

Deadline 4 Fosse Green Inquiry

Contribution from the Cliff Villages Solar Action Group



Outstanding Issues

There are many serious outstanding issues, some in the “Principles of Common Ground” submitted by the applicant.

- Not least of these is the lack of **evidence** of grid 2 connection.
- Lack of cost-effective solution to crossing the PRAX aviation fuel line.
- Lack of realistic containment of cumulative effect of battery explosion. Even in compounds of four shipping containers of lithium batteries, they could burn for weeks and the applicant has only calculated water for a matter of hours. In Summer, when we are at greatest risk of fire, there is not enough water in the Trent for our homes, let alone cooling Lithium batteries for weeks. Where is that volume of water to be stored and how and where is that volume of contaminated water to be treated? Spreading the battery compounds throughout the site increases the visual intrusion, which needs to be considered. The application should therefore be clear on what arrangement they are proposing for circa 1,300 shipping container-sized boxes of Lithium batteries, to enable the damaging visual impact and the water storage, removal and protection of the waterways can be considered in weighing up the application.
- Benefits still include batteries to the grid, but the grid is already three times over-supplied, so there is no benefit here.
- As shown on the NESO site, solar has also reached its requirement so there is no benefit from the solar energy from this site. We already wasted £1.6bn last year on turbines that are switched off. With solar being produced at the same time as other sources, this will not be usable. The applicant claims to be already included in the NESO figures but not produced any evidence. The Government NESO website states they are including schemes with permissions, which excludes Fosse Green.

Serious gaps and contradictions remaining in the Application;

We have done some work for you to highlight the serious gaps and contradictions in the application, summarised here:

The Fosse Green proposal is fundamentally undermined by **uncertain grid connections, conflicting timelines, and inconsistent financial claims**, alongside **significant overstatement of performance and environmental benefits**. The Applicant relies on **unrealistic efficiency assumptions and underestimated lifecycle emissions**, with revised analysis suggesting carbon intensity could exceed government targets rather than support them. Key aspects of the scheme—including **battery**












operation, safety risks, and decommissioning costs—are unclear, contradictory, or unsupported by evidence, while environmental impacts on **soil, biodiversity, and farmland quality** are insufficiently assessed. Comparisons used to justify the project are **misleading**, exaggerating benefits by benchmarking against fossil fuels rather than competing renewables. Taken together, the proposal presents **elevated risk, reduced credibility, and overstated public benefit**, leading to the clear conclusion that it **should not be approved in its current form**.

Fosse Green: Serious Gaps, Contradictions & Overstated Benefits

This submission delivers a **systematic challenge to the Fosse Green solar development**, arguing that the proposal is built on **uncertain data, inconsistent claims, and unrealistic assumptions**.

Key concerns:

-  **No confirmed grid connection** – timelines are unclear and internally contradictory.
-  **Inflated performance claims** – projected efficiency (15–20%) far exceeds real-world UK solar averages (~10%).
-  **Carbon impact underestimated** – true lifecycle emissions could be **over 80% higher than claimed**, pushing carbon intensity **above government targets**.
-  **Battery risks downplayed** – safety claims ignore real-world fire incidents and worst-case scenarios.
-  **Changing project scope** – key elements (like battery use and energy import/export) appear to shift without formal revision.
-  **Financial inconsistencies** – unclear whether decommissioning costs are included; risk may fall on taxpayers.
-  **Environmental impacts unclear** – missing or conflicting data on hedgerow loss, soil management, and biodiversity.
-  **Agricultural damage underestimated** – long-term land degradation and food security risks not properly addressed.
-  **Misleading comparisons** – benefits exaggerated by comparing against fossil fuels instead of other renewables.

Bottom line:

The project's **benefits are overstated, risks are understated, and key evidence is missing or contradictory**.

On this basis, the document argues the development **should be refused**.

The detailed calculations to back this up were submitted by Philip Heard at deadline 3a.



The Cliff Villages Solar Action Group now produce a Statement of Concern

Statement of Concern: Safety and Procedural Failures regarding the Prax Pipeline

The Cliff Villages Solar Action Group (CVSAG) expresses its profound concern regarding the lack of progress between **Fosse Green Energy Limited (the Applicant)** and the **British Pipeline Agency (BPA)**, acting for **Prax**, concerning the high-pressure fuel pipeline that traverses the proposed project area.

The data below reveals a pattern of technical inadequacy and a failure by the Applicant to address fundamental safety risks that threaten both national infrastructure and the local environment.

1. Defective Safety Data and Risk Assessment

The most alarming revelation is that the AC interference modelling provided by the Applicant on 29 January 2026 is considered **defective and unacceptable** by BPA (pp. 10, 21). Independent experts (SES Tech) have confirmed that the Applicant's current density calculations are incorrect (p. 21). Without accurate modelling, it is impossible to determine if the solar project can be operated safely without causing accelerated corrosion or a catastrophic rupture of the pipeline (pp. 30-31).

