

## Fosse Green Energy – Deadline 3 Comments

### Executive Summary

This submission argues that the **Fosse Green Energy project** is fundamentally a financially driven development rather than a genuinely environmentally beneficial renewable energy scheme, and therefore fails to meet the key planning “tests of soundness” (positively prepared, justified, effective, and consistent with national policy).

The applicant’s credibility is [REDACTED]. Concerns are raised about the [REDACTED] substantive evidence regarding the organisation’s capability, financial stability, and genuine intent to deliver and manage the project. It is suggested that the primary objective is to secure planning consent and sell the project for profit, rather than to generate sustainable energy.

Key issues highlighted include:

- **Site Selection:**  
The chosen location appears unjustified under national policy. It is not optimally located near existing grid infrastructure, does not prioritise brownfield land, and lacks evidence of a wider national or regional site assessment. Alternative, more suitable regions (e.g. South Wales) appear to have been overlooked.
- **Project Scale (Overdevelopment):**  
The proposal includes approximately **60% more solar panels than required**, resulting in significant additional land use (around 1,000 extra acres) without clear benefit. The justification for this “overplanting” is challenged, particularly given minimal winter solar output and negligible contribution to national demand.
- **Project Lifetime:**  
The proposed **60-year lifespan** exceeds typical industry norms (around 40 years) without convincing justification, raising concerns that this is intended to inflate the project’s financial value rather than reflect operational reality.
- **Credibility and Transparency:**  
The application is criticised for containing unclear, incomplete, or potentially [REDACTED] [REDACTED] across technical, environmental, and financial areas. There is a recurring concern about “[REDACTED]” in both documentation and responses to scrutiny.
- **Financial and Delivery Risks:**  
The project’s financial backing is described as complex and uncertain, involving layered corporate structures and entities facing legal and financial challenges. There is doubt whether the applicant will ultimately deliver or remain accountable for the project.

### Conclusion:

The submission concludes that the project is best understood as a **land-based asset value maximisation exercise**, not a credible renewable energy development. It urges the Examining Authority to assess the proposal through this lens and to scrutinise the applicant’s claims, motivations, and capability accordingly.

## Interested Party Reference number: FF339BA99

### Fosse Green Energy – Deadline 3 Comments

#### Introduction:

My understanding is that planning proposals have to be evaluated as follows:-

- *Independently assessed as to whether a plan meets the four "tests of soundness" i.e. positively prepared, justified, effective, and consistent with national policy.*
- My evaluation of this application leads me to the conclusion that this is actually a professional, polished, financial asset creation and sales plan – dressed in “Green Clothes”.
- I do not believe that this application meets the above four tests as a renewable energy project benefiting society and the environment.
- There is little substance to the actual applicant organisation (Finances, people etc) nor credibility in:-
  - Their true motivation i.e. [REDACTED] to deliver environmental and carbon beneficial energy for the nation, but the likely reality being to actually and quickly (e.g. Mallard Pass) sell any planning consent to an – at this stage – unknown third party – maybe [REDACTED]?
  - Their intention or capability to deliver, implement, manage and decommission such an energy project.
  - The plan proposal submitted. Especially the focus on the amount of land they want – rather than the best way to generate the appropriate level of energy to supply to the National Grid.
- I acknowledge that there is nothing illegal, nor out with planning regulations, about the position of selling off planning permission – e.g. land banking in housing, supermarkets etc – but do believe that it conditions and informs much of this application and applicant’s behaviour.

Consequently, I request that the Examining Authority, in their “*Inquisitorial Role*” when “*analysing Evidence and reaching Weighted Judgements*” do so through the prism of a purely financially driven, creation & maximisation of asset sales value, project rather than the supposed intention to deliver environmental benefits for society. I believe that this orientation explains many of the aspects that the applicant is trying to achieve and those that they are trying to obscure. Some of the examples are highlighted below.

The examples that I wish to briefly address are:-

1. Site Location - Survey and Choice
2. Site size

### 3. Project lifetime

#### 1. Site Location - Survey and Choice

This application is for a Nationally Significant Infrastructure Project – the applicant has not provided any evidence of a national or even regional perspective to their site location and survey work. They may be trying to use the Project-Specific Rationale in National Planning Policy NPS EN-1 which generally does not require developers to consider the whole of the UK for a specific project if they can justify the “Need” for the development AND the “Suitability” of their chosen site.

**As regards Site Suitability** – the site which was the objective of the original project – at the invitation of certain landowners – did not meet the key requirements of National Policy Statements such as EN-1, EN-3 which prioritises:-

- Proximity to existing Grid Infrastructure
- Minimisation of new Infrastructure
- Use of brownfield, industrial etc land.

This original site, seen as “cheap” Greenfield land, apparently first considered in 2021, was rejected due to no viable, available grid connection. Which planning policy would consequently categorise as an “**Unsuitable**” location. The proposed – by the landowners - grid connection at Whisby was found to be not fit for purpose.

At that moment in time, any idea of a new substation anywhere else in the area – including Navenby- was not even a twinkle in National Grid’s eye!

