

Submission ID: S2076F637

Thank you for your thorough consideration of our contributions and documents. I contribute the the attached document on behalf of over 12,000 people directly affected by the application, as local District and County Councillor, As Chair of the Cliff Villages Solar Action Group, I thank colleagues for the many hours, days and weeks of careful research, bringing significant expertise and experience.



Cliff Villages Solar Action Group

Solar on roofs not farmland

Comments to the Fosse Green Inspectorate Deadline Jan 20th 2026

1. Information and Background

1.1 This statement is submitted on behalf of the Cliff Villages Solar Action Group, the 1,574 local residents who have signed letters to the Prime Minister and more than 12,000 residents directly affected by this application. We have consulted residents via door to door knocking, four leaflet drops, five packed public meetings and numerous Parish Council meetings.

1.2 We have raised several objections to the proposed Navenby BESS (available on the NKDC Planning Online website under reference 25/0491). We raise the same objections to the Fosse Green BESS as to the Navenby BESS and ask that the UK Health Security Response be considered in the Fosse Green BESS from the same applicant, as up to date advice.

Summary of Key Areas of Objection

- **The selection of the site does not comply with NPS EN-3 priorities for solar deployment**

The methodology employed in selecting the proposed site warrants thorough examination. It is clear from the Site Selection Report that the site was not selected following a search for sites that could achieve a connection to the existing grid network, or sites that could wholly, mainly or partially utilise brownfield, previously developed, industrial or contaminated land, as prioritised for solar deployment in NPS EN-3. The site was selected as the result of an approach to the applicant from a group of landowners. Its selection was clearly contrary to NPS EN-3.

- **The scale is far greater than that envisaged for solar deployment by the Central Lincolnshire Local Plan**

The Central Lincolnshire Local Plan has a presumption in favour proposals for ground based photovoltaics and associated infrastructure, including commercial large scale proposals, unless there is clear and demonstrable significant harm arising and/or the proposal is to take place on Best and Most Versatile (BMV) agricultural land. "Large scale" is not defined in the Local Plan, finally adopted in April 2023, but certainly was not intended on a scale of thousands of acres of farmland, with the significant impacts that result.

- **The Fosse Green Energy scheme offers limited opportunity for national contribution**

Data from the published Connection Reform Results of the National Energy Systems Operator (NESO) and the Solar Power Portal shows that the UK is well on the way to achieving the UK Clean Power Plan 2030 targets for renewable energy generation without the Fosse Green Energy proposal, which is shown as not having a gate connection. Applications that can connect to an extant, built grid connection should be prioritised with greater weight of benefit over a scheme that cannot guarantee a grid connection.

- **The direct and cumulative impacts on landscape character are wholly unacceptable**

The visual impacts of the Fosse Green Energy proposal on the landscape and character of the rural areas immediately surrounding the site, and the cumulative impacts of the many renewable energy projects within a 15km radius of Navenby that will be triggered by the approval of the Fosse Green Energy DCO application, will be devastating and are wholly unacceptable. The landscape of pleasant villages in attractive countryside will change to a landscape dominated by industrial solar deployment and associated infrastructure.

- **Battery safety is a major concern**

The UK Health Security Agency's latest advice on BESS safety is powerful, raising concerns about the safety of battery storage units (Appendix 1). The Fosse Green Energy BESS should not be given permission until the regulations on safe distances from homes are clearer and wider safety regulations are developed and implemented.

- **Decommissioning needs to be secured up front**

There needs to be a clear plan for recycling of old or damaged panels within 60 years as they are replaced and when the site is decommissioned, before any permissions are given. A significant bond will be needed up front to ensure that money is available should the developer or site operator collapse.

- **The financial viability of Fosse Green Energy needs to be questioned**

We have investigated the companies behind the Fosse Green Energy application and have found them to have very little capital or staff. These empty shell companies are taking responsibility for vast, speculative developments, without clear evidence that they have the financial capacity to deliver them.

- **Local roads will not be able to cope with the increased HGV traffic**

The narrow lanes and junctions are inadequate to accommodate the increase in HGV traffic.

- **The impact on the agricultural economy has not been fully assessed**

The impact on the local agricultural economy has not been fully considered, particularly in relation to the impact on agricultural suppliers and the downstream food supply chain.

- **The loss of BMV agricultural land has not been justified**

The initial selection of the Fosse Green Energy site did not involve a search for sites that would avoid the use of BMV agricultural land. It was purely a response to an approach from the landowners. The unnecessary loss of 284 ha of BMV agricultural land is significant. There is no evidence that the applicant has sought to minimise this loss through a genuine site search process.

3. Location: Site Selection and Alternatives

3.1 The methodology employed in selecting the proposed site warrants thorough examination.

The Site Selection Report (Appendix A to the Planning Statement – document AS-098) clearly states that the site was selected by an approach from landowners. The site is entirely on agricultural land, including 284ha of BMV land. No attempt was made to find a site that wholly, mainly or partially uses brownfield, previously developed, industrial or contaminated land, as prioritised for solar deployment by NPS EN-3. There was no grid capacity in this location, no connection available.

NPS EN-3 References

Para 2.10.17

To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity, and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.

