropland, and has just mapped it all the way underneath the hedgerow. Mr Woodfield addressed the Examining Inspectors by saying “You’ve walked the site. You know what the hedgerows are like. They don’t have arable crops growing underneath them. They have a different set of habitats underneath them”. Mr Woodfield noted that Mr Lang refers to the UK Hab which is a habitat mapping and classification methodology that was appropriated for the BNG scheme. The UK habitat methodology doesn’t involve numerical scores attached to individual habitats. That’s the BNG system. So if you are doing a BNG calculation, your default guidance and the metric rules are the ones set out in the BNG User Guide. And page 26 of the User guide says when accounting for the area adjacent to hedgerows, you should map the area of habitat to the centerline of the hedgerow. It could not be more crystal clear.

17. Mr Woodfield added that Mr. Lang and the applicant consistently say their metric is robust, but they’ve had to change it several times already. This is going to require a further iteration for you to have any confidence in their biodiversity net gain figures, because when you add let’s say it’s six metres. In many instances, it’s significantly more than that along each field boundary - when you add the area of habitat that that’s left out of account in their calculation, that tots up quite quickly over a size at a site of this size to actually something that will have a meaningful impact on the applicant’s BNG figure.
18. Mr Woodfield stated that he was not disputing that this scheme will probably achieve a net gain, because the simple the way the metric works is that if you convert arable to grassland, you get big scores. He noted that for that reason alone, this scheme will probably achieve greater than 0%, will probably achieve a net gain. But he observed that the applicant is committed to a 40% net gain (Requirement 7) and he observed that it remains an open question for the Examining Inspectors whether it was likely to achieve that. He recalled that he first wrote in the pre- application correspondence about this scheme that the applicant had got its BNG wrong. The applicant made some adjustments in Parcel 1 in response to that. That was in 2024. He expressed frustration that “why a

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re we breathing down the neck of Deadline 5 this late in the examination, talking about something that's just a simple methodological error".

19. Agenda item 3(e): Biodiversity Net Gain (contd) In response to a question from the Examining Inspectors as to whether there were any other points he wanted to make on behalf of CSAG on the applicant's BNG Metric, Mr Woodfield stated that he would wait to see the mapping of whatever the land swap arrangements were with the Claydon Estate, and then made an ancillary point about the impact of the applicant's approach to mapping field margins and the habitats beneath hedgerows. He said "The double whammy here is that if you suppress the baseline value by effectively leaving out of account or mapping as cropland [<2m field margins and habitat beneath hedgerows], you then get an additional reward at the post construction stage, because the applicant is saying it will create buffers in these areas. So, the applicant is now being rewarded for creating grassland from cropland when in most situations, and I've said this point before, in most situations much of that grassland already exists. So, there is there is a kind of double whammy effect on the on the BNG calculation, which massively skews it. In my view, the applicant should be asked to provide an absolutely robust and accurate BNG calculation to the extent it can be at this stage, given the design criteria and matters to be sorted out. But let's at least get the basic rules right.

ITEM 4 – LANDSCAPE AND VISUAL (INCLUDING GOOD DESIGN

CSAG's submissions in respect of Item 4 are addressed in Appendix 2.

ITEM 5 – WATER ENVIRONMENT

a) Implications of the new Flood Map for Planning surface water datasets.

In response to the Applicant's assertion that the Environment Agency's new surface water flood risk maps did not alter the flood risk assessment that had been submitted with the

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application, CSAG noted the maps showed that the depth of the flooding across surface water flood risk areas was increased. This was relevant to concerns previously raised by East Claydon Parish Council that some of these flood areas cover accesses into and within the site. These concerns are exacerbated by the updated evidence and had not been addressed by the Applicant.

CSAG Notes that the Applicant has been asked to address this point by Action Point 13.

c) Per-and polyfluoroalkyl substances (PFAS)

CSAG noted that the update to the CEMP to address PFAS/PFOS (and other forever chemicals) is so hedged with provisos that it does not provide any confidence that the pollution risk will be avoided. Reasons for not avoiding the use of materials containing forever chemicals include availability of materials and materials not being commercially available at a reasonable cost. These clauses provide the Applicant with too much scope to evade the measures intended to avert pollution risks.

ITEM 6 – CULTURAL HERITAGE

Helen Hamilton on behalf of CSAG queried the Applicant's claim that Buckinghamshire Council was an "outlier" in its assessment of harm to Claydon House and Park. CSAG's own experts accord with Buckinghamshire Council in their view that the Applicant has understated the level of harm in respect of almost all heritage assets.

CSAG noted that it had raised concerns about the reliance on existing and proposed planting around heritage assets. The new assessments of impacts on the setting of Saint Mary's Church relies on the existing vegetation around the churchyard to diminish the importance of its rural setting, consequently reducing/minimising the likely impacts of the proposals on that setting.

CSAG observed that the vegetation was mainly overgrown hedges, which may not last for the lifetime of the development and if it did was likely to become tall and gappy. Vegetation is also at risk from disease, drought and storms.

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The vegetation is not long-standing woodland that has any level of protection. The Applicant has similarly relied on relatively recent plant growth to screen Pond Farmhouse and Botolph House.

CSAG referred to Historic England's Guidance on **The Setting of Heritage Assets** (GPA3) which advises practitioners against relying on trees and hedges for screening, saying at paragraph 40:

"Ephemeral features, such as hoardings, may be removed or changed during the duration of the development, as may woodland or hedgerows, unless they enjoy statutory protection."

CSAG also noted the lack of consideration of noise and vibration and the wider loss of tranquillity within the settings of heritage assets in the Applicant's assessments.

ITEM 7 – TRANSPORT AND ACCESS

CSAG noted that measures in the construction traffic management plan, such as mode share requirements for employees coming onto the site, would be implemented only *"where it is practical to do so."* CSAG does not consider this approach offers the level of protection it would wish to see in terms of highway safety and the amenity of residents and other road users.

ITEM 12- HEALTH

CSAG commented that it did not consider the Applicant's Health and Wellbeing assessment to be compliant with IEMA/ISEP guidance because it fails to appropriately assess either intra- or inter-project impacts.

For example, IEMA's guidance **Effective Scoping of Human Health in Environmental Impact Assessment** requires assessment of the combined effects of multiple changes in determinants of health. The Applicant's approach to intra-project impacts is to treat different categories of impacts in silos, without considering the cumulative effect of numerous and various different impacts on human physical and mental health. For example, the Applicant has assessed noise and vibration in isolation, but has not considered how noise and vibration effects may

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combine in residents' and public rights of way users' experience of loss of views, loss of amenity, the industrialisation of the character of their surroundings, along with traffic, odour and dust arising during the construction period.

In terms of inter-project cumulative effects with other development, the Applicant assumes that the impacts of other development will be fully mitigated to rule out any potential for cumulative effects. This is not in accordance with 6.29 of the IEMA guidance **Determining the Significance of Human Health Impacts in EIA**, which says that, while the impacts of individual developments may not in isolation be significant, collectively these impacts can give rise to significant public health effects.

CSAG noted that the Appeal proposals would result in a very large change to an area of landscape, which constitutes an oasis between several other very large scale proposed and ongoing development, including HS2, East-West Rail, BESS and solar development around the East Claydon substation, as well as the relatively recent Energy from Waste Plant and the planned redevelopment of the substation itself. Cumulatively, these developments will have a very large effect on the local population, which has not been captured in the Applicant's assessments.

ITEM 9 - SOILS

CSAG observed in the light of comments from Mrs Claridge of Knowle Hill Farm that the field she referred to was visited during the ASI, when it was seen to be on sloping land and so likely to be well drained, suggesting the wetness class applied by the Appellant in the agricultural classification survey may have understated the quality of the soil.

In response, to the Appellant's reply that the soil survey identified features indicating wetness, CSAG noted that soil surveys include an element of subjectivity. That is, the surveyor's conclusions as to the grading of soils entails balancing a range of factors.

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ITEM 10 – NOISE AND VIBRATION

CSAG noted its concerns about the assumptions used in the Applicant's Technical Note (REP4-085). These included the reference at paragraph 1.3.4, that piling would be a *"highly transient activity, with each pile taking typically less than a minute to install."*

The Applicant has not provided any indication as to how many piles would be installed or acknowledged that the piles would be installed one after another, meaning that piling would be experienced as continuous noise and vibration, potentially for the entirety of the 12-hour working day.

The noise and vibration could have very significant impacts on residents and users of public rights of way. CSAG pointed out that public rights of way cross long distances over the application site and so that piling noise and vibration would be experienced over long periods and distances by users.

CSAG noted that equestrian users were likely to be deterred from using public rights of way at all.

Ms Stirling for the Applicant responded that there was no evidence that horse riders would avoid the rights of way. This is not a matter on which the Appellant has provided any evidence and CSAG has made several representations about the inadequacy of the assessments of impacts on PRoW users. TCS Biosciences/Preston Farms have presented evidence of the flight behaviour of horses. (For example at REP4-104).

CSAG's reply to the Applicant's response to Action Point 43 is provided with as part of its deadline 5 response.

CSAG asked why the applicant wouldn't use a rotary piling across the whole site and understands the Applicant is to respond to this as Action Point 47.

ITEM 11 – AIR QUALITY

CSAG commented on a report submitted by the Applicant as part of REP4-084, which provided a high-level analysis of the deposition of pollutants following battery fires in the United States, noting that this was drafted before the Moss landing fire in the United States. The report, which was attached as Appendix C to Professor Dobson’s Deadline 2 written response (REP2-103) calls attention to the limitations of standard environmental sampling protocols. The report concludes that conventional soil sampling depth, such as the commonly used top six centimetres of soil failed to detect thin, spatially heterogeneous deposition layers. CSAG notes the Appellant’s comments about the differences between Moss Landing and other sites, but the importance of the Moss Landing research is that it calls in question the reliance on conventional sampling procedures to adequately assess the pollution caused by battery fires. The report on which the Applicant replies considered only such conventional sampling methods.

CSAG also noted the concerns raised by its BESS safety expert Professor Dobson at Deadline 4 about emissions of PPM 2.5 and Pm10, in the event of fire or thermal runaway, which pose risks to human and livestock health.

PART 2 CSAG COMMENTS ON THE APPLICANT’S RESPONSE TO SECOND WRITTEN QUESTIONS (REP4-082)

Q2.2.1 Overplanting. The Applicant states that, *“Should Fields D8 and D9 be developed with solar photovoltaic (PV) arrays instead of the BESS then this would provide approximately an additional 10MWp from the additional Solar PV modules that could be installed across the area. A detailed assessment would be required to confirm the estimates should the BESS area change use and house Solar PV modules instead.”*

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CSAG comment: the works plans show that fields D8 and D9 could accommodate either BESS or solar, and fields E10 and E11 were also considered as potential sites for the BESS. It is consequently unclear why these assessments were not carried out during the design phase.

Q2.2.2 The Applicant goes on to express confidence that they will have a connection for the BESS.

CSAG Comment: As the Applicant has acknowledged, the granting of consent for the BESS would provide support for an application to escalate the BESS from Gate 1 to Gate 2 status. What the Applicant has not conceded is that, should consent not be granted for the BESS, there is unlikely to be any prospect of advancing to Gate 2.

The response to Q2.2.1 indicates that the solar scheme is viable without the BESS.

Q2.2.4 The Applicant has not provided evidence to support its claim that the East Claydon BESS would require additional large transformers if the solar scheme were to be connected to it.

Q2.4.1 The Applicant says the BESS: “...has a direct relationship to the Principal Development; **is not only necessary as a source of additional revenue**; is proportionate to the nature and scale of the Principal Development; and is typical associated development commonly brought forward with solar farm developments of this scale.”

CSAG does not consider that the Applicant’s approach accords with the guidance on associated development under The Planning Act 2008. The Guidance says:

(i) Associated development should therefore either support the construction or operation of the principal development, or help address its impacts.

The Applicant has not demonstrated that the same support could not be delivered by either the Statera or Statkraft BESS developments. At ISH3, Mr Griffiths on behalf of the Applicant argued that the government supports BESS development when co-located with solar. However, there is no indication that the government’s support is only for BESS within the same ownership as the solar development rather than relating to its physical location. The proposed

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Statera BESS facility is immediately adjacent to the Order Limits and so could be defined as co-located.

The Guidance says:

(ii) Associated development should not be an aim in itself but should be subordinate to the principal development.

(iii) Development should not be treated as associated development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development. This does not mean that the applicant cannot cross-subsidise, but if part of a proposal is only necessary as a means of cross-subsidising the principal development then that part should not be treated as associated development.

The Applicant's response to the question 2.4.1 shows that the BESS element of the scheme is indeed sought as a source of additional revenue, which given the alternative storage facilities available, appears to be its main intended purpose. The Applicant has already indicated that the scheme would be viable without the BESS.

As noted in CSAG's comments under ISH3 Agenda Item 2, the permitted East Claydon BESS scheme would provide long term storage over 12 hours. By comparison, the Applicant has advised that current indicative design for the BESS is approximately 1 GWh of storage capacity, or 3 hours of storage at the proposed 335 MW. (In response to ExA second written questions at Q2.4.1 of REP4-082.)

The Applicant argues that the BESS would be "*subordinate to the Principal Development as it is required to control the transfer of energy to the national grid due to the fluctuating quantities of energy generated by solar PV panels and is not the aim of the Proposed Development in itself.*"

CSAG would question whether the BESS would genuinely be subordinate. The BESS would have greater capacity than the solar element of the scheme in terms of GWh and would make only a limited contribution to managing the fluctuating generation ability of the solar panels.

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The BESS would operate 24 hours a day and throughout the year, including for long periods when the solar panels are not generating energy at all or are producing very limited energy. This could be more than 50% of the year. During those periods, the BESS would yield income from arbitrage.

Because solar does not generate energy overnight, longer term storage is needed to deliver solar energy to the grid when it is most needed.

Q2.12.2 In response to the ExA question, the Applicant has provided a table listing those receptors identified as experiencing significant visual effects. This includes Bernwood Farm,

which would experience major/moderate adverse visual effects. It is unclear how this assessment aligns with the conclusion at Q2.7.3 that the impact on the cultural heritage of Bernwood Farm would be moderate, and that the effect would be slight and not significant.

Comments on the Applicant's responses on landscape and visual matters are addressed in Appendix 2 and to biodiversity in Appendix 3.

Consultation

Window 1: Minded-to decisions – Long Duration Electricity Storage

Publication date:	26 June 2026
Response deadline:	7 August 2026
Team:	Long Duration Electricity Storage (LDES)
Email:	LDES@ofgem.gov.uk

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Foreword

Long Duration Electricity Storage (LDES) is an increasingly important part of our energy system. NESO advice shows we need to increase the amount of storage on the system over the next few years. These assets let us capture energy from excess renewables when the wind is blowing and sun is shining and store this for when customers need it.

Ofgem has designed and is running its first ever window for cap and floor support to encourage the development of LDES projects, applying the successes of the similar schemes we have run for many years to encourage the development of interconnectors to other countries.

We were pleased with the very strong set of applicants we received for Window 1 with over 70 projects of nearly 30 GW participating in the Project Assessment. We have completed a thorough project assessment to select the best projects to meet system need. We are pleased to set out the results of that assessment today, with a varied portfolio of projects which we are minded-to support to ensure we are developing the clean power system for the future.

Beatrice Filkin

Director of Major Projects

Ofgem

Executive summary

This document sets out our minded-to decisions for the first ever application window for the Long Duration Electricity Storage cap and floor regime.

Our minded-to decisions result in a portfolio of 16 projects, representing 7,645 MW of capacity. The selected portfolio provides, in our view, an appropriate mix of duration, technology and locational distribution. It includes a strong representation of higher-duration assets, consistent with policy objectives and Capacity Advice. Decisions have been taken in line with our published methodologies, with judgement applied transparently where required.

Overall, the evidence suggests the proposed portfolio is likely to deliver system and consumer benefits, including improved security of supply, reduced emissions and lower system costs. Cap and floor payments are expected to be broadly neutral over time in direct bill terms, with wider system benefits improving outcomes for consumers.

The minded-to capacity is set at the upper end of range of NESO's advice to account for potential project attrition while meeting system need. This approach balances the risks of under-procurement and over-procurement, recognising inherent uncertainties in delivery. We intend to manage delivery risks through conditions and deliverability requirements. The resulting portfolio is therefore expected to deliver sufficient capacity even if some projects do not proceed, while maintaining value for consumers.

We recognise the importance of maintaining a pipeline of projects and we are keen to see the continuing development of new and emerging technologies. Further application windows are expected, subject to consultation in 2026 and a decision on a second window by 2027. Future windows will be informed by the Strategic Spatial Energy Plan and will consider potential improvements to regime and assessment processes.

We invite feedback on our minded-to decisions. Consultation will close on 07 August 2026. We will review responses, including any evidence of methodological issues, errors or inconsistencies, before finalising our decisions. Final cap and floor awards are expected to be published in Autumn 2026, alongside any associated delivery requirements and conditions to be reflected in our regulatory framework.

1. Introduction

- 1.1 This consultation seeks views on Ofgem’s minded-to decisions on the outcome of the Project Assessment for Window 1 of the Long Duration Electricity Storage (LDES) cap and floor regime. Window 1 represents the first application window of the regime and has involved assessment of a large and diverse group of projects.
- 1.2 77 projects were deemed eligible for the LDES cap and floor regime, as set out in our Eligibility Assessment Outcome published in September 2025. Four projects withdrew from the process before the Project Assessment commenced. This consultation therefore relates to the assessment of the remaining 73 projects.
- 1.3 This document sets out how the Project Assessment has been undertaken across these projects and the basis on which the decisions set out in this consultation have been reached. The assessment has been conducted in line with previous Ofgem publications, except where amendments have been set out within this document.
- 1.4 Where judgement has been exercised, including in combining assessment outputs and making portfolio-level decisions, this has been undertaken within the scope of the discretion set out in the Multi-Criteria Assessment (MCA) Framework. This consultation seeks views on both the application of that framework and the reasonableness of the judgements set out in this document.
- 1.5 We draw on two subsidiary documents produced by the National Energy System Operator (NESO) as part of our Project Assessment, which accompany this consultation:
 - The *LDES: Final Methodology* sets out the modelling approaches used for system benefits (the “System Benefit Modelling”) and security of supply (the “Security of Supply Modelling”).
 - The *LDES: Response to DESNZ Request for Advice. Q3 (Part 2)* (the “Capacity Advice”) sets out advice on the level of capacity required by the electricity system.
- 1.6 These documents serve distinct purposes and are based on different assumptions. They should therefore be read separately, although we consider them together where relevant in this consultation.
- 1.7 This document is accompanied by a subsidiary document setting out our assessment of impacts, and by a set of appendices providing further detail on: project inputs to the assessment; detailed breakdowns of project results; summaries of individual projects’ assessment outcomes; the impacts of our

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

proposed portfolio; and abbreviations used in this consultation. Stakeholders are encouraged to consider these when responding to this consultation.

- 1.8 In undertaking the Project Assessment, we have drawn on modelling and analytical outputs from NESO, alongside input from external advisers. These inputs have supported the development and application of the assessment methodologies and the interpretation of evidence. Ofgem retains responsibility for all judgements and decisions set out in this document.
- 1.9 This document should be read alongside the following publications:
- [LDES Window 1 – Multi-Criteria Assessment Framework](#) (September 2025)
 - [Decision on the project assessment framework for Window 1 LDES cap and floor regime](#) (September 2025)
 - [NESO Assessment Methodology for System and Welfare Impacts](#) (September 2025)
 - [LDES Cost Assessment Guidance](#) (September 2025)
 - [LDES Financial Framework Decision](#) (September 2025)
 - [LDES Eligibility Assessment Outcome](#) (September 2025)
 - [LDES Technical Decision Document](#) (March 2025)
 - [Long duration electricity storage: proposals to enable investment](#) (October 2024)
- 1.10 We have included additional links where relevant throughout this document.

Questions

- 1.11 We welcome views on our minded-to decisions and the reasoning set out in this document. This consultation seeks your views on whether the approach, methodology and evidence have been applied appropriately, including the proportionate, fair and consistent use of submitted evidence and standardised assumptions in reaching these decisions.
- 1.12 In particular, we welcome views on the following questions:
- Question 1: Do you agree with the minded-to decisions set out in this consultation?
- Question 2: Do you agree with our minded-to capacity decision for Window 1?
- Question 3: Do you agree with our minded-to decisions on Regime Requests?
- Question 4: Do you agree with opening further application windows?
- 1.13 Our minded-to decisions are made with reference to the information available at the time of publication. To ensure fairness, consistency and comparability across projects, we do not intend to take account of new or materially revised project-

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specific information submitted after that point, nor do we generally intend to re-run the Project Assessment on the basis of updated project data.

- 1.14 However, we will consider consultation responses carefully before reaching a final decision. In particular, we will consider whether any representation identifies a material methodological issue, evidential error, inconsistency in the application of the assessment framework, or other relevant matter that may justify further analysis, correction or adjustment before final decisions are made.

Timeframes

1. Stage 1 Consultation open: 26 June 2026
2. Stage 2 Consultation closes. Deadline for responses: 07 August 2026
3. Stage 3 Responses reviewed and Final decision published: Autumn 2026

How to respond

- 1.15 Complete our [online consultation](#) by 07 August 2026. If you have any questions, email ldes@ofgem.gov.uk.
- 1.16 We will publish non-confidential responses, but we will not publish responses from individuals. If any of your responses contain confidential information, please use the text box in the consultation to clearly explain which parts of your response you wish to be kept confidential. We will publish your name as part of the response unless you tell us not to.

Tracking progress

1. Click on this [link](#)
2. Then enter required information, including email address and click 'Confirm your subscription'
3. You will receive an email to notify you when it has changed status.

Confidentiality

You may request that your response, or parts of it, are treated as confidential. We will respect such requests, subject to any legal or regulatory obligations to disclose information. These may include obligations under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, or other applicable regulations. Where relevant, we may also disclose information with your explicit consent. If you wish to keep your response confidential, you should clearly state this and provide reasons.

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If only part of your response is confidential, you should clearly identify the sections concerned and provide the confidential material in a separate appendix. Where necessary, we may contact you to clarify how your information should be treated, including requesting further justification for confidentiality.

Where responses contain personal data as defined under the UK General Data Protection Regulation (UK GDPR), the Gas and Electricity Markets Authority will act as the data controller. Information provided will be used in accordance with Ofgem's statutory functions and section 105 of the Utilities Act 2000. Further information is set out in the Privacy policy on consultations (Appendix 8).

Where a response is submitted confidentially, we will not publish the respondent's name or the content of the response. We may publish the number of confidential responses received. Where responses are summarised, they will not be attributed to individual respondents, and each response will be considered on its own merits.

2. Minded-to decisions

This section sets out our minded-to decisions. These are informed by the evidence gathered through the assessment process and reflect our current view on a pathway to delivering capacity aligned with system need. It explains how the assessments have informed these positions and that final cap and floor awards will be conditional on projects meeting post-award requirements.

Consultation questions in this section

Q1. Do you agree with the minded-to decisions set out in this consultation?

- 2.1 The minded-to decisions set out a pathway to delivering long-duration electricity storage capacity aligned with system need. It comprises 16 projects delivering 7,645 MW, the upper end of the range set out in the Capacity Advice. In our judgement, this level provides appropriate headroom for reasonable attrition risk while maintaining a credible prospect of delivery within the relevant timeframes.
- 2.2 The resulting portfolio of projects has a strong representation of higher-duration assets, consistent with overall policy objectives and the Capacity Advice which also indicates a preference for deployment of long-duration and higher-capacity technologies. It also includes a mix of technologies and geographic spread, which in our view supports flexibility and resilience across the system.
- 2.3 Our minded-to decisions are informed by the Economic, Financial and Strategic Assessments, drawing on outputs from the Cost Assessment and modelling analysis. No single assessment or metric has determined the outcome. Rather, we have considered the relative performance of individual projects alongside the composition of the portfolio as a whole, including overall value for money, deliverability, consumer risk, and the balance of technology and location.
- 2.4 The Economic Assessment forms the starting baseline for our decision-making. It provides a ranking of the highest performing projects, in terms of their relative socio-economic welfare benefits against the relevant counterfactual and reflecting a combined view of both monetised (including a cost benefit assessment) and non-monetised impacts, such as security of supply and system operability.
- 2.5 We have overlaid the Financial and Strategic Assessments to determine whether the Economic Assessment ranking should be adjusted. Projects with materially elevated risk profiles or sensitivities have been adjusted as part of this process, while some more marginal cases have been retained where the risks are judged to be proportionate in light of the expected benefits.

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- 2.6 As part of this overlay, we have considered deliverability risks. However, we do not consider that the evidence we have reviewed justifies excluding projects solely based on their deliverability, where a credible pathway remains open. In reaching this view, we have considered that delivery risk may be managed through conditions that may be attached to any award and that to exclude such projects now would risk deprioritising projects that otherwise perform strongly overall.
- 2.7 These decisions have been reached in accordance with our published decisions and methodology, including the MCA Framework. A limited number of amendments to the methodology have been made and are explained within this document, in line with our discretion to make amendments to methodology and process where necessary to address material deficiencies in assessment inputs and outputs.
- 2.8 In making these minded-to decisions, we have complied with our relevant statutory duties, had regard to the relevant considerations identified in previous publications and considered the relevant and available evidence. Where judgement has been required, due to the forward-looking and evaluative nature of the Project Assessment, it has been exercised proportionately, consistently and for the reasons set out in this document.
- 2.9 Final awards will be made following consideration of comments received through consultation. These awards will be conditional on meeting delivery requirements. Projects will be required to continue to make sufficient progress, demonstrate ongoing viability, and may be subject to time-bound milestones designed to ensure timely and credible progression to delivery.
- 2.10 Such conditions may include, but are not limited to, requirements relating to deliverability and project progress, evidence of financeability and commitment, regulatory compliance, the securing of necessary consents, and compliance with applicable design requirements. Ofgem will monitor compliance with any such conditions and may withdraw cap and floor support where they are not met.
- 2.11 Table 1 below sets out the portfolio of projects that following our Project Assessment we are minded-to decide should receive cap and floor support.

Minded-to decisions

Table 1: Window 1: Minded-to decisions – Long Duration Electricity Storage

Name	Technology	Region	MW	Duration
Loch Kemp Storage	PSH	N_Scotland	660	22.3
Coire Glas	PSH	N_Scotland	1440	32
TeesCAES	CAES	NE_England	50	30
Earba PSH	PSH	N_Scotland	1800	15
Field Netherton	Li-ion BESS	N_Scotland	400	16.3
Field New Deer	Li-ion BESS	N_Scotland	400	18.03
Field Rigifa	Li-ion BESS	N_Scotland	200	18.03
Field Fyrish	Li-ion BESS	N_Scotland	200	16.5
Field Long Stratton	Li-ion BESS	E_England	400	16.05
East Claydon Storage	Li-ion BESS	E_England	500	12
Ocker Hill BESS	Li-ion BESS	W_Midlands	145	8
Sundon Storage	Li-ion BESS	E_England	500	8
Drakelow (Innova)	Li-ion BESS	W_Midlands	385	8.7
Frontier Legacy	VFB/Zn	N_Wales	65	8
Springwell	Li-ion BESS	E_Midlands	400	11.1
Thornton BESS 2	Li-ion BESS	E_Midlands	100	11.11

3. Project Assessment process

This section explains the overall structure of the Project Assessment. It summarises the objective of the assessment, the key inputs used, the main assessment components, and the overall approach to decision-making. Further detail on the methodology, outputs and any minded-to decisions are set out in the relevant sections of this document.

Objective of the Project Assessment

- 3.1 The objective of the Project Assessment is to identify which projects should receive cap and floor support, in a way that protects the interests of existing and future consumers. While the assessment draws on structured analytical outputs, it also requires judgement about how to weigh the benefits, risks and uncertainties associated with different projects, and how those projects work together as a portfolio.

Inputs to the Project Assessment

- 3.2 Information used in the assessment was drawn from project submissions, through the Data Submission Form (DSF), and from external sources. The DSFs and requirements for supplementary information were published on 23 September 2025. Completed DSFs and supporting information were required to be submitted by 18 November 2025.
- 3.3 A Supplementary Questions (SQ) process was undertaken to clarify information provided. It did not provide an opportunity for projects to submit new information after the deadline. Updated DSFs reflecting this clarification process were shared with projects on 10 December 2025 to confirm accuracy.
- 3.4 Any adjustments to submitted data are explained in the relevant sections of this document.

Components of the Project Assessment

- 3.5 The Project Assessment has been undertaken across three main components: Economic Assessment, Financial Assessment and Strategic Assessment. These components draw on project-submitted data, the Cost Assessment outputs and System Benefit Modelling.
- 3.6 The Cost Assessment reviews project-submitted costs to determine the inputs used across the assessment. This includes assessing whether costs should be used as provided, standardised, adjusted or excluded to ensure consistency and

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comparability. The resulting outputs are used across the Economic, Financial and Strategic Assessments. Further detail is set out in Section 4.

- 3.7 The Economic Assessment considers both monetised and non-monetised impacts. Monetised impacts are derived from system modelling outputs and compared against project costs, while non-monetised impacts capture wider system outcomes. These outputs are combined using a structured approach to support comparison across projects. Further detail is set out in Section 5.
- 3.8 The Financial Assessment compares expected project revenues against cap and floor levels to assess the extent of potential consumer support and relative exposure to floor payments over the regime term. Further detail is set out in Section 6.
- 3.9 The Strategic Assessment considers factors not fully captured elsewhere, including scenario sensitivity, deliverability and portfolio composition. This supports assessment of project credibility and performance across different system conditions. Further detail is set out in Section 7.

Project Assessment – minded-to decisions

- 3.10 Across all components, we have sought to ensure that inputs are treated on a consistent and comparable basis. This includes project-submitted cost, technical and modelling inputs, as well as standardisation of key assumptions. These approaches have been applied across projects or groups of projects and are reflected in the outputs of each assessment.
- 3.11 The Project Assessment has been undertaken in line with the published MCA Framework. As set out in that document, we retained discretion to make targeted amendments to the process or methodology where necessary in light of the evidence available, including to address material issues of data quality, modelling or comparability. Any material amendments are identified and explained in the relevant sections of this document.
- 3.12 The outputs of each component of the Project Assessment have been considered together as part of our decision-making. No single metric, score or threshold has been applied in isolation. Instead, indicators and benchmarks are used to inform comparison, with outcomes assessed alongside the overall composition of the portfolio. The MCA Framework does not apply a mechanistic rule for combining the components of the Project Assessment but supports the use of structured judgement in bringing them together.
- 3.13 In applying this approach, we have:

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- treated the Economic Assessment ranking as a starting point for informing our decision-making;
- considered Financial Assessment results where evidence indicates materially elevated consumer exposure risk;
- assessed Strategic Assessment results (including scenarios, deliverability, and diversity) where risks or benefits are not captured elsewhere;
- exercised judgement where there is divergence between these components, giving greater weight to factors that are material to consumer protection; and
- considered the appropriate level of capacity for Window 1 in line with the Capacity Advice and taking into account possible attrition.