So back to Policy NPS EN-1 – the applicant has not shown that the site which they chose was suitable. Further NESO stated in their November 2025 reform of the National Grid connections pipeline that compliance with The Clean Power 2030 Initiative will be a major decision making factor in the selection of which projects gain grid connection – this applies to both Solar and BESS applications – this application fails to meet the requirements of The Clean Power 2030 Initiative.

On this basis, the applicant’s location survey should have been much more geographically spread and properly considered locations across the UK. For instance, the applicant is based in S. Wales where according to the Met Office the sunshine hours are greater than here in Lincoln – typically 1,700 versus 1,500 hours per year.

Also, the Welsh Government is actively working to attract and help the development of industrial solar – this is highlighted in their “Energy Generation in Wales, 2023” report. This report contains Welsh Government statements such as “*Most solar PV capacity is located in*

*South Wales, this is likely due to the greater availability of grid connections, higher irradiance and a more developed supply chain.”* The report also highlights the Welsh Government’s position regarding industrial solar in South Wales as *“The Welsh government see solar PV – including larger, industrial scale projects as an important part of meeting Wales’s renewable energy and decarbonisation goals.”*

So, I am confused as to how we are supposed to believe that Windle Energy and its associates happened to alight upon an obscure, distant, rural, agricultural part of Lincolnshire as the result of a proper, planning policy criteria-based, site location survey. Plus, miss what is on their own doorstep and which actually meet the requirements of the National Planning Policies.

## **2. The size of the location.**

This is largely driven by the number of solar panels and the Applicant proposes to install 60% more panels than is actually needed to generate the energy required to match the export limit of the proposed site. Why?

This amounts to some 216,000 excess panels and, on a like for like basis, an additional 1,000 acres of land. Apparently they claim this is to help the generation in the winter months – well 60% of nothing, or virtually nothing, is still nothing. Actual solar generation in the UK drops by some 85-90% between mid June and Mid December whilst electricity demand rises by between 35 & 40%. Fosse Green’s projected total contribution – with the excess 60% of panels - is estimated at 6 one-hundredths of 1 % of UK Electricity (0.06%) demand in a typical mid Dec.

There is no demonstrated need for, or benefit from, these extra panels that outweighs the negative environmental impact of the excess panels, infrastructure and land grab?

## **3. The project lifetime**

there is not a believable rationale for why this project should be 60 years when others are 40 years. Unless, if at 40 years, then the benefit calculations do not work? I request the Examining Authority to forensically analyse this aspect. Key elements of such a project e.g. transformers, do not lend themselves to a cycle relating to 60 years, but do to 40 years.

But I believe that there is a common thread running through and underpinning all of this i.e. grab cheap land, maximise the acreage, lengthen the time – all of this is aimed at maximising the sales value of the project. No-one I am aware of believes that Fosse Green, and its “connections, have any intention of implementing any planning permission – this is a pure financial exercise to maximises profits.

## **Conclusion - Applicant Credibility**

There is real disappointment with the application, and the applicant, in numerous regards which has consequently created a significant issue of “Lack of Credibility”. Some of the key aspects include:-

- The site location process and its supposed output, and especially the claims that this followed, and is compliant with, National Policy.
- Numerous “technical” statements and claims which appear to be incorrect, e.g. load factor, emissions’ assessment, overplanting calculations, etc.
- There are too many “██████████” that are ██████████ giving the impression of a persistent tactic of “██████████”.
- The “██████████” tactic also seems relevant to many of the responses by the applicant to questions from both the Examining Authority and Interested Parties.
- The lack of detail in numerous areas e.g. decommissioning, community funds, “indicative” maps etc just adds to the ██████████.
- Project funding is a major area for investigation.
- It is not believed that Fosse Green will be around to deliver, nor be responsible and answerable for, any of their promises and future commitments. It is believed that this is the underlying reason for so much “Lack of Detail”.
- The funding and financial resources depend on a trail of debt – through numerous paper/shell companies – leading back through CS Projects UK to Canadian Solar Inc and Canadian Solar International (floated on the Shanghai stock exchange in 2023) to entities such as Ningbo Qixin Solar Electrical Appliance Co, Ltd. The latter of these was the Plaintiff in an appeal by Canadian Solar International versus The United States (United States Court of International Trade) regarding the court ruling against them for basically “██████████”. Please see – Canadian Solar, Inc. V United States, No 21-1434 (Fed. Cir. 2022).
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- Currently Canadian Solar is appealing “billions of dollars in duties” the CIT imposed on it in August 2025. This presents serious financial problems for Fosse Green’s backers.
- The current financial support guarantee held by Fosse Green Energy Ltd – enabling it to claim to be “a going concern” is only valid until 31/12/2026.
- The Chinese Government refused to co-operate with the CIT investigation – ██████████ – and this absence of any independent verification of anything within China, and its solar industry, throws into considerable ██████████ and ██████████ any claims/statements made by the applicant regarding the supposed carbon footprint of the proposed solar panels. The subsidised energy from the Chinese government is believed to be from

dedicated coal fired power stations fuelling the Polysilicon wafer production and solar panel manufacturing.

Fosse Green Energy - Deadline 3 Objection