Para 2.10.21

Applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land, avoiding the use of Best and Most Versatile agricultural land where possible.

Para 2.10.23

Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.

3.2 A thousand hectares was said to be required, but our calculations show an overplanting of 1.6 times as many panels as needed for 240MW planned. Smaller or non-continuous land areas would also achieve the same output, so the limiting stipulation of 1,000ha is not justified by the applicant but instead this arbitrary criteria limits the search to greenfield farmland, contrary to EN3. Using commercial roofs of industrial sites would require less infrastructure and more on-site use, by far the most intrinsically cost-effective were the feed-in tariffs on an equal footing. Commercial roofs are omitted from site selection in 2.5 Chapter 4, Para 4.2.11 (APP-029).

3.3 Even within this District, sites that should have been considered are the industrial areas in North Hykeham, where we have the energy from waste plant, Sleaford, or Newark or disused airfields. Closer to where the energy is needed opens many other options. The ES Non technical Summary (APP-180) Para 4.1.2 c states “The Applicant sought to avoid urban areas,” thus excluding areas where the energy is needed and brown-field sites, and increasing the burden of infrastructure and environmental impact. This is contrary to NPS EN3 Para 2.10.11, which states that ‘*The Powering Up Britain: Energy Security Plan states that “Government seeks large scale ground-mounted solar deployment across the UK,*

looking for development mainly on brownfield, industrial and low and medium grade agricultural land.”

- 3.4 There is insufficient evidence that a sequential test has been set, as described in EN3. Sites not available through voluntary commercial agreements, but that might be acquired via compulsory purchase have been omitted. The wider search area above the 15km radius from the imagined substation at Navenby do not appear to have been considered. The applicant’s methodology also excludes sites that are not considered to be adjacent as increased cost would be likely and would impact viability. There are several other NSIP scale solar projects in Lincolnshire, some of which have had a DCO granted or are currently in examination, that are non-continuous, such as Cottam, West Burton, One Earth and Springwell. The applicant’s assertion that the site must be continuous for viability is therefore questioned. As such there is considered to be insufficient information/evidence provided in the Fosse Green application to properly assert that a sequential approach has been taken with regard to site selection.
- 3.5 Site visits were made on two days in June 2023, apparently to select one of seven sites for the substation, (NKDC Scoping report 25/0699/EIASCO) but the connection agreement for “the proposed National Grid substation near Navenby” was already agreed in November 2022. Paragraph 2.1.2 (APP-200) The selection process seems to have focussed on accommodating one landowning company and not a realistic effort to find the best site.

“Proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual and cumulative impacts on the following considerations are, or will be made, acceptable. To determine whether it is acceptable, the following tests will have to be met: i. The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings and the historic landscape; and highway safety and rail safety; and ii. The impacts are acceptable on aviation and defence navigation system/communications; and iii. The impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic;

4. The scale is much greater than anticipated by the Central Lincolnshire Local Plan

- 4.1 The rationale for the proposed development is based on the asserted necessity for large-scale renewable energy schemes. Policy S14 of the Central Lincolnshire Local Plan has a presumption in favour proposals for ground based photovoltaics and associated infrastructure, including commercial large scale proposals, unless there is clear and demonstrable significant harm arising and/or the proposal is to take place on Best and Most Versatile (BMV) agricultural land . At the time of its preparation, “large scale” referred to projects covering several tens to 100–200 acres, such as Wellingore Four Winds Farm (approximately 4 acres) and Branston Potatoes (160 acres), both significant energy users. The present proposal, encompassing thousands of acres of farmland, far exceeds the scale

originally envisaged and raises substantive questions regarding compliance with both the letter and spirit of local planning policy. “Large scale” is not defined in the Local Plan, finally adopted in April 2023, but certainly was not intended on this current scale of thousands of acres of farmland, with the significant impacts that result.

- 4.2 The cumulative impact of the scale of the substation and three solar industrial proposals, each the size of a London Borough, makes an unacceptable impact on landscape character; visual amenity; heritage assets, their settings and the historic landscape; and impact of construction, each taking 2-2.5 years to construct and then adding maintenance and replacement.
- 4.3 The impacts are also unacceptable on aviation and defence navigation system and communications.
- 4.4 The impacts are unacceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, air quality and traffic;

5. The Fosse Green Energy scheme offers limited opportunity for national contribution

- 5.1 “5.1 The need for the proposal is important to the weight to be attributed to its claimed benefits when set against identified harms. While low carbon generation can carry public benefit in principle, the practical value and deliverability of this scheme must be assessed realistically in light of current grid connection constraints. NESO’s published connections reform results state that “Batteries are significantly oversupplied” and that “There will be no capacity for batteries in the next window.” This position has been publicly described as a moratorium on new battery storage entering the next application window, but in any event the material planning point is that grid access for new battery storage is currently constrained and uncertain, and benefit claims that depend on timely connection or operation should be treated with caution unless evidenced.” There is clearly no benefit in providing energy for thousands of homes, when they are already supplied from other renewable sources.
- 5.2 The National Energy System Operator (NESO), has published its connection reforms in January 2026, rationing grid access through permitted capacity and application windows, and that some technologies, particularly battery storage, are already materially oversubscribed. The benefits claimed for the proposed development should not be afforded full weight unless the Applicant can demonstrate a credible, timely, and deliverable connection pathway, supported by evidence rather than assumption. When the Government requirements are already superceded, as they currently are, then priority must be given to proposals where there is already an extant grid connection, and even better, a grid connection closer to where the energy is needed.
- 5.3 NESO has effectively issued a moratorium on battery storage following their battery storage report and the Government’s *Clean Power Action Plan*, demonstrating that we are well over-

supplied beyond 2035, by around three-fold, a fact also supported in correspondence from our Ministers. To quote;

‘Batteries are significantly oversupplied, with around three times more projects than the permitted capacity. This is due to projects that have protections such as planning permission. There will be no capacity for batteries in the next window.’

