

DEADLINE 5 SUBMISSION

Interested Party Reference: ██████████

Application: EN010154 – Fosse Green Energy Solar Farm

Executive Summary

This submission challenges the proposed Fosse Green Energy Solar Farm, arguing that the applicant has failed to adequately address key planning, policy, and evidential issues despite multiple opportunities.

Site Selection and Policy Compliance:

The applicant has not demonstrated a robust or ██████████ site selection process. There is no clear evidence that alternative, less sensitive sites were properly considered, nor that the chosen site aligns with national policy principles such as prioritising existing grid connections, brownfield land, or minimising environmental harm. The justification appears developer-led rather than plan-led.

Battery Energy Storage System (BESS):

The need for the proposed BESS is strongly disputed. Recent national data suggests a significant oversupply of battery storage capacity relative to projected requirements, undermining the case for this development. Additionally, safety concerns remain unresolved, with insufficient detail on fire risk, layout, and emergency planning. Key design elements are deferred to post-consent stages, limiting proper assessment.

National Need and Planning Balance:

While national demand for renewable energy is acknowledged, the submission argues that the applicant over-relies on generic policy support without properly weighing site-specific harms. Emerging evidence suggests a changing energy landscape, including potential oversupply and grid constraints, which further weakens the justification for the project.

Agricultural Land and Cumulative Impact:

The loss of agricultural land is not adequately justified, particularly given the scale of the development and the lack of thorough cumulative impact assessment. Concerns are raised about long-term food security, rural economic impacts, and landscape degradation.

Engagement with Stakeholders:

The applicant is criticised for failing to meaningfully engage with specific concerns raised by interested parties. Responses have been generic rather than detailed, reducing transparency and confidence in the process.

Conclusion:

The submission concludes that the applicant has not materially strengthened its case. Significant issues remain unresolved, particularly regarding site selection, BESS justification and safety, and land use impacts. It recommends that the Examining Authority give limited weight to unsupported claims, require stronger evidence, and reassess whether the proposal complies with national policy when rigorously applied

1. INTRODUCTION

This Deadline 5 submission responds to the Applicant's latest submissions, including responses at Deadline 3 and subsequent updates. It focuses on areas where the Applicant has either failed to materially address concerns previously raised or has relied on high-level assertions without sufficient evidence.

The key areas addressed are:

- Site selection and policy compliance
 - Battery Energy Storage System (BESS) need and safety
 - National need and planning balance
 - Agricultural land use and cumulative impacts
 - Lack of substantive engagement with Interested Party concerns
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2. SITE SELECTION AND POLICY COMPLIANCE

The Applicant continues to assert that site selection has been undertaken through a robust multi-criteria process. However, no substantive new evidence has been provided at Deadline 3 or thereafter to demonstrate:

- A genuinely comparative assessment of alternative sites
- Clear justification for the selection of this site over less sensitive land
- Proper weighting of agricultural land quality and landscape harm

The Applicant relies heavily on grid proximity as a primary constraint. However, when the applicant first discussed the proposed location:-

- There was no available grid connection.
- The land owners were suggesting a connection at Whisby.
- No plans existed for a sub station at Navenby

The applicant has yet again failed to produce any evidence of an available grid connection at the time of this site being identified for this project.

The applicant cites National Policy in support of their site location. This is challenged and refuted. Numerous participants on numerous occasions have presented that National Policy e.g. EN-1, EN-3, The Clean Power Initiative 2030 plus Government Ministers' statements regarding these policies highlight:-

- Existing and available grid connection – **not met with this application**
- Use of brownfield, industrialised, etc land - **not met with this application**
- Minimisation of new infrastructure - **not met with this application**

Critically:

- There remains no [REDACTED] explanation of why lower-impact or non-agricultural alternatives were discounted. Why sites with existing grid connectivity were not selected.
- The approach appears developer-led rather than plan-led

Accordingly, the Applicant has not demonstrated compliance with the spatial and environmental principles embedded in national policy.

3. BATTERY ENERGY STORAGE SYSTEM (BESS)

3.1 Need

The Applicant continues to rely on – now out of date - generic national policy support for BESS without demonstrating the specific need for storage at this location or at this scale.

NESO made the following announcement in December 2025:

*“In its **Connections Reform** update published on **8 December 2025**, the National Energy System Operator (NESO) revealed that the battery energy storage (BESS) pipeline was significantly over-provisioned relative to national requirements. [Energy-Storage.News +1](#)*

*NESO's data indicated that the volume of battery storage seeking grid connection was roughly **three times larger** than the capacity required to meet the UK Government's **Clean Power 2030 (CP30)** targets. [Action to Protect Rural Scotland +1](#)*

Key Findings on BESS Overcapacity

- **Total Queue Volume:** Prior to the reform, the total queue for all energy projects had reached **722 GW**, about four times the total capacity needed for 2030.
- **Battery Pipeline vs. Need:**
 - **The Pipeline:** NESO identified over **80 GW** of battery storage capacity planned for connection by 2035.
 - **The Requirement:** The [Clean Power by 2030 report](#) estimated a need for only **23–27 GW** of new BESS by 2030.
- **"Unprioritised" Projects:** As part of the reform to clear "zombie" projects, NESO moved to prioritise "shovel-ready" sites. Approximately **153 GW** of battery storage projects were not prioritised for immediate connection.”

