

FOSSE GREEN SOLAR FARM – DEADLINE 5 SUMMARY

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1. Nature of the Proposed Development

The Applicant continues to characterise the scheme as *temporary*, yet the associated National Grid Navenby Substation—required solely because of this and similar schemes—will be **permanent infrastructure**. As the substation will be permanent the Proposed Development should be considered a permanent, not temporary, development. Given the inevitability of future reuse of the grid connection, the Rochdale Envelope requires the proposal to be treated as **functionally permanent**.

2. Applicant's Responses to Deadline 2 Submissions

2.1 Abnormal Indivisible Loads (AILs)

The Applicant asserts no AILs will be required during operation, yet its own documents confirm transformer delivery by a **46.6m vehicle** and a **30–40 year transformer design life**.

2.2 Supply Chain Ethics

The Applicant provides no assurance that solar panel manufacture avoids forced labour, despite acknowledging potential production in provinces associated with Uyghur labour transfer programmes.

2.3 Solar Panel Replacement

The Applicant claims minimal disruption, yet fails to provide the **year-by-year replacement schedule** requested by the ExA (DCO.2.01).

2.4 Greenhouse Gas Emissions

There is a major discrepancy between Fosse Green and Springwell GHG estimates. Applying Springwell's intensity to Fosse Green yields **302,769 tCO₂e**, not **110,110 tCO₂e**. This is a massive discrepancy... the Rochdale Envelope approach should be applied using the worst case data.

2.5 Fossil Fuel Comparison

The Applicant continues to use an **Open Cycle Gas Turbine** comparator—more polluting than CCGT—despite multiple SoS decisions rejecting CCGT comparisons for solar NSIPs.

2.6 Energy Security

The UK ranks **239th of 240 countries** for solar yield. This results in low efficiency, intermittent energy generation which is at its maximum in summer when the maximum need is in winter.

2.7 Load Factor

The Applicant claims a 10% load factor, yet its own generation figures imply **15.4%**, significantly inflating benefits.

2.8 Decommissioning Funding

The Funding Statement remains unclear and inconsistent regarding decommissioning. The Applicant has not demonstrated how it will honour its stated *“commitment to set aside money for decommissioning”*.

2.9 BMV Land

The Applicant justifies BMV use on the basis of maximising output from an inefficient technology.

2.10 Property Prices

Multiple recent studies show negative impacts on house prices near solar farms. The Applicant provides **no metrics** to support its contrary assertion.

2.11 Ground Contamination

The Applicant confirms PFAS-free panels but does not address heavy metals or storm-damage risks demonstrated at Porth Wen and Camblesworth.

2.12 BESS Safety

The Applicant refuses to model propagation beyond a single container, contrary to real-world events and Rochdale Envelope principles.

2.13 Public Rights of Way

The Applicant incorrectly states PRoWs are not noise receptors. The submission cites national policy requiring protection of amenity and tranquillity, and notes Mallard Pass (same promoter) treated PRoWs as receptors.

2.14 Tourism

The Applicant dismisses expert evidence from an IP with 40 years' tourism experience, despite having **no empirical evidence** from comparable solar NSIPs.

3. Applicant's Responses to ExQ1

3.1 Maintenance

The draft DCO wording does not prevent near-total panel replacement under “maintenance”.

3.2 Gate 2 Grid Connection

The Applicant claims a secured Gate 2 connection but provides **no written evidence**, despite the TEC Register updating twice weekly.

3.3 Substation Dependency

There is **no alternative point of connection**. If the Navenby substation is refused, a new DCO would be required. The Applicant's statements conflict with NGET's position.

4. Applicant's Responses to Deadline 3 & 3A

4.1 Load Factor

The Applicant claims overplanting increases load factor—this is technically incorrect. Load factor is determined by climate and irradiance.

4.2 Overplanting Ratio

The Applicant has not justified the 1.6 ratio. Its own updated Technical Guide shows 1.2 would suffice.

4.3 BESS Legislation

There is **no specific UK legislation** governing BESS safety, contrary to the Applicant's implication.

4.4 Pipeline Safety

The Applicant refers to a "more conservative worst case", which is contradictory. The implication is that the Applicant appears to plan to reduce the safety margins for crossing the pipeline.

4.5 BESS Import/Export

The Applicant provides contradictory statements about whether the BESS will import from the grid.

4.6 Maintenance Schedules

The Applicant has not provided the required **year-by-year** maintenance schedules for years 25–40.

4.7 Permanent Sealing of Land

The Applicant departs from the consistent approach taken in Mallard Pass, Heckington Fen, Gate Burton, Cottam and Springwell, all of which treat substation/BESS/track land as **permanently lost**. The submission states: *"No Secretary of State decision has ever stated that land will not be permanently sealed."*

5. Additional Issues

5.1 Food Security

Recent Government national security assessments highlight the UK's vulnerability. *"The UK does not have enough land to feed its population..."* Use of BMV land for low-yield solar is incompatible with national food security priorities.

5.2 Landscape & Cumulative Impact

The Springwell decision letter recognises the growing cumulative impact across Lincolnshire. Fosse Green would materially worsen this.

Conclusion

Across multiple technical, environmental, safety, and policy domains, the Applicant's evidence remains incomplete, inconsistent, or incorrect. Key issues—including grid connection certainty, BESS safety, land loss, GHG emissions, food security, and the true permanence of the development—remain unresolved. The Rochdale Envelope requires worst-case assessment; the Applicant has repeatedly failed to adopt it.