3.14 The detailed sections that follow should therefore be read as evidence supporting the decisions set out in this consultation, rather than as standalone outcomes. These decisions reflect the outcome of this integrated assessment process, based on the evidence available at the time of assessment. Taken together, this approach ensures a consistent, evidence-based and proportionate assessment of projects against the objectives and policy intent of the regime.

3.15 Each assessment section concludes with a table showing how the project order develops through the Project Assessment. The Economic Assessment ranking is used as the starting point. Where a project's position in that order changes as a result of Financial Assessment or Strategic Assessment outputs, this is referred to as an "adjustment".

- Table 2 (Section 5) presents the Economic Assessment ranking.
- Table 3 (Section 6) presents the ranking after any adjustments informed by the Financial Assessment.
- Table 4 (Section 7) presents the ranking after any further adjustments informed by the Strategic Assessment.
- Table 5 (Section 8) presents our proposed minded-to decisions for individual projects, reflecting all adjustments and the minded-to decision on capacity for Window 1.

3.16 In the tables referenced above, and in the appendices to this document, results are generally shown to two decimal places for relative comparison only. This does not imply additional precision or certainty in results.

4. Cost Assessment

This section explains how we undertook our Cost Assessment. It ensures that project costs were treated on a fair, consistent and comparable basis across the Project Assessment. Using benchmarking, cohort comparison and expert review, we derived the cost inputs used across the Project Assessment.

Objective of the cost assessment

- 4.1 The Cost Assessment was undertaken to determine project costs in a fair, consistent and credible basis. The assessment considered critical cost line items, treatment of optimism and cost saving opportunities, contingency assumptions, cost estimate class and associated uncertainty, and wider assumptions such as foreign exchange rates. We also checked submissions for errors and removed unsupported savings where appropriate.
- 4.2 Section 4.2 of the Cost Assessment Guidance describes the Project Assessment Update process. We previously intended to undertake further cost assessment following our minded-to decisions – we now expect to undertake this process in line with the delivery requirements following our final cap and floor regime award in Autumn 2026. This will allow us to use more mature project data to set the relevant values in the Facility-Specific Parameter Register for the project.

Approach to the cost assessment and evidence use

- 4.3 Projects were grouped into five technically distinct categories and assessed through three broader Technology Groups: conventional lithium-ion batteries, novel batteries, and turbine technologies. Projects were reviewed on a like-for-like basis within these groups, with moderation applied within and across groups to support consistency.
- 4.4 The Cost Assessment required the interpretation of project-submitted data, supported by evidence such as supplier quotes, third-party reports and quantitative cost and schedule risk assessments where provided. This approach supports fair and comparable treatment of costs across all projects and addresses differences in submitted costs and assumptions.
- 4.5 This comparative Cost Assessment gave us sufficient confidence to rank projects to make minded-to decisions. However, it does not constitute an endorsement of any individual projects' costs, scope of works, or maturity or a guarantee that any of these costs will be determined to represent good value for money at the

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Post Construction Review and/or any earlier stage of the Cost Assessment process such as that described in paragraph 4.2.

- 4.6 The Cost Assessment used benchmarking, cohort comparison and expert review. External benchmarks were used where available, and cohort comparison was used where sufficient comparable project data existed, with input from subject matter experts where necessary. Where information was incomplete or unclear, the SQ process was used to clarify information already submitted.

Treatment of uncertainty

- 4.7 The assessment considered projects' submitted P50 cost estimates and reviewed the treatment of uncertainty in P10 and P90 scenarios. Where contingency provisions were assessed as excessive or insufficient, adjustments were made as appropriate. We did not adjust P90 costs upwards, consistent with the Cost Assessment Guidance that these values would form the Project Cost Ceiling (PCC), and if a project's costs were to exceed the PCC, we would expect to set cap and floor values based on the PCC. In some cases P90 costs were reduced where they covered risks beyond the intended scope of our pessimistic cost scenario, as we would not expect Consumers to be exposed to these costs in those circumstances.
- 4.8 Many projects used different assumptions when converting costs to GBP. This meant that projects using more optimistic exchange rate assumptions could appear more competitive for reasons unrelated to their underlying costs. To ensure comparability, we standardised costs with foreign exchange exposure by applying exchange rates as of 18 November 2025, the Project Assessment submission deadline. We also reviewed supplier quotes and bid validity, adjusting costs where necessary to ensure consistent treatment across all projects.

Outputs from the cost assessment

- 4.9 The Cost Assessment produced eight Cost Assessment Outputs, as defined in the Cost Assessment Guidance: Development Expenditure (Devex), Capital Expenditure (Capex), Operating Expenditure (Opex), Replacement / Renewal Expenditure) Repex, Decommissioning Expenditure (Decommex), Pass Through Costs, and Project Maturity (Maturity).
- 4.10 We identified different approaches to Decommex cost estimation across projects in the Conventional Battery and Novel Battery Technology Groups. Although projects provided supporting explanations for their submitted values, the assumptions underpinning those values were not consistently comparable across projects and were subject to significant uncertainty.

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- 4.11 To avoid differences in assumptions or presentation affecting the assessment, we applied a standard benchmarked Decommex value to projects in the Conventional Battery and Novel Battery Technology Groups. These benchmarks were developed using the evidence available from project submissions, supported by expert review. We considered the range of submitted values, the explanation and evidence provided by projects, and whether the resulting value was reasonable when applied across comparable projects. We then applied the benchmark consistently within the relevant Technology Groups, rather than accepting divergent project-specific assumptions that could not be tested on a consistent basis.
- 4.12 The benchmarks were expressed as a function of installed capacity because, for these Technology Groups, we considered this to provide a proportionate and comparable basis for Project Assessment. This approach was used for the purposes of the Cost Assessment Outputs and the Project Assessment. It does not represent a final determination of each project's efficient decommissioning costs.

5. Economic Assessment

This section explains the Economic Assessment. It compares costs and benefits across projects, using monetised impacts to inform an initial ranking and non-monetised impacts to refine that ranking. The Economic Assessment ranking serves as the starting point for our decision-making.

Economic Assessment process

5.1 The Economic Assessment process comprises three main elements:

- Monetised impacts demonstrate system value, with benefits quantified using system modelling outputs and assessed relative to project costs on a present-value basis.
- Non-monetised impacts capture critical system outcomes not reflected in monetary terms, including security of supply¹ and system operability. These are assessed through structured scoring frameworks and combined with monetised impacts to incorporate wider system and policy benefits into the Economic Assessment.
- A weighting approach combines monetised and non-monetised results (see [Economic Assessment ranking](#)) to produce an overall Economic Assessment score and ranking. This ensures the assessment reflects both economic efficiency and wider system value, while supporting robust comparison across projects.

Economic Assessment inputs

Inputs from modelling

5.2 NESO was commissioned to quantify the system impacts of LDES projects through System Benefit and Security of Supply Modelling. NESO published its proposed methodology in September 2025 and subsequently finalised the methodology applied in this assessment. While the core assessment approach and principles remain consistent with the September 2025 publication, the final methodology incorporates additional detail and implementation refinements. The final methodology is published alongside this consultation.

¹ In the MCA Framework, security of supply was originally included as a monetised impact. It is now being considered as a non-monetised impact with detail set out in the “Amendment from the MCA Framework” part of this section.

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- 5.3 System Benefit Modelling estimates the incremental impact of each project on the electricity system relative to a counterfactual without that project. These outputs are used to support comparison and ranking of monetised impacts and to inform the overall Economic Assessment score and ranking.
- 5.4 Security of Supply Modelling uses NESO's resource adequacy methodology to assess whether the electricity system is able to meet demand under a wide range of future conditions. These outputs were used as an input to the non-monetised security of supply component and to the overall Economic Assessment score and ranking.

Inputs from projects

- 5.5 Projects submitted a range of evidence used within the Economic Assessment through Data Submission Forms.² In some instances, particularly for inputs used for modelling, project submitted data was refined or derived to support comparability across projects. This included standardising key inputs where submitted values were not directly comparable or were assessed as not credible. These approaches were applied across projects or groups of projects.
- 5.6 The following examples illustrate how key inputs were refined or standardised using project-submitted data:
- **Energy capacity (MWh)** inputs used within the System Benefit Modelling were calculated using each project's continuous discharge capacity, discharge duration and efficiency assumptions (subject to any caps imposed, as described below), to reflect the storage capability committed by each project. These parameters determine the extent to which a project can discharge at rated power over the required duration. For the purposes of the assessment, energy capacity was treated as a fixed project characteristic over the asset life. Minimum and maximum state of charge assumptions were also standardised, so that submitted energy capacity values were assessed on a comparable basis.
 - **Round-trip efficiency (RTE)** inputs were also reviewed and refined. As part of this, our technical specialists and advisors identified some project-submitted values which were not credible for the relevant technology, significantly exceeding those of any known project currently in operation. Where this was the case, values were capped based on specialist engineering advice and a review of known best-in-class assets. This included, for Li-ion BESS projects, capping RTE values at 91% where higher values had been submitted.

² Key project inputs can be found in Appendix 1 (Table 6).

Inputs from our Cost Assessment

- 5.7 Costs used in the Economic Assessment to normalise project scores were taken from project submissions through the Data Submission Form (DSF) and then adjusted through the Cost Assessment process. This process determines whether submitted costs are used as provided, standardised, adjusted or excluded.

Monetised impacts

- 5.8 Monetised impacts demonstrate system value, with benefits quantified using system modelling outputs and assessed relative to project costs on a present-value basis. These are brought together through the Benefit Cost Ratio (BCR), calculated as follows.

$$\text{BCR} = \text{PV}(\text{Benefits}) \div \text{PV}(\text{Costs})$$

Benefits

- 5.9 The Economic Assessment monetises project impacts where it is practical to do so. The modelling estimates the net socio-economic welfare delivered by each project by comparing system costs with and without the project on a present-value basis. For each impact, the monetised value reflects the change in system costs after the projects is included, and the results are aggregated to estimate each project's overall contribution to socio-economic welfare (SEW).
- 5.10 The following metrics from the System Benefit Modelling were used to produce the monetised outputs.³ A full description of each metric is given in the updated NESO methodology published alongside this consultation:

NESO system benefit modelling metric
Wholesale Market Costs
CfD Costs Note. <i>The same CfD cost metric is used in two components of the monetised benefits, but with opposite signs. For consumers it is treated as a cost, while for producers it is treated as revenue.</i>
Wholesale Market Net Revenue - Producers

³ All components are derived from the System Benefit Modelling GB-focused Day Ahead model, with the exception of CfD Costs for consumers and associated revenues for CfD-supported generation, which originate from the Balancing Mechanism model. These are included in the total welfare calculation for completeness but do not influence relative project rankings, as CfD payments represent a transfer between Consumers and producers and therefore net out in the calculation of total benefits.

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Wholesale Market Net Revenue - Storage
Interconnector Congestion Rent
Wholesale market temporal arbitrage (initial commitment)
Unpriced Carbon Externality Cost

5.11 For each component, annual values are aggregated and then converted to present value using a discount rate consistent with Green Book guidance.

5.12 The monetised impact outputs are then combined as follows:

Consumer SEW = Reduction in Wholesale Market Costs and CfD Costs

Producer SEW = Wholesale Market Net Revenue (Producers) + Wholesale Market Net Revenue (Storage) + Interconnector Congestion Rent + CfD Revenues

LDES Owner SEW = Wholesale market temporal arbitrage (initial commitment)

Carbon Externality Reduction = Reduction in Unpriced Carbon Externality Cost

5.13 These components form the total benefits that is used as the numerator of the BCR:

Total benefits = Consumer SEW + Producer SEW + LDES Owner SEW + Carbon Externality Reduction

Project costs

5.14 The present value of project costs forms the denominator of the BCR and is the combination of costs derived from our Cost Assessment process and a terminal value.

5.15 The costs included are Devex, Capex, Opex and Repex. These costs are profiled over the 25-year appraisal period, in line with project submissions.

Decommissioning costs were excluded as they are expected to be incurred beyond the end of the 25-year appraisal period. TNUoS and business rates were excluded as they represent transfers rather than true economic costs.

5.16 In line with the MCA Framework, a terminal value is included to reflect the continuation of project benefits beyond this period. This recognises that, for some technologies, capital investment made during the 25-years is expected to support operation beyond that time horizon.

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5.17 We have applied standardised and technology-specific economic life assumptions based on project submissions and specialist advice. These assumptions reflect the point at which a project would be expected to require significant further capital investment to continue operating.

5.18 The assumed economic life for each technology type is as follows:

Technology	Assumed economic life
Lithium-ion Battery Energy Storage System (Li-ion BESS)	25 years
Pumped Storage Hydro (PSH)	40 years
Vanadium Flow Battery (VFB)	30 years
Vanadium Flow/Zinc Battery (VFB/Zn)	30 years
Liquid Air Energy Storage / Battery Energy Storage System Hybrid (LAES/BESS)	25 years
Compressed Air Energy Storage (CAES)	25 years

5.19 The terminal value is calculated as a proportion of each project's Capex (including Repex), equivalent to the remaining useful economic life after the 25-year horizon and is added in the final year.

Non-monetised impacts

5.20 Non-monetised impacts capture critical system outcomes not easily monetised and not already reflected in the monetised impacts. These non-monetised impacts were assessed alongside monetised impacts to provide a fuller view of project performance. These impacts were combined with monetised impacts, using the approach described in paragraph 5.55, to reflect wider system and policy benefits. Where possible, they were quantified using modelling or data-driven approaches; otherwise, they were assessed using structured scoring frameworks or qualitative evidence.

5.21 The non-monetised outputs are:

- **Security of Supply:** Contribution to system reliability
- **Avoided Renewable Curtailment:** Reduction in curtailed renewable generation
- **System Operability:** Ability to support secure and stable system operation
- **Wider Economic and Social Impacts:** Benefits beyond the electricity system
- **Real-time Flexibility:** Ability to respond to system imbalances and price signals

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- **Option Value:** Potential for future benefits.

- 5.22 The **Security of Supply** assessment considers the contribution of each project to system adequacy, focussing on the extent to which a project reduces the expected shortfall between electricity supply and demand under system stress conditions. Projects were assessed taking account of key technical characteristics, including discharge capacity, duration and efficiency.
- 5.23 The assessment was based on Security of Supply Modelling using a resource adequacy methodology. The primary metric used is Expected Energy Unserved (EEU), which measures the expected volume of unmet demand across a range of simulated conditions. EEU is a probabilistic, forward-looking measure derived across multiple weather years and outage scenarios.
- 5.24 Projects were grouped for modelling based on characteristics such as storage duration, technology type and efficiency. Where relevant, assumptions were standardised across projects, and certain technologies were modelled separately where required.
- 5.25 Security of supply was assessed using a marginal additional approach, comparing system outcomes with and without additional capacity. Modelling was undertaken for a defined set of years, with results interpolated or applied where direct modelling outputs are not available.
- 5.26 Modelling outputs were converted to present value and normalised by discharge capacity of the project to enable comparison across projects. Results vary across projects, primarily reflecting differences in storage duration and discharge capability. Projects with longer duration generally deliver stronger security of supply outcomes.
- 5.27 The **Avoided Renewable Curtailment (ARC)** assessment considers the change in curtailed renewable generation associated with each project. It measures the difference in the volume of renewable generation constrained off when the project is included, relative to a project-specific counterfactual.
- 5.28 ARC was used as a proxy for potential wider consumer benefits that are not assessed elsewhere. For example, avoided curtailment could reduce the strike prices that renewables projects need to bid in CfD auctions to achieve their target hurdle rate, or the amount of renewable capacity needed to meet decarbonisation targets.
- 5.29 ARC was derived from the System Benefit Modelling using the GB-focused Day Ahead model and was calculated as the change in curtailment over the appraisal

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period, expressed in present value terms. To support comparison across projects of different sizes, ARC is normalised by discharge capacity.

- 5.30 Results show variation across projects, reflecting differences in how projects interact with system constraints and absorb excess renewable generation, which depend on both project characteristics and system conditions.
- 5.31 The **System Operability** assessment considers the contribution of each project to the secure and efficient operation of the electricity system, beyond the elements that are already assessed as part of the monetised and Security of Supply assessments. It focuses on the extent to which projects can provide services that support system stability alongside their core storage function.
- 5.32 The assessment was based on a structured scoring methodology developed in collaboration with technical specialists and advisors, including NESO. Projects were assessed across a defined set of operability services: frequency response and reserve, stability, voltage control and restoration. For each service, projects were assessed across four dimensions:
- Capability: whether the project can provide the service
 - Availability: how often the project is available to provide the service
 - Quantity: how much of the service the project can provide, and
 - Location: whether the project is located in an area of particular need for this service.
- 5.33 Inputs were standardised where necessary. Where submitted data was not directly comparable across projects, for example because projects had used different assumptions or interpreted questions differently, we used proxy metrics or estimates derived by technical specialists and advisors in place of the submitted figures.
- 5.34 For the locational assessment, scoring was informed by Annex 3 of NESO's Clean Power 2030 Operability and Operations Analysis, which sets out expected regional needs for services such as short circuit level and voltage support.
- 5.35 For each service, a raw project score was first calculated by multiplying the project's capability, availability, quantity and, where relevant, location scores. That raw score was then normalised by cost, to support comparison across projects of different sizes.
- 5.36 For each service, these cost-normalised scores were combined using the weights assigned to each service to produce an overall system operability score for each project. The weights reflect the relative importance of each service to system

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operability, the extent to which assets are expected to be competitive in providing it, and uncertainty in the assessment.

- 5.37 The results indicate that Li-ion BESS and PSH projects are more frequently represented among higher-scoring projects, reflecting their stronger overall contribution across the assessed operability services.
- 5.38 The **Wider Economic and Social Impacts** (WESI) assessment considers impacts not captured in monetised or other non-monetised metrics, including effects on local communities, the UK economy and the energy sector. It focuses on identifying whether there is robust, project-specific evidence of materially different impacts across projects.
- 5.39 The assessment was based on a structured qualitative framework using evidence submitted through Data Submission Forms and supporting material. The assessment considered five categories of potential benefit: environmental enhancements; community benefits delivered through project activity; skills development and training; contributions to domestic supply chains and labour markets; and research, development and export potential.
- 5.40 Projects were scored against each criterion on a three-point scale (0 / + / ++), based on the strength of evidence provided. This reflects both:
- the credibility of the evidence (for example, whether benefits are supported by clear plans, analysis or delivery mechanisms), and
 - the extent to which impacts are material and project-specific, rather than generic or assumed.
- 5.41 Scores were combined using a weighted approach to produce an overall WESI score. Weighting reflects:
- the relevance of each category to wider policy objectives;
 - the robustness of the available evidence; and
 - the degree to which impacts differ meaningfully across projects.
- 5.42 Impacts that represented transfers or are captured elsewhere in the assessment were excluded.
- 5.43 Results show variation across projects, primarily reflecting differences in the strength of evidence provided. Some technologies, particularly those that are less established, more frequently demonstrate stronger WESI performance. This

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reflects evidence of potential innovation benefits, knowledge spillovers and contributions to domestic supply chains.

- 5.44 The **Real-time Flexibility** assessment considers whether projects provide additional flexibility benefits to the system not captured in modelling or elsewhere in the assessment, including their ability to respond to short-term system conditions through intra-day and balancing mechanism activity. It assesses whether there is robust evidence of material differences between projects to support relative comparison in the Economic Assessment.
- 5.45 A qualitative assessment of the evidence submitted by developers was undertaken to identify whether project characteristics could lead to material differences in real-time flexibility. Factors considered included duration, efficiency, co-location and short-term power capability.
- 5.46 Duration, efficiency and co-location were not used to differentiate projects, as the evidence did not demonstrate material or consistent differences. Short-term power capability above continuous capacity was identified as the only differentiating factor between projects that could bring additional flexibility benefits to the system, beyond those captured elsewhere in the assessment. Projects were assessed on whether this capability could be sustained over a defined short-term duration, with greater weight applied to discharge capability.
- 5.47 Only a small subset of projects demonstrated sustained short-term power capability above continuous capacity and therefore received a positive score. All remaining projects were assigned a neutral outcome.
- 5.48 The **Option Value** assessment considers the extent to which Projects may provide additional future benefits, for example by enabling expansion or adaptation over time.
- 5.49 Given the inherent uncertainty in future developments, Option Value was assessed qualitatively on a comparative basis, focusing on whether there was credible evidence that some projects are better placed than others to provide future optionality.
- 5.50 Projects were assessed using a structured, positive-only scoring framework based on evidence submitted through Data Submission Forms and supporting materials. Outcomes were assigned as follows:
- 0: no evidence of expansion potential, or none identified
 - +: expansion potential identified, but with limited supporting evidence
 - ++: expansion potential identified and supported by more developed evidence (for example, on costs, land availability or delivery considerations)

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- 5.51 These scores reflect the strength and completeness of the evidence provided, rather than the value of expansion potential itself. No additional adjustments were made based on technology-specific assumptions in the absence of supporting project-level evidence.
- 5.52 Results show a range of outcomes across projects. Many projects identify some expansion potential but provided limited supporting evidence, while a smaller subset provided more developed and credible evidence of how expansion could be delivered.
- 5.53 Differences in outcomes also reflect underlying technology characteristics. In particular, modular technologies (such as Li-ion BESS) more frequently demonstrate expansion potential.

Outputs from the Non-Monetised Impacts assessments

- 5.54 Results for non-monetised impacts are intended to support comparison across projects and should be considered alongside the monetised assessment and other non-monetised impacts as part of the overall Economic Assessment. No single non-monetised impact is determinative in isolation.

Economic Assessment ranking

- 5.55 The Economic Assessment combines the monetised assessment with the six non-monetised components to produce a final ranking. This was undertaken using a swing weighting approach. Swing weighting allows the relative importance of each component to be determined by considering three factors:
- a priori importance of the metric in achieving the objectives of the regime;
 - certainty of the assessment, based on available evidence; and
 - materiality of differences between projects.
- 5.56 To combine scores across all monetised and non-monetised impacts, the approach involved rescaling the scores for each impact, so that the scores for all metrics were measured on a common scale. We did this by assigning a score of 0 to the lowest scoring project and a score of 100 to the highest scoring project for each metric individually. The scores for all other projects were determined based on their position relative to the lowest and highest scores. These rescaled scores are presented in Table 9.
- 5.57 The components were then comparatively assessed, and relative weights were assigned based on their importance against the factors above. These weightings were based on structured judgement, informed by the evidence across the

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assessment, rather than through a mechanistic calculation.⁴ They were then applied to derive an overall Economic Assessment ranking.

Type	Metric	Weighting
Monetised	Benefit Cost Ratio (BCR)	40%
Non-monetised	Security of Supply (SoS)	19%
Non-monetised	Avoided Renewable Curtailment (ARC)	15%
Non-monetised	System Operability (SO)	12%
Non-monetised	Wider Social and Economic Impacts (WESI)	8%
Non-monetised	Real-time Flexibility (RTF)	4%
Non-monetised	Option Value (OV)	1%

5.58 The BCR was treated as the most important component within the Economic Assessment. The BCR provides a measure of net economic value by comparing system-wide benefits to project costs. It was given greater weight as it directly reflects overall value for money to consumers and captures material differences in performance across projects.

5.59 Weights for non-monetised components were set relative to the BCR. Components that are central to the assessment framework and demonstrate clear differentiation across projects were assigned higher relative weights. For example, security of supply was assigned a relatively high weighting reflecting its importance to system resilience, strong alignment with the rationale for intervention, and the fact that it is not fully captured elsewhere in the assessment. It also demonstrates clear differentiation between projects and was supported by relatively robust modelling outputs.

5.60 By contrast, components where evidence is more limited, or where differences between projects are less pronounced, were assigned lower weights. For example, real-time flexibility was assigned a lower weighting reflecting the narrow scope of the assessment and the fact that only a subset of projects demonstrated

⁴ The percentages sum to 100% but do not in the table due to rounding to zero decimal places.

material differences, while option value from expansion was given a low weighting given its more speculative nature and lower certainty in the evidence base.

Amendments from the MCA Framework

- 5.61 A limited number of amendments from the MCA Framework have been made within the Economic Assessment. These are set out below, together with the reasons for them.
- 5.62 **Use of GB-focussed Day Ahead model outputs and exclusion of Balancing Mechanism model outputs:** NESO's GB-focussed Day Ahead model outputs have been used for the purpose of the Economic Assessment, as they provide a stable and project-sensitive basis for assessing GB system and welfare impacts.
- 5.63 NESO's published methodology (September 2025) set out a sequential modelling approach incorporating both Day Ahead and Balancing Mechanism models. Under this framework, outputs from both models were intended to inform the Economic Assessment.
- 5.64 During the course of Project Assessment, NESO identified that the Balancing Mechanism model exhibited residual optimisation degeneracy. This means that, in some cases, the model could select between multiple technically valid optimisation outcomes with very similar overall system costs. This could result in variation in certain Balancing Mechanism model-derived outputs that was not necessarily driven by underlying differences in project characteristics and therefore reducing their suitability for ranking projects.
- 5.65 As a result, we decided to exclude Balancing Mechanism model-derived outputs for the purpose of project ranking within the Economic Assessment and instead rely on outputs from the GB-focussed Day Ahead model, which NESO considered a sufficiently robust, stable and project-sensitive basis for the Economic Assessment undertaken in this window.
- 5.66 To note, Balancing Mechanism model outputs remained suitable for use within the Financial Assessment, as NESO's review did not identify any material degeneracy impact associated with their use for this purpose.
- 5.67 **Treatment of Security of Supply:** Security of Supply has been treated as a non-monetised impact. The MCA Framework proposed monetising this impact by multiplying Expected Energy Unserved (EEU) by an assumed Value of Lost Load (VoLL). However, further consideration of how security of supply impacts are modelled has led to a change in approach.
- 5.68 Unlike other monetised welfare impacts, which are derived from the System Benefit Modelling using FES pathways, security of supply is estimated using a

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separate resource adequacy model with a different reference scenario. This scenario is not directly comparable to the counterfactuals used elsewhere in the Economic Assessment and, therefore, the modelling outputs from System Benefit Modelling and Security of Supply Modelling are not directly comparable and cannot be simply added together.

5.69 Security of supply is now assessed using the EEU metric, normalised by discharge capacity, and considered alongside other metrics within the Economic Assessment.

5.70 **Normalisation of non-monetised impacts:** Certain non-monetised impacts have been normalised by discharge capacity rather than cost. The MCA Framework indicated cost-based normalisation; however, we have modified that to a discharge capacity-based approach which has been applied to Security of Supply and Avoided Renewable Curtailment. This supports comparison across projects while reflecting differences in scale and duration within the assessment framework.

Limitations

5.71 This section focuses on limitations that arose during the application of the Economic Assessment, particularly where constraints on modelling, data or methodology affected how the assessment was undertaken in practice. For further detail on modelling-specific considerations, please refer to NESO's final methodology published alongside this consultation.

5.72 **Location within the Economic Assessment:** One limitation relates to the modelling outputs used to inform the assessment. As described above, outputs from the Balancing Mechanism model were excluded due to identified issues with degeneracy. As a result, locational differences are less fully reflected within the monetised assessment than originally envisaged.

5.73 Some locational effects remain captured within the assessment, including through the design of counterfactuals and within non-monetised components such as System Operability. However, the reduced reliance on Balancing Mechanism outputs means that certain locational dynamics may not be fully reflected in the Economic Assessment ranking.

5.74 However, we do note that locational diversity is considered in the Strategic Assessment.

5.75 **Treatment of project-submitted data:** Project-submitted inputs have generally been used as provided, with some standardisation applied where necessary to help with comparability (including, for example, capacity inputs used for modelling). While these adjustments were applied consistently, these

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assumptions may result in some outputs over- or under-representing individual project characteristics.

Economic Assessment outputs

5.76 The outputs of the Economic Assessment are set out in appendices 3 and 4. These appendices present the underlying results for each project in alphabetical order.

5.77 Specifically:

- Appendix 3 (Table 8) presents the final outputs of the Economic Assessment, including both monetised and non-monetised components and how they are combined to produce the overall Economic Assessment score.
- Appendix 4 (Table 9) presents the unweighted, normalised results (between 0 and 100) for each project across the monetised and non-monetised components of the Economic Assessment.

How the Economic Assessment informed minded-to decisions

5.78 The Economic Assessment ranking forms the starting point for our decision-making process.

5.79 Table 2 below presents the Economic Assessment ranking and key Economic Assessment outputs for each project. It includes the final Economic Assessment score, together with its monetised and non-monetised component scores.