- 5.4 This component should be assessed distinctly because it introduces a different impact and risk profile from the solar arrays. Given NESO’s published position on oversubscription and the absence of capacity for batteries in the next window, the benefits claimed for the BESS element should be afforded reduced weight unless the Applicant can evidence a deliverable connection pathway and a clear operational justification. In the absence of that evidence, the Examining Authority should treat the case for consenting the BESS within this DCO as unproven.”
- 5.5 APP-031 Para 6.4.76 states “As the lifetime generation figure of the BESS is significantly less than that of the Proposed Development, it is reasonable to assume that the battery will only store and discharge energy generated by the Proposed Development.” Since they only operate for a few hours, the risks associated with the battery is not justified, as the BESS supply is more than needed.
- 5.6 The NESO Connections Reform Results demonstrate the need for solar is close to requirement for 2035, but it does not include solar on roofs. I have personally asked the Minister for Net Zero how much solar is from commercial and private roofs, and this is now published on the NESO site under “*Solar photovoltaics deployed by capacity*” “*Table_1_by_capacity*” and “*Table_1_by_capacity_new*”. In November 2025 the UK cumulative Solar photovoltaic capacity was 21.481 GW, “of which domestic” is 6.273 GW, not in the NESO graph.
- 5.7 NESO’s Connections Reform Results demonstrate that the need for solar is also over capacity for 2030 and for 2035, significantly reducing the weight of benefit of this proposal. Over supply of electricity is a significant disbenefit, as “Constrain costs” were 1-5-1.8bn in 2024. **Applications that can connect to an existing, built grid capacity should be prioritised with greater weight of benefit**, and would save costs. NESO’s “control allows a more strategic approach, including regional targets, rather than allowing a few landowners to dictate planning policy.

