

WRITTEN REPRESENTATION – BARRY SMITH (IP REFERENCE No FA51BF9EA)

I am a long-term resident (25 years +) of North Kesteven. I oppose the proposed development and wish to highlight 2 areas of concern that have not been exposed previously in the evidence presented to the ExA.

Gate 2 Status

The announcement at the Fosse Green Energy (FGE) Inquiry on 6 Jan 26 that FGE has Gate 2 status to connect to the Navenby substation highlights a lack of transparency and consistency in NESO's decision making process on grid connections. (Of note, the latest Transmission Energy Capacity (TEC) register makes no reference to this Gate 2 status for FGE). Under NESO connections reforms published in Dec 25, (<https://www.neso.energy/industry-information/connections-reform>) there is a graph headed "Great Britain's new connections pipeline". This identifies the delivery pipeline for 2030 (Phase 1) and 2035 (Phase 2). However, there is no dataset that identifies which schemes are included in these pipelines other than the TEC register. Furthermore, there is also the statement, "Batteries are significantly over supplied". I would be grateful if you could advise what your intentions are to resolve this oversupply (some 300%) and help us to clarify whether the FGE project, "has become protected" which Gate 2 status implies.

Turning specifically to the proposed Navenby substation connection identified by FGE, I believe its positioning is in contravention of the policy within NPS EN-3 in terms of the priorities for solar deployment, in that it cannot support any solar power projects on brownfield, previously developed, contaminated or industrial land (Reference: NPS EN-3 para 2.10.21/ 2.10.23). Developers argue that 15 km is the maximum distance that solar plants can economically be built away from their grid connection due to the power losses sustained during the energy transportation to that grid connection. Hence, by placing the substation on a greenfield site with no suitable brownfield sites within this 15 km radius the whole scale industrialisation of the rural landscape in the area results. Furthermore, NPS EN-3 para 2.10.17 articulates that maximum use should be made of existing grid infrastructure and should avoid green field development. There is no evidence that National Grid considered Navenby as a strategically appropriate location for the Great Grid Upgrade programme. Rather it is the drive from developers such as FGE with inappropriately positioned large scale solar PV arrays on greenfield sites in the area that has led to the proposed placement of the Navenby substation. The cumulative impact of these speculative projects connecting to a Navenby substation is that some 7% of the total land area of N Kesteven would be covered in solar panels alongside numerous BESS sites.

The recent statement from the Deputy Director of System Planning and Connections in OFGEM (Blog 8 Dec 25) highlights the significant changes in the areas of connections reform and strategic energy planning that are underway and serves to

undermine the drive from developers such as FGE for a substation at Navenby. The way energy projects connect to the grid will be linked to strategic plans, in particular the Strategic Spatial Energy Plan (SSEP). This has led to NESO publishing the new connections queues. Projects that are “ready” and “needed” receive a confirmed connection date, connection point and queue position. FGE clearly has not achieved any of these requirements and therefore, cannot have Gate 2 (Confirmed Connection) status

The SSEP is due to publish in Autumn 27 and it appears that projects such as FGE are attempting to subvert this new Connections Reform process by pushing National Grid to meet their connection demands in advance of the creation of this strategic plan. Although it is recognised that there is a desire to front load approvals for renewable energy projects to reduce technology risk for grid projects in the period 2030-35, the recent government (NESO CP30 aligned solar) datasets published highlight that there is no shortage of solar generation capacity in this period. Furthermore, NESO highlight that their datasets do not account for the large-scale increases in solar generation (approximately 10 GW nationally) that are occurring as a result of panels being fitted on domestic and industrial roofs. These capabilities will only continue to grow reflecting recent changes in planning policy for house building and industrial sites to implement green energy solutions. Hence, the need case (strategic alignment criteria) for the FGE project has not been met and therefore, it cannot meet the Gate 2 requirements that form part of the UK’s Connections Reforms.

The Centralised Strategic Network Plan (CSNP) is a whole system plan to 2050 which describes the network the UK will need to move power across the system. It will use the SSEP as its main input. Ofgem has published guidance on how the CSNP should be developed and NESO’s methodology should follow this. The full CSNP is now due in 2028. However, there is a need for a transitional plan for the electricity grid in the 2030’s so an updated tCSNP refresh will be published in June 26. It will reflect the connections reform outcomes implemented in Dec 25. Building a new substation on a greenfield site at Navenby has not been identified within this strategic planning process. Hence, FGE cannot have been provided with a confirmed connection date, connection point and queue position and therefore, cannot meet Gate 2 standards.

Finally, regional energy planning must align with national plans. In 2028 NESO will create 11 Regional Energy Strategic Plans (RESPs) covering 9 regions in England plus one for Scotland and 1 for Wales. These plans are intended to provide consistent demand and supply projections and direct where network investment is needed as the grid decarbonises. Network operators will align their investment plans with the direction set by the RESP. Like the CSNP, transitional RESP plans are required with a transitional RESP expected in Jan 26. The intent with all of these changes is that energy policy will reflect a situation where top-down strategic planning aligns with bottom-up connections reform. Projects such as FGE, that have not met the defined Readiness Criteria (land, planning, finance) and claiming Confirmed Connection status to an as yet unapproved substation at Navenby must be challenged by the ExA or the democratic deficit surrounding the planning process for large scale solar PV projects will be brought into sharp relief.

Cybersecurity

Planning policy(NP3), Ministerial statements and the overarching Solar Roadmap strategy published in June 2025 emphasise the need to ensure our energy security, independence and for the UK to take back control of its energy supplies. However there is growing concern and mounting evidence provided by the UK's Security Services that electronic devices (and their underlying silicon chip architecture) produced by Chinese manufacturers and used in solar generation facilities as well as Battery Energy Storage Systems pose a significant security risk. These risks include the ability for an adversary to trigger a "kill switch" that could take a facility off line or, worst case, cause a battery unit runaway with the subsequent possible fire or explosion. Either of these would cause economic harm to the UK power network and the latter could also cause severe environmental damage. I believe **without appropriate mitigation** the issue of total reliance on a Chinese logistics chain for the implementation of the solar array and battery storage proposed in the Fosse Green development poses a significant cyber security risk to the UK. Hence, the planning directive within EN3 for projects to provide the UK with energy security has not been met as currently proposed and should be rejected on these planning grounds.

To mitigate these risks of hostile action by a hostile geopolitical adversary, there is a duty under the Network and Information Systems Regulations (2018) to take appropriate and proportionate technical and organisational measures to manage risks posed to the security of the network and the information systems on which their essential service relies. However, this duty currently only applies to electrical generators with a capacity of more than 2 GW which the Fosse Green Energy (FGE) solar array and battery storage system does not meet. However, the Cyber Security and Resilience (Network and Information Systems) Bill that has been introduced by the Government in November 2025 **is a recognition of the need for greater protection of projects at the scale of FGE. Hence,** I believe that responsible developers would, in response to these identified threats, wish to exceed the statutory minimum standards on cybersecurity within the 2018 Regulations.

Would the ExA ask whether the applicant accepts these concerns and if they are willing to provide reassurance in the area of energy security by committing to complying with the 2018 Regulations in advance of any future legislative **requirement in the cyber domain** on the project?