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Table 2: Economic Assessment ranking (baseline)

Ranking	Project	Technology	Region	Capacity	Duration	First Operation	Final Score	Monetised Score	Non-Monetised Score
1	Loch Kemp Storage	PSH	N_Scotland	660	22.3	2030	180.12	100.00	80.12
2	Coire Glas	PSH	N_Scotland	1440	32	2033	170.39	77.49	92.90
3	TeesCAES	CAES	NE_England	50	30	2029	118.20	25.97	92.23
4	Earba PSH	PSH	N_Scotland	1800	15	2033	112.09	53.15	58.93
5	Field Netherton	Li-ion BESS	N_Scotland	400	16.3	2030	102.16	39.26	62.89
6	Field New Deer	Li-ion BESS	N_Scotland	400	18.03	2030	101.44	38.26	63.17
7	Field Rigifa	Li-ion BESS	N_Scotland	200	18.03	2030	95.27	27.90	67.37
8	Field Fyrish	Li-ion BESS	N_Scotland	200	16.5	2030	94.04	32.37	61.67
9	Field Long Stratton	Li-ion BESS	E_England	400	16.05	2033	93.06	31.62	61.44
10	Hunterston	LAES/BESS	S_Scotland	300	8	2030	84.77	0.00	84.77
11	Killingholme 1	LAES/BESS	E_Midlands	300	8	2030	77.80	0.88	76.92
12	East Claydon Storage	Li-ion BESS	E_England	500	12	2030	75.91	27.55	48.36
13	Kincardine	Li-ion BESS	S_Scotland	145	8	2029	73.35	54.46	18.89
14	Ocker Hill BESS	Li-ion BESS	W_Midlands	145	8	2029	73.27	44.94	28.33
15	Sundon Storage	Li-ion BESS	E_England	500	8	2030	72.14	25.19	46.95
16	Drakelow (Innova)	Li-ion BESS	W_Midlands	385	8.7	2030	70.96	20.70	50.26
17	Frontier Legacy	VFB/Zn	N_Wales	65	8	2029	69.32	30.57	38.75
18	Springwell	Li-ion BESS	E_Midlands	400	11.1	2030	69.12	27.44	41.68
19	Thornton BESS 2	Li-ion BESS	E_Midlands	100	11.11	2029	67.58	42.76	24.82
20	Neilston BESS 3	Li-ion BESS	S_Scotland	300	11.22	2030	66.96	34.01	32.95
21	Branxton BESS	Li-ion BESS	S_Scotland	480	8	2029	66.00	36.82	29.18
22	Thorpe Marsh 2	Li-ion BESS	E_Midlands	336	8.7	2033	65.38	12.52	52.85
23	Glenmuckloch	PSH	S_Scotland	182	9.1	2030	64.06	25.51	38.54

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Ranking	Project	Technology	Region	Capacity	Duration	First Operation	Final Score	Monetised Score	Non-Monetised Score
24	Loch na Cathrach	PSH	N_Scotland	500	8	2030	63.73	25.79	37.94
25	Neilston BESS 2	Li-ion BESS	S_Scotland	100	11.11	2029	63.72	41.91	21.81
26	Frontier Botley	VFB/Zn	S_Wales	200	8	2030	63.35	17.40	45.95
27	Frontier Pelham	VFB/Zn	E_England	200	8	2030	62.73	17.28	45.44
28	Frontier Bramford 2	VFB/Zn	E_England	200	8	2030	62.60	17.24	45.37
29	Frontier Navenby	VFB/Zn	E_Midlands	200	8	2030	62.60	17.61	44.99
30	Frontier Wymondley	VFB/Zn	E_England	200	8	2030	62.36	17.15	45.21
31	Frontier Bramford 1	VFB/Zn	E_England	200	8	2030	62.20	16.97	45.22
32	Frontier Market	VFB/Zn	E_England	200	8	2030	62.10	16.69	45.41
33	Frontier Astwood	VFB/Zn	E_England	200	8	2030	62.08	16.86	45.21
34	Frontier Hockcliffe	VFB/Zn	E_England	200	8	2030	62.00	16.92	45.09
35	Mossmorran	Li-ion BESS	S_Scotland	200	8	2029	61.78	40.80	20.98
36	Frontier Grange Lane	VFB/Zn	W_Midlands	99	8	2030	61.73	22.84	38.90
37	Exeter Storage	Li-ion BESS	SW_England	250	8	2028	60.78	33.60	27.18
38	Thorpe Marsh 1	Li-ion BESS	E_Midlands	354	8.7	2030	60.22	15.09	45.12
39	Frontier Weaver	VFB/Zn	W_Midlands	120	8	2030	59.12	19.59	39.53
40	Enderby (Innova)	Li-ion BESS	E_England	310	8.64	2030	57.18	16.20	40.97
41	Frontier Ayr	VFB/Zn	S_Scotland	200	8	2030	56.43	13.54	42.89
42	Gretna	Li-ion BESS	S_Scotland	400	8	2029	55.66	35.49	20.17
43	Rayleigh BESS	Li-ion BESS	London	290	8	2029	55.45	31.23	24.22
44	Chickerell Storage	Li-ion BESS	SW_England	400	8	2029	55.38	29.52	25.86
45	Frontier Busby	VFB/Zn	S_Scotland	150	8	2030	54.35	10.91	43.44
46	Frontier Norwich	VFB/Zn	E_England	85	8	2031	52.83	10.53	42.29
47	Westport Energy Storage	Li-ion BESS	S_Scotland	150	10.2	2030	51.71	23.20	28.52
48	Frontier Willington	VFB/Zn	W_Midlands	90	8	2030	50.17	6.06	44.11

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Ranking	Project	Technology	Region	Capacity	Duration	First Operation	Final Score	Monetised Score	Non-Monetised Score
49	Chessington BESS	Li-ion BESS	London	240	11.17	2029	49.95	23.00	26.95
50	Connahs	Li-ion BESS	N_Wales	500	8	2029	48.99	16.33	32.66
51	LDES Barry	VFB	S_Wales	50	8	2030	48.76	15.35	33.41
52	Thorpe Marsh (Fidra)	Li-ion BESS	E_Midlands	341	10	2030	48.50	17.31	31.19
53	Nexus 1	Li-ion BESS	SW_England	1800	8.7	2030	48.37	14.42	33.96
54	Plumpton Energy Park	Li-ion BESS	W_Midlands	1000	8	2030	48.01	11.28	36.73
55	Hagshaw	VFB	S_Scotland	500	8	2030	47.84	9.70	38.14
56	Solomons Farm BESS	Li-ion BESS	London	240	11.17	2029	47.21	22.89	24.31
57	Canner's Lane	Li-ion BESS	E_Midlands	1000	8	2030	46.24	12.94	33.31
58	Navenby Energy Park	Li-ion BESS	E_Midlands	1000	8	2030	45.91	11.06	34.85
59	Dalby Energy Storage	Li-ion BESS	E_Midlands	1000	8	2030	45.56	10.86	34.70
60	Mowbray Energy Park	Li-ion BESS	NE_England	1000	8	2029	45.51	16.33	29.18
61	Hawthorn Pit	Li-ion BESS	NE_England	1000	8	2030	45.34	13.82	31.52
62	Al Boum Photo	Li-ion BESS	NE_England	100	11.11	2032	44.79	12.96	31.83
63	LDES Roosecote	VFB	W_Midlands	50	8	2030	44.04	9.99	34.05
64	Swinford Energy Park	Li-ion BESS	E_England	1000	8	2030	43.41	9.57	33.84
65	Bellmoor Energy Park	Li-ion BESS	NE_England	1000	8	2030	43.26	10.74	32.51
66	Didcot Parkway	Li-ion BESS	S_Wales	138	8	2029	43.17	24.27	18.91
67	Lapwing	Li-ion BESS	E_England	249.6	11.68	2030	42.73	17.61	25.12
68	Middleton BESS	Li-ion BESS	W_Midlands	100	8	2029	42.65	20.72	21.93
69	Old Rides	Li-ion BESS	London	1000	8	2030	42.55	11.32	31.24
70	Spirebush	VFB	S_Scotland	100	8	2030	42.48	10.79	31.70
71	Caithness BESS	Li-ion BESS	N_Scotland	456	8	2030	40.15	12.56	27.59
72	Aberthaw Energy	Li-ion BESS	S_Wales	249	8	2030	30.51	13.41	17.09
73	Deeside Power	VFB	N_Wales	50	8	2028	26.05	5.23	20.82

6. Financial Assessment

This section explains the Financial Assessment. The Financial Assessment compares expected revenues with project costs and cap and floor levels to assess the extent of potential consumer support and relative exposure to floor payments. The Financial Assessment is combined with the Economic Assessment to inform our decision-making.

Consultation questions in this section

Q2. Do you agree with our minded-to decisions on Regime Requests?

Financial Assessment process

6.1 The Financial Assessment process comprises of two main stages:

- Stage 1: We first determine the inputs to the Financial Assessment by assessing Regime Requests, where projects have proposed changes to the default cap and floor parameters. This includes requests relating to regime variation, regime duration and residual value.
- Stage 2: A Financial Assessment score is then produced for each project using the applicable regime parameters. This draws on four core elements:
 - project costs, derived from the Cost Assessment process;
 - revenue estimates, derived using a Revenue Assessment methodology;
 - cap and floor levels, based on project-specific parameters determined through the Cap and Floor Financial Model (CFFM), including the outcome of any Regime Requests; and
 - comparison of projected revenues against each project's floor level to compute the Financial Assessment score.

Regime Requests

6.2 The Financial Framework establishes a regime with standardised parameters set by Ofgem and limited flexibility for projects to propose changes to regime duration, residual value or, in exceptional cases, regime variation. The default parameters include a 25-year regime duration, zero residual value, and indicative default rates of return of 4.47% at the floor and 7.48% at the cap, both expressed in CPIH-real terms.

6.3 Projects could make Regime Requests to seek limited changes to certain parameters of the cap and floor regime where justified. These requests are designed to address any specific project characteristics or risks not fully captured

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in the standard regime design while continuing to support consumer benefit and value for money. They are assessed alongside the default regime assumptions as part of the Financial Assessment.

6.4 We assessed 50 Regime Requests in total:

- two Regime Variation requests,
- one Regime Duration request,
- 45 Residual Value requests, and
- two combined Regime Duration and Residual Value requests.

Regime Variations

6.5 We are minded-to reject both Regime Variation requests. The submissions did not provide sufficient evidence to meet the criteria set out in the Financial Framework. In particular, the projects did not demonstrate that the default administrative regime (including regime duration, residual value and the ACOD floor) had been fully considered, nor that it is insufficient to secure financing.

6.6 One project proposed a capital structure aligned to interconnector precedent, including an alternate debt service coverage ratio (DSCR), and did not demonstrate that the flexibility within the default regime would be insufficient to support project-specific debt terms. Evidence was limited to indicative engagement with a single potential lender and does not demonstrate that finance would not be available under the default regime, including the ACOD floor.

6.7 Neither submission provided sufficiently robust quantitative analysis to justify a higher, inflation-linked floor. In particular, the projects did not demonstrate that the administrative floor is insufficient, or that the requested uplift is necessary to meet lender requirements. Detailed financial evidence, including returns analysis and sensitivities were not provided, and we are therefore unable to assess the need for, or scale of, any uplift or its impact on consumers.

6.8 The projects did not demonstrate that the requested variations would deliver consumer benefit or represent value for money. While wider socio-economic benefits were identified, these are assessed separately under the Economic Assessment and do not substitute for evidence on consumer impacts within the Financial Assessment. Available evidence also indicates limited reliance on floor support, suggesting the projects are expected to operate within the default cap and floor corridor.

Regime Duration

- 6.9 We are minded-to reject the requested variation to regime duration as it did not meet the evidential bar for departure from the default regime. The submission did not provide sufficient quantitative evidence to support a longer regime duration. In particular, it did not demonstrate that the default 25-year regime is inappropriate, that it would not support delivery, or that an extension is necessary to achieve value for money.
- 6.10 Insufficient evidence was provided on consumer impacts. While a reduction in the first-year floor was identified, the project did not assess how costs would evolve over time or the cumulative impact on consumers, including intergenerational fairness. The submission also referenced an asset life exceeding the default regime duration, evidence based solely on asset life or depreciation is not sufficient where it does not account for the effects of an inflation linked regime structure over time.

Residual Value

- 6.11 Of the 45 projects that requested a non-zero residual value, we are minded-to accept 41 and minded-to reject four. Most projects provided sufficient evidence that a non-zero residual value was appropriate, either because it reflected credible post-regime asset value or reduced the level of the floor. The four rejected requests linked residual value to negative decommissioning costs, which was not consistent with the requirement that residual value reflects the expected economic value of the project beyond the regime, based on reasonable and supportable assumptions.

Combined requests

- 6.12 We are minded-to reject the two combined requests for an extended Regime Duration and a non-zero Residual Value. The submissions did not provide sufficient quantitative evidence to support an extended regime duration, including that the default 25-year regime is insufficient or that an extension would deliver consumer benefit, including value for money. While reductions in the first-year floor were identified, the projects did not assess how costs would evolve over time or the cumulative impact on consumers.
- 6.13 The projects did not provide sufficient evidence on the relationship between asset life and regime duration. As set out in the Financial Framework, asset life or depreciation alone is not sufficient where it does not account for the effects of an inflation-linked regime structure over time or demonstrate value for money. As the case for a longer duration was not demonstrated, the associated residual value proposals are not supported.

How Regime Request decisions informed the Financial Assessment

- 6.14 Following this assessment, projects proceed to the Financial Assessment on the basis of the applied regime parameters. For projects proposing an alternative floor, regime duration or a non-zero residual value, those parameters are assessed through the Financial Assessment and reflected in the cap and floor levels generated through the CFFM. Where a request is rejected, the default parameters are used instead.

Financial Assessment score

- 6.15 The Financial Assessment provides a basis for comparing the expected financial impacts of projects on consumers, including the likelihood and potential scale of cap and floor payments. It draws on project-specific cap and floor levels, expected revenue estimates, and assessed cost information.

Inputs to the Financial Assessment score

- 6.16 The inputs to the Financial Assessment are revenue estimates across the main components of the revenue stack, project-specific and standardised assumptions used to support comparability, and project-specific cap and floor levels. These inputs are derived from a combination of system modelling outputs, external analysis and project-submitted data.

Inputs to the Revenue Assessment

- 6.17 We estimated project revenues across the main components of the revenue stack. These components are Ancillary Services, Balancing Mechanism (previously referred to as Non-Energy BM Actions in the MCA Framework), Capacity Market, Wholesale Temporal Arbitrage (Initial Commitment) and Re-optimisation. System Benefit Modelling provides estimates for Wholesale Temporal Arbitrage (Initial Commitment) and Balancing Mechanism revenues, while the remaining revenue streams are informed by analysis from external advisers. Project-submitted data is used to inform calibration of selected components and to provide context for the assessment.
- 6.18 Consistent with the MCA Framework, the Financial Assessment is not intended to predict future revenues with certainty or to assess the standalone financial viability of individual projects. It provides a structured basis for comparing expected revenue profiles and cap and floor levels.
- 6.19 Standardised assumptions or adjustments were applied to revenue information to support consistency and comparability across projects. These were applied where submitted forecasts differ materially from other available evidence or

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where benchmarking indicates significant variation across otherwise similar projects. Further detail can be found in paragraphs 6.34 to 6.36.

Standardisation within the Revenue Assessment

6.20 For each project, we applied a consistent approach to the two revenue components estimated by the System Benefit Modelling (Wholesale Temporal Arbitrage (Initial Commitment) and Balancing Mechanism), taking account of differences between project-submitted information and modelling outputs. These components are subject to greater uncertainty and variation than other parts of the revenue stack. The approach was designed to limit the influence of uncertain or model-dependent estimates, while retaining the overall shape of the modelling outputs and anchoring outcomes in project-specific evidence.

Inputs from our Cost Assessment

6.21 The Financial Assessment also draws on assessed cost information from the Cost Assessment. This reflects project-submitted estimates that have been subject to a proportionate assessment and, where appropriate, adjustment using Ofgem's cost assessment methodologies. These inputs are used to determine project-specific cap and floor levels and to compare expected revenues with the floor level.

Revenue estimation process

6.22 We have estimated revenues across the main components of the revenue stack to allow for comparison between projects. These estimates are not intended to predict future revenues precisely. We have managed revenue uncertainty through a consistent and proportionate approach, using common assumptions across projects to support comparability. This allows us to assess expected revenues and relative revenue risk on a like-for-like basis.

6.23 Where appropriate, we have drawn on modelling outputs and supporting analysis alongside project-submitted information to inform our estimates. Given the forward-looking nature of the assessment, revenue forecasts are inherently uncertain and require judgement. For this reason, the assessment focuses on comparing relative revenue risk across projects rather than predicting absolute outcomes.

6.24 Components of the revenue stack:

- **Ancillary Services revenues:** Revenues are informed by the System Operability assessment (paragraph 5.31) using outputs as a proxy for relative capability and to allocate a share of total revenues. Service-level revenue pools are derived from the System Benefit Modelling estimates of

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system-wide balancing costs, alongside assumptions on the share expected to be captured by projects. Revenues are then allocated to projects in proportion to their relative scores.

- **Balancing Mechanism revenues:** Balancing Mechanism revenues are informed by the System Benefit Modelling of system conditions, reflecting the value of redispatch and constraint management. Given uncertainty in real-time system behaviour, these revenues are applied on a consistent and comparative basis rather than as precise forecasts of project-level earnings. Please note as per paragraph 5.66, although these revenues were outputs from NESO's Balancing Mechanism model, it was considered appropriate to use them, as NESO did not identify any material degeneracy that would affect their suitability for this purpose.
- **Capacity Market revenues:** Revenues are primarily driven by auction clearing prices and technology-specific derating factors, both of which are uncertain. Estimates draw on available evidence, including recent auction outcomes, project submissions and supporting analysis, and are intended to illustrate relative revenue potential and exposure to risk rather than predict specific outcomes.
- **Wholesale Temporal Arbitrage (Initial Commitment):** Revenues are informed by the System Benefit Modelling. These reflect the value storage assets can capture by charging when prices are low and discharging when prices are high and form the core component of the revenue stack.
- **Re-optimisation:** Revenues reflect additional value from adjusting operations in response to real-time market conditions after initial commitment. These revenues are inherently uncertain and sensitive to modelling assumptions. Project submissions showed wide variation, so a common approach has been applied across projects to ensure consistency, rather than relying on project-specific forecasts.

Cap and floor levels

6.25 The Financial Assessment scores are calculated using project-specific floor levels.

6.26 Provisional cap and floor levels are set based on assessed project costs and the relevant regime parameters. Where applicable, project-specific requests relating to regime duration, residual value or regime variation are considered as part of this process. Further detail on the methodology is set out in the Cap and Floor Financial Model (CFFM) and the accompanying CFFM Handbook.

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- 6.27 Project costs are drawn from the Cost Assessment, with further adjustments to reflect how costs are expected to be treated within the cap and floor regime. In particular, pass-through costs and financing costs (including Interest During Construction) are included, and costs are adjusted to reflect the time value of money. Residual value assumptions are also applied, where relevant.
- 6.28 In simple terms, cap and floor levels are calculated using a building blocks approach. Assessed project costs are combined with financing assumptions and rates of return to derive the revenue thresholds that support investability at the floor and limit excess returns at the cap. These thresholds are then used to assess the extent of potential consumer exposure through floor payments.
- 6.29 This stage establishes the revenue thresholds against which project revenues are assessed. In particular, the floor represents the level below which projects may receive support and therefore plays a central role in determining the potential for consumer exposure.

Outputs from the Financial Assessment

- 6.30 Financial Assessment scores are calculated by comparing estimated project revenues against each project's floor level over the regime duration. The resulting score provides a normalised indicator of expected revenues relative to the floor, allowing comparison of potential reliance on floor payments across projects of different scales.
- 6.31 Financial Assessment scores are intended to support relative comparison between projects rather than to provide precise forecasts. Scores below or above 1.00 indicate whether expected revenues are below or above the floor level on average over the regime. This is intended as a broad, directional indicator of potential reliance on floor payments and associated consumer exposure, rather than a decision threshold.
- 6.32 Where relevant, the effect of accepted Regime Requests is reflected in the Financial Assessment score. Where requests are not accepted, projects are assessed on the basis of the default regime parameters. The Revenue Assessment also produces adjusted revenue ranges across the main revenue streams. These are used as inputs to the Financial Assessment model and help inform our view of potential consumer support under the cap and floor regime.

Amendments from the MCA Framework

- 6.33 A limited number of amendments have been made within the Financial Assessment. These are set out below, together with the reasons for them.

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- 6.34 **Revenue adjustment:** System Benefit Modelling for Balancing Mechanism and Wholesale Temporal Arbitrage (Initial Commitment) have been adjusted using the minimum observed difference from project-submitted data for those revenue components. Re-optimisation has also been impacted as this is a factor of the Wholesale Temporal Arbitrage (Initial Commitment) data. This reflects our judgement that modelling outputs provide a consistent basis for comparing relative performance across projects but are not directly comparable to project forecasts in absolute terms.
- 6.35 We have used both PLEXOS modelling outputs and project-submitted information to inform adjusted revenue estimates for use in the Financial Assessment, while submitted forecasts are retained for reference. This supports a consistent and comparable assessment across projects and avoids undue reliance on any single source of evidence.
- 6.36 Consistent with the MCA Framework, the Financial Assessment is a high-level, forward-looking assessment based on modelled revenues and assumptions. It is intended to support a consistent comparison of projects, rather than to provide precise forecasts of future revenues.
- 6.37 **Financial Assessment scenario analysis:** Scenario analysis of the Financial Assessment score has been removed for the purposes of the Financial Assessment. While some variation in financial scores is observed under different scenarios, analysis indicates that this does not materially affect relative comparison or selection outcomes. Additional scenario analysis is therefore not considered informative for this assessment.

Limitations of the Financial Assessment

- 6.38 The Financial Assessment is subject to limitations, reflecting uncertainty in long-term revenue projections. Estimates depend on modelling assumptions, market developments and system conditions that cannot be predicted with certainty. The assessment therefore places greater weight on relative comparisons of downside risk across projects than on precise absolute forecasts.
- 6.39 Adjustments to project-submitted data and common assumptions on revenues and regime parameters have been made. Revenue estimates derived from System Benefit Modelling reflect modelled system behaviour under defined assumptions and are not intended to represent realisable market revenues. They should be interpreted as comparative indicators of relative performance, rather than forecasts.
- 6.40 Long-term revenue forecasting remains inherently uncertain. Actual revenues may differ from forecast revenues because they will depend on future market

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conditions, operational performance and other factors that cannot be predicted with certainty at this stage. The Financial Assessment outputs should therefore be interpreted as a range of potential outcomes under a consistent framework of assumptions and considered alongside the Economic and Strategic Assessments within the MCA Framework.

How the Financial Assessment informed minded-to decisions

- 6.41 The Financial Assessment informed our decision-making. The Financial Assessment assesses project costs and expected revenues to evaluate financial viability and the extent of potential consumer support required under the cap and floor regime.
- 6.42 Financial Assessment outputs have been considered alongside the Economic and Strategic Assessments, consistent with the approach set out in the MCA Framework. This reflects the forward-looking nature of the Financial Assessment and the need to interpret its results in the context of uncertainty and other assessment factors.
- 6.43 We have elected to make adjustments to our Economic Assessment ranking for projects with Financial Assessment scores that demonstrate materially elevated risk profiles. Projects below a score of 0.60 have been identified, through analysis of the distribution of scores, as having comparatively higher downside risk. This was not a pre-determined threshold, but a judgement applied in the round, reflecting a clear separation in the data.
- 6.44 Although not fixed in advance, this threshold has been applied consistently across projects as a proportionate proxy for materially elevated risk of floor reliance, rather than as a standalone decision rule. This approach to setting the threshold also has regard to the wider strategic benefits offered by some projects, acknowledging that a trade-off may be justifiable where particular benefits offset a lower Financial Assessment score.
- 6.45 In applying this threshold alongside the Economic Assessment baseline ranking, we are exercising the judgment contemplated by the MCA Framework to interpret Financial Assessment outputs and to make proportionate decisions where risk is most pronounced. We welcome views on the appropriateness of this threshold and how it has been applied.
- 6.46 Table 3 below presents the Economic Assessment ranking alongside the Financial Assessment results. The Financial Assessment (FA) score is shown alongside the Submitted FA score for comparison and is presented as either above or below the threshold.
- 6.47 For clarity:

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- Projects whose position has been adjusted following consideration of the Financial Assessment outputs are indicated in **bold** and labelled “(adj)” alongside their ranking to denote that their position has changed.
- In all cases, projects retain their relative order from the Economic Assessment baseline, even where their position within the table has changed to reflect adjustments.

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Table 3: Economic Assessment ranking with Financial Assessment results

Ranking	Project	Technology	Region	Capacity	Duration	First Operation	Submitted FA Score	Assessed FA Score
1	Loch Kemp Storage	PSH	N_Scotland	660	22.3	2030	Above	Above
2	Coire Glas	PSH	N_Scotland	1440	32	2033	Above	Above
3	TeesCAES	CAES	NE_England	50	30	2029	Above	Above
4	Earba PSH	PSH	N_Scotland	1800	15	2033	Above	Above
5	Field Netherton	Li-ion BESS	N_Scotland	400	16.3	2030	Above	Above
6	Field New Deer	Li-ion BESS	N_Scotland	400	18.03	2030	Above	Above
7	Field Rigifa	Li-ion BESS	N_Scotland	200	18.03	2030	Above	Above
8	Field Fyrish	Li-ion BESS	N_Scotland	200	16.5	2030	Above	Above
9	Field Long Stratton	Li-ion BESS	E_England	400	16.05	2033	Above	Above
12	East Claydon Storage	Li-ion BESS	E_England	500	12	2030	Above	Above
13	Kincardine	Li-ion BESS	S_Scotland	145	8	2029	Above	Above
14	Ocker Hill BESS	Li-ion BESS	W_Midlands	145	8	2029	Above	Above
15	Sundon Storage	Li-ion BESS	E_England	500	8	2030	Above	Above
16	Drakelow (Innova)	Li-ion BESS	W_Midlands	385	8.7	2030	Above	Above
18	Springwell	Li-ion BESS	E_Midlands	400	11.1	2030	Above	Above
19	Thornton BESS 2	Li-ion BESS	E_Midlands	100	11.11	2029	Above	Above
20	Neilston BESS 3	Li-ion BESS	S_Scotland	300	11.22	2030	Above	Above
21	Branxton BESS	Li-ion BESS	S_Scotland	480	8	2029	Above	Above
22	Thorpe Marsh 2 (Innova)	Li-ion BESS	E_Midlands	336	8.7	2033	Above	Above
25	Neilston BESS 2	Li-ion BESS	S_Scotland	100	11.11	2029	Above	Above
26	Frontier Botley	VFB/Zn	S_Wales	200	8	2030	Above	Above
27	Frontier Pelham	VFB/Zn	E_England	200	8	2030	Above	Above
28	Frontier Bramford 2	VFB/Zn	E_England	200	8	2030	Above	Above

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Ranking	Project	Technology	Region	Capacity	Duration	First Operation	Submitted FA Score	Assessed FA Score
29	Frontier Navenby	VFB/Zn	E_Midlands	200	8	2030	Above	Above
30	Frontier Wymondley	VFB/Zn	E_England	200	8	2030	Above	Above
31	Frontier Bramford 1	VFB/Zn	E_England	200	8	2030	Above	Above
32	Frontier Market	VFB/Zn	E_England	200	8	2030	Above	Above
33	Frontier Astwood	VFB/Zn	E_England	200	8	2030	Above	Above
34	Frontier Hockcliffe	VFB/Zn	E_England	200	8	2030	Above	Above
35	Mossmorran	Li-ion BESS	S_Scotland	200	8	2029	Above	Above
37	Exeter Storage	Li-ion BESS	SW_England	250	8	2028	Above	Above
38	Thorpe Marsh 1 (Innova)	Li-ion BESS	E_Midlands	354	8.7	2030	Above	Above
40	Enderby (Innova)	Li-ion BESS	E_England	310	8.64	2030	Above	Above
42	Gretna	Li-ion BESS	S_Scotland	400	8	2029	Above	Above
43	Rayleigh BESS	Li-ion BESS	London	290	8	2029	Above	Above
44	Chickerell Storage	Li-ion BESS	SW_England	400	8	2029	Above	Above
47	Westport Energy Storage	Li-ion BESS	S_Scotland	150	10.2	2030	Above	Above
49	Chessington BESS	Li-ion BESS	London	240	11.17	2029	Above	Above
50	Connahs	Li-ion BESS	N_Wales	500	8	2029	Above	Above
52	Thorpe Marsh (Fidra)	Li-ion BESS	E_Midlands	341	10	2030	Above	Above
53	Nexus 1	Li-ion BESS	SW_England	1800	8.7	2030	Above	Above
54	Plumpton Energy Park	Li-ion BESS	W_Midlands	1000	8	2030	Above	Above
56	Solomons Farm BESS	Li-ion BESS	London	240	11.17	2029	Above	Above
57	Canner's Lane	Li-ion BESS	E_Midlands	1000	8	2030	Above	Above
58	Navenby Energy Park	Li-ion BESS	E_Midlands	1000	8	2030	Above	Above
59	Dalby Energy Storage	Li-ion BESS	E_Midlands	1000	8	2030	Above	Above
60	Mowbray Energy Park	Li-ion BESS	NE_England	1000	8	2029	Above	Above
61	Hawthorn Pit	Li-ion BESS	NE_England	1000	8	2030	Above	Above

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Ranking	Project	Technology	Region	Capacity	Duration	First Operation	Submitted FA Score	Assessed FA Score
62	Al Boum Photo	Li-ion BESS	NE_England	100	11.11	2032	Above	Above
64	Swinford Energy Park	Li-ion BESS	E_England	1000	8	2030	Above	Above
65	Bellmoor Energy Park	Li-ion BESS	NE_England	1000	8	2030	Above	Above
66	Didcot Parkway	Li-ion BESS	S_Wales	138	8	2029	Above	Above
67	Lapwing	Li-ion BESS	E_England	249.6	11.68	2030	Above	Above
68	Middleton BESS	Li-ion BESS	W_Midlands	100	8	2029	Above	Above
69	Old Rides	Li-ion BESS	London	1000	8	2030	Above	Above
71	Caithness BESS	Li-ion BESS	N_Scotland	456	8	2030	Above	Above
72	Aberthaw Energy	Li-ion BESS	S_Wales	249	8	2030	Above	Above
10 (adj)	Hunterston	LAES/BESS	S_Scotland	300	8	2030	Above	Below
11 (adj)	Killingholme 1	LAES/BESS	E_Midlands	300	8	2030	Above	Below
17 (adj)	Frontier Legacy	VFB/Zn	N_Wales	65	8	2029	Above	Below
23 (adj)	Glenmuckloch	PSH	S_Scotland	182	9.1	2030	Above	Below
24 (adj)	Loch na Cathrach	PSH	N_Scotland	500	8	2030	Above	Below
36 (adj)	Frontier Grange Lane	VFB/Zn	W_Midlands	99	8	2030	Above	Below
39 (adj)	Frontier Weaver	VFB/Zn	W_Midlands	120	8	2030	Above	Below
41 (adj)	Frontier Ayr	VFB/Zn	S_Scotland	200	8	2030	Above	Below
45 (adj)	Frontier Busby	VFB/Zn	S_Scotland	150	8	2030	Above	Below
46 (adj)	Frontier Norwich	VFB/Zn	E_England	85	8	2031	Above	Below
48 (adj)	Frontier Willington	VFB/Zn	W_Midlands	90	8	2030	Above	Below
51 (adj)	LDES Barry	VFB	S_Wales	50	8	2030	Above	Below
55 (adj)	Hagshaw	VFB	S_Scotland	500	8	2030	Above	Below
63 (adj)	LDES Roosecote	VFB	W_Midlands	50	8	2030	Above	Below
70 (adj)	Spirebush	VFB	S_Scotland	100	8	2030	Above	Below
73 (adj)	Deeside	VFB	N_Wales	50	8	2028	No Data*	No Data*

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*Deeside Power Energy Hub did not submit a CFFM and so have no Financial Assessment data.

7. Strategic Assessment

This section explains the Strategic Assessment. It considers factors not fully captured in previous assessments, including scenario sensitivity, deliverability and overall portfolio-level considerations. The Strategic Assessment is combined with the Economic Assessment and Financial Assessment to inform our decision-making.

Strategic Assessment process

7.1 The Strategic Assessment comprises of the following elements:

- Scenario analysis allows us to test the robustness of outcomes under a range of plausible future system conditions. It evaluates how relative project performance and ranking of the Economic Assessment varies under alternative assumptions, ensuring results are not dependent on a single case.
- Deliverability Assessment assesses whether projects are credible to deliver in practice, considering key risks in aggregate.
- Diversity assessment considers the overall mix of technologies, locations and interdependencies. This ensures that outcomes are aligned with system needs, avoids unintended concentration risks where possible, and provides a balanced technology portfolio capable of delivering a range of system services.