Great Britain's new connections delivery pipeline

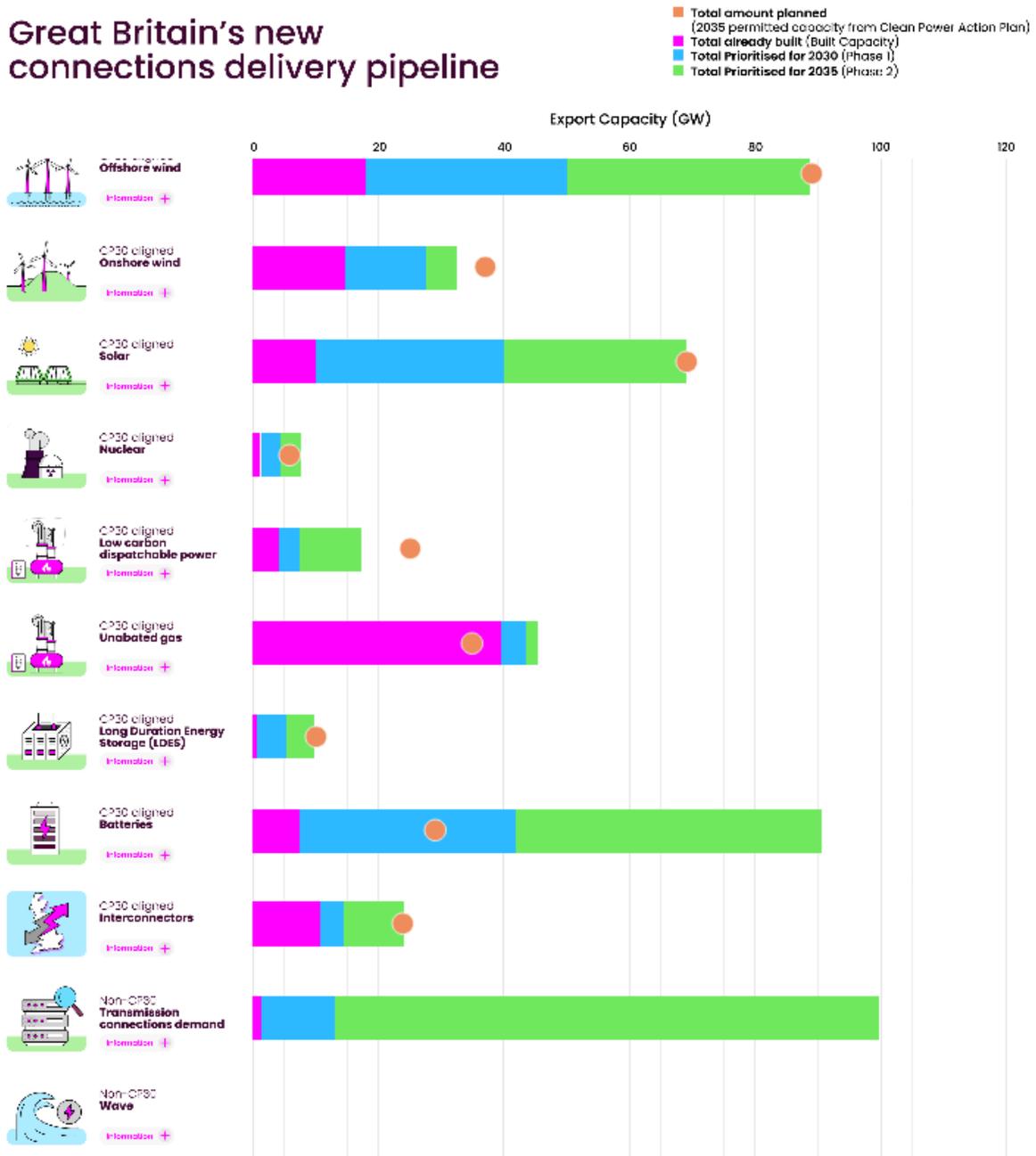


Figure above is from NESO's [Connection Reform Results](#) Jan 2nd 2026

5.8 The overall national need for renewable energy is already met, judging from the Solar Power Portal. The UK has around 96GW of offshore wind in 123 projects in development (Solar Power Portal) and 42.7GW of onshore wind. (Renewable UK) The UK Clean Power Plan 2030 is for 43-50 offshore wind, 27-29 GW onshore wind and 45-47GW solar, which could be acquired through rooftops, railways, motorways etc. Thus the calculated need for a total of 126GW already adequately met by wind alone, aside from our many rooftop solar developments, not yet counted. The proposed development does not meet the Government target of reduced emissions.

5.9 From our calculations the emissions savings suggested by the applicant are incompatible with those from Springwell, conflicting and underestimated. Savings from this project have to be calculated against the renewable mix at the time. Thus, the estimates for savings over 60 years are 86% too high.¹⁰ The need for the Fosse Green Energy proposal has reduced since other applications have now been passed or progressing further. To the South, Mallard Pass and to the East, Heckington Fen both have permission. There is a live application for 1,300 acres at Beacon Fen Energy Park Ltd for 400MW of power and 600MW of battery power on just 757ha, connecting to an expanded Bicker Fen substation. To the West, 3,000 acres of Tillbridge was granted permission by the Minister in October. Also to the West, lies the Great North Road Solar Park planned to cover some 4 to 7,000 acres. To the East three Springwell applications are with the Inspectorate for final decision. A list of the area now covered could be obtained from the District Council, to include ground-mounted solar developments of less than 50MW. I understand they have a long and shortlist, but it is the long list that we will experience locally, and the one that needs to be considered, including construction, repair and decommissioning.

6. The direct and cumulative impacts on landscape character are wholly unacceptable

6.1 **Lincolnshire has an agricultural foundation** resulting in many isolated dwellings, hamlets and villages, set in food-producing countryside. With each of these applications, people might easily travel east-west along these routes, through miles of Solar industry, with never more than fifteen minutes break in views of the oppressive industry. There are 35,000 acres or 141 square kilometers of solar, including solar developments to the East, readily viewed from the high ground of the Cliff Villages, such as Navenby. The alien features of glass or silicon and steel draw the eye and create a different, industrialised character to the landscape, both on the heath and looking out from the heath. Concrete and cables give it a permanence, making the ground very difficult to return to crops, should our grandchildren ever get the chance. A working lifetime is hardly “temporary” and the additional 50% from 40 to 60 years is not adequately justified.

6.2 The District Council consultant explains that the applicant “fails to acknowledge in their impact assessment that solar arrays and other energy projects such as BESS, lighting, overhead lines and pylons, and associated sub stations and converter stations are, together, likely to significantly impact on the existing landscape character over an extensive area across the published character areas... This would require changes to the national, regional and local character assessments.” The landscape of pleasant villages set in attractive countryside, would change to a landscape dominated by industrial solar, and all that could follow in an industrial landscape.

6.3 The District Council consultant also explains that the **landscape character** of the local, and potentially regional area, may be “completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that historically and currently is predominantly agricultural”. 51% of the parish of Thorpe on the Hill and a quarter of the parishes of Bassingham and Aubourn and Haddington will be

covered by the Fosse Green Energy proposal. The cumulative impact on these villages is devastating to their character and setting.

6.4 In the ES Chapter 5 Environmental Impact Assessment Methodology (APP-030) that over the 60 year extended ‘temporary’ operational phase there would be periodic replacement of development components, and the design life of key equipment is provided in Table 3-11. As the panels are likely to be replaced on numerous occasions, additional information is required to assess the impacts of what might, in effect, be more than a single construction stage, but rather a *series of re-construction periods*, potentially involving large-scale equipment.