2. Inadequate Protective Provisions

Despite the midpoint of the examination passing on 24 March 2026, there is no signed Statement of Common Ground (SoCG). The Applicant has repeatedly attempted to impose **generic, "off-the-shelf" protective provisions** designed for statutory undertakers, which BPA argues are entirely unsuited for a high-pressure fuel pipeline (pp. 3, 10). The Applicant's refusal to engage with bespoke protections suggests a lack of understanding of the "critical national infrastructure" they are impacting (pp. 11, 30).

3. Insufficient Land Rights and Mitigation Limits

There is a significant risk that the current **Order Limits** (the land boundaries defined in the DCO) are insufficient to accommodate the necessary mitigation measures (pp. 2, 23). If the required safety measures (such as sacrificial zinc strips or concrete barriers) fall outside these limits, the Applicant will have no legal right to install them, potentially leaving the pipeline unprotected and in breach of the **Pipeline Safety Regulations 1996** (pp. 29, 32).



4. Procedural Failures and Lack of Meaningful Engagement

The correspondence details a history of "chasing" the Applicant for data that was either provided late, remained outstanding, or was technically flawed (pp. 2, 18). BPA remains of the view that the Applicant is not engaging meaningfully and has failed to provide a genuine commitment to addressing these safety-critical issues (pp. 4, 20).

Conclusion

CVSAG believes that the Applicant's inability to reach a technical and legal agreement with the BPA/Prax is a major red flag. A project of this scale should not proceed while fundamental questions regarding the **safety of national fuel supplies** and the **risk of environmental contamination** remain unanswered due to the Applicant's own technical failures. This application is inadequate and without resolution of technical and safety issues and must therefore be refused.

Cllr Marianne Overton MBE

On behalf of the Cliff Villages Solar Action Group

31.03.2026



To: The Planning Inspectorate

From: Cliff Villages Solar Action Group (CVSAG)

Date: 27 March 2026

Reference: Fosse Green Energy Limited (EN010154) – Deadline 3A Submission

Subject: Formal Representation regarding the Applicant's Failure to reach Agreement with BPA/Prax

Dear Examining Authority,

The Cliff Villages Solar Action Group (CVSAG) submits this formal representation to highlight our grave concerns regarding the ongoing failure of Fosse Green Energy Limited ("the Applicant") to reach a safety-critical agreement with the British Pipeline Agency (BPA) and Prax concerning the high-pressure fuel pipeline.

Based on the Deadline 3A correspondence from Fieldfisher LLP (p. 1),

CVSAG wishes to draw the Examining Authority's attention to the following four critical failures:

1. Technically Defective Safety Modelling

It is deeply alarming that as of the midpoint of this examination (24 March 2026), the Applicant has failed to provide a valid risk assessment (p. 1). BPA has been independently advised that the Applicant's AC interference modelling, provided on 29 January 2026, contains **incorrect current density calculations** (pp. 10, 21). Without accurate data, there is no evidence that this project can be delivered safely without risking accelerated corrosion or a catastrophic breach of national fuel infrastructure (pp. 2, 30).

2. Inadequate Protective Provisions

The Applicant continues to propose "generic" protective provisions that are wholly unsuited to a high-pressure fuel pipeline (pp. 3, 10). Despite BPA providing bespoke draft provisions based on established precedents (such as the Net Zero Teesside DCO) on 18 March 2026, the Applicant has failed to engage meaningfully with these requirements (pp. 2-3). This lack of cooperation places the safety and integrity of the pipeline at unnecessary risk.

3. Insufficient Order Limits for Mitigation



There is a significant risk that the current **Order Limits** are insufficient to accommodate the necessary mitigation measures (pp. 2, 23). If mitigation—such as sacrificial zinc strips or concrete barriers—is required in third-party land outside these limits, the Applicant will have no legal right to install them (pp. 29-30). This would result in a direct breach of the **Pipeline Safety Regulations 1996**, which is a criminal offence (p. 32).

4. Failure of Meaningful Engagement

The correspondence reveals a persistent pattern of the Applicant providing late, inadequate, or incorrect data (pp. 2, 18). BPA remains of the view that the Applicant is not "actively consulting or meaningfully addressing" these significant safety concerns (p. 10).

Conclusion

CVSAG asserts that a Development Consent Order cannot be granted while such fundamental risks to **national infrastructure and the local environment** remain unresolved. The Applicant's inability to secure a signed Statement of Common Ground with a primary stakeholder like BPA/Prax by the examination midpoint demonstrates a profound procedural and technical failure (p. 1).

Yours faithfully,

The Cliff Villages Solar Action Group (CVSAG)