Scenario analysis

7.2 The purpose of the scenario analysis is to test how robust the Project Assessment outcomes are under a range of future conditions. It supports consideration of risks of regret and uncertainty when comparing projects and helps assess whether relative project outcomes remain broadly stable when key assumptions about costs, revenues and system conditions are varied.

7.3 As set out in the MCA Framework, scenario analysis is structured around two complementary elements: flexibility across scenarios and the risk of cost overruns. The first examines how sensitive a project's relative position is to alternative system conditions, including different Future Energy Scenarios (FES) pathways and weather years. The second considers how stable outcomes remain when project costs differ from the Base Case.

7.4 All scenarios are assessed relative to a defined Base Case. For the Economic Assessment, the Base Case comprises the FES Holistic Transition pathway, a standard 2013 weather year, and a base cost scenario using adjusted project-

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submitted P50 values, excluding pass-through costs such as business rates and TNUoS charges.

- 7.5 Each scenario introduces a single change relative to the Base Case. This allows us to test sensitivity to specific assumptions in a clear and transparent way and to better understand which factors drive changes in outcomes. The Economic Assessment scenarios considered in the aggregate deviation “Scenario Analysis Score” presented in Table 4 are two alternative FES pathways (Electric Engagement and Falling Behind) and two alternative weather years (1990 and 1997). The pessimistic cost sensitivity was produced and considered independently but we decided not to include it in this aggregate score.
- 7.6 The scenario analysis identified a small number of projects that were materially more sensitive than others to changes in the underlying assumptions. These are treated as higher-risk cases in the Strategic Assessment. More generally, however, most projects exhibited some sensitivity while remaining broadly stable in comparative terms. This supports the view that the proposed portfolio is largely robust under a range of plausible future conditions.

Deliverability Assessment

- 7.7 The purpose of the Deliverability Assessment is to identify whether there are material risks to projects delivering their proposed capacity within their stated delivery timelines. It highlights areas where delivery risk may be higher and should be taken into account – it is not intended to provide a binary view on whether a project will or will not be delivered, nor does it determine licence award or replace the need for further assurance at later stages of the cap and floor regime.
- 7.8 The assessment focused on delivery risk factors that we consider material at this stage of project development and that are commonly associated with large-scale infrastructure delivery. These were: schedule contingency and overall delivery timeline assumptions; grid connection arrangements and readiness; planning and consenting status; proposed IT and Operational Technology (OT) security measures; and supply chain availability, informed by both project submissions and external technical advice.
- 7.9 The assessment produced assessment outputs for each project. We applied judgment to combine these outputs into an overall assessment of the likelihood of these deliverability risks not being mitigated following a cap and floor award using a red, amber and green rating.⁵ We do not consider that the current evidence justifies excluding projects solely on these risks – where a pathway to

⁵ Green (low likelihood of risks not being mitigated), Amber (medium likelihood of risks not being mitigated), Red (High likelihood of risks not being mitigated)

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timely delivery remains open and where the projects otherwise perform strongly overall.

- 7.10 On connections specifically, we consider a project's current position in the connection queue is largely outside their control. Accordingly, where a credible pathway to timely delivery remains open, and where a project otherwise performs strongly overall, we are minded to manage the resulting risk through conditions attached to any award of cap and floor support, including time-bound milestones, consistent with the approach taken in previous cap and floor regimes.

Portfolio-level considerations

- 7.11 The Strategic Assessment also considers portfolio-level effects to assess whether the proposed portfolio appropriately balances benefits and risk across the portfolio as a whole. In particular, we considered technological diversity, locational diversity and interdependencies between projects, recognising that these factors may affect whether the overall portfolio is robust and resilient for consumers.

Diversity

- 7.12 The MCA Framework noted that it could be in the long-term interests of consumers to avoid over-reliance on a narrow set of technologies, and that there may be wider benefits from learning associated with deployment of novel technologies. Consistent with this, we considered the portfolio emerging from the Economic, Financial and project-level Strategic Assessments and, where justified, considered an appropriate level of technology diversity, taking into account the wider evidence base and the overall impact on consumer outcomes.
- 7.13 The MCA Framework also recognised that system benefits may not scale linearly when projects are considered as a portfolio, and that the distribution of projects across locations may therefore be relevant. As set out in paragraph 5.72, we have not relied on locational signals from System Benefit Modelling on a project-by-project basis. However, location remains reflected within the Economic Assessment through the design of counterfactuals and other components, including system operability.
- 7.14 In addition to the modelling set out in NESO's September 2025 methodology, NESO has undertaken additional zonal sensitivity analysis to assess the impact of different locations on redispatch costs. We considered this analysis as part of the wider evidence base on locational impacts. However, given its project-agnostic nature and the fact that it was designed to provide a broad zonal comparison, we did not consider it a sufficient basis for adjusting the proposed portfolio.

Interdependencies

- 7.15 We also considered whether material interdependencies exist between projects that could affect deliverability or the effectiveness of the portfolio. Based on project submissions and supporting evidence, most projects did not identify material interdependencies.
- 7.16 A small number of potential interdependencies were identified, most notably where projects may interact through shared natural resources, such as water availability for pumped storage hydro projects. In those cases, resolution is subject to external processes, including planning and environmental permitting decisions by the relevant authorities.
- 7.17 This analysis has informed our consideration of interdependencies within the Strategic Assessment and has been taken into account alongside other portfolio-level factors as part of our overall approach. While interdependencies may give rise to delivery risks in a limited number of cases, we have considered these risks at a portfolio level, including through our consideration of potential project attrition in setting the capacity limit. Projects will need to manage any relevant interdependencies as part of delivery, including securing the necessary consents and approvals.

Amendments from the MCA Framework

- 7.18 A limited number of amendments have been made within the Strategic Assessment. These are set out below.
- 7.19 **Removal of Financial Assessment alternative revenue scenarios:** As described in paragraph 6.34 and in light of the changes made to revenue estimation for the Financial Assessment, we have not included alternative revenue-based scenarios within the Strategic Assessment. This means that scenario testing does not include alternative FES pathways, weather years, or high and low revenue sensitivities for Financial Assessment scores, as was originally contemplated under the MCA Framework.
- 7.20 **Removal of the optimistic cost scenario:** Following review of project-submitted P10 cost data, we decided not to include an optimistic cost scenario within scenario analysis. This reflects concerns about the reliability and consistency of the project-submitted data that would inform such a scenario, as well as our judgement that downside cost risk is the more material consideration at this stage given the potential transfer of cost risk to consumers.

How the Strategic Assessment informed minded-to decisions

- 7.21 The Strategic Assessment informed our decision-making. The Strategic Assessment considers factors not fully captured in the Economic and Financial Assessments, including scenario sensitivity, deliverability, and overall portfolio-level considerations – thereby reducing the risk of regret under uncertainty and supporting a portfolio that is robust rather than merely optimal on a single central case.
- 7.22 Most projects remain largely stable under a range of future scenarios. Projects below a scenario score threshold of -100 have been identified as exhibiting greater sensitivity across the scenarios considered. This threshold was not pre-determined in advice but has been identified through analysis of the distribution of scores, which shows clear separation between projects with a relatively higher and lower risk exposure.
- 7.23 We considered it appropriate to use a threshold to provide a structured and transparent basis for identifying projects that were materially more sensitive to changes in underlying assumptions, rather than relying solely on unstructured judgment. In our judgment, the threshold reduces the risk of over-weighting uncertainty, while still allowing the outcomes of the assessment to be informed by uncertainty where sensitivity is most pronounced.
- 7.24 Projects are assessed as largely having a credible pathway to delivery, noting external uncertainties mentioned above. Delivery risks were assessed across components such as contingency, gate connections, supply chain, planning and information technology. The likelihood of these deliverability risks not being mitigated has been assessed using a red, amber and green rating.⁶
- 7.25 Overall, the assessment has been made on a project-by-project basis, but we acknowledge that some degree of interdependency may arise between these projects. For example, potential supply chain constraints where assets are located in similar areas, or constraints affecting assets that rely on the same water resources, including those arising from water abstraction rights or other local authority requirements.
- 7.26 We do not consider that the current evidence justifies excluding projects solely on these risks – where a pathway to timely delivery remains open and where the projects otherwise perform strongly overall. These delivery risks can be managed through conditions and ongoing project milestones, and that to exclude such

⁶ Green (low likelihood of risks not being mitigated), Amber (medium likelihood of risks not being mitigated), Red (High likelihood of risks not being mitigated)

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projects now would risk deprioritising those that our assessment shows could deliver significant system benefits.

7.27 We have applied discretion in line with the MCA Framework to broaden the technology diversity by including one Vanadium Flow/Zinc Battery project. This does not displace earlier assessments but reflects a portfolio-level judgment. No project is included on diversity grounds alone – reflecting the judgment that the residual risks of this project are proportionate when weighed against the benefits of greater technological diversity.

7.28 This modest expansion increases representation of technologies with different operating characteristics without materially changing the overall portfolio. Given its limited scale, inclusion would not materially increase risk to consumers, while offering potential upside through increased diversity and learning benefits. It does not result in the exclusion of any projects that would otherwise have been included.

7.29 The proposed portfolio has an appropriate locational spread of projects. The largest concentration of projects is in Scotland with the remaining projects spread across England and Wales. Our judgment is that the deployment of capacity in the proposed locations is appropriate and is likely to have positive system benefits. There is also no indication the system would be adversely impacted.

7.30 Table 4 below presents the Economic Assessment ranking, incorporating adjustments informed by the Financial Assessment outputs (see Table 3) and further adjustments arising from the Strategic Assessment.

7.31 For clarity:

- Projects previously adjusted following the Financial Assessment outputs (see Table 3) are labelled “(adj)” alongside their ranking.
- Projects whose position changes as a result of the Strategic Assessment are highlighted in **bold** and labelled “(adj)” to denote that an adjustment has occurred following consideration of Strategic Assessment outputs.
- In all cases, projects retain their relative order from the Economic Assessment baseline, even where their position within the table has changed to reflect adjustments.

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Table 4: Economic Assessment ranking with adjustments based on Financial and Strategic Assessment outputs

Ranking	Project	Technology	Region	Capacity	Duration	First operation	Scenario Analysis Score	Deliverability Rating	Diversity
1	Loch Kemp Storage	PSH	N_Scotland	660	22.3	2030	-2	Green	
2	Coire Glas	PSH	N_Scotland	1440	32	2033	2	Green	
3	TeesCAES	CAES	NE_England	50	30	2029	-17	Amber	
4	Earba PSH	PSH	N_Scotland	1800	15	2033	1	Green	
5	Field Netherton	Li-ion BESS	N_Scotland	400	16.3	2030	-3	Amber	
6	Field New Deer	Li-ion BESS	N_Scotland	400	18.03	2030	-8	Amber	
7	Field Rigifa	Li-ion BESS	N_Scotland	200	18.03	2030	4	Amber	
8	Field Fyrish	Li-ion BESS	N_Scotland	200	16.5	2030	9	Amber	
9	Field Long Stratton	Li-ion BESS	E_England	400	16.05	2033	-19	Amber	
12	East Claydon Storage	Li-ion BESS	E_England	500	12	2030	1	Amber	
14	Ocker Hill BESS	Li-ion BESS	W_Midlands	145	8	2029	-55	Amber	
15	Sundon Storage	Li-ion BESS	E_England	500	8	2030	7	Amber	
16	Drakelow (Innova)	Li-ion BESS	W_Midlands	385	8.7	2030	-12	Amber	
17 (adj)	Frontier Legacy	VFB/Zn	N_Wales	65	8	2029	-149	Amber	Yes
18	Springwell	Li-ion BESS	E_Midlands	400	11.1	2030	-6	Amber	
19	Thornton BESS 2	Li-ion BESS	E_Midlands	100	11.11	2029	-77	Green	
20	Neilston BESS 3	Li-ion BESS	S_Scotland	300	11.22	2030	-31	Amber	
21	Branxton BESS	Li-ion BESS	S_Scotland	480	8	2029	-17	Amber	
22	Thorpe Marsh 2 (Innova)	Li-ion BESS	E_Midlands	336	8.7	2033	38	Green	
26	Frontier Botley	VFB/Zn	S_Wales	200	8	2030	-11	Amber	
27	Frontier Pelham	VFB/Zn	E_England	200	8	2030	-14	Amber	
28	Frontier Bramford 2	VFB/Zn	E_England	200	8	2030	-15	Amber	
29	Frontier Navenby	VFB/Zn	E_Midlands	200	8	2030	-13	Amber	

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Ranking	Project	Technology	Region	Capacity	Duration	First operation	Scenario Analysis Score	Deliverability Rating	Diversity
30	Frontier Wymondley	VFB/Zn	E_England	200	8	2030	-16	Amber	
31	Frontier Bramford 1	VFB/Zn	E_England	200	8	2030	-17	Amber	
32	Frontier Market	VFB/Zn	E_England	200	8	2030	3	Amber	
33	Frontier Astwood	VFB/Zn	E_England	200	8	2030	-13	Amber	
34	Frontier Hockcliffe	VFB/Zn	E_England	200	8	2030	-13	Amber	
35	Mossmorran	Li-ion BESS	S_Scotland	200	8	2029	-29	Amber	
37	Exeter Storage	Li-ion BESS	SW_England	250	8	2028	46	Green	
38	Thorpe Marsh 1 (Innova)	Li-ion BESS	E_Midlands	354	8.7	2030	61	Green	
40	Enderby (Innova)	Li-ion BESS	E_England	310	8.64	2030	51	Amber	
42	Gretna	Li-ion BESS	S_Scotland	400	8	2029	17	Amber	
43	Rayleigh BESS	Li-ion BESS	London	290	8	2029	51	Green	
44	Chickerell Storage	Li-ion BESS	SW_England	400	8	2029	13	Green	
47	Westport Energy Storage	Li-ion BESS	S_Scotland	150	10.2	2030	-33	Amber	
49	Chessington BESS	Li-ion BESS	London	240	11.17	2029	19	Amber	
50	Connahs	Li-ion BESS	N_Wales	500	8	2029	-3	Amber	
52	Thorpe Marsh (Fidra)	Li-ion BESS	E_Midlands	341	10	2030	-5	Green	
53	Nexus 1	Li-ion BESS	SW_England	1800	8.7	2030	22	Green	
54	Plumpton Energy Park	Li-ion BESS	W_Midlands	1000	8	2030	63	Amber	
56	Solomons Farm BESS	Li-ion BESS	London	240	11.17	2029	27	Amber	
57	Canner's Lane	Li-ion BESS	E_Midlands	1000	8	2030	50	Amber	
58	Navenby Energy Park	Li-ion BESS	E_Midlands	1000	8	2030	57	Amber	
59	Dalby Energy Storage	Li-ion BESS	E_Midlands	1000	8	2030	72	Amber	
60	Mowbray Energy Park	Li-ion BESS	NE_England	1000	8	2029	47	Amber	
61	Hawthorn Pit	Li-ion BESS	NE_England	1000	8	2030	65	Amber	

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Ranking	Project	Technology	Region	Capacity	Duration	First operation	Scenario Analysis Score	Deliverability Rating	Diversity
62	Al Boum Photo	Li-ion BESS	NE_England	100	11.11	2032	49	Green	
64	Swinford Energy Park	Li-ion BESS	E_England	1000	8	2030	58	Amber	
65	Bellmoor Energy Park	Li-ion BESS	NE_England	1000	8	2030	78	Amber	
66	Didcot Parkway	Li-ion BESS	S_Wales	138	8	2029	-1	Amber	
67	Lapwing	Li-ion BESS	E_England	249.6	11.68	2030	38	Green	
68	Middleton BESS	Li-ion BESS	W_Midlands	100	8	2029	43	Amber	
69	Old Rides	Li-ion BESS	London	1000	8	2030	74	Amber	
71	Caithness BESS	Li-ion BESS	N_Scotland	456	8	2030	42	Amber	
72	Aberthaw Energy	Li-ion BESS	S_Wales	249	8	2030	20	Amber	
10 (adj)	Hunterston	LAES/BESS	S_Scotland	300	8	2030	-39	Green	
11 (adj)	Killingholme 1	LAES/BESS	E_Midlands	300	8	2030	-61	Amber	
13 (adj)	Kincardine	Li-ion BESS	S_Scotland	145	8	2029	-156	Amber	
23 (adj)	Glenmuckloch	PSH	S_Scotland	182	9.1	2030	-23	Green	
24 (adj)	Loch na Cathrach	PSH	N_Scotland	500	8	2030	-23	Green	
25 (adj)	Neilston BESS 2	Li-ion BESS	S_Scotland	100	11.11	2029	-123	Green	
36 (adj)	Frontier Grange Lane	VFB/Zn	W_Midlands	99	8	2030	-60	Amber	
39 (adj)	Frontier Weaver	VFB/Zn	W_Midlands	120	8	2030	-24	Green	
41 (adj)	Frontier Ayr	VFB/Zn	S_Scotland	200	8	2030	-20	Green	
45 (adj)	Frontier Busby	VFB/Zn	S_Scotland	150	8	2030	-15	Green	
46 (adj)	Frontier Norwich	VFB/Zn	E_England	85	8	2031	7	Green	
48 (adj)	Frontier Willington	VFB/Zn	W_Midlands	90	8	2030	0	Amber	
51 (adj)	LDES Barry	VFB	S_Wales	50	8	2030	-4	Amber	
55 (adj)	Hagshaw	VFB	S_Scotland	500	8	2030	-25	Amber	
63 (adj)	LDES Roosecote	VFB	W_Midlands	50	8	2030	20	Amber	

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Ranking	Project	Technology	Region	Capacity	Duration	First operation	Scenario Analysis Score	Deliverability Rating	Diversity
70 (adj)	Spirebush	VFB	S_Scotland	100	8	2030	-3	Green	
73 (adj)	Deeside	VFB	N_Wales	50	8	2028	0	Amber	

8. Capacity and Attrition

This section explains Capacity and Attrition. It draws on the Capacity Advice and wider evidence on likely delivery risk to assess how much capacity should be awarded in Window 1 while protecting consumers. It also explains why we consider a total award capacity at the upper end of the recommended capacity range.

Consultation questions in this section

Q3. Do you agree with our minded-to capacity decision for Window 1?

Capacity and attrition approach

- 8.1 Given the volume of eligible projects and the combined capacity seeking support, we consider it prudent to only award up to a certain total capacity. This ensures that cap and floor regimes are awarded in line with expected system requirements and limits the risk of exposing consumers to excessive floor payments or reduced system benefits from over-procurement. At the same time, it recognises that a project not receiving an award in Window 1 has not necessarily failed the assessment but may instead fall outside the capacity required at this stage.
- 8.2 Our assessment of the appropriate capacity range draws primarily on the Capacity Advice which recommended that between 2.7GW and 7.7GW of additional capacity would be needed by 2035 – indicating that deployment in the middle to upper end of this range is likely to be cost-optimal and supports delivery of Clean Power 2030 and Net Zero 2050⁷. We have also taken into account that capacity expansion modelling shows a preference for longer-duration assets in the first instance, reflecting their ability to provide sustained system value during extended periods of low renewable output.
- 8.3 A further key consideration is attrition risk: the possibility that some projects offered an award may not proceed to operation. Attrition may occur for a range of reasons, including developers choosing not to accept an award, financing challenges, or other unforeseen delivery issues. Attrition risk is particularly relevant for larger and more complex projects, including some pumped storage hydro schemes, and where projects have sought but not obtained changes to the standard regime.

⁷ The majority of the outputs from modelled pathways and sensitivities indicate that the middle to upper bound of additional capacity deployment in the recommended range is more likely to be cost optimal.

Limitations

- 8.4 Our approach to determining capacity and attrition is subject to limitations. The primary constraint is the reliance on an overall optimal capacity range derived from pre-existing analysis, rather than a disaggregated assessment of specific capacity requirements in particular locations and with defined technical capabilities. While interim Strategic Spatial Energy Plan (SSEP) outputs provide support for the existing range, the underlying evidence base on future system needs remains evolving and does not yet provide sufficiently granular system-level requirements.
- 8.5 In addition, attrition risk remains inherently uncertain. There is limited empirical evidence on project attrition under this regime, and individual projects may exhibit materially different risk profiles. Taken together, these limitations mean that the optimal level and composition of capacity cannot be determined with precision. We have therefore adopted a proportionate approach based on the best available aggregate evidence, while recognising that future system planning would inform any subsequent application windows.

How Capacity and Attrition informed minded-to decisions

- 8.6 Our minded-to decision on capacity is to include a total of 7,645MW, just below the upper limit of the advised range (7,700MW). This provides headroom for a reasonable degree of attrition while also ensuring that, if all projects proceed, the total capacity awarded remains within the recommended capacity range.
- 8.7 We consider this approach reflects a sensible balance between the risk of under-procurement, in the event of attrition, and over-procurement, if excessive capacity is supported at consumer expense. We have not adopted the more aggressive approach of setting capacity above the recommended range in anticipation of attrition. Instead, we consider that remaining within that range, but towards its upper end, provides the most proportionate balance on the evidence available.
- 8.8 The resulting portfolio is also consistent with the broader evidence base. It has a strong representation of higher-duration and larger-capacity assets, in line with the Capacity Advice, and provides a reasonably evidenced pathway to delivering substantial capacity by 2030 and beyond. While delivery cannot be guaranteed and attrition risk remains, the selected projects are, on the evidence currently available, capable of supporting both Clean Power 2030 ambitions and longer-term system needs.
- 8.9 Table 5 presents our proposed minded-to decisions for all projects. It identifies those projects proposed for inclusion within our Window 1 portfolio, reflecting our

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minded-to position on portfolio composition and capacity. The table also shows where a project's position has changed during our assessment following consideration of the Economic, Financial and Strategic Assessments.

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Table 5: Minded-to decisions

Ranking	Project	Technology	Region	Capacity	Duration	First Operation	EA Adjustment	FA Adjustments	SA Adjustments
1	Loch Kemp Storage	PSH	N_Scotland	660	22.3	2030			
2	Coire Glas	PSH	N_Scotland	1440	32	2033			
3	TeesCAES	CAES	NE_England	50	30	2029			
4	Earba PSH	PSH	N_Scotland	1800	15	2033			
5	Field Netherton	Li-ion BESS	N_Scotland	400	16.3	2030			
6	Field New Deer	Li-ion BESS	N_Scotland	400	18.03	2030			
7	Field Rigifa	Li-ion BESS	N_Scotland	200	18.03	2030			
8	Field Fyrish	Li-ion BESS	N_Scotland	200	16.5	2030			
9	Field Long Stratton	Li-ion BESS	E_England	400	16.05	2033			
12	East Claydon Storage	Li-ion BESS	E_England	500	12	2030			
14	Ocker Hill BESS	Li-ion BESS	W_Midlands	145	8	2029			
15	Sundon Storage	Li-ion BESS	E_England	500	8	2030			
16	Drakelow (Innova)	Li-ion BESS	W_Midlands	385	8.7	2030			
17	Frontier Legacy	VFB/Zn	N_Wales	65	8	2029		Yes	Yes
18	Springwell	Li-ion BESS	E_Midlands	400	11.1	2030			
19	Thornton BESS 2	Li-ion BESS	E_Midlands	100	11.11	2029			
20	Neilston BESS 3	Li-ion BESS	S_Scotland	300	11.22	2030			
21	Branxton BESS	Li-ion BESS	S_Scotland	480	8	2029			
22	Thorpe Marsh 2 (Innova)	Li-ion BESS	E_Midlands	336	8.7	2033			
26	Frontier Botley	VFB/Zn	S_Wales	200	8	2030			
27	Frontier Pelham	VFB/Zn	E_England	200	8	2030			
28	Frontier Bramford 2	VFB/Zn	E_England	200	8	2030			
29	Frontier Navenby	VFB/Zn	E_Midlands	200	8	2030			

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Ranking	Project	Technology	Region	Capacity	Duration	First Operation	EA Adjustment	FA Adjustments	SA Adjustments
30	Frontier Wymondley	VFB/Zn	E_England	200	8	2030			
31	Frontier Bramford 1	VFB/Zn	E_England	200	8	2030			
32	Frontier Market	VFB/Zn	E_England	200	8	2030			
33	Frontier Astwood	VFB/Zn	E_England	200	8	2030			
34	Frontier Hockcliffe	VFB/Zn	E_England	200	8	2030			
35	Mossmorran	Li-ion BESS	S_Scotland	200	8	2029			
37	Exeter Storage	Li-ion BESS	SW_England	250	8	2028			
38	Thorpe Marsh 1 (Innova)	Li-ion BESS	E_Midlands	354	8.7	2030			
40	Enderby (Innova)	Li-ion BESS	E_England	310	8.64	2030			
42	Gretna	Li-ion BESS	S_Scotland	400	8	2029			
43	Rayleigh BESS	Li-ion BESS	London	290	8	2029			
44	Chickerell Storage	Li-ion BESS	SW_England	400	8	2029			
47	Westport Energy Storage	Li-ion BESS	S_Scotland	150	10.2	2030			
49	Chessington BESS	Li-ion BESS	London	240	11.17	2029			
50	Connahs	Li-ion BESS	N_Wales	500	8	2029			
52	Thorpe Marsh (Fidra)	Li-ion BESS	E_Midlands	341	10	2030			
53	Nexus 1	Li-ion BESS	SW_England	1800	8.7	2030			
54	Plumpton Energy Park	Li-ion BESS	W_Midlands	1000	8	2030			
56	Solomons Farm BESS	Li-ion BESS	London	240	11.17	2029			
57	Canner's Lane	Li-ion BESS	E_Midlands	1000	8	2030			
58	Navenby Energy Park	Li-ion BESS	E_Midlands	1000	8	2030			
59	Dalby Energy Storage	Li-ion BESS	E_Midlands	1000	8	2030			
60	Mowbray Energy Park	Li-ion BESS	NE_England	1000	8	2029			
61	Hawthorn Pit	Li-ion BESS	NE_England	1000	8	2030			
62	Al Boum Photo	Li-ion BESS	NE_England	100	11.11	2032			

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Ranking	Project	Technology	Region	Capacity	Duration	First Operation	EA Adjustment	FA Adjustments	SA Adjustments
64	Swinford Energy Park	Li-ion BESS	E_England	1000	8	2030			
65	Bellmoor Energy Park	Li-ion BESS	NE_England	1000	8	2030			
66	Didcot Parkway	Li-ion BESS	S_Wales	138	8	2029			
67	Lapwing	Li-ion BESS	E_England	249.6	11.68	2030			
68	Middleton BESS	Li-ion BESS	W_Midlands	100	8	2029			
69	Old Rides	Li-ion BESS	London	1000	8	2030			
71	Caithness BESS	Li-ion BESS	N_Scotland	456	8	2030			
72	Aberthaw Energy	Li-ion BESS	S_Wales	249	8	2030			
10	Hunterston	LAES/BESS	S_Scotland	300	8	2030		Yes	
11	Killingholme 1	LAES/BESS	E_Midlands	300	8	2030		Yes	
13	Kincardine	Li-ion BESS	S_Scotland	145	8	2029			Yes
23	Glenmuckloch	PSH	S_Scotland	182	9.1	2030		Yes	
24	Loch na Cathrach	PSH	N_Scotland	500	8	2030		Yes	
25	Neilston BESS 2	Li-ion BESS	S_Scotland	100	11.11	2029			Yes
36	Frontier Grange Lane	VFB/Zn	W_Midlands	99	8	2030		Yes	
39	Frontier Weaver	VFB/Zn	W_Midlands	120	8	2030		Yes	
41	Frontier Ayr	VFB/Zn	S_Scotland	200	8	2030		Yes	
45	Frontier Busby	VFB/Zn	S_Scotland	150	8	2030		Yes	
46	Frontier Norwich	VFB/Zn	E_England	85	8	2031		Yes	
48	Frontier Willington	VFB/Zn	W_Midlands	90	8	2030		Yes	
51	LDES Barry	VFB	S_Wales	50	8	2030		Yes	
55	Hagshaw	VFB	S_Scotland	500	8	2030		Yes	
63	LDES Roosecote	VFB	W_Midlands	50	8	2030		Yes	
70	Spirebush	VFB	S_Scotland	100	8	2030		Yes	
73	Deeside Power	VFB	N_Wales	50	8	2028		No data	

9. Next steps

This section sets out the next steps. Following consultation, we intend to publish our Window 1: Final Awards in Autumn 2026 alongside the associated regulatory framework and development requirements. We also expect to undertake consultation on design of future windows in 2026 and confirm our position by 2027.

Consultation questions in this section

Q4. Do you agree with opening further applications windows?

Consultation – Minded-to decisions

- 9.1 Consultation on our Window 1: Minded-to Decisions – Long Duration Electricity Storage cap and floor regime closes on 07 August 2026. This consultation seeks your views on whether the approach, methodology and evidence have been applied appropriately, including the proportionate, fair and consistent use of submitted evidence and standardised assumptions to reach our minded-to decision.
- 9.2 We will consider consultation responses carefully before reaching a final decision. In particular, we will consider whether any representation identifies a material methodological issue, evidential error, inconsistency in the application of the assessment framework, or other relevant matter that may justify further analysis, correction or adjustment before final decisions are made.

Publication – Final awards

- 9.3 We intend to publish our Window 1: Final Awards – Long Duration Electricity Storage cap and floor regime in Autumn 2026. As mentioned above, we also expect to put in place clear delivery requirements, including conditions and ongoing project milestones to ensure projects develop in line with their delivery plans, which will allow us to revoke cap and floor agreements from projects that are not making sufficient progress.
- 9.4 These will include but are not limited to, progress in securing connections and financing, reaching final investment decision, demonstrating construction progress, meeting testing and commissioning requirements, and achieving commercial operation. Projects must also provide regular reporting on progress, risks, and any material delivery constraints, including how these are being managed.

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

- 9.5 We will also continue to develop and finalise the regulatory framework, including licence conditions informed by stakeholder feedback, and the Regulatory Instructions and Guidance (RIGs). These documents will also reflect requirements for project delivery, reporting and operation under the regime.