6.5 The significant visual impact on **recreational receptors** is also indicated in the closing of part or all of 36 footpaths during construction and the temporary creation of a few permissive paths, which would be through a closed in hedged corridor instead of uplifting open views - and they can be closed at any time. The Viking Way is a significant walk overlooking the lower land. Our villages and paths currently focus on the attractive views over twelve miles to the Trent Valley and on to the hills of Nottingham and Derbyshire. It is impossible to shield the structures from above and the barriers would diminish the open views. The visual impact of concrete, fencing and panels is far greater than the footprint, as it the eye is drawn to the shining alien features in the landscape, entirely spoiling the experience of human connection with the natural world.

6.6 The **cumulative impacts** on the landscape within the relevant assessment area, including in relation to the proposed Navenby substation and other energy infrastructure proposals, must be assessed comprehensively and transparently. Where connection assumptions depend on infrastructure that is not yet consented or constructed, that uncertainty is directly relevant to deliverability and to the robustness of cumulative assessment. In those circumstances, the public benefit claimed for the scheme should not be afforded full weight unless the Applicant can evidence a credible and deliverable connection pathway and demonstrate that the cumulative assessment captures the realistic scale and interaction of relevant proposals. In addition, given the stated 60 year operational period and periodic component replacement, the examination must be satisfied that construction, replacement and maintenance effects have been assessed in a way that remains accurate across the lifetime of the development.” prescribed

6.7 The need is already fulfilled using applications with an extant grid capacity and connection. Covering an entirely agricultural area with solar, changing the nature of the landscape from rural to industrial solar is unnecessary. It is also soon outdated with more efficient and modern solar energy technology, so the replacements and maintenance will be important.

1.Forepower Lincoln (250) Ltd	FOREPOWER LINCOLN (250) LIMITED	Navenby 132kV Substation
2.Vicarage Drove BESS Limited	VICARAGE DROVE BESS LIMITED	Navenby 132kV Substation
3.Bicker Drove	REWE 1 LIMITED	Navenby 400kV Substation

4. Bicker Fen BESS	O&G Solar (SPV 40) Limited Renewable Energy Systems Limited	Navenby 400kV Substation
5. Cliff Hill Energy Farm		Navenby 400kV Substation
6. Denton Estate Solar PV and BESS	Elgin Energy Holdings Limited	Navenby 400kV Substation
7. Ewerby	Leoda Solar Farm Limited	Navenby 400kV Substation
8. Housham PV & BESS	FOSSE GREEN ENERGY LIMITED	Navenby 400kV Substation
9. Navenby GEC (Ethos Green)	NAVENBY GREEN ENERGY CENTRE LTD	Navenby 400kV Substation
10. Springwell	SPRINGWELL ENERGYFARM LIMITED	Navenby 400kV Substation
11. Springwell	SPRINGWELL ENERGYFARM LIMITED	Navenby 400kV Substation
12. Springwell	SPRINGWELL ENERGYFARM LIMITED	Navenby 400kV Substation

There is a further application called “Navenby” but apparently connected to the “Trent”.

6.8 The NESO TEC Register now shows 12 or 13 projects seeking connection to the non-existent substation at Navenby. The Inspector will want to have cognisance of the whole picture in considering the cumulative impacts on the character of the landscape and all other factors. Just three of the solar applications covers almost 10,000 acres, 37 square km, bigger than the whole of Lincoln City, and that houses over 100,000 people. Each is bigger than a London Borough. The impact on this area is very significant. The Parish of Thorpe on the Hill, for example is 47% covered in panels. Barriers created to hide the panels create unwanted barriers in themselves, closing in the open landscape. The application is below the cliff edge, so shielding from above is not practical, creating an industrial appearance to the landscape. Importantly, we currently have attractive historic villages set in rural countryside, but these vast areas of solar and the significant industrial developments, would change the whole nature of the landscape.

7. Battery Energy Storage Systems (BESS) safety is a major concern

7.1 Government guidance on grid scale electrical energy storage systems has emphasised the need for robust safety governance, adherence to relevant standards, and clear incident management arrangements across the lifecycle of such development. The proposed distribution of BESS infrastructure across multiple compounds materially expands the development footprint and can intensify effects on landscape and land use. Critically, any assertions by the Applicant that incidents will not propagate between units or that contaminated firewater cannot reach watercourses must be supported by evidence and should not be treated as established fact. The examination should focus on whether the draft DCO secures enforceable requirements covering fire prevention and response

planning, containment of potentially contaminated firewater and runoff, monitoring, incident reporting, and ongoing operational controls.

- 7.2 Whether bunched together or spread we cannot accept the applicants' over-optimistic accident rate and statement that no fire will spread to adjacent units and no poisonous water will enter the water courses.
- 7.3 The safety case for the BESS element must be evidenced in a way that is robust to plausible operational conditions, including concurrent emergency demands and potential failure modes. The Applicant should be required to demonstrate, with supporting evidence, that the proposed layout, separation, detection and suppression systems, and incident response arrangements are appropriate, including the management of potentially contaminated firewater and runoff. The examination should also test whether the local emergency response framework has been properly consulted and whether the draft DCO secures enforceable Requirements for emergency planning, incident management, and ongoing operational controls, rather than relying on assumptions that adverse scenarios will not occur."
- 7.4 "The question for this examination is not whether wider national regulations may evolve in future, but whether this DCO can secure an evidence based safety case through enforceable Requirements. The BESS element should be assessed distinctly from the solar arrays because it introduces a different risk profile and different control measures. If it is to be included within the DCO, the draft Order must contain clear, enforceable Requirements that secure its layout parameters, safety management framework, emergency planning, and environmental protection measures, rather than leaving critical safety controls to non-binding commitments."
- 7.5 Waddington is a key military base, one of the busiest in the UK Cranwell our RAF officer training site for the UK and Digby the RAF Intelligence unit. The locality is thus at a higher level of risk from foreign cyber-attacks, kill-switches either cutting off the power or creating burn-outs as found in panels elsewhere. The RAF have raised that solar installations are safe "when sensibly located, designed and orientated, pose any glint and glare flight safety issues for either military or civilian aviation". What mitigations are there to reduce the possibility of an aircraft flying accident or an incident where the aircraft's payload is inadvertently lost creating a major fire risk for the significant number of Battery Energy Storage Sites (BESS). Will a No-Fly Zone be established over these sites to prevent the possible catastrophic impact of an accident or an incident on the large number of containers containing lithium cells which make up a BESS and are susceptible to shock resulting from this type of accident or incident? The nearest BESS to the airfield is less than 3km from the threshold of Runway 02.
- 7.6 Given the reliance of modern energy infrastructure on networked control systems and communications, the Applicant should evidence that appropriate and proportionate cyber security and operational resilience measures will be implemented, including governance, incident response, and supply chain assurance where relevant. Where legal duties apply under the Network and Information Systems Regulations 2018 or other applicable regimes,

the examination should not rely on generic assurances but should require clear evidence of how risks will be managed across construction and operation.”

8. Decommissioning and replacements

- 8.1 There needs to be a clear plan for recycling of old or damaged panels within 60 years as they are replaced and when the site is decommissioned, before any permissions are given.
- 8.2 In Chapter 14 (APP-039), Table 14-22, the Applicant has assumed no waste on the assumption manufacturers in China will take responsibility. That assumption requires scrutiny against the UK’s waste regulatory framework. Government guidance under the WEEE regime confirms that PV panels are electrical and electronic equipment and must be treated as such for reporting and end-of-life management purposes. The examination should require the Applicant to demonstrate a credible and enforceable waste and end-of-life strategy for panels and associated equipment, including clear allocation of responsibility and funding, rather than relying on assumptions about overseas manufacturers.
- 8.3 The examination must be satisfied that the impacts of cable installation are not treated as a single, one-off construction effect if maintenance, repair or replacement could require further intrusive works during the operational period. The Applicant should provide clear evidence on cable design life, fault repair scenarios, replacement triggers, and the likely scale of future works, and the draft DCO should secure appropriate controls for such works, including land restoration and management of construction impacts.”
- 8.4 Further, “underground cable faults often require extensive works, specialist resource, tools and equipment to locate the fault, followed by significant work to expose the damage, replace the damaged section and then up to an additional month to carry out necessary cable jointing and testing of new sections. The mobilisation of specialist equipment to undertake fault repairs on underground cabling results in significant local impacts, particularly for landowners and public highways. This presents significant risks to security of supply and network reliability.” At the joins every 400m, a wider bay is required (45m), with a permanent inspection tower in place. Those towers are not mentioned in the above ground visual intrusion of the cables, nor in the replacement and decommissioning.
- 8.5 The quantity of waste on 575,000 panels with latest research indicating a 20% failure rate over 10 years. The County Council Local Impact Report calculates about 15 million panels to be disposed of, using the applicant’s figures, but with this latest research on failure rates, this is likely to be an underestimate. The Applicant’s waste assessment should be revisited to ensure it reflects realistic rates of component replacement and failure over the operational lifetime, including panels, inverters and associated equipment. If specific failure rate assumptions are relied upon, they should be clearly sourced and the resulting waste quantities should be shown through a transparent calculation so that the examination can verify them. In the absence of such clarity, the

examination should not accept the waste assessment as robust, and the draft DCO should secure an enforceable end-of-life and decommissioning strategy, including funding and responsibility allocation, before construction proceeds.”

8.6 It is not clear all these costs are included in the £340m calculated by the applicant. There is a risk of increased landfill with the added risks of pollution and fire. A significant bond would be needed to ensure money is available should the developer or site operator collapse. A suggested condition would be similar to that in the Helios Renewable Energy Project. In the draft DCO, dated 27 May 2025, paragraph 5(3) of Schedule 2 states:-

“No later than year 15 of operation the undertaker must notify the local planning authority that the undertaker has put in place the requisite decommissioning security in the form as required by the landowners”.

However, the bond needs to be front-loaded, because the cost burden of decommissioning is created at construction and new businesses most often fail in the early years. For example, a lump sum up front should be required, as in a highways bond.

9. The financial viability of Fosse Green Energy needs to be questioned

9.1 The viability of the project relies on other applications also being successful to justify the new substation, which may not get permission anyway. Thus the other companies are also relevant. We have investigated these companies seeking permission and find them to have very little capital or staff. These empty shell companies are taking responsibility for vast, speculative developments with undeveloped safety regulations, especially regarding the battery installations. Significant bonds are needed should the public purse need to step in. These are not detailed in the application, but could be £100m or more.

