

To: Planning Inspectorate Fosse Green Examining Authority

From: Cliff Villages Solar Action Group (IP No: [REDACTED])

Dear Sir/Madam

PROPOSED FOSSE GREEN DEVELOPMENT: UNRESOLVED/UNANSWERED ISSUES

As there will be no further opportunity for Interested Parties to challenge the Applicant face to face, following your recent procedural decision (the Rule 8(3) letter dated 8 April 2026) which cancelled the reserved hearings week of 11 May 2026, we would be grateful if you would, under Rule 17, ensure the Applicant comprehensively responds to the significant number of issues we consider to be, as yet, inadequately addressed. A number of our concerns have been addressed through your third set of questions but we would be grateful if the areas detailed below could also be addressed.

The key reasons for this Rule 17 request are:

- Complexity of new submissions: There have been a number of new, significant documents such as the Inter-Relationships document (Revision 1) submitted on 1 April 2026 and the updated Statement of Common Ground which introduce technical complexities regarding cumulative impacts with the approved Springwell project. These require detailed cross-examination and robust scrutiny from Interested Parties and Community Action Groups.
- Material Changes in Local Context: The Secretary of State's approval of Springwell Solar Farm on 8 April 2026 creates a "material change in circumstances". The cumulative impact on North Kesteven is no longer hypothetical.
- Safety Concerns. High impact risk issues associated with BESS fires and their subsequent impact on the local environment (pollution of the aquifer and adjoining water courses) as well as human health from any plume also need to consider the impact of storm damage on the array as the evidence from recent storm events in the UK is that heavy metals used in the arrays' construction have been exposed. Further dialogue is required with the relevant statutory authorities to reach a common ground understanding of these risks.
- Incomplete Responses to Date. The Applicants ongoing omissions in the areas detailed below mean that we have no confidence that the ExA can yet be satisfied that all relevant matters have been addressed through the written evidence process.

Permanent sealing of land: The Applicant has dismissed this issue without any evidence to the contrary and has stated ignorance of any other NSIPs where the

Secretary of State has considered land to be permanently sealed, including Mallard Pass, promoted by the same applicant. Of note in the recent Springwell decision, the Secretary of State considered land beneath substations, BESS, access tracks etc to be permanently sealed.

Overplanting: The ExA, in its first set of questions, asked the Applicant to justify an overplanting ratio of 1.6. Despite two issues of the Solar Technical Summary there has been no justification for this figure. Indeed, there appears to be firm justification that an overplanting ratio of 1.17 is sufficient.

Load Factor: The Applicant, through the Solar Technical Guide and the estimated total generation figure of 19,438,499 MWh, appears to assume a load factor range for the Proposed Development of between 15 and 20 percent. This is significantly above the current UK average of circa 10%. Even with the perceived technical improvements in panel efficiency on the horizon (nominally approximately 10%) here is no justification produced to support such high load factor figures. A more realistic maximum achievable load figure would be 11%.

Greenhouse Gas (GHG) Emissions: Other than the 'this is industry best practice' statement, the Applicant has failed to justify the low level of GHG emissions they claim for their development. If the same data as the approved Springwell development had been applied, it would be some 3 times higher. Given that Springwell also claim they have complied with industry best practice, then the worst-case (Springwell data) should be applied.

Inflated 'benefits': If the load factor was circa 10%, the estimated total generation figure through life would be some 13 million MWh. When this figure is combined with the underestimated GHG emissions figure, the perceived benefits of the Proposed Development are excessively inflated.

Traffic: Traffic routing through Haddington is an example of the Applicant's conflicting evidence over time; initially it was stated there would be no HGVs through the village, then there would be 84 daily HGV movements. The latest estimate is 109 daily HGV movements. It is noted the road safety assessment is solely based on collision data and no iRAP assessment has been undertaken.

Funding for Decommissioning: The Applicant initially stated decommissioning was included in the Funding Statement. They then admitted it was not; then merely added the word 'decommissioning' to the funding statement with no uplift in the total £340M cost. The Applicant also stated "The Applicant is committed to setting aside costs for decommissioning", but subsequently has ignored its own statement. In our opinion, this has created a fear that there is a significant danger that this cost will fall to the local council and hence future generations, to foot the bill.

BESS Safety: In terms of BESS safety, the Applicant's statement that the 2 x BESS fires in the UK would NOT have occurred if the design principles of their Proposed Development had been employed, is an example of our concerns over an overconfident approach to safety. Both the BESS fires referred to, would have been constructed to the same US standards that the Applicant proposes and there is no evidence provided by the Applicant that they were constructed to poor standards. In

addition, the Applicant has not conducted realistic worst-case modelling, in accordance with the Rochdale Envelope, for fire, thermal runaway and plume assessment, which would assume propagation beyond a single container as has occurred in incidents worldwide as well as the UK.

Grid Connection: On a number of occasions, we have questioned the 'secured' Gate 2 and Gate 1 connections for the solar development and BESS respectively. The Applicant repeatedly states a grid connection has been secured. Given that the Applicant refuses to provide proof of such and the statement that the Applicant is "awaiting confirmation of its confirmed connection", it is important that the Applicant provides written proof of a secured connection prior to any DCO approval.

Visitor Economy: We consider the Applicant has not adequately address the impact of the Proposed Development on the visitor economy

CVSAG