Future windows – consultation

- 9.6 We acknowledge that this is the first application window for the LDES cap and floor scheme. Developing a clear future pipeline will benefit both developers and consumers by ensuring that we can retain the strong levels of interest we have seen in this window. We expect to open further windows to address any possible attrition, or where delivery risks arise from Window 1, and to ensure capacity requirements align with future system needs.
- 9.7 We intend to consult this year on the design of possible future windows following the outcome of Window 1, with the aim of confirming our intent to open a second window by 2027. Opening will be subject to consultation, development of clear evidence from the forthcoming SSEP on specific system requirements, further Ofgem policy work to develop the regime and selection process, including learning lessons from Window 1.
- 9.8 We expect to consider multiple factors as part of this consultation, including but not limited to:
- the specific system needs and requirements informed by the SSEP
 - alignment with overall energy system reforms
 - whether current regime parameters remain appropriate
 - overall improvements to selection process
 - the possible role of emerging technologies.
- 9.9 We also recognise the importance of maintaining investor confidence and avoiding unnecessary costs for developers. In designing any future window, we will consider options to streamline participation for projects previously assessed in Window 1, where appropriate. There will be no automatic route into a future window, but projects unsuccessful in Window 1 will not be excluded.

Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

Appendix 1. Key project inputs

Table 6: Key project inputs

Project	Technology	Region	Capacity (MW)	Duration (hours)	RTE (%)	Regime duration (years)	First Operation	Track
Aberthaw Energy	Li-ion BESS	S_Wales	249	8	91	25	2030	Track 1
Al Boum Photo	Li-ion BESS	NE_England	100	11.11	90	25	2032	Track 2
Bellmoor Energy Park	Li-ion BESS	NE_England	1000	8	85	25	2030	Track 1
Branxton BESS	Li-ion BESS	S_Scotland	480	8	91	25	2029	Track 1
Caithness BESS	Li-ion BESS	N_Scotland	456	8	88	25	2030	Track 1
Canner's Lane	Li-ion BESS	E_Midlands	1000	8	85	25	2030	Track 1
Chessington BESS	Li-ion BESS	London	240	11.17	90	25	2029	Track 1
Chickerell Storage	Li-ion BESS	SW_England	400	8	89	25	2029	Track 1
Coire Glas	PSH	N_Scotland	1440	32	82	25	2033	Track 2
Connahs	Li-ion BESS	N_Wales	500	8	85	25	2029	Track 1
Dalby	Li-ion BESS	E_Midlands	1000	8	85	25	2030	Track 1
Deeside	VFB	N_Wales	50	8	69	25	2028	Track 1
Didcot Parkway	Li-ion BESS	S_Wales	138	8	90	25	2029	Track 1
Drakelow (Innova)	Li-ion BESS	W_Midlands	385	8.7	91*	25	2030	Track 1
Earba PSH	PSH	N_Scotland	1800	15	79	25	2033	Track 2
East Claydon Storage	Li-ion BESS	E_England	500	12	90	25	2030	Track 1
Enderby (Innova)	Li-ion BESS	E_England	310	8.64	91*	25	2030	Track 1
Exeter Storage	Li-ion BESS	SW_England	250	8	90	25	2028	Track 1
Field Fyrish	Li-ion BESS	N_Scotland	200	16.5	87	25	2030	Track 1
Field Long Stratton	Li-ion BESS	E_England	400	16.05	90	25	2033	Track 2

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Technology	Region	Capacity (MW)	Duration (hours)	RTE (%)	Regime duration (years)	First Operation	Track
Field Netherton	Li-ion BESS	N_Scotland	400	16.3	87	25	2030	Track 1
Field New Deer	Li-ion BESS	N_Scotland	400	18.03	85	25	2030	Track 1
Field Rigifa	Li-ion BESS	N_Scotland	200	18.03	85	25	2030	Track 1
Frontier Astwood	VFB/Zn	E_England	200	8	62	25	2030	Track 1
Frontier Ayr	VFB/Zn	S_Scotland	200	8	62	25	2030	Track 1
Frontier Botley	VFB/Zn	S_Wales	200	8	62	25	2030	Track 1
Frontier Bramford 1	VFB/Zn	E_England	200	8	62	25	2030	Track 1
Frontier Bramford 2	VFB/Zn	E_England	200	8	62	25	2030	Track 1
Frontier Busby	VFB/Zn	S_Scotland	150	8	62	25	2030	Track 1
Frontier Grange Lane	VFB/Zn	W_Midlands	99	8	62	25	2030	Track 1
Frontier Hockcliffe	VFB/Zn	E_England	200	8	62	25	2030	Track 1
Frontier Legacy	VFB/Zn	N_Wales	65	8	62	25	2029	Track 1
Frontier Market	VFB/Zn	E_England	200	8	62	25	2030	Track 1
Frontier Navenby	VFB/Zn	E_Midlands	200	8	62	25	2030	Track 1
Frontier Norwich	VFB/Zn	E_England	85	8	62	25	2031	Track 2
Frontier Pelham	VFB/Zn	E_England	200	8	62	25	2030	Track 1
Frontier Weaver	VFB/Zn	W_Midlands	120	8	62	25	2030	Track 1
Frontier Willington	VFB/Zn	W_Midlands	90	8	62	25	2030	Track 1
Frontier Wymondley	VFB/Zn	E_England	200	8	62	25	2030	Track 1
Glenmuckloch	PSH	S_Scotland	182	9.1	61	25	2030	Track 1
Gretna	Li-ion BESS	S_Scotland	400	8	91	25	2029	Track 1
Hagshaw	VFB	S_Scotland	500	8	69	25	2030	Track 1
Hawthorn Pit	Li-ion BESS	NE_England	1000	8	85	25	2030	Track 1
Hunterston	LAES/BESS	S_Scotland	300	8	See note**	25	2030	Track 1

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Technology	Region	Capacity (MW)	Duration (hours)	RTE (%)	Regime duration (years)	First Operation	Track
Killingholme 1	LAES/BESS	E_Midlands	300	8	See note**	25	2030	Track 1
Kincardine	Li-ion BESS	S_Scotland	145	8	91	25	2029	Track 1
Lapwing	Li-ion BESS	E_England	249.6	11.68	90	25	2030	Track 1
LDES Barry	VFB	S_Wales	50	8	69	25	2030	Track 1
LDES Roosecote	VFB	W_Midlands	50	8	69	25	2030	Track 1
Loch Kemp Storage	PSH	N_Scotland	660	22.3	80	25	2030	Track 1
Loch na Cathrach	PSH	N_Scotland	500	8	78	25	2030	Track 1
Middleton BESS	Li-ion BESS	W_Midlands	100	8	84	25	2029	Track 1
Mossmorran	Li-ion BESS	S_Scotland	200	8	91	25	2029	Track 1
Mowbray Energy Park	Li-ion BESS	NE_England	1000	8	85	25	2029	Track 1
Navenby Energy Park	Li-ion BESS	E_Midlands	1000	8	85	25	2030	Track 1
Neilston BESS 2	Li-ion BESS	S_Scotland	100	11.11	90	25	2029	Track 1
Neilston BESS 3	Li-ion BESS	S_Scotland	300	11.22	90	25	2030	Track 1
Nexus 1	Li-ion BESS	SW_England	1800	8.7	87	25	2030	Track 1
Ocker Hill BESS	Li-ion BESS	W_Midlands	145	8	91	25	2029	Track 1
Old Rides	Li-ion BESS	London	1000	8	85	25	2030	Track 1
Plumpton Energy Park	Li-ion BESS	W_Midlands	1000	8	85	25	2030	Track 1
Rayleigh BESS	Li-ion BESS	London	290	8	91	25	2029	Track 1
Solomons Farm BESS	Li-ion BESS	London	240	11.17	90	25	2029	Track 1
Spirebush	VFB	S_Scotland	100	8	69	25	2030	Track 1
Springwell	Li-ion BESS	E_Midlands	400	11.1	91	25	2030	Track 1
Sundon Storage	Li-ion BESS	E_England	500	8	89	25	2030	Track 1
Swinford Energy Park	Li-ion BESS	E_England	1000	8	85	25	2030	Track 1
TeesCAES	CAES	NE_England	50	30	62	25	2029	Track 1

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Technology	Region	Capacity (MW)	Duration (hours)	RTE (%)	Regime duration (years)	First Operation	Track
Thornton BESS 2	Li-ion BESS	E_Midlands	100	11.11	90	25	2029	Track 1
Thorpe Marsh (Fidra)	Li-ion BESS	E_Midlands	341	10	91	25	2030	Track 1
Thorpe Marsh 1 (Innova)	Li-ion BESS	E_Midlands	354	8.7	91*	25	2030	Track 1
Thorpe Marsh 2 (Innova)	Li-ion BESS	E_Midlands	336	8.7	91*	25	2033	Track 2
Westport Energy Storage	Li-ion BESS	S_Scotland	150	10.2	83	25	2030	Track 1

*These projects had their RTE capped in accordance with paragraph 5.6.

**Due to the hybrid design of these projects, round-trip efficiency varies across the underlying technologies. This was reflected in the modelling, and no single RTE value is reported in this table.

Appendix 2. Project Assessment Results overview

A2.1 The table below presents the key outputs from the Economic Assessment, Financial Assessment, and Strategic Assessment for each project. The Economic Assessment outputs comprise the final score, monetised component score, and non-monetised component score. The Financial Assessment outputs comprise the submitted Financial Assessment (FA) score, based on project-submitted revenue assumptions, and the FA score with adjusted revenues following our assessment. The Strategic Assessment outputs comprise the Deliverability score and the Scenario Analysis score, which reflects the aggregate deviation in Economic Assessment ranking across the alternative FES and weather year scenarios assessed.

Table 7: Project Assessment results

Project	Final EA Score	Monetised Score	Non-monetised Score	Submitted FA Score	Assessed FA Score	Deliverability Score	Scenario Analysis Score
Aberthaw Energy	30.51	13.41	17.09	Above	Above	Amber	20
Al Boum Photo	44.79	12.96	31.83	Above	Above	Green	49
Bellmoor Energy Park	43.26	10.74	32.51	Above	Above	Amber	78
Branxton BESS	66.00	36.82	29.18	Above	Above	Amber	-17
Caithness BESS	40.15	12.56	27.59	Above	Above	Amber	42
Canner's Lane	46.24	12.94	33.31	Above	Above	Amber	50
Chessington BESS	49.95	23.00	26.95	Above	Above	Amber	19
Chickerell Storage	55.38	29.52	25.86	Above	Above	Green	13
Coire Glas	170.39	77.49	92.90	Above	Above	Green	2
Connahs	48.99	16.33	32.66	Above	Above	Amber	-3
Dalby Energy Storage	45.56	10.86	34.70	Above	Above	Amber	72
Deeside Power	26.05	5.23	20.82	No data	No data	Amber	0
Didcot Parkway	43.17	24.27	18.91	Above	Above	Amber	-1
Drakelow (Innova)	70.96	20.70	50.26	Above	Above	Amber	-12
Earba PSH	112.09	53.15	58.93	Above	Above	Green	1

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Final EA Score	Monetised Score	Non-monetised Score	Submitted FA Score	Assessed FA Score	Deliverability Score	Scenario Analysis Score
East Claydon Storage	75.91	27.55	48.36	Above	Above	Amber	1
Enderby (Innova)	57.18	16.20	40.97	Above	Above	Amber	51
Exeter Storage	60.78	33.60	27.18	Above	Above	Green	46
Field Fyrish	94.04	32.37	61.67	Above	Above	Amber	9
Field Long Stratton	93.06	31.62	61.44	Above	Above	Amber	-19
Field Netherton	102.16	39.26	62.89	Above	Above	Amber	-3
Field New Deer	101.44	38.26	63.17	Above	Above	Amber	-8
Field Rigifa	95.27	27.90	67.37	Above	Above	Amber	4
Frontier Astwood	62.08	16.86	45.21	Above	Above	Amber	-13
Frontier Ayr	56.43	13.54	42.89	Above	Below	Green	-20
Frontier Botley	63.35	17.40	45.95	Above	Above	Amber	-11
Frontier Bramford 1	62.20	16.97	45.22	Above	Above	Amber	-17
Frontier Bramford 2	62.60	17.24	45.37	Above	Above	Amber	-15
Frontier Busby	54.35	10.91	43.44	Above	Below	Green	-15
Frontier Grange Lane	61.73	22.84	38.90	Above	Below	Amber	-60
Frontier Hockcliffe	62.00	16.92	45.09	Above	Above	Amber	-13
Frontier Legacy	69.32	30.57	38.75	Above	Below	Amber	-149
Frontier Market	62.10	16.69	45.41	Above	Above	Amber	3
Frontier Navenby	62.60	17.61	44.99	Above	Above	Amber	-13
Frontier Norwich	52.83	10.53	42.29	Above	Below	Green	7
Frontier Pelham	62.73	17.28	45.44	Above	Above	Amber	-14
Frontier Weaver	59.12	19.59	39.53	Above	Below	Green	-24
Frontier Willington	50.17	6.06	44.11	Above	Below	Amber	0
Frontier Wymondley	62.36	17.15	45.21	Above	Above	Amber	-16
Glenmuckloch	64.06	25.51	38.54	Above	Below	Green	-23

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Final EA Score	Monetised Score	Non-monetised Score	Submitted FA Score	Assessed FA Score	Deliverability Score	Scenario Analysis Score
Gretna	55.66	35.49	20.17	Above	Above	Amber	17
Hagshaw	47.84	9.70	38.14	Above	Below	Amber	-25
Hawthorn Pit	45.34	13.82	31.52	Above	Above	Amber	65
Hunterston	84.77	0.00	84.77	Above	Below	Green	-39
Killingholme 1	77.80	0.88	76.92	Above	Below	Amber	-61
Kincardine	73.35	54.46	18.89	Above	Above	Amber	-156
Lapwing	42.73	17.61	25.12	Above	Above	Green	38
LDDES Barry	48.76	15.35	33.41	Above	Below	Amber	-4
LDDES Roosecote	44.04	9.99	34.05	Above	Below	Amber	20
Loch Kemp Storage	180.12	100.00	80.12	Above	Above	Green	-2
Loch na Cathrach	63.73	25.79	37.94	Above	Below	Green	-23
Middleton BESS	42.65	20.72	21.93	Above	Above	Amber	43
Mossmorran	61.78	40.80	20.98	Above	Above	Amber	-29
Mowbray Energy Park	45.51	16.33	29.18	Above	Above	Amber	47
Navenby Energy Park	45.91	11.06	34.85	Above	Above	Amber	57
Neilston BESS 2	63.72	41.91	21.81	Above	Above	Green	-123
Neilston BESS 3	66.96	34.01	32.95	Above	Above	Amber	-31
Nexus 1	48.37	14.42	33.96	Above	Above	Green	22
Ocker Hill BESS	73.27	44.94	28.33	Above	Above	Amber	-55
Old Rides	42.55	11.32	31.24	Above	Above	Amber	74
Plumpton Energy Park	48.01	11.28	36.73	Above	Above	Amber	63
Rayleigh BESS	55.45	31.23	24.22	Above	Above	Green	51
Solomons Farm BESS	47.21	22.89	24.31	Above	Above	Amber	27
Spirebush	42.48	10.79	31.70	Above	Below	Green	-3
Springwell	69.12	27.44	41.68	Above	Above	Amber	-6

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Final EA Score	Monetised Score	Non-monetised Score	Submitted FA Score	Assessed FA Score	Deliverability Score	Scenario Analysis Score
Sundon Storage	72.14	25.19	46.95	Above	Above	Amber	7
Swinford Energy Park	43.41	9.57	33.84	Above	Above	Amber	58
TeesCAES	118.20	25.97	92.23	Above	Above	Amber	-17
Thornton BESS 2	67.58	42.76	24.82	Above	Above	Green	-77
Thorpe Marsh (Fidra)	48.50	17.31	31.19	Above	Above	Green	-5
Thorpe Marsh 1 (Innova)	60.22	15.09	45.12	Above	Above	Green	61
Thorpe Marsh 2 (Innova)	65.38	12.52	52.85	Above	Above	Green	38
Westport Energy Storage	51.71	23.20	28.52	Above	Above	Amber	-33

Appendix 3. Economic Assessment final outputs

A3.1 The table below presents the Economic Assessment ranking and final scores for each project. The final score comprises a weighted monetised component score and a weighted non-monetised component score. The weighted non-monetised component score is derived from six components: Security of Supply (SoS), Avoided Renewable Curtailment (ARC), System Operability (SO), Wider Economic and Social Impacts (WESI), Real-time Flexibility (RTF), and Option Value (OV).

Table 8: Economic Assessment results

Project	Ranking	Final Score	Monetised Score	Non-Monetised Score	SoS	ARC	SO	WESI	RTF	OV
Aberthaw Energy	72	30.51	13.41	17.09	5.39	1.92	9.79	0.00	0.00	0.00
Al Boum Photo	62	44.79	12.96	31.83	15.64	1.88	11.63	1.85	0.00	0.83
Bellmoor	65	43.26	10.74	32.51	6.40	5.08	14.92	4.44	0.00	1.67
Branxton BESS	21	66.00	36.82	29.18	2.26	2.67	22.58	0.00	0.00	1.67
Caithness BESS	71	40.15	12.56	27.59	7.06	4.21	15.49	0.00	0.00	0.83
Canner's Lane	57	46.24	12.94	33.31	4.99	5.40	17.63	4.44	0.00	0.83
Chessington BESS	49	49.95	23.00	26.95	9.59	4.70	9.23	2.59	0.00	0.83
Chickerell Storage	44	55.38	29.52	25.86	3.33	3.04	11.99	6.67	0.00	0.83
Coire Glas	2	170.39	77.49	92.90	47.50	18.72	15.20	11.48	0.00	0.00
Connahs	50	48.99	16.33	32.66	4.46	5.52	14.81	7.04	0.00	0.83
Dalby	59	45.56	10.86	34.70	7.16	4.89	18.40	2.59	0.00	1.67
Deeside Power	73	26.05	5.23	20.82	0.00	9.99	0.00	10.00	0.00	0.83
Didcot Parkway	66	43.17	24.27	18.91	2.34	2.69	10.37	1.85	0.00	1.67
Drakelow (Innova)	16	70.96	20.70	50.26	7.66	2.37	23.85	5.56	9.99	0.83
Earba PSH	4	112.09	53.15	58.93	23.42	9.28	14.37	11.85	0.00	0.00
East Claydon	12	75.91	27.55	48.36	13.43	4.92	21.67	6.67	0.00	1.67

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Enderby (Innova)	40	57.18	16.20	40.97	7.66	2.25	14.67	5.56	10.00	0.83
Exeter Storage	37	60.78	33.60	27.18	1.48	3.19	14.17	6.67	0.00	1.67
Field Fyrish	8	94.04	32.37	61.67	19.16	10.45	16.34	8.15	7.57	0.00
Field Long Stratton	9	93.06	31.62	61.44	25.17	5.65	14.90	8.15	7.57	0.00
Field Netherton	5	102.16	39.26	62.89	20.23	9.63	17.31	8.15	7.57	0.00
Field New Deer	6	101.44	38.26	63.17	22.74	12.24	14.32	6.30	7.57	0.00
Field Rigifa	7	95.27	27.90	67.37	20.98	12.70	17.97	8.15	7.57	0.00
Frontier Astwood	33	62.08	16.86	45.21	3.55	10.14	11.53	20.00	0.00	0.00
Frontier Ayr	41	56.43	13.54	42.89	3.60	10.15	9.13	20.00	0.00	0.00
Frontier Botley	26	63.35	17.40	45.95	3.41	10.20	12.35	20.00	0.00	0.00
Frontier Bramford 1	31	62.20	16.97	45.22	3.50	10.16	11.56	20.00	0.00	0.00
Frontier Bramford 2	28	62.60	17.24	45.37	3.50	10.16	11.71	20.00	0.00	0.00
Frontier Busby	45	54.35	10.91	43.44	2.73	10.49	10.21	20.00	0.00	0.00
Frontier Grange Lane	36	61.73	22.84	38.90	2.23	10.64	6.02	20.00	0.00	0.00
Frontier Hockcliffe	34	62.00	16.92	45.09	3.41	10.20	11.48	20.00	0.00	0.00
Frontier Legacy	17	69.32	30.57	38.75	1.90	10.89	5.96	20.00	0.00	0.00
Frontier Market	32	62.10	16.69	45.41	3.41	10.26	11.74	20.00	0.00	0.00
Frontier Navenby	29	62.60	17.61	44.99	3.41	10.20	11.38	20.00	0.00	0.00
Frontier Norwich	46	52.83	10.53	42.29	5.47	7.08	9.74	20.00	0.00	0.00
Frontier Pelham	27	62.73	17.28	45.44	3.55	10.14	11.76	20.00	0.00	0.00
Frontier Weaver	39	59.12	19.59	39.53	2.30	10.73	6.50	20.00	0.00	0.00
Frontier Willington	48	50.17	6.06	44.11	2.19	10.69	11.24	20.00	0.00	0.00
Frontier Wymondley	30	62.36	17.15	45.21	3.41	10.20	11.61	20.00	0.00	0.00
Glenmuckloch	23	64.06	25.51	38.54	5.59	15.59	6.26	11.11	0.00	0.00
Gretna	42	55.66	35.49	20.17	2.26	2.75	13.49	0.00	0.00	1.67
Hagshaw	55	47.84	9.70	38.14	4.12	8.42	8.10	16.67	0.00	0.83
Hawthorn Pit	61	45.34	13.82	31.52	5.35	5.33	14.72	4.44	0.00	1.67

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Hunterston	10	84.77	0.00	84.77	43.65	16.02	9.44	14.81	0.00	0.83
Killingholme 1	11	77.80	0.88	76.92	43.65	15.99	1.63	14.81	0.00	0.83
Kincardine	13	73.35	54.46	18.89	2.26	2.40	12.57	0.00	0.00	1.67
Lapwing	67	42.73	17.61	25.12	11.67	5.03	7.59	0.00	0.00	0.83
LDES Barry	51	48.76	15.35	33.41	4.77	8.02	3.12	16.67	0.00	0.83
LDES Roosecote	63	44.04	9.99	34.05	4.77	7.98	3.80	16.67	0.00	0.83
Loch Kemp Storage	1	180.12	100.00	80.12	26.64	21.07	18.45	13.70	0.26	0.00
Loch na Cathrach	24	63.73	25.79	37.94	5.63	6.96	9.80	15.56	0.00	0.00
Middleton BESS	68	42.65	20.72	21.93	2.26	4.61	15.06	0.00	0.00	0.00
Mossmorran	35	61.78	40.80	20.98	2.26	2.47	14.59	0.00	0.00	1.67
Mowbray Energy Park	60	45.51	16.33	29.18	3.58	5.77	14.56	4.44	0.00	0.83
Navenby Energy Park	58	45.91	11.06	34.85	6.51	5.02	18.04	4.44	0.00	0.83
Neilston BESS 2	25	63.72	41.91	21.81	8.82	4.91	8.07	0.00	0.00	0.00
Neilston BESS 3	20	66.96	34.01	32.95	10.01	4.78	17.33	0.00	0.00	0.83
Nexus 1	53	48.37	14.42	33.96	8.10	3.95	11.59	5.19	4.31	0.83
Ocker Hill BESS	14	73.27	44.94	28.33	3.62	2.16	20.88	0.00	0.00	1.67
Old Rides	69	42.55	11.32	31.24	5.99	5.15	14.81	4.44	0.00	0.83
Plumpton Energy Park	54	48.01	11.28	36.73	7.16	4.88	21.27	2.59	0.00	0.83
Rayleigh BESS	43	55.45	31.23	24.22	3.82	2.24	16.50	0.00	0.00	1.67
Solomons Farm BESS	56	47.21	22.89	24.31	9.59	4.70	9.19	0.00	0.00	0.83
Spirebush	70	42.48	10.79	31.70	4.76	7.98	3.31	14.81	0.00	0.83
Springwell	18	69.12	27.44	41.68	12.40	3.73	23.70	1.85	0.00	0.00
Sundon Storage	15	72.14	25.19	46.95	6.23	2.38	30.00	6.67	0.00	1.67
Swinford Energy Park	64	43.41	9.57	33.84	6.29	5.11	16.33	4.44	0.00	1.67
TeesCAES	3	118.20	25.97	92.23	27.93	38.00	8.06	17.41	0.00	0.83
Thornton BESS 2	19	67.58	42.76	24.82	7.80	5.02	11.17	0.00	0.00	0.83
Thorpe Marsh (Fidra)	52	48.50	17.31	31.19	7.53	3.66	16.48	1.85	0.00	1.67

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Thorpe Marsh 1 (Innova)	38	60.22	15.09	45.12	8.91	2.09	21.46	1.85	9.98	0.83
Thorpe Marsh 2 (Innova)	22	65.38	12.52	52.85	14.22	0.00	25.97	1.85	9.98	0.83
Westport Energy Storage	47	51.71	23.20	28.52	9.68	5.74	9.30	2.96	0.00	0.83

Appendix 4. Economic Assessment normalised outputs

A4.1 The table below presents the normalised scores for each Economic Assessment component. For each component, project scores are normalised on a scale from 0 to 100, where 0 represents the lowest-scoring project and 100 represents the highest-scoring project. These scores are presented before the application of weighting.

Table 9: Economic Assessment normalised outputs

Project	BCR	SoS	ARC	SO	WESI	RTF	OV
Aberthaw Energy	13.41	11.34	5.04	32.6	0.0	-	-
Al Boum Photo	12.96	32.92	4.95	38.8	9.3	-	50.00
Bellmoor Energy Park	10.74	13.48	13.37	49.7	22.2	-	100.00
Branxton BESS	36.82	4.75	7.03	75.3	0.0	-	100.00
Caithness BESS	12.56	14.86	11.07	51.6	0.0	-	50.00
Canner's Lane	12.94	10.51	14.21	58.8	22.2	-	50.00
Chessington BESS	23.00	20.19	12.38	30.8	13.0	-	50.00
Chickerell Storage	29.52	7.01	8.00	40.0	33.3	-	50.00
Coire Glas Hydro	77.49	100.00	49.25	50.7	57.4	-	-
Connahs	16.33	9.39	14.52	49.4	35.2	-	50.00
Dalby Energy Storage	10.86	15.07	12.87	61.3	13.0	-	100.00
Deeside Power	5.23	-	26.29	0.0	50.0	-	50.00
Didcot Parkway	24.27	4.92	7.07	34.6	9.3	-	100.00
Drakelow (Innova)	20.70	16.13	6.23	79.5	27.8	99.93	50.00
Earba PSH	53.15	49.31	24.43	47.9	59.3	-	-
East Claydon Storage	27.55	28.28	12.95	72.2	33.3	-	100.00
Enderby (Innova)	16.20	16.13	5.92	48.9	27.8	100.00	50.00
Exeter Storage	33.60	3.12	8.41	47.2	33.3	-	100.00
Field Fyrish	32.37	40.34	27.50	54.5	40.7	75.73	-

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	BCR	SoS	ARC	SO	WESI	RTF	OV
Field Long Stratton	31.62	53.00	14.87	49.7	40.7	75.73	-
Field Netherton	39.26	42.59	25.35	57.7	40.7	75.73	-
Field New Deer	38.26	47.87	32.22	47.7	31.5	75.73	-
Field Rigifa	27.90	44.16	33.42	59.9	40.7	75.73	-
Frontier Astwood	16.86	7.48	26.67	38.4	100.0	-	-
Frontier Ayr	13.54	7.58	26.72	30.4	100.0	-	-
Frontier Botley	17.40	7.17	26.83	41.2	100.0	-	-
Frontier Bramford 1	16.97	7.38	26.72	38.5	100.0	-	-
Frontier Bramford 2	17.24	7.38	26.72	39.0	100.0	-	-
Frontier Busby	10.91	5.75	27.61	34.0	100.0	-	-
Frontier Grange Lane	22.84	4.70	28.01	20.1	100.0	-	-
Frontier Hockcliffe	16.92	7.17	26.83	38.3	100.0	-	-
Frontier Legacy	30.57	4.01	28.65	19.9	100.0	-	-
Frontier Market	16.69	7.17	27.00	39.1	100.0	-	-
Frontier Navenby	17.61	7.17	26.83	37.9	100.0	-	-
Frontier Norwich	10.53	11.52	18.63	32.5	100.0	-	-
Frontier Pelham	17.28	7.48	26.67	39.2	100.0	-	-
Frontier Weaver	19.59	4.83	28.25	21.7	100.0	-	-
Frontier Willington	6.06	4.60	28.12	37.5	100.0	-	-
Frontier Wymondley	17.15	7.17	26.83	38.7	100.0	-	-
Glenmuckloch	25.51	11.76	41.02	20.9	55.6	-	-
Gretna	35.49	4.75	7.25	45.0	0.0	-	100.00
Hagshaw	9.70	8.66	22.16	27.0	83.3	-	50.00
Hawthorn Pit	13.82	11.27	14.02	49.1	22.2	-	100.00
Hunterston	-	91.90	42.16	31.5	74.1	-	50.00
Killingholme 1	0.88	91.90	42.07	5.4	74.1	-	50.00

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	BCR	SoS	ARC	SO	WESI	RTF	OV
Kincardine	54.46	4.75	6.31	41.9	0.0	-	100.00
Lapwing	17.61	24.57	13.25	25.3	0.0	-	50.00
LDES Barry	15.35	10.04	21.10	10.4	83.3	-	50.00
LDES Roosecote	9.99	10.04	20.99	12.7	83.3	-	50.00
Loch Kemp Storage	100.00	56.09	55.44	61.5	68.5	2.60	-
Loch na Cathrach	25.79	11.84	18.33	32.7	77.8	-	-
Middleton BESS	20.72	4.75	12.14	50.2	0.0	-	-
Mossmorran	40.80	4.75	6.50	48.6	0.0	-	100.00
Mowbray Energy Park	16.33	7.53	15.18	48.5	22.2	-	50.00
Navenby Energy Park	11.06	13.70	13.22	60.1	22.2	-	50.00
Neilston BESS 2	41.91	18.58	12.91	26.9	0.0	-	-
Neilston BESS 3	34.01	21.07	12.58	57.8	0.0	-	50.00
Nexus 1	14.42	17.04	10.39	38.6	25.9	43.07	50.00
Ocker Hill BESS	44.94	7.62	5.69	69.6	0.0	-	100.00
Old Rides	11.32	12.62	13.56	49.4	22.2	-	50.00
Plumpton Energy Park	11.28	15.07	12.85	70.9	13.0	-	50.00
Rayleigh BESS	31.23	8.04	5.88	55.0	0.0	-	100.00
Solomons Farm BESS	22.89	20.19	12.38	30.6	0.0	-	50.00
Spirebush	10.79	10.01	21.00	11.0	74.1	-	50.00
Springwell	27.44	26.10	9.82	79.0	9.3	-	-
Sundon Storage	25.19	13.12	6.26	100.0	33.3	-	100.00
Swinford Energy Park	9.57	13.24	13.44	54.4	22.2	-	100.00
TeesCAES	25.97	58.80	100.00	26.9	87.0	-	50.00
Thornton BESS 2	42.76	16.43	13.20	37.2	0.0	-	50.00
Thorpe Marsh (Fidra)	17.31	15.86	9.64	54.9	9.3	-	100.00
Thorpe Marsh 1 (Innova)	15.09	18.77	5.49	71.5	9.3	99.84	50.00

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	BCR	SoS	ARC	SO	WESI	RTF	OV
Thorpe Marsh 2 (Innova)	12.52	29.94	0.00	86.6	9.3	99.78	50.00
Westport Energy Storage	23.20	20.38	15.10	31.0	14.8	-	50.00

Appendix 5. Strategic Assessment outputs

A5.1 The table below presents the Strategic Assessment results for each project. This includes the Deliverability score and the Scenario Analysis score. The Scenario Analysis score reflects the aggregate deviation in a project's Economic Assessment ranking across alternative Future Energy Scenarios (FES) and weather year sensitivities. The scenario-specific columns show the deviation in Economic Assessment ranking under each individual scenario.