No evidence has been provided to show:

- That this particular BESS is required to make the solar development acceptable
- That alternative grid or storage solutions have been considered
- Despite repeated questions – to my knowledge – the applicant has failed to evidence their claimed “connection status”

Life has moved on as regards this topic and the applicant is trying to use out of date positions to justify their proposal. There is no National or Local Need for this BESS. There is no environmental or energy need for this BESS. It has all the appearance of being part of the strategy to maximise the financial worth and sales value of the sought after DCO.

The applicant has failed to adequately address the challenges and concerns in this regard.

The justification remains over broad, out of date and non-site-specific.

3.2 Safety and Design Detail

The Applicant's responses remain at a high level and defer critical detail to post-consent stages. This is not appropriate given the scale and potential risks.

Outstanding concerns include:

- Fire risk and thermal runaway scenarios
- Lack of confirmed separation distances
- Absence of detailed layout and emergency response strategy

The reliance on future discharge of requirements creates uncertainty and limits the Examining Authority's ability to properly assess impacts.

The Applicant has not demonstrated that:

- Risks are fully understood
- Effective mitigation is secured within the DCO framework

4. NATIONAL NEED AND PLANNING BALANCE

The Applicant relies on national policy to assert an overriding need for solar generation. While national need is acknowledged, this does not negate the requirement to assess:

- Site-specific harm
- Cumulative impacts
- Whether adverse impacts outweigh benefits

The Applicant has not engaged meaningfully with the argument that:

- The contribution of this scheme must be weighed against its environmental and land-use impacts

There remains an over-reliance on generic policy support rather than a balanced planning judgment.

Further, as with the BESS situation, tempus fugit, the below is an extract from the CEO of EDF in a recent statement:


*The primary source for **Simone Rossi's** (CEO of EDF in the UK) comments in April 2026 is an opinion piece he wrote for [The Telegraph](#).*

Miliband's green energy is going to waste, says EDF boss

Households face paying hundreds of millions to switch off wind and solar farms, says supplier



 Energy Editor

 is the Telegraph's Energy Editor.

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Green energy generated by Ed Miliband's renewables' drive risks going to waste, the chief executive of EDF Energy has warned.

[Writing in The Telegraph](#), Simone Rossi said the UK is producing "too much electricity" based on current levels of demand, meaning households face paying hundreds of millions of pounds to switch off wind and solar farms.

The imbalance is compounded by deindustrialisation, which has driven down the UK's annual electricity consumption from 350 terawatt hours (TWh) to 272 TWh over the past two decades.

Mr Rossi said: "The supply of home-grown electricity has progressed well in recent years, with more wind and solar projects being approved and built, nuclear projects under way, major investments into the Grid and commitments to reform planning and regulation.

"But at a UK level, the demand for power actually fell 20pc across two decades from 2005 and has only recently stabilised and started to grow."

*He added: "**In the UK electricity sector, the risk is that we have too much supply and not enough demand.**"*

"Almost every day this country switches off wind farms because we have too much electricity – and at the same time motorists spend millions pouring expensive petrol and diesel into their cars.

"It's wasted British energy we could be using. This has to change."

Simone Rossi, the chief executive of EDF Energy, called on ministers to accelerate the rollout of electric vehicles and heat pumps

Wasted wind power cost billpayers £1.5bn last year because of curtailment costs. These are paid to developers when they are forced to switch off because the network is too congested to transport their power elsewhere.

The National Energy System Operator raised concerns because of excess energy generation last week, warning that it was preparing plans to stop the grid from being overwhelmed by solar power this summer.

- ***Grid Capacity:*** He pointed out that while solar and wind generation are hitting record highs (reaching 52.5% of UK electricity in 2025), the grid is "not yet fit for purpose" to manage these peaks without significant waste.

The Telegraph +7

The obvious conclusion – and one avoided and ignored by the applicant - is that the energy demand position has significantly changed since they first were invited by some local landowners to install an industrial solar energy complex in rural Lincolnshire.

5. AGRICULTURAL LAND AND CUMULATIVE IMPACT

The loss of agricultural land remains insufficiently justified.

The Applicant has not provided:

- A convincing explanation for the scale of land take
- Evidence that cumulative impacts with other solar developments have been fully assessed

The issue is not the acceptability of solar development in principle, but the concentration and scale in this location.

This raises concerns regarding:

- Long-term land use strategy
- Food security implications
- Landscape character

So we have a potential situation of having a surplus of “green energy” whilst reducing the Nation’s already dwindling agricultural and food production. With the significant, associated economic damage caused to the overall rural economy, agricultural supply chains and employment.

6. ENGAGEMENT WITH INTERESTED PARTY SUBMISSIONS

The Applicant has not directly engaged with the specific concerns raised under this Interested Party reference (██████████).

Instead:

- Responses have been thematic and generic
- No point-by-point rebuttal has been provided
- No appropriate answers provided to pertinent questions.

This limits ██████████ and makes it difficult to determine whether specific issues have been properly considered. It also raises the aspect of the applicant's attitude and willingness to providing evidence to support their many "assertions".

A more direct and structured response is required.

7. CONCLUSION

In summary:

- The Applicant has not materially advanced its case in response to the concerns raised
- Key issues remain unresolved, particularly in relation to:
 - Site selection
 - BESS safety and justification
 - Agricultural land use

The submission maintains that:

- The proposed development has not been sufficiently justified
- The planning balance has not been properly demonstrated

The Examining Authority is therefore requested to:

- Give limited weight to unsupported assertions
 - Require clearer evidence and secured mitigation
 - Consider whether the proposal complies with national policy when applied rigorously at the site-specific level
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Michael Campbell

Interested Party Ref: ██████████

Deadline 5 Submission