



Fosse Green Energy

EN010154

8.15 Statement of Common Ground with
the UK Health and Security Agency

VOLUME

8

Planning Act 2008 (as amended)

Regulation 8(1)(e)

Infrastructure Planning (Examination Procedure)

Rules 2010

24 March 2026

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

Fosse Green Energy Development Consent Order 202[]

8.15 Statement of Common Ground with the UK Health and Security Agency

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1. Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Fosse Green Energy Limited and the UK Health Security Agency.

Signed on behalf of Fosse Green Energy Limited

Name: Lloyd Sandles

Position: Director

Date: 23/

Signature

Signed on behalf of the UK Health Security Agency

Name:

Position:

Date:

Signature:

2. Introduction

2.1 Purpose of this document

- 2.1.1 This Statement of Common Ground (SoCG) relates to the application submitted to the Planning Inspectorate on 18 July 2025 (the Application) by Fosse Green Energy Limited (the Applicant) for a Development Consent Order (DCO) for the Fosse Green Energy solar project (the Proposed Development).
- 2.1.2 This SoCG has been prepared by the Applicant and the UK Health Security Agency (together the “Parties”) in respect of the Proposed Development.
- 2.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the Parties and where agreement has not yet been reached. This SoCG will be revised and updated as appropriate and/or required by the ExA at relevant examination deadlines.
- 2.1.4 In particular, this SoCG focuses on the interaction between the Proposed Development and the health security of local people.
- 2.1.5 As set out in the procedural decision made by the ExA on 22 August 2025 **[PD-005]**, the ExA requires final and signed SoCGs to be submitted at the midpoint of examination. In line with the Examination Timetable set out at Annex A to the Rule 8 Letter **[PD-010]**, this is Deadline 3A (24 March 2026). Further to this, procedural decisions dated 21 November 2025 **[PD-007]** includes the UK Health Security Agency as a party with which the Applicant must enter into a SoCG.
- 2.1.6 Application document references are taken from the EN010154 – Fosse Green Energy Examination Library.

2.2 The Proposed Development

- 2.2.1 The Application is for the construction, operation (including maintenance), and decommissioning of a ground-mounted solar photovoltaic (PV) electricity generating station with a capacity exceeding 50 megawatts, with battery storage, onsite substation, and associated infrastructure to generate and export/import electricity. The associated development includes, but is not limited to, access provision, battery storage, underground cabling, areas of landscaping and biodiversity enhancement, and a 400 kV underground Grid Connection Cable to connect the Proposed Development to the national electricity transmission network.
- 2.2.2 The Proposed Development will provide a significant amount of renewable energy over its 60-year operational lifetime supporting resilience, security and affordability of electricity supplies. It would be a critical part of the national portfolio of renewable energy generation that is required to decarbonise the UK’s energy supply quickly.
- 2.2.3 The Proposed Development will help meet the urgent need for this infrastructure to support “energy objectives, together with the national security, economic, commercial, and net zero benefits” as set out in the Overarching

National Policy Statement for energy (NPS EN-1) (**Ref 1**). It is infrastructure of critical national priority.

2.3 Parties to this Statement of Common Ground

- 2.3.1 The Parties have been, and continue to be, in direct communication in respect of the Proposed Development.
- 2.3.2 The UK Health Security Agency is part of the UK government's Department of Health and Social Care.
- 2.3.3 The UK Health Security Agency prevents, prepares for and responds to infectious diseases, and environmental hazards, to keep all our communities safe, save lives and protect livelihoods. It provides scientific and operational leadership, with local, national and international partners to protect the public's health and build the nation's health security capability.
- 2.3.4 The Applicant is a partnership between Windel Energy Limited and Recurrent Energy.
- 2.3.5 Founded in 2018, Windel Energy is a privately held company dedicated to driving the transition towards a sustainable future. Specialising in the origination, development and integration of renewable energy projects and low-carbon disruptive technologies, Windel Energy is at the forefront of clean energy innovation.
- 2.3.6 With a portfolio exceeding 5 gigawatts of renewable power in various stages of development, Windel's team of talented professionals bring a deep understanding and high level of expertise in land viability, electricity networks, planning (Town and Country Planning Act 1990, Developments of National Significance) and consenting for Nationally Significant Infrastructure Projects, legal processes and construction feasibility.
- 2.3.7 Windel Energy adopt a long-term ownership approach, ensuring the efficient operation and management of renewable assets. Leveraging an extensive network of relationships, institutional grade infrastructure and in-house industry expertise, Windel is committed to delivering impactful and enduring energy solutions.
- 2.3.8 Recurrent Energy, a subsidiary of Canadian Solar Inc, is one of the world's largest and most geographically diversified utility-scale solar and energy storage project development, ownership, and operations platforms. With an industry-leading team of in-house energy experts, Recurrent Energy serves as Canadian Solar's global development and power services business.
- 2.3.9 To date, Recurrent Energy has successfully developed, built, and connected 12 GWp of solar projects and more than 5 GWh of energy storage projects across six continents. As of September 30, 2025, its global pipeline includes approximately 23 GWp of solar power and 73 GWh of energy storage capacity. The company also has over 14 GW of solar and energy storage projects under operations and maintenance (O&M) contracts.