Table 10: Strategic Assessment outputs

Project	Deliverability	Scenario Analysis	Electric Engagement	Falling Behind	Weather year 1990	Weather year 1997
Aberthaw Energy	Amber	20	2	1	14	3
Al Boum Photo	Green	49	5	10	-4	38
Bellmoor Energy Park	Amber	78	30	38	9	1
Branxton BESS	Amber	-17	-4	0	-16	3
Caithness BESS	Amber	42	2	16	16	8
Canner's Lane	Amber	50	25	29	0	-4
Chessington BESS	Amber	19	-10	0	9	20
Chickerell Storage	Green	13	-4	11	5	1
Coire Glas	Green	2	1	1	0	0
Connahs	Amber	-3	-4	4	2	-5
Dalby Energy Storage	Amber	72	30	34	5	3
Deeside Power Energy Hub	Amber	0	0	0	0	0
Didcot Parkway	Amber	-1	-6	-6	16	-5
Drakelow (Innova)	Amber	-12	-1	0	-10	-1
Earba PSH	Green	1	0	1	-1	1
East Claydon Storage	Amber	1	-1	3	-6	5
Enderby (Innova)	Amber	51	12	16	4	19

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Deliverability	Scenario Analysis	Electric Engagement	Falling Behind	Weather year 1990	Weather year 1997
Exeter Storage	Green	46	16	-21	29	22
Field Fyrish	Amber	9	3	-2	5	3
Field Long Stratton	Amber	-19	-1	2	-19	-1
Field Netherton	Amber	-3	-2	0	-2	1
Field New Deer	Amber	-8	-2	0	-4	-2
Field Rigifa	Amber	4	1	-1	3	1
Frontier Astwood	Amber	-13	-13	-8	11	-3
Frontier Ayr	Green	-20	-14	-4	-1	-1
Frontier Botley	Amber	-11	-13	-6	12	-4
Frontier Bramford 1	Amber	-17	-14	-9	10	-4
Frontier Bramford 2	Amber	-15	-14	-7	11	-5
Frontier Busby	Green	-15	-7	-6	4	-6
Frontier Grange Lane	Amber	-60	-22	-23	1	-16
Frontier Hockcliffe	Amber	-13	-13	-8	11	-3
Frontier Legacy	Amber	-149	-48	-40	-51	-10
Frontier Market	Amber	3	-2	-4	5	4
Frontier Navenby	Amber	-13	-15	-9	13	-2
Frontier Norwich	Green	7	-21	-1	21	8
Frontier Pelham	Amber	-14	-14	-7	12	-5
Frontier Weaver	Green	-24	-14	-17	15	-8
Frontier Willington	Amber	0	22	-2	-19	-1
Frontier Wymondley	Amber	-16	-13	-9	10	-4
Glenmuckloch	Green	-23	11	4	-15	-23
Gretna	Amber	17	-7	-1	9	16
Hagshaw	Amber	-25	-7	2	-7	-13

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Deliverability	Scenario Analysis	Electric Engagement	Falling Behind	Weather year 1990	Weather year 1997
Hawthorn Pit	Amber	65	34	32	0	-1
Hunterston	Green	-39	1	-1	-9	-30
Killingholme 1	Amber	-61	0	-4	-23	-34
Kincardine	Amber	-156	-55	-56	-38	-7
Lapwing	Green	38	3	7	18	10
LDES Barry	Amber	-4	29	-11	-19	-3
LDES Roosecote	Amber	20	7	2	-8	19
Loch Kemp Storage	Green	-2	-1	-1	0	0
Loch na Cathrach	Green	-23	8	7	-21	-17
Middleton BESS	Amber	43	8	-2	22	15
Mossmorran	Amber	-29	-16	-29	6	10
Mowbray Energy Park	Amber	47	29	23	0	-5
Navenby Energy Park	Amber	57	28	32	-1	-2
Neilston BESS 2	Green	-123	-12	-42	-44	-25
Neilston BESS 3	Amber	-31	-16	0	-12	-3
Nexus 1	Green	22	20	30	-11	-17
Ocker Hill BESS	Amber	-55	-4	-51	8	-8
Old Rides	Amber	74	29	39	4	2
Plumpton Energy Park	Amber	63	34	32	1	-4
Rayleigh BESS	Green	51	-7	-5	34	29
Solomons Farm BESS	Amber	27	-5	2	13	17
Spirebush	Green	-3	-1	2	-2	-2
Springwell	Amber	-6	-6	6	-12	6
Sundon Storage	Amber	7	0	2	3	2
Swinford Energy Park	Amber	58	26	33	1	-2

Consultation Window 1: Minded-to decisions – Long Duration Electricity Storage

Project	Deliverability	Scenario Analysis	Electric Engagement	Falling Behind	Weather year 1990	Weather year 1997
TeesCAES	Amber	-17	0	-1	-10	-6
Thornton BESS 2	Green	-77	0	-47	-33	3
Thorpe Marsh (Fidra)	Green	-5	-11	8	5	-7
Thorpe Marsh 1 (Innova)	Green	61	15	20	7	19
Thorpe Marsh 2 (Innova)	Green	38	8	8	11	11
Westport Energy Storage	Amber	-33	-19	-16	3	-1

Appendix 6. Project Assessment Summaries

Project	Summary
Aberthaw Energy	Aberthaw Energy Ltd ranked 72nd in the Economic Assessment, with a score of 30.51. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 20; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Al Boum Photo	Al Boum Photo LDES Battery Energy Storage System ranked 62nd in the Economic Assessment, with a score of 44.79. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 49; Green deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Bellmoor Energy Park	Bellmoor Energy Park ranked 65th in the Economic Assessment, with a score of 43.26. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 78; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

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Branxton BESS	Branxton BESS ranked 21st in the Economic Assessment, with a score of 66.00. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -17; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Caithness BESS	Caithness BESS ranked 71st in the Economic Assessment, with a score of 40.15. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 42; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Canner's Lane	Canner's Lane Energy Park ranked 57th in the Economic Assessment, with a score of 46.24. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 50; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Chessington BESS	Chessington BESS ranked 49th in the Economic Assessment, with a score of 49.95. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 19; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor

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	portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Chickerell Storage	Chickerell Storage ranked 44th in the Economic Assessment, with a score of 55.38. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 13; Green deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Coire Glas	Coire Glas Hydro Pumped Storage Scheme ranked 2nd in the Economic Assessment, with a score of 170.39. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of 2; Green deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Connahs	Connahs Energy Storage ranked 50th in the Economic Assessment, with a score of 48.99. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -3; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

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Dalby Energy Storage	Dalby Energy Storage ranked 59th in the Economic Assessment, with a score of 45.56. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 72; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Deeside Power	Deeside Power Energy Hub (L-Ion) DPEH (L) ranked 73rd in the Economic Assessment, with a score of 26.05. The Financial Assessment was not completed as the financial model was not submitted. No material concerns were identified with the Strategic Assessment (Scenario Analysis score of 0; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking and lack of financial data is offset by its performance in the Strategic Assessment, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Didcot Parkway	Didcot Parkway LDES Facility ranked 66th in the Economic Assessment, with a score of 43.17. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -1; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

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Drakelow (Innova)	Drakelow (Innova) ranked 16th in the Economic Assessment, with a score of 70.96. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -12; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Earba PSH	Earba PSH ranked 4th in the Economic Assessment, with a score of 112.09. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of 1; Green deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
East Claydon Storage	East Claydon Storage ranked 12th in the Economic Assessment, with a score of 75.91. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of 1; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Enderby (Innova)	Enderby (Innova) ranked 40th in the Economic Assessment, with a score of 57.18. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 51; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Exeter Storage	Exeter Storage ranked 37th in the Economic Assessment, with a score of 60.78. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 46; Green deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

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Field Fyrish	Field Fyrish Ltd. ranked 8th in the Economic Assessment, with a score of 94.04. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of 9; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Field Long Stratton	Field Long Stratton Ltd. ranked 9th in the Economic Assessment, with a score of 93.06. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -19; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Field Netherton	Field Netherton Ltd. ranked 5th in the Economic Assessment, with a score of 102.16. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -3; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Field New Deer	Field New Deer Ltd. ranked 6th in the Economic Assessment, with a score of 101.44. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -8; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Field Rigifa	Field Rigifa Ltd. ranked 7th in the Economic Assessment, with a score of 95.27. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of 4; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Frontier Astwood	Frontier Astwood ranked 33rd in the Economic Assessment, with a score of 62.08. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -13; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over

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	projects that have performed more strongly under our assessment framework.
Frontier Ayr	Frontier Ayr ranked 41st in the Economic Assessment, with a score of 56.43. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -20; Green deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Botley	Frontier Botley ranked 26th in the Economic Assessment, with a score of 63.35. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -11; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Bramford 1	Frontier Bramford 1 ranked 31st in the Economic Assessment, with a score of 62.20. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -17; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

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Frontier Bramford 2	Frontier Bramford 2 ranked 28th in the Economic Assessment, with a score of 62.60. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -15; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Busby	Frontier Busby ranked 45th in the Economic Assessment, with a score of 54.35. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -15; Green deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Grange Lane	Frontier Grange Lane ranked 36th in the Economic Assessment, with a score of 61.73. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -60; Amber deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Hockcliffe	Frontier Hockcliffe ranked 34th in the Economic Assessment, with a score of 62.00. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -13; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the

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	project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Legacy	Frontier Legacy ranked 17th in the Economic Assessment, with a score of 69.32. However, the project did not meet the Financial Assessment threshold. In the Strategic Assessment the project was below the Scenario Analysis threshold with a score of -149, and received an Amber deliverability rating. Notwithstanding these factors, our minded-to decision is to include the project in the proposed portfolio for cap and floor support. We have considered its performance across the assessment criteria in the round and note that its economic performance is not materially out of line with other projects we are minded-to support. We have also taken into account the strategic benefit of increasing technology diversity, in particular by including the highest-ranking project utilising Vanadium Flow technology.
Frontier Market	Frontier Market Harborough ranked 32nd in the Economic Assessment, with a score of 62.10. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 3; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Navenby	Frontier Navenby ranked 29th in the Economic Assessment, with a score of 62.60. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -13; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over

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	projects that have performed more strongly under our assessment framework.
Frontier Norwich	Frontier Norwich ranked 46th in the Economic Assessment, with a score of 52.83. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of 7; Green deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Pelham	Frontier Pelham ranked 27th in the Economic Assessment, with a score of 62.73. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -14; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Weaver	Frontier Weaver ranked 39th in the Economic Assessment, with a score of 59.12. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -24; Green deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

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Frontier Willington	Frontier Willington ranked 48th in the Economic Assessment, with a score of 50.17. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of 0; Amber deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Frontier Wymondley	Frontier Wymondley ranked 30th in the Economic Assessment, with a score of 62.36. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -16; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Glenmuckloch	Glenmuckloch Pumped Storage Hydro ranked 23rd in the Economic Assessment, with a score of 64.06. However, the project did not meet the Financial Assessment threshold, indicating a higher potential reliance on floor support. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -23; Green deliverability rating). Taking these factors together, we have not identified any material evidence to justify departing from our minded-to decision not to include the project in the proposed cap and floor portfolio. This conclusion reflects, in particular, its relatively lower economic performance and failure to meet the Financial Assessment threshold.
Gretna	Gretna Long Duration Energy Storage Project ranked 42nd in the Economic Assessment, with a score of 55.66. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 17; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the

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	proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Hagshaw	Hagshaw LDES ranked 55th in the Economic Assessment, with a score of 47.84. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -25; Amber deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Hawthorn Pit	Hawthorn Pit Energy Storage ranked 61st in the Economic Assessment, with a score of 45.34. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 65; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Hunterston	Hunterston Long Duration Energy Storage Project ranked 10th in the Economic Assessment, with a score of 84.77. However, the project did not meet the Financial Assessment threshold, indicating a higher potential reliance on floor support. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -39; Green deliverability rating). Taking these factors together, we have not identified any material evidence to justify departing from our minded-to decision not to include the project in the proposed cap and floor portfolio. This conclusion reflects, in particular, its failure to meet the financial threshold, notwithstanding its relatively strong economic performance.

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Killingholme 1	Killingholme 1 Long Duration Energy Storage Project ranked 11th in the Economic Assessment, with a score of 77.80. However, the project did not meet the Financial Assessment threshold, indicating a higher potential reliance on floor support. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -61; Amber deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively positive economic ranking offsets its failure to meet the Financial Assessment threshold, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Kincardine	Kincardine Long Duration Energy Storage Project ranked 13th in the Economic Assessment, with a score of 73.35, and was above the Financial Assessment threshold. However, it did not meet the Scenario Analysis threshold in the Strategic Assessment, with a score of -156, and received an Amber deliverability rating. This indicates a high degree of sensitivity across a range of plausible future scenarios, suggesting the project is unlikely to perform as strongly as indicated in the base case. Taking these factors together, the project's Strategic Assessment results support our minded-to decision not to include it in the proposed portfolio for cap and floor support.
Lapwing	Lapwing ranked 67th in the Economic Assessment, with a score of 42.73. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 38; Green deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
LDES Barry	LDES Barry ranked 51st in the Economic Assessment, with a score of 48.76. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -4; Amber deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment

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	threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
LDES Roosecote	LDES Roosecote ranked 63rd in the Economic Assessment, with a score of 44.04. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of 20; Amber deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Loch Kemp Storage	Loch Kemp Storage ranked 1st in the Economic Assessment, with a score of 180.12. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -2; Green deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Loch na Cathrach	Loch na Cathrach ranked 24th in the Economic Assessment, with a score of 63.73. The project did not meet the Financial Assessment threshold, indicating a higher potential reliance on floor support. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -23; Green deliverability rating). Taking these factors together, we have not identified any material evidence to justify departing from our minded-to decision not to include the project in the proposed cap and floor portfolio. This conclusion reflects, in particular, its relatively lower economic performance and failure to meet the Financial Assessment threshold.
Middleton BESS	Middleton BESS ranked 68th in the Economic Assessment, with a score of 42.65. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 43; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in

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	the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Mossmorran	Mossmorran Long Duration Energy Storage Project ranked 35th in the Economic Assessment, with a score of 61.78. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -29; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Mowbray Energy Park	Mowbray Energy Park ranked 60th in the Economic Assessment, with a score of 45.51. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 47; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Navenby Energy Park	Navenby Energy Park ranked 58th in the Economic Assessment, with a score of 45.91. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 57; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

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Neilston BESS 2	Neilston BESS 2 ranked 25th in the Economic Assessment, with a score of 63.72 and was above the Financial Assessment threshold. However, it did not meet the Scenario Analysis threshold in the Strategic Assessment with a score of -123, and received a Green deliverability rating. This indicates a high degree of sensitivity across a range of plausible future scenarios, suggesting the project is unlikely to perform as strongly as indicated in the base case. Taking these factors together, the project's Strategic Assessment results support our minded-to decision not to include it in the proposed portfolio for cap and floor support.
Neilston BESS 3	Neilston BESS 3 ranked 20th in the Economic Assessment, with a score of 66.96. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -31; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Nexus 1	Nexus 1 ranked 53rd in the Economic Assessment, with a score of 48.37. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 22; Green deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Ocker Hill BESS	Ocker Hill BESS ranked 14th in the Economic Assessment, with a score of 73.27. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -55; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.

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Old Rides	Old Rides Energy Storage ranked 69th in the Economic Assessment, with a score of 42.55. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 74; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Plumpton Energy Park	Plumpton Energy Park ranked 54th in the Economic Assessment, with a score of 48.01. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 63; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Rayleigh BESS	Rayleigh BESS ranked 43rd in the Economic Assessment, with a score of 55.45. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 51; Green deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Solomons Farm BESS	Solomons Farm BESS ranked 56th in the Economic Assessment, with a score of 47.21. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 27; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor

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	portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Spirebush	Spirebush LDES (part of HEC-WE project) ranked 70th in the Economic Assessment, with a score of 42.48. The project did not meet the Financial Assessment threshold. No material concerns were identified in the Strategic Assessment (Scenario Analysis score of -3; Green deliverability rating). Taking these factors together, we have not identified sufficient evidence that the project's relatively low economic ranking and failure to meet the Financial Assessment threshold are offset by strategic considerations, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Springwell	Springwell ranked 18th in the Economic Assessment, with a score of 69.12. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -6; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Sundon Storage	Sundon Storage ranked 15th in the Economic Assessment, with a score of 72.14. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of 7; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Swinford Energy Park	Swinford Energy Park ranked 64th in the Economic Assessment, with a score of 43.41. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 58; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

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TeesCAES	TeesCAES ranked 3rd in the Economic Assessment, with a score of 118.20. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -17; Amber deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Thornton BESS 2	Thornton BESS 2 ranked 19th in the Economic Assessment, with a score of 67.58. The project was above the Financial Assessment threshold, and no material concerns were identified in the Strategic Assessment (Scenario Analysis score of -77; Green deliverability rating). Taking these factors together, we are minded-to award this project cap and floor support.
Thorpe Marsh (Fidra)	Thorpe Marsh (Fidra) ranked 52nd in the Economic Assessment, with a score of 48.50. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -5; Green deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Thorpe Marsh 1 (Innova)	Thorpe Marsh 1 (Innova) ranked 38th in the Economic Assessment, with a score of 60.22. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 61; Green deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Thorpe Marsh 2 (Innova)	Thorpe Marsh 2 (Innova) ranked 22nd in the Economic Assessment, with a score of 65.38. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of 38; Green deliverability rating). Taking these factors together, we are

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	not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.
Westport Energy Storage Limited	Westport Energy Storage Limited ranked 47th in the Economic Assessment, with a score of 51.71. No material concerns were identified in either the Financial Assessment (above threshold) or the Strategic Assessment (Scenario Analysis score of -33; Amber deliverability rating). Taking these factors together, we are not minded-to include the project in the proposed cap and floor portfolio. We have not identified sufficient evidence that the project's relatively low economic ranking is offset by its performance in the Financial and Strategic Assessments, such that it should be prioritised for cap and floor support over projects that have performed more strongly under our assessment framework.

Appendix 7. Abbreviations

Abbreviation	Full Meaning
LDES	Long Duration Electricity Storage
Ofgem	Office of Gas and Electricity Markets
NESO	National Energy System Operator
DESNZ	Department for Energy Security and Net Zero
MCA	Multi-Criteria Assessment
SSEP	Strategic Spatial Energy Plan
GW	Gigawatt
GWh	Gigawatt hour
PSH	Pumped Storage Hydro
CAES	Compressed Air Energy Storage
BESS	Battery Energy Storage System
Li-Ion	Lithium Ion
LAES	Liquid Air Energy Storage
MW	Megawatt
MWh	Megawatt hour
SQ	Supplementary Questions
DSF	Data Submission Form
Devex	Development Expenditure
Capex	Capital Expenditure
Opex	Operating Expenditure
Repex	Replacement / Renewal Expenditure

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Decommex	Decommissioning Expenditure
PCC	Project Cost Ceiling
TNUoS	Transmission Network Use of System
RTE	Round Trip Efficiency
BCR	Benefit Cost Ratio
SEW	Socio-Economic Welfare
DSCR	Debt Service Coverage Ratio
ACOD	Administrative Cap and Floor Default
CFFM	Cap and Floor Financial Model
RIGs	Regulatory Instructions and Guidance
CPIH	Consumer Price Index including owner occupiers' housing costs
CfD	Contracts for Difference
EEU	Expected Energy Unserved
VoLL	Value of Lost Load
ARC	Avoided Renewable Curtailment
SoS	Security of Supply
SO	System Operability
RTF	Real Time Flexibility
WESI	Wider Economic and Social Impacts
OV	Option Value
BM	Balancing Mechanism
VFB	Vanadium Flow Battery
VFB/Zn	Vanadium Flow/Zinc Battery

Appendix 8. Privacy policy

Personal data

The following explains your rights and gives you the information you are entitled to under the UK General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the UK GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

We may share your personal data with NESO and DESNZ.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for six months after the publication of the decision for the Project Assessment for Window 1 of the LDES cap and floor.

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services

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- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
 - to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/> or telephone 0303 123 1113.

7. Your personal data will not be sent overseas

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.

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EN010158 Rosefield Solar Development

CSAG Landscape Notes for Deadline 5

July 2026

Carly Tinkler CMLI

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1 Introduction

- 1.1 This note sets out CSAG's landscape expert (Ms Tinkler)'s oral submissions made at ISH3; responses to points raised during ISH3; post-ISH3 submissions; and comments on Deadline 4 material. It also summarises CSAG's position on landscape matters at Deadline 5.
- 1.2 Matters not raised in this note may be dealt with at Deadline 6, and in the light of material submitted at Deadline 5 / later.

2 Summary of oral submissions at ISH3

This section summarises Ms Tinkler's oral submissions and responses to points raised during ISH3 at Agenda item 4: *Landscape and visual (including good design)*.

2.1 Design Commitments (item 4 a))

- 2.1.1 In terms of the proposed colours and materials, the Applicant's aim – with which Ms Tinkler agrees – is to reduce high levels of adverse landscape and visual effects by selecting colours that would integrate with those present in the receiving landscape.
- 2.1.2 The Applicant said that following consent, detailed designs would be produced for approval by the Council, including under DCO Requirement 4 which deals with external appearance, and the application would include justification of the choice of colour, with consideration of the landscape and visual effects.
- 2.1.3 Ms Tinkler explained that without knowing what the backdrop colours are, visual integration is very difficult to achieve. The main problem is high levels of contrast, where white / a very pale

colour is seen against a very dark colour, and *vice versa*, which of course will vary from place to place, and depend on the time of year.

- 2.1.4 The colours of certain scheme elements proposed by the Applicant are specified as green, grey, white, and / or metallic. However, shades / tones of green and grey range from almost black to almost white.
- 2.1.5 Ms Tinkler said it would be helpful if, before the Examination is concluded, the Applicant would formally commit to undertaking a colour study at the detailed design stage to inform the proposed colour choices, and also agree the scope of the study.
- 2.1.6 The ExA asked Ms Tinkler to produce draft wording on the scope of the study to discuss / agree with the Applicant in time for submission at Deadline 5.

2.2 Landscape and visual impact assessment (LVIA) (item 4 b))

- 2.2.1 Ms Tinkler's and Buckinghamshire Council's landscape expert (Mr Hutchins)'s opinion is that the LVIA occasionally departs from the relevant guidance. The Applicant disagrees.
- 2.2.2 At ISH3, the Applicant's LVIA method was discussed, including matters such as the use of three- and four-point scales, and examples of approved DCOs where the SoS had accepted LVIA's which had adopted a similar approach to the Applicant. Ms Tinkler explained that in those and other cases, the matters had not been agreed or satisfactorily resolved.
- 2.2.3 The ExA said that the parties' positions are clear, and it appears likely that the matter will not be agreed.
- 2.2.4 During oral submissions made by a local councillor, the Applicant's landscape expert (Mr Leaver) reiterated his opinion that the Scheme is neither 'industrial', nor 'industrialising'. Please see Ms Tinkler's note about this in *Comments on Deadline 4 submissions* below.
- 2.2.5 In response to the Councillor's concerns about the adverse effects of changes to the wider recreational landscape, including cumulative effects, Ms Tinkler said the Applicant had acknowledged that the Scheme would result in significant residual adverse effects, including cumulative effects, on recreational amenity.
- 2.2.6 The matter of non-visual landscape effects was also discussed. Although disagreement remains about whether or not non-visual effects were properly considered in the LVIA (in Ms Tinkler's opinion, they were not), Ms Tinkler explained that in some respects, the matter falls away (it is still relevant to levels of effects in terms of 'significance') because the Applicant has clarified and confirmed that the proposed mitigation (screen planting) would not reduce levels of adverse effects on landscape character after Year 10 of operation.

2.3 Landscape and visual mitigation (item 4 c))

- 2.3.1 The matter of the adverse landscape and visual effects arising from the proposed mitigation measures was discussed.
- 2.3.2 Ms Tinkler's opinion is that whilst the loss of characteristic openness was factored into the LVIA, the disruption of field patterns (through the introduction of new hedges along lines where historically, hedges would not have been present), and the total loss of view, were not.
- 2.3.3 Mr Leaver did not mention the disruption of field patterns, but said that the loss of view had been factored in, by – as Ms Tinkler understands it – only reducing the level of adverse visual effect at Year 10 by a small amount to reflect the fact that existing views would be lost, albeit screened by hedges, not panels.

- 2.3.4 Ms Tinkler said if that is the case, it is accepted, but pointed out that there are certain situations where existing views would not be screened by panels – for example where located some distance from the viewpoint at a lower elevation – but the existing views would be screened by grown-on hedges on the periphery of the site, resulting in a higher level of adverse visual effect than the LVIA assumes.
- 2.3.5 CSAG's ecology expert (Mr Woodfield) said it was important to clarify the differences between mitigation, compensation and enhancement, especially in terms of balancing benefits / enhancements with mitigation / compensation. He also said that the error of double-counting mitigation as enhancement applies to both ecology and landscape topics.
- 2.3.6 Ms Tinkler explained that the Applicant has confirmed that all the proposed landscape planting is required for landscape / visual mitigation purposes, so there would be no enhancements.
- 2.3.7 Mr Leaver's response to a local councillor's oral submission confirmed that not all views of the development could be screened by planting, especially from viewpoints at elevated locations, but also said that levels of visual effects decrease with distance.
- 2.3.8 **Post-hearing note:** Levels of visual (and landscape) effects do tend to decrease with distance, but the scale of the development and the amount of the view it occupies must be factored in. In this case, not only would high levels of adverse visual effects be experienced in proximity to the Scheme where existing open rural views were replaced by 'industrialising' elements, but also, at elevated viewpoints some distance from the Scheme, such as on Hogshaw Hill, from which most if not all of the elements would be highly conspicuous within the broad, rural panorama. Glint and glare on the arrays would exacerbate the effect.
- 2.3.9 In concluding remarks, Ms Tinkler mentioned that during the recent landscape SoCG meeting, Mr Leaver said he agreed with GLVIA3 para. 3.39, which states that landscape / visual mitigation cannot be double counted as landscape / visual enhancement, and also confirmed that all the proposed planting is for mitigation, not enhancement. However, during ISH3, Mr Leaver stated that the Scheme *would* deliver landscape / visual enhancement (ie Moderate Beneficial 'significant' effects on / arising from the proposed landscape 'fabric').
- 2.3.10 Ms Tinkler said she still did not understand how Mr Leaver had arrived at this conclusion (see also *Post-ISH3 submissions* below).

2.4 Other matters raised during discussions re Agenda item 4

East Claydon settlement in LVIA

- 2.4.1 Ms Tinkler said that the settlement of East Claydon was not included as a receptor in the LVIA, although it is in proximity to the Order Limits, with high levels of interinfluence and intervisibility, and many High sensitivity landscape and visual receptors. However, she also said that if an assessment was carried out, it would not change the agreed overall conclusion that indirect adverse landscape effects would be significant at least until Year 10 of operation (the area covered would include East Claydon).
- 2.4.2 As time at the Hearing was tight, Ms Tinkler did not explain further, but has added a note about this in the *Post-ISH3 submissions* section below.

Additional Landscape Note for Deadline 3

- 2.4.3 Ms Tinkler asked whether the ExA had received CSAG's *Additional Landscape Note for Deadline 3*, which was submitted a couple of days after the deadline, but they had not, and asked CSAG to resubmit at Deadline 5.

- 2.4.4 For information, the note concerns the Applicant's Deadline 2 *Response to Written Representations* [REP2-086], item ref. 7.1.46. Here, the Applicant responds to Ms Tinkler's comments in CSAG's *Landscape and Visual Report* (LVR) [REP1-127] about the LVIA's photomontages, referring to the image she used to illustrate the concerns she has about effects along the proposed fenced corridors crossing the site (also noting the absence of any such visualisations provided in the LVIA – see *Residual Matters in Post-ISH3 submissions* below).
- 2.4.5 The Applicant's response says that the use of AI-generated images in professional LVIAs is not acceptable, and that CSAG's image is 'inaccurate'.
- 2.4.6 Ms Tinkler explained that the reason why the note on this point was submitted late is because she needed to contact the person who produced the image to clarify how it was generated, but the response arrived just after Deadline 3.
- 2.4.7 The response explains that the image was not generated by AI, and is accurate.

Landscape SoCG

- 2.4.8 Ms Tinkler explained that there is a typographical error which needs correcting in CSAG's comments at item 4-6 of the landscape section of the current draft of the SoCG between the Applicant and CSAG, as submitted by the Applicant at Deadline 4 [REP4-022]; also, Ms Tinkler would like to make a few minor adjustments in the light of Deadline 4 material and ISH3.
- 2.4.9 Afterwards, Ms Tinkler spoke to the Applicant, and it was agreed that she would update the SoCG and send it back to the Applicant before Deadline 5.
- 2.4.10 There may be further discussions between the Applicant and CSAG about landscape matters in due course, in which case the SoCG would be updated as appropriate.

2.5 Glint and glare (Agenda item 7 d))

- 2.5.1 CSAG's position on glint and glare is set out in Section 8 of the LVR, and supplemented in CSAG's *Landscape Notes for Deadline 3 May 2026* [REP3-064].
- 2.5.2 At ISH3, following discussions about transport-related glint and glare effects, Ms Tinkler reiterated some of CSAG's concerns about the informal glint and glare assessment (GGA) method used by the Applicant, mainly relating to i) the risk of incidents / accidents involving vehicles, pedestrians, cyclists, and equestrians occurring along minor roads / lanes; and ii) the sequential and cumulative effects of glint and glare, which augment the risk.
- 2.5.3 As Ms Tinkler explained in Section 4 of [REP3-064], the above and other concerns have been confirmed by an independent glint and glare expert who was appointed by a group of residents opposing the Lime Down solar NSIP [EN010168], with which Ms Tinkler is involved.
- 2.5.4 The expert's report is available for reference if required, in Stop Lime Down (SLD)'s [REP1-167] Section 6, and Appendix G [REP1-178], although it may be more helpful to read Section 3.5 of SLD's Deadline 4 submission [REP4-132], which summarises notes of a meeting held with SLD's glint and glare expert and Pager Power, the company which produced the GGA for Lime Down, and wrote the informal guidance which the Rosefield Applicant used for their GGA.
- 2.5.5 In the notes, SLD's glint and glare expert asks the Applicant to explain a key point raised in Ms Tinkler's LVR and [REP3-064], which is why low traffic volume is considered a factor indicating that local roads / their users are Low sensitivity given the context of such roads and when the consequence of visual impairment could still be severe.

