



HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Simon Warder
Examining Authority for the East Yorkshire Solar Farm
Planning Inspectorate
Room 3/OP, Temple Quay House
3 The Square, Temple Quay
Bristol
BS1 6PN

9 July 2024

Dear Mr Warder

I write ahead of this evening's Open Floor Hearing to raise some further concerns and questions regarding the application for the East Yorkshire Solar Farm.

We have seen across multiple Government announcements and policy statements in recent years a great urgency to increase the deployment and use of renewable power. Given this claimed urgency, I welcomed the applicant's apparent desire to construct and activate the East Yorkshire Solar Farm as soon as they could if their proposals received planning consent. I was therefore concerned to see that the dDCO contains provisions allowing them to delay construction by up to five years from the date of approval.

I was also concerned to see in the applicant's responses to your written questions at Deadline 1 that the timeline for constructing and connecting the project to the National Grid appears to have slipped. Throughout the pre-application period, the applicant has said that construction would commence in 2025 to be completed by 2027 and that they would be seeking to work with National Grid to get their connection date brought forward from the 2029 date they have currently. In their Deadline 1 responses, this timeline has changed to construction starting two years prior to the grid connection date. I would query why the applicant has now decided to change the language they have used in this area.



On the other side of the project, come the end of the 40-year lifetime of the project, we have seen no firm suggestion of how the site will be decommissioned or how this work will be funded. The applicants Framework Decommissioning Management Plan says at paragraph 21.3 that " method of decommissioning the Scheme at the end of its operational life is uncertain at present", and there is no indication of how the decommissioning work will be funded. Hopefully more detail will be forthcoming on these points in the detailed Decommissioning Fund, but it must be ensured that there is money set aside for the eventual decommissioning of the site to prevent. I would be very interested to know what can be done to secure this in the draft Development Consent Order.

I also have concerns about the wider funding of this project. In the applicant's Funding Statement, the total cost of construction is estimated to be £345 million. The applicant says in paragraph 2.3.2 of the Funding Statement that their shareholders have committed £6.5 million towards land acquisition and application costs, and Paragraph 2.3.3 suggests that PNE can fund the remainder of the construction and compulsory acquisition costs. The letter from PNE given in Appendix 1 of the Funding Statement is quite categorical in saying that PNE is not required to fund the Project. I would therefore ask you to urgently seek clarification from the applicant of where the funding for the Project will be coming from.

Furthermore, Funding Statement paragraph 2.1.3 says Boom is the sole shareholder in the project, however the applicant says in paragraph 4.1.2 of the Grid Connection Statement that another company, Eclipse, will have responsibility for ongoing ownership, management, and maintenance of substations and the grid corridor. The applicant has provided no information about this arrangement, other than its existence. Can the need for the applicant to provide a letter of intent or some other form of written commitment from Eclipse on this arrangement be impressed upon them?

I also have many concerns about the technical aspects of the application. In their documentation, the applicant has not been precise in what their estimated export capacity is. They say over 50 MW many times, but only in pre-application documents can a figure of 400 MW be seen. I also understand that the applicant is seeking to install 480 MW of generating capacity to enable this to be achieved. We can see from other solar farms around the country, such as Cleve Hill Solar Farm and Longfield Solar Farm that the amount of land needed to generate this level of power output is around 1,200 acres.

In their answer to your written questions for Deadline 1, question 1.5.1, the applicant claims the land user per MW output is 3.83. Looking through their explanation of how this was calculated shows immediate flaws. The applicant has used their currently planned installed capacity of 480 MW, rather than the planned export capacity of 400 MW. They also erroneously exclude large portions of the land they wish to remove from public access but keep within the site limits.



If we look at the area breakdowns provided by the applicant for what the land requested in the DCO is earmarked for, we can see that the total land area removed from public enjoyment is around 1,000 ha. When using the proper 400 MW power output, we find that the site has a land use per MW exported of 6.2 acres/MW.

Can I therefore ask for an independent assessment of the actual generating and export capacity of the proposals to be commissioned before the conclusion of the examination period, as the amount of land requested far exceeds the amount of land that would appear to be needed to reach the levels claimed? It is imperative that this is known, both so that you as Examining Authority can make an informed recommendation to the Secretary of State, and to fulfil the requirements of NPS EN-3.

I also note that the dDCO only guarantees that the development will generate more than 50 MW of power. What provisions can be inserted into the DCO to ensure that an operational solar farm will generate within some margin of the 400 MW the applicant advertises the proposals?

The applicant states in their Consultation Report that they have removed the battery storage element of the application “due to engineering reasons pertinent to the Scheme Site”. Battery storage is a core component of renewable energy schemes, allowing excess power to be stored to supplement periods when site generation is low, but energy demand is high, and the applicant themselves note that battery technology has proved safe on other solar projects. As a result, could you ask the applicant to provide a fuller explanation of the reasons why this component was removed from the design?

Regarding the configuration of the solar panels, in their documentation the applicant does not supply any detailed comparative assessment of the projected outputs of the three main solar panel configurations (south facing, east-west facing fixed, east-west facing tracking) using data from the site. The applicant says that they wish to use tracking solar arrays, as these work effectively at their existing sites in Australia, however Yorkshire is significantly further north than the site in Australia is south, which will severely impact the benefits of using tracking panels.

Additionally, the addition of tracking introduces a significant amount of maintenance and overheads to the proposals, as the bearings and motors will wear out and need to be replaced, requiring a large stockpile of replacement components to be held by the operator of the site, and increasing the complexity of the site’s operation for what appears to be limited, if any, benefit.



Paragraph 6.5.12a of the applicant's Statement of Need says that tracking panels need more land per unit of installed output but has the potential generate more energy than a fixed mounting; there is no supporting evidence for this provided by the applicant and the applicant does not provide any evidence or reasoning for why tracking panels require more land area for the same installed capacity. Could the applicant be asked to provide this as soon as possible? All existing solar farms in the UK use fixed, south facing panel arrays, so for the applicant to decide to deviate from this should require some hard evidence that it represents a marked improvement over a fixed array.

Finally, I would also echo the suggestion made by Michael Field that the Planning Inspectorate retains a consultant electrical engineer to provide an independent verdict on the technical aspects of the East Yorkshire Solar Farm application. Currently, all the figures and numbers we the public have to work with are generated and provided by the applicant, who, as we can see from the example I raised earlier in this letter on the land per MW of exported power calculations, are very willing to openly massage numbers to be in their favour.

Yours sincerely,

A handwritten signature in black ink that reads "David Davis". The signature is written in a cursive style with a large, sweeping initial 'D'.

Rt. Hon. Sir David Davis KCB MP