

The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

By email: FosseGreenEnergy@planninginspectorate.gov.uk

20 March 2026

Application by Fosse Green Energy for an order granting Development Consent for the Fosse Green Energy Project (Application Reference EN010154)

Dear Planning Inspectorate,

Introduction

I write on behalf of Navenby Energy Limited, a subsidiary of NatPower UK Limited, registered as an Interested Party on the 26 January 2026 (the “**Interested Party**”). This representation concerns the application by Fosse Green Energy Limited (the “**Applicant**”) for a Development Consent Order for the Fosse Green Energy Project (Application Reference EN010154) (the “**Application**”), specifically in relation to the proposed cable route.

The Interested Party holds an option agreement, entered into in January 2025, granting a six-year option to acquire land directly south of Hill Rise Road, west of Coleby (the “**Site**”). A full planning application for a Battery Energy Storage System (the “**BESS Project**”) was submitted to and validated by North Kesteven District Council under reference 25/0533/FUL on 15 May 2025. This live application is material to the Examination.

Extent of Overlap

Sheets 12 and 13 of the Applicant’s Land Plans (Fosse Green Energy — Volume 2, 2.1 Land Plans (Revision 03), document reference EN010154/APP/2.1) demonstrate that the proposed export cable corridor passes directly through land forming part of the Interested Party’s Site for the BESS Project. This creates a significant and unresolved land-use conflict.

Operational Compatibility and Access Concerns

The Application provides inadequate clarity regarding how the Applicant intends to secure access for inspection, maintenance, or fault repair along the section of cable proposed within the Site.

Emergency repair works would typically require unrestricted temporary working areas, excavation, heavy plant, and reliable operational access. It is unclear how this could be delivered without substantial disruption to, or the temporary suspension of, the BESS Project's construction or operation.

This uncertainty creates material operational risk for both projects and highlights the inherent incompatibility of locating a strategic transmission cable through land required for energy storage infrastructure. The absence of a credible operational access strategy weighs strongly against the appropriateness of the proposed alignment.

Further, the presence of a high voltage cable and associated easements within the BESS Project's red line boundary would effectively sterilise the Site, limiting the positioning of battery units, transformers, access routes, laydown areas, and other operational infrastructure. Co-locating a transmission-grade cable corridor and a BESS installation within the same development parcel is not practically or safely achievable.

Long Duration Energy Storage Requirements and Site Protection

The Government, following advice from DESNZ and NESO, has identified the need for long duration energy storage ("**LDES**") in order to achieve the Clean Power 2030 policy objective. In response, Ofgem has been instructed to establish the LDES scheme to facilitate the delivery of the nationally strategically important projects required to support that objective. The policy position is therefore clear: LDES forms a necessary part of the future electricity system and is not merely desirable, but required to enable the transition to clean power by 2030.

LDES is recognised as being essential to delivering the lowest cost outcome for consumers, whilst also strengthening network resilience and security. In particular, it has an important role in reducing the curtailment of increasing volumes of wind and solar generation, thereby avoiding unnecessary system costs and making more effective use of renewable electricity which would otherwise be wasted. In that sense, the protection of developable energy land for LDES is wholly consistent with national policy and the wider public interest.

The BESS Project applied to participate in Ofgem's LDES Cap and Floor Scheme in June 2025 and was confirmed as eligible in September 2025. It is currently

progressing through the final Project Assessment stage, with outcomes expected in Spring 2026. Under the scheme, applicants must demonstrate access to viable expansion areas. Protecting the full developable extent of the Site is therefore essential.

The introduction of a high-voltage cable and associated easements within the BESS Project's red line boundary would materially constrain the Site's ability to comply with LDES requirements, undermining its contribution to UK energy system flexibility and resilience. Avoiding unnecessary sterilisation of developable energy land is clearly in the public interest and aligns with national policy.

Compulsory Acquisition Concerns

The proposed cable route gives rise to the potential compulsory acquisition of land or the imposition of permanent rights over land essential to the BESS Project. Such acquisition would severely prejudice delivery of a policy-aligned energy storage scheme for which a validated planning application is in place.

The Applicant has not demonstrated that the compulsory acquisition of this land is necessary, nor that a compelling case in the public interest exists, particularly given the availability of alternative routing options that avoid the conflict entirely (see further below). The proposed acquisition would also fail the proportionality test, as it would sterilise land capable of supporting nationally important energy storage infrastructure when a less intrusive alternative appears achievable.

The Interested Party therefore invites the Examining Authority to scrutinise closely the compulsory acquisition powers sought by the Applicant over the Site and to consider whether such powers are justified.

Engagement with the Applicant

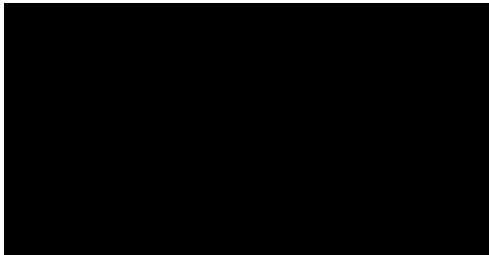
The Interested Party has engaged with the Applicant on the cable alignment since February 2025. As the development of the BESS Project and its application in the LDES Cap and Floor Scheme has progressed, the Interested Party concluded in February 2026 that the Applicant's proposed alignment could only be accommodated in part.

This position was communicated to the Applicant via email on 6 March 2026 and the Attachment (*Plan: Proposed Cable FG2*) to this letter shows the alternative route proposed by the Interested Party. In summary, the Interested Party is able to accommodate the cable within the south-western corner of the BESS Project's red line boundary. However, the easternmost field cannot accommodate a cable easement for the technical and operational reasons set out above.

Conclusion

In summary, for the reasons set out in this letter the Interested Party objects to the Application in its present form insofar as it relates to the proposed cable route affecting the Site. The Interested Party remains willing to engage constructively with both the Applicant and the Examining Authority to agree a practicable and mutually acceptable solution.

Yours faithfully,



John Sturman
Managing Director, NatPower UK Limited
(on behalf of Navenby Energy Limited)

Attachment: Plan - Proposed Cable FG2 (alternative routing)