10. Local roads cannot cope with the increased HGV traffic

10.1 The narrow lanes and junctions are inadequate to accommodate the likely increase in traffic. All roads used by HGV's need to be wide enough for two HGV's to pass without breaking up the edge of the road. With the expected increase in traffic, passing places are inadequate.

10.2 Chapter 13 (App-038) Para 13.4.68) states “Where practicable, the Framework CTMP [EN01054/APP/7.18] will restrict HGVs to routes which avoid these villages” However, having specifically stated in Para 13.4.67 that HGV trips will not pass through Haddington, Figure 13-4 shows HGVs being routed through the village, as well as Thurlby.

10.3 The scale and intensity of construction traffic associated with the Proposed Development raise serious questions about the suitability and resilience of the local road network. The examination should test whether the Applicant's construction traffic assumptions are realistic, whether worst case scenarios have been properly assessed, and whether the proposed mitigation measures are sufficient to prevent unacceptable impacts on highway safety and local amenity.

10.4

11. The impact on the agricultural economy has not been fully assessed

- 11.1 The economic benefits claimed for the proposal appear limited in scale and duration, with construction phase employment temporary and operational employment minimal. When assessed against the long term loss of agricultural land, changes to land use, and potential displacement effects, the net local economic benefit is uncertain and should be treated with caution in the overall planning balance.
- 11.2 The Applicant's assessment does not demonstrate that the economic consequences of removing extensive areas of productive agricultural land from use for the duration of the operational period have been properly addressed. The examination should require a clear assessment of the potential effects on agricultural output, farm business resilience, and the wider local supply chain, including contractors, haulage, input suppliers, agronomy services and local processing. Where any quantified claims are relied upon, they should be supported by an auditable methodology and source material. In the absence of that evidence, the planning concern remains that long term land use change at this scale can materially affect the functioning of the local agricultural economy, and that those effects should be assessed and weighed transparently within the socio-economic case.
- 11.3 Every reduction in productive land, means less food available for eating or for export. Even if it is used for energy crops, land can be returned to food the following year, if that is what is wanted, or to woodland, wetland or ponds. Locking ourselves out of our best asset for sixty years, with contracts to global companies, is severely limiting to our local economy. The socio-economic impacts are clearly negative and reasonable grounds for an objection.

12. Agricultural soils

- 12.1 The incremental loss of Best and most versatile (BMV) land to large infrastructure projects intensifies pressure on remaining agricultural land to maintain food production and/or could lead to increased reliance on food imports, raising concerns about sustainability due to longer supply chains, global conflict, higher carbon emissions, and food miles. Even in Lincolnshire and the UK, good farmland is at increasing flood risk and climate change. We cannot afford to hand it away for 60 years.
- 12.2 Currently, other ground-mounted solar industrial units of 1MW and above which are operational, under construction, granted planning permission and/or approved at appeal, through planning, cover 1,584ha of BMV land in Lincolnshire, in addition to the circa 3,550ha of BMV land covered by proposed or granted NSIP solar developments. The Council are of the view that the applicant's assessment underestimates the amount of BMV land affected by solar development in Lincolnshire. It is concluded that should development go ahead, there would be a significant loss of the best classifications of

agricultural land, with a significant loss of economic and other benefits. In Chapter 15 (APP-040) Page 15-13, the Applicant states “The Applicant has sought to minimize the use of BMV land, and the Proposed Development is not considered to have an impact on food security.” Given that the Fosse Green Energy project will take 284ha of BMV land out of agricultural production, the applicant has clearly not sought to minimize the use of BMV land.

- 12.3 The small number of trials per hectare creates a material margin for classification error, meaning that the reported proportion of BMV land could change with additional sampling or alternative interpretation at the boundary between subgrades. In examination terms, this uncertainty should be treated as a risk to the robustness of the BMV assessment, not as a basis to minimise harm. The Applicant should be required to demonstrate that the agricultural land classification evidence is sufficiently representative and that the policy test for loss of BMV land has been applied on a precautionary, evidence based footing.”
- 12.4 In light of other projects in the wider District and County, the cumulative impact is significant. This loss of BMV land is considered to be a negative and is contrary to national policy in the NPS EN1 and EN3 and Policy S67 of the CLLP.
- 12.5 This is reasonable grounds for objection, linked with the fact there is no sequential test applied and no alternative sites properly considered.

13. Conclusion

This application is for over 2,600 acres of agricultural land to be taken into solar industry and a further 867 acres dug for cables right up the Cliff Edge, our most protected feature, designated an Area of Great Landscape Value (Policy S62 of the Central Lincolnshire Local Plan). The proposal has significant harmful impacts, damaging the very nature of our landscape. Lying below and in full view of the cliff edge, the impacts cannot be adequately mitigated.

The weight to be attributed to the claimed benefits should be tested against deliverability and evidence of system value. Where the proposal depends on grid infrastructure that is not yet consented or constructed, and where connection timing and capacity are uncertain, the Examining Authority should be cautious about attributing full benefit weight on the basis of assumed export and operation. In those circumstances, the planning balance must be undertaken on a realistic basis, assessing whether the adverse impacts identified across environmental and socio-economic topics are outweighed by benefits that are evidenced, deliverable, and properly attributable to this scheme.