2.4 Terminology

2.4.1 In the tables in Section 3 of this SoCG, “Matters agreed, not agreed or under discussion” are colour coded in column 5 and categorised as follows:

- a. “Agreed” (green) indicates where the issue has been resolved;
- b. “Not Agreed” (red) indicates a final position that a matter cannot be agreed; and
- c. “Under discussion” (amber) indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the Parties.

3. Record of Engagement

3.1 Summary of consultation

3.1.1 A summary of the meetings and correspondence that has occurred between the Applicant and the UK Health Security Agency is set out in **Table 3-1**.

Table 3-1: Engagement between the Applicant and the UK Health Security Agency

Date	Form of Correspondence	Details
21/10/2024	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to the UK Health Security Agency for the launch of Statutory Consultation.
27/11/2024	Email	Response to Statutory Consultation received from the UK Health Security Agency.
17/09/2025	Email / Letter	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to the UK Health Security Agency
24/10/2025	Relevant Representation	The UK Health Security Agency submitted a relevant representation to the Planning Inspectorate.
22/12/2025	Draft Statement of Common Ground	The Applicant issued the draft Statement of Common Ground to the UK Health Security Agency for review and comment.
19/01/2026	Email / Letter	The UK Health Security Agency provided a response in relation to the draft Statement of Common Ground.

4. Matters agreed, not agreed or under discussion

4.1 Battery Energy Storage System (“BESS”) Fire Unplanned Emissions

Table 4-1: BESS Fire Unplanned Emissions

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
4.1.1	BESS Fire Unplanned Emissions	<p>In the event of a potential fire occurring at the Battery Energy System Storage (BESS), the applicant has modelled potential hydrogen fluoride (HF) emissions to air, finding that short term concentrations will not exceed AEGL-1 (acute exposure guideline levels) at locations beyond 200m. However, the modelling results presented do not detail the BESS location(s) in comparison with sensitive receptors, which would be needed to contextualise the potential plume impact.</p> <p>We acknowledge that the applicant has committed to deploying a minimum buffer of 200m from the BESS to residential receptors, as noted in Commitment BA1 in the Design Commitments, at Appendix A of the Design Approach Document [APP-186]. However, as there are receptors within the Principal Site of the</p>	<p>The Applicant has committed to a minimum buffer of 200m from the centralised BESS to residential receptors, as noted in Commitment BA1 in the Design Commitments, at Appendix A of the Design Approach Document [APP-186]. The Works Plans [AS-105] as secured through the DCO control the Proposed Development in that the centralised BESS (Work No. 2) cannot be constructed within 200m of a residential receptor the closest residential receptor to the centralised BESS is Grange Cottage, which is located approximately ~275m at its closest point to the centralised BESS (as illustrated in Figure WQ1-2 of Appendix A of the Applicant's Response to the Examining Authority's First Written Questions [REP2-029] submitted at Deadline 2). The appropriate boundary to measure receptor</p>	Under Discussion

