

January 2026

David Crampton MCIOB. During my career In construction I have been responsible for the design and build delivery of several high profile nationally significance projects.

Written submission following my attendance and contribution to the Fosse Green ExA 6 and 7 January 2026

The Examining Authority's DRAFT written questions and requests for information (dWQ1) Issued on 23 December 2025

GC.1.15 Funding for Decommissioning costs

EN-3 3.10.57 Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed

It is our understand that the applicant is not intending to remove all the assets from the site at the end of the period that the applicant is applying for this proposed solar development

Any assets the applicant proposes to leave in or on the ground: -

- Are not temporary and must be considered as a “permanent consent”
- The applicant needs to investigate the environmental impact from the degradation of assets left in the ground and the effects this may have on the soil and its future use for agriculture as well as ground water drinking supplies

We have noted from other applications that the ExA has considered funding for decommissioning could be generated by the value of the assets removed during decommissioning. We suggest that this approach cannot be relied upon and it is pure speculation to suggest what value these assets will have in 60 years. It is our opinion that funds must be secured from the generated income of the scheme, deposited in a suitable escrow or similar account from day one for decommissioning of components at end of the project life.

GC.1.16 & 17 Applicant Waste management

It is our understanding that there are no facilities in the UK that can recycle solar panels from industrial sized solar schemes, confirmed by the Springwell applicant. This statement may also apply to batteries. It is our understanding that the approach contravenes the UK Governments strategy towards a Circular Economy and Sustainable Manufacturing. Our research identifies that at the end of life, which is suggested as 30 years or sooner if damage occur, that the panels have no future use and need to be recycled or taken to landfill. As no suitable recycling facilities exist it is reasonable to conclude that landfill is the only option available to the applicant. This then raises a further question about the environmental effects of chemicals and other pollutants leaching from the panels, and particularly PFAS (forever chemicals) as the waste assets degrade.

The UK Government and the DWI (Drinking Water Inspectorate) recognise the concern in this area of pollutants. Please refer to the links below :-

<https://www.gov.uk/government/publications/interim-position-statement-on-the-approach-to-pmt-concept-to-support-uk-reach-risk-management-of-pfas/interim-approach-to-the-pmt-concept-to-support-uk-reach-risk-management-of-pfas>

<https://www.dwi.gov.uk/research/completed-research/risk-assessment-chemical/persistent-mobile-and-toxic-substances-hazards-to-drinking-water-in-england-and-wales/>

<https://esauk.org/2025/03/27/defra-sets-out-governments-circular-economy-ambitions-with-sector-based-roadmaps/>

<https://energyadvicehub.org/uk-government-to-introduce-new-circular-economy-strategy/>

CC.1.01 Applicant Assessment of greenhouse gas (GHG) emissions offset (carbon savings) compared with other forms of electricity generation

We understand this question refers to decarbonisation of electricity in the UK. It's our opinion that the way carbon savings for power is counted is outdated and does not reflect the true carbon cost of energy produced from solar generation. We appear not to count the carbon costs of taking the materials from the earth, processing these, manufacturing the components, packaging and transporting the products, placing them in the UK and final decommissioning the site and returning food production. A more transparent approach recognising the carbon omissions from the whole life of the products used in solar farms would show a very different picture.

6 January 2026, Specific hearing 1 Agenda item 3.1

Can I suggest to the Inspector that it would be useful to see the following calculations

- The total amount of solar generation currently approved or in the planning process
- The total amount of solar generation that is in the pipeline, either listed on the NESO register, application for a grid connection, known about from other sources etc
- The amount of solar generation required to fulfil the needs identified by the UK Government

Response to Applicants overview to agenda item 3.1

- The applicant talked about need to increase the number of installed solar schemes, we made the point that this is not the correct metric. The appropriate measured is the number of schemes approved and/or in the pipeline including solar on roofs, which according to NESO is not currently in their pipeline figures, compared to the UK requirement for renewable schemes
- The applicant stated that this scheme would lead to cheaper electricity prices, we pointed out that this is a misleading statement not supported by facts, in the later part of 2025 it was announced that energy bills will increase by over by £100+ because of infrastructure upgrades, after the predicted future saving this will still result in a net increase of energy bill

- The applicant argued the need for home grown energy, world conflict cited as one reason, this argument equally applies to food security. We are not against solar located in the right place, it should not be located on productive agricultural land
- The applicant argued the need for sustainability, we agree with this statement, this same argument applies to the need for sustainable home grown food, and it is our opinion that solar needs to be located away from productive farmland in compliance with EN-3 clause 3.10.14
- The applicant made comment about Government policy, this is not something we planned to do, as we didn't believe this hearing would debate Government policy. In response to the applicants statement that this scheme complies with Government policy, we would point out that there are Government policies that the applicant doesn't comply with, Circular Economy and Sustainable Manufacturing being one, there are others.
- As a wider point the term "net zero" is a misleading phrase resulting from the outdated way carbon outputs are measured, we understand that taking materials from the earth, processing, manufacturing and transport all from abroad is not counted in the UK figures. I suggest the UK needs a much more holistic and transparent approach to measuring the UKs carbon footprint. The applicant made comment about "cumulative warming". Without a more holistic approach it is reasonable to conclude that measuring the UK carbon footprint, without considering the output from products imported into the UK, solar, battery, food etc the UK is not having the positive reduction on the worlds carbon footprint the applicant or Government would have us believe
- The applicant stated there is no obvious reason why the Navenby substation would not proceed. We believe this is a presumption that the applicant has or at least should not have control over
- The applicant stated that the solar scheme is at Gate 2 and the battery facility is at Gate 1. This statement is not supported by the NESO TEC register. It is also difficult to understand how the scheme could be at Gate 2 when there is no grid connection available.
- Applicant stated that solar panels are 24% efficient. This figure requires clarification, our research suggests that solar panels typically convert 18% to 22% of sunlight into electricity, while top-tier monocrystalline panels can exceed 24%. Our research also suggests that solar panel performance degrades over time and that 65 to 75% of the solar panel performance is between the months of April and September, this means that 25 to 35% of the performance of the panels is at the time of year when we need the most electricity.
- LCC stated that the applicant does not believe construction or decommissioning will not have an adverse upon archaeological in the ground? LCC did not agree with this statement

Response to Applicants overview to agenda item 3.2

- The applicant quoted clauses from planning documents including EN-1 and EN-3 as well as case law. It our contention that the applicant was selective in the clauses they quote. There are clauses in planning documentation that do not support the case made by the applicant, an example 3.10.14 in EN-3 that

imposes requirements on the applicant. It is our conclusion that the applicant has been extremely selective in their justification of the site and has not considered all the relevant clauses in planning documentation

- Applicant advised that National Grid suggested the location for the Fosse Solar scheme. This appears not to be supported by the facts.
- Applicant advised they selected the site based on the location of the proposed generator station at Navenby. The timings suggest this statement is not accurate.
- The applicant advised that they have explained how they have applied planning regulations and the law, their assertion is selective and does not cover all the relevant requirements. The applicant noted we, (we assume this in reference to opposition to the proposal) had not proposed any alternative sites. This is not our role, please refer to clause 3.10.9 to 3.10.39 of EN-3
- The ExA asked LCC and NKDC what brownfield land existed in NKDC and LCC. We don't believe this is relevant, this is an NSIP, and as such the applicant should consider all locations on a national basis, it should also be noted that brownfield sites are more likely to be found near urban areas.

3.3 Effects for agriculture and land use

- The applicant discussed the scheme as a percentage of the East Midland agricultural land, in early responses they were asking what brownfield sites were available in NKDC. This suggests the applicant is choosing statistics to suit any point they are making. We suggest consistent measure should be applied for clarity.
- The scheme does not completely remove the use of BMV land
- The applicant stated that all assets above ground would be removed. The applicant then clarified that assets in the ground below a level of 900mm would not be removed. We raised the following points
 - EN-3 clause 3.10.56 and 3.10.59 talks about assets to be removed at the end of scheme life and that the scheme is considered as temporary, if anything is left in the ground we question if this scheme should be considered as temporary.
 - We question if any studies had been carried out to understand the pollution that may arise from the long term degradation of underground cables. Concerns may be PFAS (forever chemicals)
- The applicant stated the landowner had advised there would be no loss of agriculture employment because of this scheme. We pointed out that there would be a loss of employment from companies that provided support and services to agriculture, this needs to be considered and reported upon as well as loss of income and jobs in tourism.
- The applicant referred to 2024 DEFRA food security report and that the food supply in the UK is broadly stable. We pointed out to the ExA that DEFRA do state that 60% of UK food is grown in the UK, in other reports DEFRA have stated that this figure reduces to 50% by the time it reaches our plate. We also pointed out that DEFRA recognise the potential risk to UK food supplies from climate change, world conflict, both have created supply issues in recent years.
- The applicant advised that if the circumstances required the land to be returned to agriculture this could be achieved relatively easily and that may mean missing one

growing season, but they would achieve the next growing season. This suggests that that we may have food and no power, and supports our opinion that solar panels need to be located on non-agricultural land from day 1

3.5 Effects of traffic and transport

The applicant discussed a traffic plan. We noted that in our opinion enforcement of traffic management plans is extremely difficult without some very draconian consequences, which are not proposed by the applicant. The applicant responded by saying that noncompliance with the traffic management plan is a criminal offence. This needs clarity, is the applicant suggesting that an individual using a traffic route on a public road, that is outside of the traffic management plan, will face criminal prosecution.