At present there is no secured grid connection agreement and the proposed connection strategy relies on infrastructure and capacity that are not yet confirmed. This introduces material uncertainty as to the timing, deliverability, and operational assumptions of the scheme. In these circumstances, the claimed benefits of the Proposed Development

should be afforded reduced weight unless and until a credible and deliverable grid connection pathway is demonstrated.

There is no point in creating an economic and environmental disaster, to resolve another, when the targets are already attained. This agricultural area has much of the best land in the country for growing cereals and potatoes, our staple foods. Devouring thousands of acres, including around a quarter of best and most versatile land has a disproportionate impact on our environment, our wellbeing, our ability to grow food and maintain a local economy that depends on agriculture and desecrates the nature of the landscape.

Yours sincerely,

Kind Regards,

Marianne

Councillor Marianne Overton MBE

Marianne Overton MBE Chair of the Cliff Villages Solar Action Group

Council of European Municipalities and Regions CEMR

Spokesperson on Climate and Energy 2025

Independent Councillor Lincolnshire County Council

and North Kesteven District Council

Leader of the Lincolnshire Independents and the Independent Network

Vice Chairman of the Local Government Association 2025

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Working together for Local People

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Appendix 1

UK Health Security Response to the BESS at Navenby



UK Health
Security
Agency

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Nottingham, NG2 4LA
T +44 (0)300 303 3049
Environmental.Hazards@ukhsa.gov.uk
www.gov.uk/ukhsa
Our Ref: CIRIS 92951
Your Ref: 25/0491/FUL

9th October 2025

Dear North Kesteven District Council,

Planning Application for: Battery Energy Storage System (BESS) and associated infrastructure on land to the south Of Green Man Road Navenby LN5 0AY - 25/0491/FUL

Thank you for forwarding a copy of this Planning Application consultation to the UK Health Security Agency (UKHSA) on 28th August 2025.

We previously replied to you on 20th June 2025 stating we do not normally respond to these types of planning application consultations unless the council have specific health concerns. Following local community objections based on health concerns you have requested comments from us.

It is understood that the planning application is for a Battery Energy Storage System (BESS) and associated infrastructure on land to the south of Green Man Road Navenby LN5 0AY.

UKHSA has the following comments in regard to the proposed development.

1. Fire Safety and Air Quality Assessment

The proposed 3.5-meter container separation is materially non-compliant with the current National Fire Chiefs Council (NFCC) guidance, which suggests a minimum 6-meter separation to prevent the spread of fire via thermal radiation and to allow safe access for emergency services.

The applicant's low-risk air quality conclusion is based on dispersion modelling for a "worst-case scenario" of only 12 battery modules on fire. The non-compliant 3.5m spacing significantly increases the probability of a domino effect (thermal runaway) that spreads well beyond 12 units. This design failure renders the air quality modelling and its conclusion of "no noticeable discomfort" unreliable and insufficient to safeguard the community.

The assessment fails to address the high probability that a lithium-ion fire will be left to burn out for days or weeks due to Fire and Rescue Service (FRS) potential protocol. This prolongs the potential exposure of nearby residents to toxic gases (Hydrogen Fluoride, Carbon

Monoxide) and carcinogenic particulates (PM2.5), representing a severe chronic health risk not considered in the Acute Exposure Guideline Level 1 (AEGL-1) analysis.

2. Contamination Risk to land and groundwater

The site is underlain by the Lincolnshire Limestone Aquifer, which is highly vulnerable to contamination due to its permeable nature.

We would ask the planning regulator is satisfied whether the proposed 300m³ firewater lagoon capacity is sufficient to contain the combined volume of fire suppression water and a severe rainfall event. The failure to contain this water would lead to the release of highly toxic firewater runoff (containing heavy metals and corrosive acids) into the aquifer, posing potential contamination risk to land and groundwater, the public water supply and environmental health.

3. Absence of an assessment on electromagnetic fields (EMF)

The application completely omits any assessment of Extremely Low Frequency (ELF) Electric and Magnetic Fields (EMFs). Given the presence of high-voltage transformers and high-current power conversion systems close to residential receptors, a formal assessment demonstrating compliance with ICNIRP guidelines is a non-negotiable requirement for public health reassurance.

4. Long-Term Public Health Risk (Decommissioning)

The applicant's commitment to deal with the battery waste (anticipated circa 2074) is unacceptably vague, relying on "legislation in place at the time." The disposal of thousands of tonnes of hazardous lithium-ion battery waste (toxic and highly reactive) is a vast and extremely expensive undertaking. The council may want to consider whether a more detailed decommissioning framework is required.

5. Noise and cumulative effects

The applicant has undertaken a noise assessment that although compliant with the National Planning Policy Framework (NPPF) and the Noise Policy Statement for England (NPSE) still concludes nighttime noise will not to be below the LOAEL. However, noise impacts have not addressed future infrastructure and cumulative effects. The council may wish to consider the cumulative impacts.

The planning authority may wish to contact the local authority public health team for matters relating to wider determinants of health associated with this development/proposal.

Yours sincerely



Environmental Public Health Scientist

cc
UKHSA East Midlands Health Protection Team