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
		<p>development, we would expect that the applicant appropriately identifies and documents the location of those individual receptors relative to the BESS units and includes them within future modelling at detailed design stage.</p>	<p>offset distances from is the centralised BESS boundary (which as mentioned above, is secured by the Works Plans), not the Order Limits boundary. Design commitments are secured under Requirement 6 (detailed design approval) of the Draft DCO [APP-016].</p> <p>As detailed in Appendix 14-G: Unplanned Emissions Assessment of the ES [APP-176] the Fire Protection Research Foundation published a report assessing BESS fire emissions (specifically carbon monoxide, hydrogen fluoride, chlorine and methane) and concluded that only hydrogen fluoride would be present at concentrations of concern beyond the immediate vicinity of such a fire.</p> <p>A Plume assessment, secured by the Framework Construction Environmental Management Plan (CEMP) [APP-189], will be completed at the detailed design stage and approved by the fire authority (Lincolnshire Fire and Rescue). This will include a map of receptors within 1km, in line with the UKHSA suggestion and NFCC guidelines. It should be noted that there</p>	

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
			<p>are no residential receptors within the Order Limits of the Proposed Development.</p> <p>The Proposed Development includes embedded design mitigation and protection measures to reduce fire risk to human health and the environment, which are detailed in the Framework Battery Safety Management Plan [APP-198].</p>	
4.1.2	Particulate Matter	<p>Consideration should also be given to the potential off-site impacts on sensitive receptors of wider products of combustion (e.g. particulate matter) that could result during a fire.</p> <p>In addition to above, we would expect that the plume assessment, secured by the Framework CEMP [APP-189] should appropriately consider all products of combustion from the proposed development and specifically consider their respective potential for impacts on human health, in addition to meeting the requirements of Lincolnshire Fire and Rescue Service. The plume assessment secured by the Framework CEMP [APP 189] should confirm the density of smoke or estimated pollutant concentrations and</p>	<p>Appendix 14-G: Unplanned Emissions Assessment of the ES [APP-176] considers potential products of a thermal event and identifies hydrogen fluoride (HF) as the only pollutant likely to be present after 30 minutes at concentrations of concern at distances of more than a few tens of metres from a fire. All fires combusting any form of building or equipment will generate smoke, but long-term air quality objectives or targets for particulate matter (PM₁₀ or PM_{2.5} size fractions) would not be exceeded by a single fire event occurring over a timescale of hours.</p> <p>A Plume assessment, secured by the Framework CEMP [APP-189], will be completed at the detailed design stage and</p>	Under Discussion

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
		<p>allow comparison with UK Air Quality Standards, AEGLs and WHO guideline levels (for PM_{2.5}: Annual mean of 5µg/m³; 24-hour mean of 15µg/m³. For PM₁₀: Annual mean of 15µg/m³; 24-hour mean of 45µg/m³).</p>	<p>approved by the fire authority (Lincolnshire Fire and Rescue).</p> <p>The Applicant acknowledges that there is agreement on the AEGLs being the appropriate criteria to be used when estimating short term exposure risks from pollutant concentrations from accidents and fires. This is the purpose for which AEGLs have been established.</p> <p>UK Air Quality Standards, including Objective values and Targets, have been set for a different purpose. They are used to ensure that development does not introduce ongoing sources of emissions that could adversely affect health, for example, exhaust emissions from gas fired power plant or road traffic. It is established good practice to consider start up or emergency shut down emissions from power plant, or increased congestion from road traffic within the development consent process, but not to consider the impact on air quality of a building, vehicle or other property catching fire. This is partly a</p>	

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
			<p>practical matter as while concentration values can be estimated, a fire event is too short to influence compliance with objectives or targets based on daily or annual mean concentrations and there are allowable exceedances of short term (e.g. 1 hour) objectives. The application of UK Air Quality Standards will not alter the procedure followed by Lincolnshire Fire and Rescue (LFR) beyond what the AEGLs provide, nor has LFR requested this in the course of discussion with the Applicant. The Applicant therefore does not consider reporting against UK Air Quality Standards to be appropriate for a fire-based modelling scenario.</p> <p>The Applicant notes that in setting current objectives values for PM₁₀ and PM_{2.5} and the newer targets for PM_{2.5}, the relevant health focused bodies advising the Department of Environment Food and Rural Affairs on the matter reviewed the WHO guidance and concluded that while there are benefits in achieving these proposed guideline values, different criteria were appropriate for the UK and England at that time. The WHO guidelines are not</p>	

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
			<p>adopted in England at this time within the regime for local air quality management and current guidance (summarised at https://uk-air.defra.gov.uk/air-pollution/uk-policy-context) specifically refers to the use of air quality objectives, targets and gives no status to WHO guideline values. The Applicant considers the use of WHO guideline values for PM_{2.5} or PM₁₀ continues to be inconsistent with current UK regulations set to protect human health from these pollutants and inconsistent with both national planning policy and guidance on local air quality management. For these reasons, the Applicant does not consider a condition secured by the Framework CEMP [APP-189] based on reporting against WHO guideline values to be appropriate.</p>	

