

Application Reference: EN010154 – Fosse Green Energy.

Submitting Party: Interested Party – Reference: [REDACTED]

Submission Stage: Deadline 7 – Formal Reply to Applicant's Baseline Assertions

Submission Date: 9 June 2026.

1. Executive Summary

This submission response highlights the fundamental flaws in the Applicant's site selection framework, grid connectivity claims, and national need arguments for the co-located 480MWh Battery Energy Storage System (BESS). The Applicant, Fosse Green Energy Limited, relies on an integrated project design to justify absorbing vast tracts of greenfield agricultural land. However, recent evidence confirms that the project lacks verified registry proof of an active Gate 2 grid allocation. Furthermore, sweeping regulatory interventions have invalidated the "urgent national need" case for additional battery storage infrastructure.

These fundamental issues have been consistently raised by interested parties and the applicant has adopted the tactic of largely avoiding addressing them claiming that they have been previously addressed during the examination process. The reason these issues continue to be represented is due to the wholly inadequate responses from the applicant.

The most fundamental flaw in this application is that it is based upon an invitation from a local land owner to utilise local agricultural land with a proposed grid connection at Whisby, which was rejected by National Grid. Consequently, the proposal had no available, nor even proposed, grid connection and hence fails to meet the fundamental planning requirements. This point has consistently been raised and the applicant has consistently avoided responding properly whilst perpetuating the fiction of the Navenby grid connection which did not exist - even as an idea - at the commencement of the applicant's local engagement.

As regards the applicant's comments regarding the use of AI in submissions. AI has been a useful resource for subject matter research, plus reviewing and highlighting inconsistencies, mistakes, evasion and avoidance in the applicant's plans and responses. Please note, that all the final submissions have been the result of human intelligence and work.

2. Flaws in Site Selection & Greenfield Aggression

- **The Applicant's Position:** The Applicant maintains that site selection followed a localized multi-criteria process fundamentally dictated by proximity to a viable National Grid point of connection. They argue that because large-scale brownfield

sites with nearby grid capacity do not exist in the region, a greenfield location was operationally essential.

- **The Rebuttal:** The choice of the Principal Site represents a post-rationalisation of commercial land acquisition rather than a objective search for minimal environmental impact (p. 1). The Applicant has tethered its entire development layout to the proposed 400 kV Navenby Substation—an unbuilt, unconsented asset promoted under a completely separate planning track. Basing a greenfield site selection framework on non-existent infrastructure introduces fatal regulatory uncertainty.
 - **Agricultural Degradation:** The Applicant notes that only 43% of the Best and Most Versatile (BMV) agricultural land will sit directly under panels. This ignores the permanent structural damage, heavy compaction, and widespread trenching required to integrate a sprawling 240MW asset and its massive cable corridors across rural Lincolnshire.
-

3. The Grid Connection Illusion and BESS Overcapacity

- **The Registry Discrepancy:** The Applicant claims a "secured" Phase 2 grid connection window for May 2033. However, the official National Energy System Operator (NESO) Transmission Entry Capacity (TEC) Register contains **no record or reference** validating a Gate 2 status for Fosse Green Energy. The Applicant admits it does not meet standard registry parameters and is merely awaiting a notification in late Q3 2026.
 - **The BESS Stranded at Gate 1:** The 480MWh BESS component holds an inferior Gate 1 status with an unconfirmed, speculative connection date. Under current NESO rules, Gate 1 projects face immediate elimination or severe delays beyond 2035.
 - **The November/December 2025 Structural Overhaul:** On 8 December 2025, NESO implemented aggressive connection reforms to purge over-provisioned technologies. The transmission queue remains choked with over 80 GW of battery capacity competing for a national 2030 target of just 23 GW to 27 GW. Because the UK pipeline is over-allocated by a factor of three, NESO formally deprioritised 153GW of speculative projects.
 - **The Core Contradiction:** The Applicant used the spatial requirements of a co-located BESS to disqualify smaller, less harmful brownfield alternatives. Yet, in Document 9.12, they admit that if a Gate 2 agreement is never granted for the BESS, they will simply drop the storage and build a standalone solar farm. The local community is being asked to absorb the acute fire, safety, and landscape impacts of a high-risk facility that functions as a speculative "ghost asset" on paper.
-

4. Conclusion

The material conditions of the UK energy market changed permanently following the late 2025 NESO reforms. The "urgency" argument used by the Applicant to bypass local safety and spatial constraints is an historical artifact. There is no regulatory or public interest justification for granting a DCO to a Gate 1 project that offers zero marginal utility to national grid stability while placing a disproportionate burden on rural infrastructure.

Interested Party [REDACTED] requests that the Examining Authority apply the direct findings of the NESO December 2025 Reforms. The unneeded, un-allocated BESS facility should be removed from the application, restricting any potential DCO strictly to a reduced standalone solar infrastructure footprint. Which in turn should have to have proven, available grid connection prior to any potential granting of a DCO.

The Examination evidence currently indicates that:

- formal confirmation of the claimed Gate 2 position for the solar element has not yet been placed before the Examination;
- the BESS element remains outside Gate 2 and has no confirmed connection date;
- the Applicant accepts that the solar development could proceed without the BESS;
- key aspects of project delivery remain dependent upon separate infrastructure and future regulatory decisions.

Accordingly, Interested Parties submit that the Examining Authority should exercise caution when considering claims regarding connection certainty, project deliverability and the necessity of the BESS element.

The Examining Authority is respectfully requested to give limited weight to assertions regarding a secured and certain grid connection unless and until supporting documentary evidence is provided within the Examination.

Michael Campbell.

Interested Party Reference: [REDACTED]

Deadline 7 Submission

Mandatory AI Use Statement

This submission was drafted with assistance from ChatGPT (OpenAI). The author has reviewed, amended and takes full responsibility for the final submitted text.