- 2.5.6 The expert concludes that *'the Pager Power report and modelling outputs lack sufficient data and robust evidence specifically around quantitative thresholds, hazard and risk analysis, sufficient evidence demonstrating impact as a result of cumulative and multi-directional impact of solar reflections. The fact that this study was undertaken using Pager Power developed software that has not been independently validated brings into question the validity of the results together with the interpretation of these results. The Pager Power guidance is essentially their own internal guidance made available to others as requested. Given the safety-critical nature of this issue, such guidance needs to be independently assessed against industry-recognised criteria'*.
- 2.5.7 In Ms Tinkler's opinion, it is highly likely that the above critique applies to the Rosefield Applicant's GGA, and that levels of adverse effects on numerous receptors have indeed been underestimated.

3 Post-ISH3 submissions

East Claydon settlement in LVIA

- 3.1 During ISH3, Ms Tinkler said that the settlement of East Claydon was not included as a receptor in the LVIA.
- 3.2 Mr Hutchins appeared to confirm that the Council had agreed with the Applicant that East Claydon could be scoped out of the LVIA.
- 3.3 If that is the case, it is very surprising, and not clear why the Applicant would want to scope East Claydon out of the LVIA, given East Claydon's proximity to the Order Limits; high levels of interinfluence and intervisibility between the settlement and the Scheme (and other existing / proposed industrialising developments); and the High sensitivity landscape and visual receptors.
- 3.4 Indeed, in Ms Tinkler's opinion, it is inconsistent that the village of Steeple Claydon was included in the LVIA, but not East Claydon: Steeple Claydon lies c. 1.6km from the Order Limits, north of the HS2 corridor, whereas East Claydon is just c. **185m** from the Order Limits.
- 3.5 Ms Tinkler said that if an assessment was carried out, it would not change the agreed conclusion that overall, indirect landscape effects, and many visual effects, would be significant adverse at least until Year 10 of operation. However, at ISH3, Mr Hutchins said, and Ms Tinkler agrees, that the assessment would be helpful, as without it, one may assume, but cannot know for certain, whether adverse effects on East Claydon and associated receptors would be significant, nor the level of the effect, and whether this could be reduced through mitigation.
- 3.6 It is also very important to understand the inter-project **cumulative** effects that would be experienced by East Claydon in particular, given its proximity to large sites already approved for energy generation / storage and other industrialising / urbanising projects, and those for which approval is being, or is likely to be, sought.
- 3.7 In addition, and importantly, given the high sensitivity receptors, the assessment could result in an increase in the level of landscape value, and thus sensitivity, which the LVIA currently ascribes to the LCAs in this part of the study area that would be indirectly affected (LCA 5.6 Claydon Valley, 5.7 Hogshaw Claylands, and 5.8 North Marston Undulating Claylands). This in turn would result in higher levels of adverse landscape effects than assumed (as explained in Section 4.2 of CSAG's LVR).
- 3.8 If carried out, the assessment should factor in the presence of heritage assets, especially the Grade II* Church of St Mary, which lies at the eastern edge of East Claydon and overlooks the north-eastern part of the Scheme, and nearby Grade II-listed White House Farmhouse, which is in a similarly prominent position.

- 3.9 The lane which runs past the church is on the route of the North Buckinghamshire and Midshires Ways, leading eastwards to a point where the Ways and a public footpath join (also access to Sion Hill Farm). Both routes have clear views over (and ultimately cross) the north-eastern part of the site. The footpath also runs past the approved BESS site. It leads to Granborough, with good views back from the hill at the edge of the village. Note the close historical and present-day association between St Mary's, and Granborough's Grade II* Church of St John the Baptist, and that the Scheme would occupy much of the farmland – with medieval roots – in between.
- 3.10 The lack of consideration of these and other heritage assets in the LVIA is an important omission, as it is an integral part of the LVIA process, as explained in GLVIA3 paras. 5.7 – 5.11; para. 5.9 states, *'The LVIA also needs to address the fact that many historic features - archaeological remains, buildings and designed landscapes - are important in their own right as well as features of the landscape.'*
- 3.11 As explained in CSAG's LVR at paras. 5.4.8 – 5.4.15, the landscapes around and between all the villages make highly important contributions to the settings of numerous significant heritage assets, and the heritage assets make highly important contributions to the value of their associated landscapes. Solar arrays in particular not only industrialise, but also 'sterilise' and homogenise rural landscapes, where seasonal changes would otherwise be seen and experienced / celebrated (Historic England's publication *The Setting of Heritage Assets* highlights the need to consider seasonal changes).

Landscape 'fabric' hard / soft elements

- 3.12 Ms Tinkler had intended to raise this under Agenda Item 4 c), as it was not specifically mentioned in the LVR. However, time was tight and the matter is not of great importance in that it does not affect Ms Tinkler's conclusions; however, it is another factor in understanding why the Applicant's claim of a Moderate Beneficial (significant) effect on / arising from the new / improved soft landscape 'fabric' could not be achieved.
- 3.13 In [APP-110] LVIA Appendix 10.1: *Rosefield LVIA Methodology and Assessment Criteria*, para. 2.2.4, the Applicant confirms that the term landscape 'fabric', which is used in the LVIA, is interchangeable with what GLVIA3 calls landscape 'elements'.
- 3.14 It also confirms that, as defined in the GLVIA3 Glossary, landscape 'fabric' / 'elements' include 'hard' / man-made landscape items such as buildings (along with roads, fences and so on), and 'soft' / natural landscape items such as trees and hedges (along with landcover such as grass or crop, water, landform and so on).
- 3.15 However, it appears that the LVIA has only assessed effects on 'fabric' in terms of the loss / addition of a few soft / natural landscape elements. For example, LVIA para. 10.1.10 states, *'In considering effects on landscape fabric, this chapter considers the removal or addition of elements such as vegetation'*; para. 10.10.22 refers to *'change to the fabric of the landscape in terms of hedgerow and tree cover'*; and in Table 10.4, under the heading *Landscape effects*, the first item is *'Landscape fabric (woodland, trees and hedgerows)'*.
- 3.16 Also note that LVIA Method para. 2.2.4 defines *'Landscape fabric/elements'* as *'The individual **features** of the landscape'* (emphasis added). I do **not agree** that the words 'fabric' / 'element' are interchangeable with the word 'feature', which in the context of landscape character is defined in the GLVIA3 Glossary as *'Particularly prominent or eye-catching elements in the landscape, such as tree clumps, church towers or wooded skylines OR a particular aspect of the project proposal'*. Note that throughout, the LVIA refers to solar panels as Scheme 'elements'.
- 3.17 So, whilst in themselves the panels are 'fabric' / 'elements', the arrays would become a new landscape 'feature'. As acknowledged by the Applicant, this would result in a) significant direct adverse residual landscape effects on overall landscape character and visual amenity, and b)

significant indirect adverse effects, as the arrays would be perceived as a distinct, prominent, and artificial characteristic at odds with the prevailing rural / agricultural landscape character.

- 3.18 LVIA para. 10.10.316 states that during operation, notwithstanding the introduction of solar arrays and other hard 'fabric' / elements, *'The underlying pattern and structure of the landscape would remain largely unchanged'*. That may be true; however, whilst the panels permit the retention of the underlying soft 'fabric', they mask it, and would be perceived as the new landscape 'fabric'. Furthermore, the perception of man-made fabric would be increased through the effects of glint and glare.
- 3.19 The LVIA concludes that by Year 10, the new and improved soft 'fabric' ie hedges and trees would result in a **Moderate Beneficial** effect, which is categorised as 'significant'.
- 3.20 However, **the LVIA has not factored in the adverse effects of the new hard 'fabric'**, such as security fences; surfaced access tracks; substations; buildings, units, and containers; and other structures, including, of course, the solar panels.
- 3.21 In theory, the question is whether the soft 'fabric's high levels of beneficial effects would outweigh the hard 'fabric's high levels of adverse effects. In my opinion, they would not. However, the most important matter is that the Applicant has confirmed that **all** the proposed planting is for mitigation, so therefore cannot be double counted as enhancement / beneficial effect.
- 3.22 Even if some of the planting was proposed as a true enhancement, the resultant benefit would be very small, and would certainly be significantly outweighed by the high levels of adverse landscape and visual effects arising from the introduction of the hard elements.
- 3.23 Furthermore, in themselves, the new hedges and trees would give rise to adverse effects resulting from the disruption of field patterns, loss of openness, and loss of view.
- 3.24 For the above reasons, the Applicant's claimed Moderate Beneficial (significant) effect on / arising from the new / improved soft landscape 'fabric' could **not** be achieved.

4 Comments on Deadline 4 submissions

- 4.1 In the *Applicant's Response to Deadline 3 Submissions (Rev 1)* [REP4-081], the Applicant responds to CSAG's *Landscape Notes for Deadline 3* May 2026 [REP3-064].
- 4.2 The notes summarise CSAG's position on landscape matters at Deadline 3, following ISH1; oral submissions made at ISH1, and responses to points raised in the oral submissions; post-hearing submissions; and CSAG's Deadline 3 responses to / comments on material submitted at Deadlines 1 and 2.
- 4.3 Point ref. **3.8.4** of the Applicant's response in REP4-081 concerns non-visual effects.
- 4.4 This matter was the subject of **ExQ2.12.6**, which CSAG responded to at Deadline 4 in [REP4-103].
- 4.5 As explained above, in Section 2 *Summary of oral submissions at ISH3* under Agenda Item 4 b), whilst disagreement remains about whether or not non-visual effects were properly considered in the LVIA (in Ms Tinkler's opinion, they were not), Ms Tinkler explained that in some respects, the matter falls away because the Applicant has clarified and confirmed that the proposed mitigation would not reduce levels of adverse effects on landscape character after Year 10 of operation.
- 4.6 However, it is still relevant, in that it is a factor in the LVIA having underestimated levels of effects, and some effects would be categorised as 'significant' when not reported as such in the LVIA.

- 4.7 Point ref. **3.8.5** re photomontages / visualisations of views from PRowS crossing sites: the Applicant does not consider these necessary. CSAG still considers that visualisations would have helped to clarify the nature and levels of effects of this proposal.
- 4.8 Point ref. **3.8.6** re soils: the response is not clear about whether any topsoil would be stripped. If that is necessary it has implications for a) transport and highways, if soil is removed from the site / brought back in during decommissioning; b) site layout, if large amounts of soil have to be stored on site (note storage in tall piles for 40+ years may render soil infertile); and c) restoration of the subsoil to fertile, productive agricultural soil during decommissioning.
- 4.9 Point ref. **3.8.7** re wildflower meadows: the Applicant's response appears reasonable.
- 4.10 Point ref. **3.8.8** re soils / resting / fertility: the Applicant's response appears reasonable.
- 4.11 Point ref. **3.8.9** re LVIA glint and glare effects: the Applicant confirms that the LVIA did not consider the effects of glint and glare on landscape or visual receptors, the reason being that the Applicant's GGA did not identify any significant adverse effects on ground-based human receptors. However, as explained in previous submissions and responses, CSAG has concerns about the 'informal' method used in the GGA and the conclusions, which in CSAG's opinion are flawed.
- 4.12 Regardless of whether or not the effects would be 'significant', LVIA should consider the effects of glint and glare in particular locations / for specific landscape and visual receptors. That is because the overall effects of glint and glare are very likely to adversely affect people's experiences of being within / travelling through the landscape. In particular, the effects can range from being potentially dangerous at close quarters, to disturbing / unpleasant nearby, and distracting at longer distances. Furthermore, glint and glare exacerbate the industrialising effect of the installation.
- 4.13 See also comments on 3.8.10 and 3.8.11.
- 4.14 Point ref. **3.8.10** re glint and glare effects / GGA: The Applicant disagrees that the GGA method and conclusions are flawed. See also 3.8.9 and 3.8.11. Matter to be discussed / responded to at ISH3 (see Section 2 *Summary of oral submissions at ISH3* Agenda item 7 d) above), and Deadline 5.
- 4.15 Point ref. **3.8.11** re glint and glare effects / GGA: Applicant refers to 3.8.9 above, see also 3.8.10.
- 4.16 Point ref. **3.8.12** re 'industrialisation': the Applicant does not agree that the Scheme is 'industrialising', nor that it would 'industrialise' the landscape. The reason given is that *'this tract of the landscape is not wild or natural without human influence. It is a farmed, working landscape with some strong built influences such as the National Grid East Claydon Substation and converging overhead powerlines'*.
- 4.17 Firstly, in the ExAs' reports of findings and conclusions and recommendation to the SoS for Energy Security and Net Zero for solar NSIPs that I have seen, the ExA has confirmed that such development *'falls within Schedule 2, Paragraph 3(a) of the EIA Regulations as an **industrial** installation for the production of electricity'*.

- 4.18 Secondly, from a landscape and visual perspective, in Ms Tinkler's opinion, solar developments such as this are, or are at least perceived to be, 'industrial' in use, nature and scale, regardless of the nature and character of the landscapes within which they would be situated – see below.
- 4.19 In fact, this opinion appears to be shared by some experts working on solar NSIP projects for applicants, and by ExAs. For example:
- i) Throughout, ES Appendix 8.5 of the pre-Examination stage Light Valley Solar Project **[EN0110012]** acknowledges that *'solar panels and their associated infrastructure will introduce an industrial element to the wider rural landscape'*.
 - ii) In the consented West Burton Solar Project **[EN010132]** ExA's *Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy Security and Net Zero*, para. 3.3.61 concludes (with emphasis added), *'it is apparent that... [the scheme] would lead to a significant change from the modest agricultural functionality of the current land use to an **industrialised** solar use...'*.
 - iii) In the consented East Yorkshire Solar Farm scheme **[EN010143]** ExA's *Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy Security and Net Zero*, para. 3.6.56 says (with emphasis added), *'The Applicant acknowledged that the proposal would introduce incongruous, **industrial** features that would change the overall landscape character'*.
 - iv) In the consented Sunnica Energy Farm scheme **[EN010106]** ExA's *Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy Security and Net Zero*, the term 'quasi-industrial' is used by the ExA, who recommended refusal in part because of the *'widespread and significant effects upon landscape character and visual amenity due to the design of the scheme including its large scale: significant localised landscape character effects would result'* (see list at para. 9.1.5). During the Examination, Historic England noted the industrial nature of the solar panels and associated development.
- 4.20 Thirdly, Ms Tinkler agrees that whether or not an 'industrial' project would 'industrialise' its host landscape, or be perceived to 'industrialise it', depends on the nature of the receiving landscape.
- 4.21 If the receiving landscape was characterised by similar types of 'industrial' development, then the extent of 'industrialisation' would be less than in good quality rural landscapes such as these, where currently, immediate 'industrialisation' is limited to the substation and lines of pylons, with HS2 and the waste facility on the margins.
- 4.22 Point ref. **3.8.13** re grazing: Ms Tinkler accepts that this proposal does not rely solely on grazing to achieve the predicted / required outcomes, but the Applicant intends to pursue the option. See comments on point ref. 3.8.16 below.
- 4.23 Point refs. **3.8.14** and **3.8.15** re choice of colour / materials: the Applicant's response is that a full Environmental Colour Assessment (ECA) is not required.
- 4.24 This matter was discussed at ISH3 under Agenda item 4 a) – see Section 2 *Summary of oral submissions at ISH3* above.
- 4.25 Point ref. **3.8.16** re grazing. (see also 3.8.13 above).
- 4.26 CSAG's **[REP3-064]** Appendix CT-1 *Grazing* sets out the problems associated with grazing animals in large-scale solar array areas, which is a firm or informal commitment in many planning applications for such developments.

- 4.27 Appendix CT-1 para. A1.13 asks the Applicant if they could produce a note for the ExA listing examples and providing details of operational solar sites in the UK where currently, sheep / other animals are regularly grazed.
- 4.28 The Applicant has not provided a list, and the response asserts that '*Grazing is already a well-established and effective management practice at numerous operational solar farms across the UK*'; however, no evidence to justify this claim is provided.
- 4.29 It is known (for example from Defra registers and data) that sheep-grazing occurs on several small-scale commercial agricultural holdings, but, due to the problems, there are – or appear to be – very few examples of grazing occurring, or even having occurred, on operational large-scale solar sites in the UK.
- 4.30 In Ms Tinkler's opinion, it would be helpful if a list could be provided, given the Applicant's hope that if the Scheme was consented, grazing would take place in order to deliver optimum ecological mitigation (or enhancement).
- 4.31 Point ref. **3.8.17** re deer-proof fencing and site security. The Applicant's response states that '*The deer-proof fencing will act as a deterrent to prevent anyone entering the Solar PV fields, with its height of no greater than 2.5m. It is designed to be robust enough to keep sheep within the fields should they be there for grazing*'.
- 4.32 This statement contradicts the evidence. See for example (as cited in CSAG's *Landscape Notes for Deadline 3*) *Theft From Solar Farms* (February 2023), by Crime Intelligence and Opal (the 'Police unit for the United Kingdom developing intelligence to disrupt organised networks involved in acquisitive crime in partnership with the public / private sector').
- 4.33 The deer-proof fencing would be robust enough to keep sheep in, but one Police Designing Out Crime Officer (DOCO) I spoke to described deer-proof fencing "*as useful as a chocolate fireguard*" in deterring / preventing solar crime, because criminals / vandals easily cut through the wire netting (or in some cases, flatten and drive over the fence).
- 4.34 That is why some insurance companies will no longer insure schemes where deer-proof netting is proposed.
- 4.35 The problem is that if the deer-proof fencing is replaced by the type of security fencing recommended by DOCOs / others, it increases levels of adverse landscape and visual effects (and may have adverse implications for wildlife, as mammal gates cannot be installed in high-security fencing systems).

5 Comments on Applicant's Responses to ExQ2

- 5.1 CSAG's comments on the Applicant's responses to ExQ2 [**REP4-082**], Table 2-11.1: *Landscape and visual (including good design)*, are as follows:

ExQ2.12.2 Moderate (not significant) effects

- 5.2 CSAG notes the Applicant's response.

ExQ2.12.3 Assessment of effects

- 5.3 The Applicant provides examples of approved DCOs where the SoS had accepted LVIA's which had adopted a similar method / approach to the Applicant, especially in terms of the use of three- and four-point scales.
- 5.4 As noted above (Section 2 *Summary of oral submissions at ISH3* under Agenda Item 4 b)), at ISH3, Ms Tinkler explained that in those and other cases, the matters had not been agreed, nor satisfactorily resolved, and here, it appears unlikely that the parties will agree.
- 5.5 Ms Tinkler considers this matter to be important because it is a factor in the LVIA having underestimated levels of landscape sensitivity, and thus levels of adverse effects, which could be 'significant' when not reported as such in the LVIA.
- 5.6 For example, on the LVIA's three-point scale, **Low** levels of landscape sensitivity are ascribed to some of the LCTs and LCAs, meaning that the landscapes are amongst the lowest value and sensitivity landscapes in Britain ie despoiled with little hope of recovery. Clearly, that is not the case, not only as can be seen whilst travelling around the area, but also from the descriptions in the LVIA itself, which contradict the Low sensitivity judgement (see CSAG's LVR paras. 4.2.1 – 4.2.14).
- 5.7 Also, with reference to point scales, as explained in the LVR (eg para. 5.2.4) and at ISH1, there is a problem (of which the Landscape Institute is now aware) with using even-numbered point scales (as the Applicant's LVIA has done) because the 'Moderate' level is not in the middle, with implications for judgements about overall levels of effects, and 'significant' effects.
- 5.8 The Applicant's note in the landscape section of the draft SoCG about this matter states that '*it is not necessary to establish a specific threshold of significance at a median point, such as between minor and moderate*'. However, by definition, 'median' is 'in the middle', and therefore should be 'Moderate', not '*between minor and moderate*'.
- 5.9 **[APP-110]** LVIA Appendix 10.1: *Rosefield LVIA Methodology and Assessment Criteria*, para. 2.7.2 states that '*Where Moderate effects are predicted, professional judgement is applied to determine whether the effect is significant or not ensuring that the potential for significant effects to arise has been thoroughly considered and justification is provided for the judgement reached as appropriate*'.
- 5.10 That approach is reasonable if 'Moderate' is in the middle, which it would be if an odd-numbered scale was used, but here, it is not, because an even-numbered scale has been used. Therefore, using the LVIA's four-point scale, if a **Moderate to Low** level of effect is reported, it is not categorised as 'significant'. If Moderate was in the middle of the scale, then it could be. Also, because the significance threshold has been set higher than it should be, it is likely that more adverse effects than assumed would be 'significant'.

ExQ2.12.4 Fields D28 and D29

- 5.11 CSAG notes the Applicant's response.

6 Summary position at Deadline 5

- 6.1 This section sets out CSAG's position on landscape matters at Deadline 5, and the main areas of agreement / disagreement which currently remain between CSAG and the Applicant.
- 6.2 Good progress has been made on the landscape section of the SoCG, and most points that required clarification have been resolved. It is anticipated that following adjustments in the light of ISH3 and additional material, an updated draft will be submitted at Deadline 5, although discussions will continue if / as required.

6.3 In summary, the parties **agree** that:

- i) the Scheme would result in significant adverse direct and indirect effects, including cumulative effects, on landscape character, public and private visual amenity, and recreational amenity;
- ii) the proposed mitigation screen planting would not reduce levels of adverse landscape effects, and in many cases, would not reduce levels of adverse visual effects;
- iii) all proposed planting is mitigation, there is no enhancement;
- iv) not all views can be mitigated by screen planting;
- v) in themselves, the mitigating measures would give rise to adverse landscape and visual effects.

6.4 The parties do **not agree**:

- i) whether the Scheme would 'industrialise' the landscape (in Ms Tinkler's opinion, it would);
- ii) about levels of adverse landscape and visual effects: in Ms Tinkler's opinion, levels have been underestimated: some effects should be categorised as 'significant' but are not assessed as such in the LVIA;
- iii) that at Year 10, the new / improved landscape 'fabric' would result in Moderate Beneficial (significant) (in Ms Tinkler's opinion, the LVIA erroneously double-counts landscape / visual mitigation as landscape / visual enhancement, and the Applicant has confirmed that all the proposed planting is mitigation, not enhancement).

6.5 In summary, notwithstanding the Applicant's clarifications and additional material, Ms Tinkler's position remains as set out in CSAG's LVR. The proposed development would industrialise a very large area within a good quality rural landscape. The Applicant disputes that the term 'industrialising' applies to this development, but it is not disputed that the proposals would result in significant adverse effects on character, and visual, recreational, and residential amenity for the duration of the operation.

6.6 But this proposal cannot be seen in isolation. As explained in Section 5.5 of CSAG's LVR, given that on its own, the proposed development would give rise to significant adverse effects on landscape character, and visual / other amenity, there is no doubt that in combination with other existing and proposed industrial / industrialising developments within the study area – some adjacent to and in close proximity to the Scheme – the inter-project cumulative landscape effects would also be significant adverse, but even more extensive / widespread.

6.7 I **agree** with Mr Hutchins' position on this matter, as set out in BC's RR [RR-026] at paras. 73 and 75, which state, '*the Council consider that the cumulative effects of this Proposed Development taken with other development in the area mark it out as an **unusual and exceptional case**. As a result, the Council consider this a case which departs from the starting point for Critical National Priority Infrastructure in NPS EN-1... The net effect of this is that **the local landscape is already at a tipping point**. The area risks a **stark and rapid transformation from a rural landscape to one dominated by modern infrastructure***' (emphasis added).

6.8 It is important to understand the highly important, even critical function that the site plays in this wider existing and future development context, in that it forms a critical gap and 'respite' between the developments, allowing the unimpeded movement of wildlife and people. The increase in such development results in ever-more pressure being put on ever-decreasing landscape resources, meaning that the resources become even more valuable, and more susceptible to these forms of change.

Planning Act 2008 – section 55

Application by Rosefield Energyfarm Limited for an order granting development consent for the Rosefield

Solar Farm (EN010158)

Comment on responses to Examining Authority's second written questions (biodiversity)

on behalf of the

Claydons Solar Action Group (CSAG)

Claydons Solar Action Group

ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
Q2.5.3	Proposed Bernwood Site of Special Scientific Interest (SSSI) – Ecological Impact Assessment (EclA) Explain what account you have taken of the proposed Bernwood SSSI and associated surveys and research reports in conducting the EclA in general and in particular with reference to Bechstein's bats.	The Applicant has used all available information to inform the assessment of the proposed Bernwood SSSI. The Applicant's approach to taking account of the proposed Bernwood SSSI is set out in paragraph 7.5.9 of the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] and comprised assessing each of the proposed interest features individually. Natural England have agreed the approach to assessment within their Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] Table 2 Ref 1.1. The baseline information used to support the assessment included site survey work carried out by the Applicant outlined in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] as well as Natural England's Commissioned Report 558 "The Bernwood population of Bechstein's Bats" that was collated to support the SSSI extension and synthesised data collected for High Speed 2 (HS2) from 2011. The Applicant also had sight of the latest available HS2 Bernwood annual bat monitoring reports which are not in the public domain but are shared with Natural England (including those from 2024), and the broader findings of which are shared with a wider group of	CSAG notes that it is now clear that the Applicant had sight of maps of the proposed SSSI boundary but elected not to introduce these into the Examination. CSAG notes that these draft SSSI maps not only support the case for removal of panels from fields B3 and B6-B8 (which the Applicant has now at least partially conceded) but also Buckinghamshire Council's position (supported by CSAG) that solar infrastructure should not be installed in fields B10, B11 and D28 and D29.

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Claydons Solar Action Group

ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
		stakeholders including Buckinghamshire Council and BBOWT.	
Q2.5.4	Bechstein's Bat – potential loss of foraging habitat In its deadline 3 submission [REP3-061] at paragraphs 1.9 to 1.19 NE outlines its reasons for advocating that an avoidance approach is adopted with regard to the foraging habitat of Bechstein's bats, with all grazed fields, and in particular fields B3, B6, B7 and B8, protected from development throughout the order limits. Buckinghamshire Council has adopted a similar position throughout the examination with the latest statement of common ground between it and the applicant [REP3-016] maintaining that proposed infrastructure should be removed from fields B6,	The Applicant disagrees with both Natural England and Buckinghamshire Council that solar PV modules should be removed from all of Fields B3, B6, B7 and B8 and also B10, B11, D28 and D29 on the assumption that this would cause a significant effect with regards foraging bats. A full response to this question has been provided within the Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086] 1.1.5 page 5, 2.3.11 page 61 (submitted at Deadline 2) and in addition Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], RR-203 page 209 (submitted at Procedural Deadline A). However, the Applicant is still in dialogue with Natural England over Fields B3, B6, B7 and B8 and is confident that an agreement can be reached that would address the points made in their representation. The Applicant notes that the additional fields referenced by Buckinghamshire Council are not a subject of concern of Natural England, and are not part of the discussions currently in progress.	CSAG notes and welcomes the Applicant's partial concessions on this matter, but is concerned that they do not obviate the scope for significant impacts on important foraging resources (especially grazed grassland and in particular cattle-grazed grassland) within the core sustenance zones of Bechstein's bat and other rare or scarce bat species. CSAG is concerned that Natural England has taken an approach to discussing/agreeing such concessions that is non-precautionary, and instead based on their not having sufficient evidence of the importance of the existing grazed fields (including B3, the rest of B7 and indeed field D29, per its Deadline 3 submission) to maintain a position of opposition to their loss to solar infrastructure (Natural England <i>pers comm</i>). To the extent that absence of information is a factor here, CSAG observes that this is a vacuum that it is the Applicant's role to fill, not Natural England's. NE have also opined that in terms of hectarage, they believe the Applicant's compensation proposals are

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	B7, B10, B11, D28 and D29. Please provide a comprehensive response to both positions.		'likely to be looked upon favourably' by the ExA. CSAG are again concerned that this is not the relevant consideration for the statutory authority. What NE should be concerning itself with is whether such compensation is likely deliverable or effective, and by extension adequate. A key concern around that deliverability or effectiveness is the applicant's continuing retreat from any firm or secured commitment to delivering livestock grazing generally, and cattle grazing in particular. We heard in ISH3 that the applicant hasn't even explored the feasibility of securing grazing in the post development scenario, though in answer to ExQ2 it claims to have spoken to potential graziers to determine local interest (though no further details are provided and no explanation for this inconsistent position is given). CSAG are concerned that NE has taken a non-precautionary approach which leaves as a live issue the scope for significant impacts on Bechstein's bats and potentially other bat species from ineffective or poorly delivered mitigation and compensation.
Q2.5.5	Bechstein's Bat – potential loss of foraging habitat	In summary, and whilst precise figures cannot be confirmed until the detailed design stage, the	CSAG notes that the recent change of proposals to remove solar from B6, B8 and

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	What would the potential impact on the proposed development be of omitting photovoltaic panels and associated infrastructure from each of the fields listed above individually and in combination?	following fields are indicatively capable of providing the following peak generation figures: - Field B3: 2.1MW peak (MWp); - Field B6: 1.3MWp; - Field B7: 10.9MWp; - Field B8: 3.3MWp; - Field B10: 5.2MWp; - Field B11: 12.6MWp; - Field D28: 20.1MWp; and, - Field D29: 8MWp These fields, in total, are indicatively capable of providing 63.5MWp.	part of B7 will (according to these figures provided by the Applicant) reduce generation capacity by around 8MWp. As late as Deadline 4, the Applicant was saying <i>"Fields B6, B7 and B8 are considered important to the Proposed Development, in supporting the need to retain installed capacity so as not to result in a significant operational constraint or reduction in function and to maximise the Proposed Development's contribution to the urgent need for new renewable energy"</i>. CSAG notes the tension and inconsistency between that Deadline 4 position, and what is now proposed. CSAG also notes the discussion around overplanting and the speed of advances in technology and efficiency and how these are likely to compensate in short order for the removal of arrays from Fields B6, B8 and part of B7. CSAG questions why the Applicant is refusing to make further changes that would evidently have limited or no material impact on target operational generation capacity, but which would substantially improve ecological impact outcomes and certainty (especially for

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			bats). CSAG invites the ExA to contemplate the same question.
Q2.5.6	Bechstein's Bat – potential loss of foraging habitat How do you respond to Claydons Solar Action Group's (CSAG) concerns, set out in paragraph 4.12 of [REP3-065] that temporary construction compounds are proposed on fields B6, B7 and B8 and this is inconsistent with a precautionary approach?	ES Volume 3, Figure 3.8: Indicative Location of Primary and Secondary Construction Compounds [EN010158/APP/6.3.5] indicates that the Applicant is proposing a single temporary construction compound of 1,250m² and has indicated that it could be located within one of these four fields (B3, B6, B7, or B10) but would not constitute a compound in each field. The Applicant estimates that the construction compound would be used for a maximum of 12-18 months in this location. The lighting information is detailed in the Outline CEMP [EN010158/APP/7.2.5]. Core	CSAG notes that the Applicant's limited and very late design concessions in respect of removing solar infrastructure from B6, B8 and part of B7 contradict its assertions in response to this question (and elsewhere) that it has already taken a precautionary approach. CSAG is concerned that Applicant's approach appears instead to have been to maximise solar infrastructure delivery everywhere except where it gets sufficient push-back from statutory consultees to constitute a consenting risk. On the construction compounds specifically, CSAG notes the statement made by the Applicant in ISH3 that there would be further revisions to the Works Plans (REP1-005) to remove the scope for the temporary works construction compound north of Sheephouse Wood to be sited in Field B6 or the retained part of B7. CSAG consider that this commitment should be extended to all of Field B7 and that the micro-sting allowance within B10 should be narrowed to ensure the compound is sufficiently remote from the

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
		working hours are 7am-7pm, which avoids night-working in the majority of the bats' active season (short overlaps with dawn/dusk in spring/autumn occur, but these overlaps occur outside the more sensitive breeding season). Security lighting through the night will be passive infrared systems (not visible spectrum); the only lighting from a H&S perspective would be to the emergency exit doors etc. Details of the lighting to sensitive receptors is secured in the Design Commitments [EN010158/APP/5.9.6]. As bats are largely nocturnal when foraging, the use of the compound is temporary, and alternative grassland foraging habitat within the bats' home	field boundaries to avoid impacts from temporary lighting, dust and noise.