4.2 Electric and Electromagnetic Fields

Table 4-2: Electric and Electromagnetic Fields

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
4.2.1	EMF Exposure	The Electromagnetic Field (EMF) exposure estimates quoted in section 14.8 of the ES and Appendix 14-F refer to a graph used to illustrate “the comparison between the magnetic fields of a 400kV underground cable and an equivalent overhead line”, and are not specific to the 400 kV cables in the proposed development (e.g. depth of the cable, current, cable layout) nor it is specified in the reference that the graph provides maximum magnetic field levels for 400 kV overhead lines in general. For potential EMF health impacts, UKHSA advises that according to the following voluntary Code of Practice (details are given in Appendix A to this SoCG), if the cable exceeds 132 kV, a calculation or measurement of the maximum fields directly above the cable is recommended to demonstrate compliance with the 1998 International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines.	As stated in Appendix 14-F: Electromagnetic Fields Assessment of the ES [APP-175] exposure Limits in the UK are based upon the 1998 International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines (Ref 2), on the advice of the Health Protection Agency (HPA). The ICNIRP ‘reference levels’ for the public are 100µT for magnetic fields and 5,000 volts per metre (or 5kV/m) for electric fields. These are the levels above which more investigation is needed if this level of exposure is likely to occur; the permitted levels of exposure are somewhat higher, 360µT and 9kV/m. They apply where the time of exposure is significant, for instance in a residence. As a worst-case the lower ‘reference level’ of 100µT and 5kV/m was used in assessment as the threshold at which potentially significant effects could occur. The National Grid document ‘Undergrounding high voltage electricity transmission lines’ (2015) (Ref 3) states that for a 400kV cable buried at 0.9 m	Agreed

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
		<p>The UK Health Security Agency is in agreement with the Applicant's consideration of EMF Exposure.</p>	<p>depth, the typical magnetic field is 24 microteslas when on top of the cable and 3 microteslas at 5m from the centreline, with the maximum level known by National Grid being 96 microteslas on top of the cable at 0.9 m depth, and 13 microteslas at 5m. Taking into account this guidance and the UK limits (Ref 4) set for safety of members of the public, the maximum reported electromagnetic field for the 400kV grid connection cables within the Cable Corridor of the Proposed Development buried at a minimum depth of 0.9m as per Chapter 3: The Proposed Development of the ES [REP1-0168] would comply with the ICNIRP limits and were therefore scoped out of the assessment. Therefore, it is not considered necessary or that any value would be added by carrying out a calculation for the Proposed Development. The desk based secondary information on EMF emissions from 400kV cable circuits is considered sufficient at this stage, which is a concept design stage at which time the precise depth and location of the Cable Corridor is not known and will be determined at detailed design stage, post consent, with the parameters consented</p>	

Reference	Description of Matter	UK Health Security Agency Position	Applicant Position	Status
			within the DCO. The secondary data is sufficient to demonstrate there will not be any likely significant effects or exceedances of safe thresholds for members of the public. Any future calculations, should UKHSA require it, would be better provided at detailed design stage, once the precise location and depth of the cable circuits are known.	

References

- Ref 1 Department for Energy Security & Net Zero (2025). Overarching National Policy Statement for Energy (EN-1). Available at: [Overarching National Policy Statement for Energy \(EN-1\) – December 2025](#)
- Ref 2 International Commission on Non-Ionizing Radiation Protection (ICNIRP) (1988). ICNIRP Guidelines For Limiting Exposure To Time-Varying Electric, Magnetic And Electromagnetic Fields (Up To 300 Ghz). Available at: <https://www.icnirp.org/cms/upload/publications/ICNIRPemfgdl.pdf>
- Ref 3 National Grid (2015). Undergrounding high voltage electricity transmission lines. Available at: https://www.nationalgrid.com/sites/default/files/documents/39111-Undergrounding_high_voltage_electricity_transmission_lines_The_technical_issues_INT.pdf
- Ref 4 Department of Energy and Climate Change (DECC) (2012). Power Lines: Demonstrating compliance with EMF public exposure guidelines. A voluntary Code of Practice. Available at: <https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf>