

Fosse Green Energy (FGE) Examination.

Submitted by: Michael Campbell (Interested Party Ref: [REDACTED])

Deadline: Examination Deadline 2 – 6th February 2026

Reference: The Applicant's response to Relevant Representations i.e. Document REP1-047

I, and my family, live in the Hamlet of Thurlby, near Lincoln and wish to submit the following remarks and observations on section 7 of document REP1-047 i.e. the Applicant's responses to the Relevant Representations.

In summary, I do not accept that the Applicant has either properly addressed, or satisfactorily answered, numerous, fundamental Planning Issues raised in this examination.

The key two areas that I wish to address are that of Site Selection and Grid Connection. One of the key aspects not addressed is that this proposal is for a **Nationally Significant Infrastructure Project (NSIP)**. The Applicant has **not** provided any evidence of:-

- A **National** perspective, professional, planning policy criteria based (e.g. EN-1 & EN-2) search, which both seeks to identify appropriate sites in line with these policies and The Clean Power 2030 Initiative.
- A comprehensive, professional planning based evaluation of alternative sites.
- A justification for this particular site against relevant criteria, and with special reference to:-
 - "Land Use". **National Policy** (NPS EN-3 -reference Paras 2.10.21, 2.10.23, 2.10.17) which prioritises the use of brownfield, previously developed, contaminated and industrial land for solar projects.
 - **The Clean Power 2030 Initiative** further contradicts and undermines FGE's site selection. This initiative emphasises strategic site selection for energy infrastructure, with key conditions and criteria used for selecting site locations highlighting:-
 - Proximity to existing grid infrastructure,
 - Brownfield land — previously developed and now disused — is explicitly preferred for clean energy infrastructure due to faster permitting and community acceptance.

Please note that NESO, in its November 2025 reform of the National grid connections pipeline, has stated that compliance with **The Clean Power 2030 Initiative**, will be a major decision making factor in the selection of which projects gain grid connection status. This applies to both BESS and Solar projects. The Applicant has failed to demonstrate how this application complies with this Initiative.

Consequently, I wish to challenge the Applicant's response to the interested parties' points on the topic of a substation – tables 7.11 & 7.12 .- The Applicant comment is that *'there are no obvious reasons for the substation not to be granted consent' either by NKDC or by the Planning Inspectorate at appeal.*"

This seems to be just yet another unsubstantiated, unfounded assertion in this application. Where is their evidence and facts for making that statement?

Indeed, with what is in the public domain relevant to this topic, it would be equally accurate – if not more so – to state that an application for a currently non-existent, unplanned for, theoretical substation:-

- May not even be applied for by national grid, due to the significant backlog of grid connection projects required for existing, installed, renewable energy assets.
- That NESO states (as above) that compliance with **The Clean Power 2030 Initiative**, will be a major decision making factor in the selection of which projects gain grid connection status. I do not accept that this application is compliant with this requirement
- Therefore it is wrong to make their above statement and it should be withdrawn.

Further, as the proponents of this application are based in Swansea, South Wales, the following is pertinent:-

- South Wales (Met office data) has more sunlight hours than Lincoln. Typically, the sunniest part of South Wales is the south-western coastal strip of Pembrokeshire.
- **Sunlight Hours:** This region receives an average annual sunshine total of **over 1,700 hours**.
- **Sunniest Town: Tenby** is often cited as the sunniest town in the region, with approximately 1,667 to over 1,700 hours of annual sunshine.
- **Specific Hotspot:** The Dale Peninsula in Pembrokeshire is noted as having an average of over 1,800 hours annually, sometimes cited as the sunniest place in Wales.
- While Pembrokeshire is the sunniest, **Swansea** is also a bright spot in South Wales with around 2,170+ hours reported in specific datasets (often linked to high-pressure systems), and **Barry Island** in South Glamorgan is noted for high sunshine levels.
- Based on long-term climate data from the Met Office station, **Key Sunshine Data for Waddington (Lincoln): Annual Average: ~1,505 hours**.

There is no justification or explanation – that I have seen – as to how people, and an organisation, located as above, and involved in solar generation, just happened to ignore their own locale and amazingly alight in a rural Lincolnshire location. Obviously, in planning terms Lincolnshire is NOT ruled out for such development despite there being other better sites. The point here is that there is no available evidence of an appropriate site selection process, containing selection criteria, alternatives’ ranking and prioritisation, which should have addressed – amongst many other things – why this project was not applied for in South Wales, where they (the Applicant) already have various existing solar projects.

This failure requires further explanation in the light and context – as below - of The Welsh Government’s report - Energy Generation in Wales, 2023

Most solar PV capacity is located in south Wales, with both Cardiff City Region and Swansea Bay City Region hosting over 450 MW each. This is likely due to **the greater availability of grid connections, higher irradiance and a more developed supply chain**. The local authority area that hosts the largest amount of solar PV capacity is Pembrokeshire, with 209 MW installed. 0 300 600 900 1,200 1,500 Cumulative installed capacity (MW) Less than 10 kW (typical rooftop) 10 kW to 1 MW (typical commercial rooftop or small-scale ground array) 2009 2011 2013 2015 2017 2019 2021 2023 1 MW to 5 MW (small solar farm) Greater than 5 MW (large solar farm)

The Welsh Government is working hard to progress in this regard. The following is a summary of some key points from this government report.

“Welsh Government position: industrial solar in South Wales

1. Strong support for expanding solar as part of the net-zero transition

The Welsh Government sees solar PV — including larger, industrial-scale projects — as an important part of meeting Wales’s renewable energy and decarbonisation goals.

Solar is treated as a key technology alongside wind, especially for increasing clean electricity supply. Wales already has around **1.3 GW of installed solar PV capacity**, showing solar is a mainstream and growing contributor.

2. Industrial solar is expected to grow, but must be well-sited

While most Welsh solar installations are currently small-scale, the Government recognises that larger commercial and utility-scale schemes will be needed to scale up renewable generation. However, development must balance energy needs with land, environmental, and community impacts.

3. South Wales is a major focus area because of demand and grid connections

The Government highlights that solar capacity is concentrated in regions such as **Swansea Bay and Cardiff**, where:

- electricity demand is high
- industrial and commercial sites are available
- grid infrastructure is better developed

South Wales is therefore strategically important for further industrial deployment”.

Basically, this is stating that the Welsh Government is both, acting in accordance with, and also, promoting, the principles enshrined in the National Policy and Initiative. It is highlighting the suitability of Welsh locations compatible with the national policy and agenda. Further it has made changes to planning in order to facilitate such developments.

I do not accept that the Applicant has addressed, nor explained, why none of this is covered in their – supposed – site selection survey and why an appropriate location was not / could not be, found in South Wales. Consequently, leading them to a rural Lincolnshire location, with a surplus of electricity generation, no available Grid connection and the taking up of agricultural land – and doing so supposedly with a regard for National Policy and Need.

Also, I do not accept their “post event” claims about alternative site selection choices in this Lincolnshire area. It has all the hallmarks of a belated attempt to pretend that they had done “something”. That is “something” other than just be invited to the area by certain landowners – as stated by themselves - and trying to post rationalise their decision. There is no explanation of why other and, more appropriate sites, were not evaluated throughout England, Wales and Scotland for this NSIP.

I do not accept that these issues have been satisfactorily addressed, nor answered, by the Applicant. I request that The Examining Authority challenges and evaluates the Applicant’s responses and assertions in these – and other areas.

Thank you.

Michael Campbell

Reference [REDACTED]