

██████████ – Springwell Solar Action Group

This document is a Written Representation submitted in objection to the proposed Fosse Green Solar Development. It critiques the Applicant's submissions, highlighting inconsistencies, policy non-compliance, and deficiencies in technical, environmental, and planning evidence, ultimately arguing that the proposal should not be accepted in its current form.

1. Executive Summary

The representation asserts that the Applicant has not demonstrated compliance with relevant policies including NPS EN-1, EN-3, and the NPPF. It identifies material inconsistencies in the Applicant's technical and environmental evidence, inadequate assurances regarding land use impacts, and insufficient decommissioning obligations. Consequently, it submits that the Examining Authority cannot reasonably conclude the proposal meets robust planning assessment requirements .

2. Introduction

The document provides a structured critique of the Applicant's responses, specifically REP3A-025 and REP4-018, pointing out material deficiencies and failures to comply with policy and guidance that undermine the Applicant's conclusions .

3. Nature of the Proposed Development

The Applicant describes the development as temporary (60 years), but the representation argues that due to permanent grid infrastructure, notably reliance on the Navenby substation, the development is effectively permanent. This contradicts the reversibility principles of NPS EN-1 which require consideration of long-term land use effects .

4. Technical and Engineering Matters

The Applicant's claim that no Abnormal Indivisible Loads (AILs) will be required during operation is contradicted by acknowledgement of transformer delivery via AIL and a design life of 30–40 years. Additionally, the Applicant's asserted load factor of 10% is challenged by an independent calculation closer to 15.4%, which inflates perceived benefits and conflicts with evidence-based assessment requirements in NPS EN-1 .

5. Environmental and Climate Considerations

The Applicant rejects panel-based greenhouse gas (GHG) comparisons in favour of megawatt-based scaling, leading to significant discrepancies when compared to data from Springwell Solar Farm. The representation criticizes the failure to apply a worst-case Rochdale Envelope approach and reliance solely on operational emissions, which ignores lifecycle carbon assessment principles. This approach conflicts with NPS EN-1 and NPPF climate objectives.

6. Energy Security

The Applicant's description of the development as providing "secure energy" is not supported by evidence. It is noted that solar generation is intermittent and cannot provide baseload supply, a fact acknowledged in UK Government policy and inconsistent with energy security definitions in NPS EN-1.

7. Battery Energy Storage System (BESS)

The Applicant's reliance on the "Unplanned Emissions Assessment" is undermined by insufficient design detail and failure to model risk propagation beyond a single BESS unit. This omission violates the precautionary approach required under NPS EN-1.

8. Land Use and Agriculture

The Applicant justifies the use of Best and Most Versatile (BMV) land by maximizing grid output, but this is deemed insufficient under NPPF agricultural land policy. The Applicant also fails to adopt a precautionary assumption that land beneath infrastructure will be permanently lost, conflicting with recent Secretary of State decisions and their own submissions.

9. Grid Connection and Infrastructure

Although the Applicant asserts securing a Gate 2 grid connection, no documentary evidence has been provided. Without such evidence, the Examining Authority cannot be satisfied of the proposal's deliverability. As with Springwell the Applicant seems to feel that the grid connection at Navenby is a given. Whilst the PI on Springwell did highlight that he felt this was a risk and cautioned the work commencing prior to the substation being build the SOS has ignored this. This would indicate a SOS who is Predetermined which is a major issue in planning regulations. Anyone who is predetermined should declare and step away from the process. It is clear that the SOS and those linked to that office are predetermined and are therefore not suitable to assess these applications.

10. Decommissioning and Financial Provision

The Applicant states that decommissioning costs are included but fails to provide a detailed financial mechanism. This lack of assurance does not meet NPS EN-1 requirements for confidence in mitigation measures. The Applicants own Legal team stated in the OFH that we don't know what will happen in 10 years let alone 60 years therefore in his words he would not confirm what would happen to the land and also could not guarantee it would be returned to the same state as it was in 2026. This therefore makes a complete mockery of the claims stated by the Applicant in their literature.

11. Environmental and Safety Risks

The Applicant mentions PFAS-free panels but does not assess other potential contaminants such as heavy metals. This incomplete environmental assessment breaches NPS EN-1 requirements. If the Applicant is able to state the panels will be free of PFAS they should also be able to state where the panels will originate from. Will they be sourced from China?

12. Socio-Economic Effects

Claims that property values will not be affected are unsupported and contradict available evidence. This approach is inconsistent with the NPPF's requirement to consider community impacts.

13. Conclusion

The representation concludes that the Applicant has failed to demonstrate the acceptability of the Proposed Development in planning terms. The evidence is inconsistent, incomplete, and non-compliant with relevant policies. Without further clarification, limited weight should be given to the Applicant's case.