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
		range is being provided, no significant impacts on Bechstein bats were identified pertaining to the construction compound. The Applicant maintains that it has taken a precautionary approach to the assessment of potential impacts on bats as presented in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] and explained in the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] (see response to [RR-049], page 317- 318).	
Q2.5.7	Bechstein's Bat – assessment methodology Section 3 of NE's post issue specific hearing 1 submission [REP3-061] sets out a comprehensive	The Applicant does not agree with Natural England that the loss of 40ha of grazed grassland would constitute a negative impact (as outlined above in the response to Q2.5.4 in particular). Of the 95ha of grassland provided within the Order Limits, 29ha is retained grassland that is being enhanced and 66ha of arable land is being	CSAG notes that the Applicant's response in its first para (left) makes no distinction between grassland (in the general sense) and 'grazed grassland' which is the focus of NE's (and others') concerns about loss of higher quality foraging habitat. The secured delivery of future grazing on any retained and/or created grasslands is critical to the Applicant's claims of compensation, and yet as we have heard in ISH2 and ISH3, the Applicant continually declines to make a solid commitment to it and (at least at ISH3) has not made any substantial investigations into its feasibility and/or deliverability. Claims

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	critique of the applicant's assessment methodology for Bechstein's bats and its conclusion of a "potentially significant effect" at the district level. Provide a detailed response focusing in particular on NE's position that: The installation of Solar PV Modules should be considered as a loss of foraging	converted. Thus, the overall amount of grassland is a 55ha gain, not a 40ha loss. The Applicant considers that the mitigation measures outlined in the Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.5] would be sufficient to ensure suitable foraging habitat is available for foraging Bechstein's bats. ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] has already considered the potential displacement effects that could occur as a result of solar PV modules and has included appropriate mitigation to offset these potential impacts.	that net gain in area of grassland equate to net gain in foraging habitat for Bechstein's and other bat species must be viewed in this context – the Applicant seeks to confound delivery of grassland <i>per se</i> with the delivery of higher quality foraging habitat, in particular <i>cattle grazed</i> grassland, and continues to provide no assurances that it views delivering the latter as any more than a convenient aspiration for consenting purposes which it can later cite "practical challenges" as a reason for failure to deliver. It is extremely telling, in CSAG's view, that the Applicant confirmed at ISH3 that it has made no meaningful attempt to look into the practical feasibility of delivering the grazing it asks the ExA to weigh into the balance of considerations here, and whilst this position is contradicted by some of its answers to the ExA's second written questions, there is no evidence to corroborate any claim of having explored the matter. CSAG also notes the linguistic gymnastics employed by the Applicant to attempt to convince the ExA that potentially significant effects (arising from its failure to apply an appropriately precautionary

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	habitat and as having an avoidance effect/impact on bats in the absence of mitigation (in line with a worst-case scenario assessment). - The loss of approximately 40ha of grazed grassland and foraging habitat would constitute a significant negative impact on a nationally important population of Bechstein's bat. - Significant impacts to this foraging habitat have the potential to negatively effect the conservation status of the species. and its conclusion that:	Whilst noting that there is no net loss, but a net gain of 55ha, the 40ha referenced represents just under 1% of the Bechstein's bat home range (4160 ha, as reported in Natural England Commissioned Report 558 "The Bernwood population of Bechstein's Bats" PDF p261). That report further notes that 'their collective home range and Core Sustenance Zone [7,934ha] ... extends far beyond [the] discrete woodland blocks and Bechstein's bats were recorded commuting, foraging and roosting several kilometres away'.(PDF p6). It is therefore considered reasonable to suggest that providing	approach and design out adverse impacts) are not something to be concerned about. Impacts on Bechstein's bats that are short of the level at which an adverse effect on "the conservation status of the species in the longer term" would arise would still be significant in EIA terms. An example would be significant short-term population change and habitat disruption which is ameliorated in the longer term. The Applicant's late in the day concessions as regards Fields B6, B8 and part of B7 stand as evidence that the Applicant has not followed the mitigation hierarchy in approaching the development design to date. The live question these late changes generate for the ExA is whether these changes are sufficient to obviate the scope for significant effects on Bechstein's bats or whether the Applicant can, and should, go further in accordance with the mitigation hierarchy and the requirements of NPS EN-1. CSAG believe it is unfortunate in this context that the SNCB Natural England appear to be taking a position based not on science or due precaution, but on a position of nervousness about maintaining objection in an effective data vacuum. This appears to neglect that NE

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	“Ultimately, we disagree with the conclusion of the Environmental Statement. We advise there is a risk that the application in its current form has not mitigated potential impacts to an acceptable level and therefore a significant residual impact remains. We advise that the	additional grassland within the home range is acceptable mitigation, even if it does not replicate the current location of grassland. See also the response to Q2.5.8. As set out in Paragraph 7.10.133 of ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5], a potentially significant effect does not equate to significant and that there would be no ‘significant harm’ (either alone or cumulatively). This is because the impacts, predicted on a precautionary basis only, are unlikely to result in an effect at a sufficient scale	can have a professional opinion even where the science is scant or absent.

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	scheme is amended to address this risk given the national significance of the population and the uncertainty over the effectiveness of the mitigation”.	to adversely change the current conservation status of the species in the longer term. The mitigation outlined in the Outline LEMP [EN010158/APP/7.6.5] is designed to: • maintain the Bechstein's bat range/distribution by avoiding woodlands and hedgerows; and • maintain the Bechstein's bat population by providing additional grassland of better quality than is currently the case, all within the Bechstein's bat current home range.	

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		These elements together support the maintenance of the conservation status of Bechstein's bat in the longer term. That said, as indicated earlier, the Applicant notes concerns from various parties with regard to the location and distribution of existing grazing. However, the Applicant is still in dialogue with Natural England over Fields B3, B6, B7 and B8 and is confident that an agreement can be reached that would address the points made in their Representation.	
Q2.5.8	Bechstein's Bat – National Policy Statement (NPS) EN-1	This response should be read alongside the Applicant's response to Q2.5.9 which refers to which paragraph in NPS EN-1 should be applied in	As above, CSAG notes the linguistic gymnastics employed by the Applicant to attempt to convince the ExA that potentially significant effects on Bechstein's bats (arising from the Applicant's failure to apply an appropriately precautionary approach and design out impacts) do not engage with the relevant paragraphs of NPS-EN1. In its

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	What is your response to Buckinghamshire Council's post ISH1 submission at paragraph 18 of [REP3-056] regarding the application of paragraph 5.4.55 of NPS EN-1 to the potential "harm" that it considers would be caused to Bechstein's bats by the proposed development and its conclusions?	considering the weight to be applied to any impact on Bechstein's bats. The Applicant refers to its response regarding 'significant harm' and the planning balance that was previously provided for Q1.7.12 in Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]. The Applicant does not believe that the Proposed Development would result in significant harm for the reasons outlined in Ref. 3.5.4 of Applicant's Response to Deadline 3 Submissions [EN010158/AP/8.22].	response to Q2.5.7, above, the Applicant seeks to define "harm" as an adverse effect on "the conservation status of the species in the longer term". CSAG invites the ExA to view that definition as incomplete. Significant 'harm' to Bechstein's bats which would engage with the relevant paragraphs of NPS EN-1 could include significant short-term population change and habitat disruption, even if that were ameliorated in the longer term. The Applicant is inviting the ExA to adopt an illogical, irresponsible and non-policy compliant definition of significant harm simply because it cannot rule out the potential of such significant harm arising from its scheme, and doesn't want to effect the design changes that would get it to that position. Whilst the design concessions that have been made to remove solar infrastructure from Fields B6, B8 and part of B7 may have lessened the likelihood of such significant harm, they have not eliminated it.

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		It is noted that there is no qualification to the use of 'harm' in paragraph 5.4.55, but that distinction is clearly made in 5.4.43 and 5.4.44 (which requires such harm to be 'significant'). In addition, paragraph 5.4.55 notes that consent should be refused <i>where harm to a protected species and relevant habitat would result</i>. Here, all of the woodlands and the majority of hedgerows are being retained, and twice as much grassland is being provided or enhanced as is being lost and therefore there is no harm to the relevant habitat needed to support Bechstein's bat.	

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		It is worth reiterating that, whilst Natural England and others have expressed concerns about the fields between Shrubs Wood, Decoypond Wood and Sheephouse Wood, the three breeding colonies that comprise the single population of Bechstein's bats are centred on three different woodlands: Finemere Wood SSSI, Grendon and Doddershall Woods SSSI and Ham Home-cum-Ham Green Woods SSSI (as stated in Natural England Commissioned Report 558 "The Bernwood population of Bechstein's Bats" PDF p5).	

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
Q2.5.10	Bechstein's Bat – buffer widths In its deadline 3 submission [REP3-061] at paragraphs 1.20 to 1.27 NE makes the case that to avoid fragmentation, buffers should not be measured from a centre line of existing hedgerows (as currently proposed by the applicant) but on a precautionary basis be based on an agreed	The Applicant refers to the response regarding the measurement of hedgerow buffers previously provided within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] and secured within the Design Commitments [EN010158/APP/5.9.6]. The spatial extent of development as set out in the DCO Application has similarly been based on offsets from the centreline of the hedgerows. This is considered to be the most consistent data source available across the Site.	CSAG notes that the Applicant maintains its illogical position on the measurement of hedgerow (and woodland) buffers and CSAG also notes that it is not accepted by Natural England, Buckinghamshire Council or CSAG. This matter has now been discussed at ISH2 and ISH3 and the best case the Applicant has been able to put forward for this approach is that it has been done elsewhere and that it is convenient (for them). CSAG responded in ISH3 with evidence of where, in a similar situation where rare Annex II bats (such as Bechstein's) were present, there are in fact precursors (such as Botley West solar scheme) where the more logical and sensitive approach of measuring from the feature, not the hedgerow centreline, has been taken, dispelling the Applicant's suggestion that it is a standard approach. CSAG understands that Bucks Council are providing examples at Deadline 5 of where the Applicant's approach to measurement is insufficient to deliver a meaningful buffer at all, and/or insufficient to accommodate the root protection areas of hedgerow trees. CSAG may also add to

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	width (10-15m either side of a field) on top of the existing ecological features representing the baseline conditions. Please provide a comprehensive response.	The approach taken to date has been to increase buffer widths in areas where the corridors are considered to be more sensitive (including, but not limited to, the fields between Shrubs Wood, Decoypond Wood and Sheephouse Wood). The Applicant is willing to review the size of buffers in particular locations as part of the evolving bespoke approach to buffers, and has requested that Natural England make location-specific recommendations. From a bat perspective, the principal function of the buffers is to ensure continued commuting, thus avoiding fragmentation. The	those examples in its response to the late information on BNG errors received from the Applicant on 23rd June 2026.

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		hedgerows within the buffers facilitate navigation (as well as providing shelter, insect prey etc), and the buffer width (the distance between Solar PV modules in adjacent fields) mitigates for the presence of the Solar PV modules themselves, should that be the cause of any displacement effect. The hedgerow width/height within any buffer does not affect the distance between Solar PV modules.	
Q2.5.11	Bechstein's Bat – effectiveness of proposed mitigation	As set out in the Outline LEMP [EN010158/APP/7.6.5], the Applicant's primary aim with mitigation outlined for both foraging bats and foraging ground-nesting birds is to increase botanical diversity and hence	CSAG notes the incremental 'backing away' from a solid commitment to grazing by the Applicant since submission and how this answer (and its submissions at ISH2 and ISH3) confirm it is now little more than an aspiration to be delivered 'if possible'. See also Applicant's response to Q2.5.12 below. CSAG further notes the contradiction between the reference to 'positive

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	How do you respond to CSAG's concerns set out in paragraphs 4.15 and 4.16 of [REP3-065] about what it considers to be inconsistencies on the part of the applicant with regard to the importance of grazing as a mitigation and the likelihood of its delivery?	invertebrate diversity and not be wholly reliant on grazing for the long-term management of grassland. The Applicant has indicated its willingness to secure grazing as part of the long-term management regime (and has had positive discussions with tenants who may be willing to provide either sheep or cattle grazing). This recognises that the presence of livestock may have some advantages but also that there may be factors outside of its control that could prevent grazing, such as the outbreak of a disease affecting sheep and/or cattle. Therefore, the Applicant has given mechanical mowing and collection as an	discussions with tenants' in this answer and the answer given by the Applicant in ISH3 that no such investigation into the feasibility or deliverability of grazing has yet been undertaken as (to quote Ms Stirling) "it is too early in the process". As the Applicant's position on grazing and its importance to the mitigation and compensation of impacts from the scheme is now somewhat ambiguous, CSAG suggests that the Applicant should provide a table of all the statements and impact assessments in its ES which are (or may have been) founded on an assumption that grazing will be delivered, and clarify to the ExA whether those statements remain valid in the absence of grazing.

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		alternative option should grazing not be possible at any point in time or location(s).	
Q2.5.12	Bechstein's Bat – effectiveness of proposed mitigation In response to the ExA's written question 1.7.14(4) [REP2-087]* you maintain that in the absence of proposed grazing the mitigation would still be effective.	As outlined above for Q2.5.11, the Applicant's primary aim with mitigation outlined for both foraging bats and foraging ground-nesting birds is to increase botanical diversity and hence invertebrate diversity and not be wholly reliant on grazing for the long-term management of grassland. The Applicant considers the proposed mitigation for both Bechstein's bats and foraging birds would still be effective in the absence of grazing. As outlined in the Applicant's Response to the Examining Authority's First Written Questions [REP2-087] Q1.7.14, evidence presented by the RSPB has shown that solar schemes designed with biodiversity in mind can support a greater diversity of breeding birds than a typical arable and modified grassland landscape. In addition, a very recent paper² has shown that ground-nesting corn bunting are foraging under panels including commuting to forage within the solar park from adjacent habitat. In both cases, it was suggested that solar farms designed with biodiversity in mind support a greater diversity	CSAG notes that the first paragraph of this answer is somewhat disingenuous given the known value and importance of cattle grazed grasslands for bat foraging, including Bechstein's. The Applicant has provided no evidence to the Examination that supports a case that grassland managed by mowing will be of equivalent value as foraging habitat for Bechstein's and other bat species to cattle grazed grassland. Evidence related to bird use of solar sites is simply beside the point. CSAG notes that the applicant again declines to provide the information from HS2 on which it seeks to rely into the Examination. CSAG has commented above on the qualifier that should be applied to the Applicant's claim of a net gain in grassland delivered by the scheme. In the absence of any certainty that such grassland will be grazed, a simple numerical comparison of area is insufficient to provide confidence

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	This appears to have been based on an acoustic survey data obtained from High Speed 2 (HS2) which suggests field B7 does not show extensive use by Bechstein's bats and ignores the contrary findings of Natural England Commissioned Report 558 "The Bernwood population of Bechstein's Bats".	of invertebrates than intensively managed grassland and arable cropland. Since the ES was published, at least one study (Szoldatits <i>et al.</i>, 2025³) has found increased bat activity at ecovoltaic solar sites (though not for all species in all seasons, and the study was undertaken in the US not in the UK (see Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087] Appendix 2). This does suggest that the wider suite of measures in the Outline LEMP [EN010158/APP/7.6.5] will be effective at providing a foraging resource for both ground-nesting birds and bats. The assessment therefore does not ignore the findings of Natural England's report; the mitigation provides grassland over a wider area than currently exists. The mitigation focuses on where Bechstein's bats maternity roosts have been identified over multiple years, as noted in earlier responses above – see also response to Q2.5.9 - and also provides grassland in the vicinity of Decoypond Wood and Sheephouse Wood (Fields B9 and B17).	in any actual gain. It is an exercise in quantitative comparison without any thought to qualitative comparison.

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	Please confirm or otherwise that you still consider the proposed mitigation for Bechstein's bats would be effective without grazing, referencing the evidence in support of your position. <i>*assumed to refer</i> 1.7.16(4)		

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
Q2.5.13	Bechstein's Bat – management of habitat and grazing In its deadline 3 submission [REP3-061] at paragraph 1.31 NE maintains that it is not just the presence of grazing which is important for foraging Bechstein bats, but also the frequency and timing of grazing, as well as stocking density. The latest outline	As outlined above for Q2.5.11 the Applicant's primary aim with mitigation outlined for both foraging bats and foraging ground nesting birds is to increase botanical diversity and hence invertebrate diversity and not be wholly reliant on grazing for the long-term management of grassland. The Applicant does consider that there is a potential conflict between maintaining botanical diversity and intensive grazing as too much grazing pressure is likely to reduce the botanical diversity at key times of the year which would likewise reduce invertebrate diversity, so there is a balance to be struck. Low-intensity grazing at low stocking densities with stock being moved frequently (as proposed in the Outline LEMP [EN010158/APP/7.6.5] and secured by Requirement 7 in the Draft DCO [EN010158/APP/3.1.7]) would strike the correct balance between botanical diversity (and in turn increasing invertebrate biomass) and bat foraging objectives and grazing would be timed for key periods in the life cycle of Bechstein's bats. Final objectives with regard stocking rates and timing of grazing would be included in the detailed Landscape and Ecological Management Plan, subject to approval by the relevant planning	As outlined above, CSAG asks the ExA to note the qualitative difference between grassland managed by grazing and grassland managed only by mowing, when contemplating the 'net gain' in grassland area cited by the Applicant. CSAG notes that no party has suggested 'intensive' grazing be deployed. CSAG agrees with the Applicant that "<i>Low-intensity grazing at low stocking densities with stock being moved frequently would strike the correct balance between botanical diversity (and in turn increasing invertebrate biomass) and bat foraging objectives and grazing would be timed for key periods in the life cycle of Bechstein's bats.</i>". CSAG's concern is that the Applicant appears to be distancing itself from this commitment, regardless of its critical role in mitigating and compensating for impacts on Bechstein's bats and other species, and that it is seeking to default to grassland managed by mowing.

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	Landscape and Ecological Management Plan (oLEMP) [REP2-067] suggests the creation of species rich grassland in the mitigation areas with any grazing of this grassland to take place as aftermath grazing, in the autumn and winter and with a low stocking density, so as to create and maintain the floristic diversity that is required	authority in consultation with the Environment Agency and Natural England	

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	for achieving landscape and botanical objectives. Is there a conflict between achieving landscape and botanical objectives and mitigating the effects of the proposed development on Bechstein's bats?		
Q2.5.14	Bechstein's Bat – management of habitat and grazing In relation to grazing the current oLEMP	The Applicant intends to use grazing as the preferred management method for grassland, as outlined in response to Q2.5.13 above. Grazing currently takes place on solar farms throughout the UK and is a proven and viable method of	CSAG invites the ExA to note the contradiction between this answer and the response of Amy Stirling in ISH3 to a question from Dominic Woodfield (representing CSAG), which suggested there had been no substantive investigations by the applicant into the delivery of grazing generally, and cattle grazing in particular.

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	[REP2-087] (paragraph 5.2.3) states "Opportunities for grazing will be considered where practicable and is viable with details such as timings and stocking densities to be provided in the LEMP(s) at the detailed design stage". Given the cautious language used by the applicant, how likely is it	grassland management. Grazing will be implemented at Rosefield unless there are extenuating circumstances outside of the Applicant's control, such as an outbreak of disease requiring the animals to be kept indoors or quarantined, or in the highly unlikely event that the Applicant cannot procure a flock of sheep or herd of cattle. The Outline LEMP [EN010158/APP/7.6.5] provides for flexibility in case of such extenuating circumstances so that the grassland could still be managed to deliver the environmental objectives of the Proposed Development. However, the Applicant is	CSAG observes that the ExA has noted the cautious language used by the Applicant in the oLEMP, and in ISH2 and ISH3 and the Applicant's reluctance to fully commit to grazing management generally, and that it instead is trying to raise the profile of mown grassland as qualitatively equivalent for bat foraging (whilst providing no evidence in support of that assertion).

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	that any significant level of grazing would be achieved on the proposed development? What discussions and with what parties have taken place to date and have any commitments been made or agreements signed?	confident that grazing is deliverable at the Proposed Development. Opportunities to provide cattle and sheep grazing have been discussed with existing agricultural tenants and it is highly likely that the grazing will be delivered in partnership with existing tenants and/or local farmers. No firm commitments or agreements have been reached at this early stage as such agreements are normally signed at the procurement stage post-consent and prior to operation.	

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
Q2.5.15	Bechstein's Bat – monitoring How do you respond to CSAG's concerns set out in paragraphs 4.17 and 4.18 of [REP3-065] that monitoring is being used as mitigation?	The Applicant considers that the mitigation as outlined in the Outline LEMP [EN010158/APP/7.6.5] (and secured by Requirement 7 of the Draft DCO [EN010158/APP/3.1.7]) is adequate and follows the mitigation hierarchy. Monitoring is not being used as mitigation; monitoring will be undertaken against specific objectives to ensure that these objectives are being met. Such monitoring will be used to determine if management regimes need to be amended to achieve the intended objectives (see Section 6.2 of the Outline LEMP [EN010158/APP/7.6.5]). Further details with regards monitoring objectives have been	CSAG consider that the Applicant's late in the day concessions as regards Fields B6, B8 and part of B7 stand as evidence that the Applicant did not follow the mitigation hierarchy in approaching the development design. The live question these changes generate for the ExA is whether these changes are sufficient to obviate the scope for significant effects on Bechstein's bats or whether the Applicant can, and should, go further, given that residual potential significant effects on Bechstein's have not been obviated. The Applicant's answer on the 'monitoring as mitigation' question is contradicted by the confused picture presented by the Applicant at ISH3 as to whether it would or would not contemplate removal of panels if monitoring showed that their presence was compromising the efficacy of buffers and flight corridors. Ms Stirling for the Applicant suggested that removal of panels 'wasn't ruled in or out'.

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
		provided within the Outline LEMP [EN010158/APP/7.6.5] submitted at Deadline 4.	
Q2.5.16	Bechstein's Bat – monitoring With regard to the monitoring strategy for effects of the proposed development on Bechstein's bats to be submitted at deadline 4 (ISH1 action 14 [EV7-018]) please:	The comment is noted. The Applicant has updated the Outline LEMP [EN010158/APP/7.6.5] submitted at Deadline 4 to clearly address these listed items 1-4 in this question. In relation to Point 3, Natural England's opinion (expressed in a meeting on 10 June 2026 and to be included in the Draft Statement of Common Ground with Natural England [EN010158/APP/5.14] [REP1-025] that will be updated at a future deadline) is that it would be	The ExA will recall that certain matters relating to the Applicant's approach to monitoring remain unresolved despite the Applicant's Deadline 4 submissions. At ISH3, the Applicant (via Paola Reason) was unable to confirm whether monitoring of the Rosefield project would be able to synchronise with and draw upon radio tracking studies for HS2. She was also unable to confirm whether studies to establish the baseline for monitoring of invertebrate biomass in retained and/or created grassland fields would be timed to coincide with periods of livestock (especially cattle) grazing in order to ensure a robust and complete comparison. The ExA will also note the inconsistency between the Applicant's position as stated in this answer, and its position at ISH3 where in response to questions about

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	1. Clearly outline the methodology you propose for establishing the baseline. 2. Set out the methods to be used and frequency of data collection. 3. Confirm or otherwise, that you only propose that the monitoring regime would use adaptive measures to alter the ongoing	better to get to a position where the layout was acceptable than to rely on Solar PV module removal at a later date once investment in those modules had been made. The Applicant shares this view and therefore no removal of Solar PV modules and associated infrastructure would arise as a result of monitoring results.	whether panels would be removed where impacting the efficacy of buffers or flight corridors. Ms Stirling gave a more ambiguous answer which suggested it was within Bucks Council's purview to dictate that, and the draft DCO did not rule it in or out.

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	management of habitats and not involve the removal of PV panels and associated infrastructure. 4. If adaptive measures only would be used to alter the ongoing management of habitats explain what these would likely be.		
Q2.5.17	Ground nesting birds	<i>[CSAG notes that the Applicant's lengthy answer to this question has been superseded by its recent Position Paper on this matter, produced</i>	<i>[CSAG notes that the Applicant's lengthy answer to this question has been superseded by its recent Position Paper on this matter, produced in response to an action point from ISH3, and which was provided to CSAG a few days before</i>

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	Provide a detailed response to the concerns raised by CSAG with regard to ground nesting birds set out in paragraphs 5.1 to 5.5 of [REP3-065].	<i>in response to an action point from ISH3, and which was provided to CSAG a few days before Deadline 5. CSAG intends to respond to this Position Paper as soon as possible and in any event well before Deadline 6. Other than the response in the next column, the Applicant's answer to Q2.5.17 will be reviewed as part of that process]</i>	<i>Deadline 5. CSAG intends to respond to this Position Paper as soon as possible and in any event well before Deadline 6. Other than the response on the comment about Mr Woodfield below, the Applicant's answer to Q2.5.17 will be reviewed as part of that process]</i> CSAG notes that in its answer to this question the applicant makes reference to and seeks to rely on the conclusions of "A recent paper peer-reviewed by Mr Woodfield (who is acting on behalf of CSAG)". It is correct that Mr Woodfield peer reviewed this paper (Solar Energy UK, Solar farms and Skylarks June 2026. https://solarenergyuk.org/resource/solar-farms-and-skylarks/), but the Applicant neglects to mention that he was highly critical of it as part of that process, and while the final draft was very much improved as a consequence of his inputs, he was not given a second opportunity to review. This is an industry funded and supported paper, not a completely independent and impartial scientific exercise. If the ExA wishes to see Mr Woodfield's comments on the draft, he would be happy to make them available to the Examination.

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
Q2.5.19	Cumulative assessment In the latest statement of common ground (SoCG) between you and Buckinghamshire Council [REP3-016], there is still no agreement on the Council's position that a cumulative assessment of the combined losses of arboricultural features	The Applicant discussed this comment in a meeting with Buckinghamshire Council on 5 June 2026 whereby Buckinghamshire Council noted that this was related to their concern that the Order Limits of the Proposed Development overlap with the HS2 Act land limits and would place Solar PV modules in areas designated or already planted as woodland by HS2. The Applicant is aware that some parcels of the land within the Order Limits are covered by	CSAG shares Buckinghamshire Council's concern about cumulative impacts and the inconsistency between buffers and root protection areas arising from the Applicant's illogical approach to measuring buffers from the hedgerow centre-line and/or woodland land parcel, rather than from the feature which is intended to be buffered. CSAG notes that the Applicant undertook as an action point to provide the land swap plans related to the HS2 mitigation planting and this has yet to be actioned. Will this be provided with the formal confirmation letter which the Applicant is intending to procure from HS2 Ltd?

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
	across multiple schemes should be undertaken. Provide an update on the latest discussions and positions of the two parties.	the Secretary of State for Transport's HS2 Safeguarding Directions made under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. HS2's requirement for this land is for the purposes of mitigation. This land is also the subject of a private agreement between the Claydon Estate, The Department for Transport and HS2 regarding the effect of the Direction. The Proposed Development does not impact any HS2 mitigation planting due to the agreement reached with the Claydon Estate, which switches out areas of	

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		mitigation planting within the safeguarded land for replacement land which is not impacted by the Proposed Development. The Applicant has email confirmation from HS2 that this is the case and is in the process of consulting with High Speed Two (HS2) Limited to obtain a formal letter of confirmation which we plan to submit to the Examining Authority, once available. The Applicant is aware of the importance of the areas around Decoypond Wood to bats and has protected commuting routes through appropriate buffers as set out and secured by the Outline LEMP [EN010158/APP/7.6.5].	

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ExQ2 ref	Question	Applicant's response (from Table 2-5.1 of REP4-082)	CSAG comment
		Buckinghamshire Council have noted this response and this matter is now agreed within the updated Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.4] submitted at Deadline 4.	
Q2.5.20	Hedgerow removal In the latest SoCG between you and Buckinghamshire Council [REP3-016], there is still no agreement on the Council's position that	The Applicant notes the comment. Most of the hedges are sectional removals within an extensive retained network which in many cases, for example the cable route, will be reinstated on completion of the works. The existing framework of hedgerows remains largely intact and is supplemented by new planting as detailed in the Outline LEMP [EN010158/APP/7.6.5]. The only potential complete hedgerow removal relates to	CSAG notes the position between the parties. The Applicant's approach appears to be to consider fragmentation over an extended timeframe, whereas over the construction and initial operational phases, the time taken for replacement hedges to mature will inevitably mean that fragmentation will occur, even if it is only temporary in some locations.

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	there would be fragmentation of ecological networks in the Bernwood Opportunity Area due to the loss of approx. 2,060m of hedgerow. Provide an update on the latest discussions and positions of the two parties.	Hedge H270, which lies within the footprint of the proposed Rosefield Substation. Up to c.2,060m of hedgerow could be removed during construction, however, to c.750m of hedgerow will be re-instated on completion of construction works, approximately c.3420m of hedgerow will be newly planted, of which a proportion will be early planting ahead of construction works commencing. The Applicant is still of the opinion that there would not be a fragmentation of the ecological network due to the proposed re-instatement of hedgerows, new hedgerow planting and enhancement of retained hedgerows, and provision of buffers from	

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		hedgerows, however Buckinghamshire Council and the Applicant have not reached an agreement on this matter.	

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