

Submission by Thurlby Parish Meeting

Ref: Fosse Green Energy Solar Farm (EN010154)

Application Reference: EN010154 – Fosse Green Energy

Submitting Party: Thurlby Parish

In Response to: Applicant's Deadline Responses to Deadline 4/5 Submission, F314047FD

Submission Date: 9 June 2026 (Deadline 7)

1. Executive Summary

Thurlby Parish welcomes the opportunity to reply to the Applicant's responses regarding our previous submissions (F314047FD). While we note the Applicant's technical reassurances, critical gaps remain regarding the safety, proximity, and oversight of the Battery Energy Storage System (BESS). Most notably, a profound divergence exists between the Applicant's optimistic safety modelling and the strict, conditional demands imposed by the Lincolnshire Fire and Rescue Service (LFRS). The Parish Meeting maintains that the BESS element must not be approved under the current unverified parameters.

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.

Also, this topic does raise the applicant's position as it is a company with "Nil - Employees" (Companies House), so who is doing their design work, and have they the necessary qualifications and up to date experience, especially as regards the fire risk element?

2. The Critical Divergence: Applicant Views vs. Lincolnshire Fire & Rescue Service (LFRS)

The Applicant's responses imply that BESS safety, infrastructure requirements, and toxic plume risks are completely resolved. A direct comparison with the Statement of Common Ground (SoCG) reveals this is not the case:

- **Plume Modelling and Certainty:**

- *The Applicant's View:* The Applicant asserts in Appendix 14-G that hazardous chemical concentrations (specifically Hydrogen Fluoride) drop below dangerous levels before crossing the site perimeter, presenting no risk to Thurlby's residents.
 - *The LFRS View:* LFRS has **refused to blindly accept this early-stage plume data**. LFRS has explicitly dictated that the definitive, final Plume Assessment can only be approved at the *detailed design stage*—long after the DCO may be granted—once the exact battery manufacturer and exact cell chemistry are legally selected.
 - *Parish Reply:* It is democratically unacceptable to grant development consent based on speculative modelling. Residents are being asked to accept a major hazard site next to their homes while the vital safety data remains entirely subject to post-consent design choices.
 - **Infrastructure Stress and Site Adequacy:**
 - *The Applicant's View:* The Applicant argues that incorporating the BESS alongside the solar infrastructure is fully safe and optimized, minimizing local impact.
 - *The LFRS / LCC View:* Lincolnshire County Council (LCC) and LFRS maintain that managing a thermal runaway event in rural Lincolnshire places an immense, disproportionate burden on local infrastructure. LCC continues to log a **formal objection to the project layout**, stating that the Applicant has "not demonstrated a sufficient level of assurance" regarding the cumulative safety risks of clustering multiple BESS sites in the area.
 - *Parish Reply:* Thurlby Parish strongly aligns with LFRS and LCC. The local, rural road network and limited local emergency resources are entirely unsuited to managing a complex lithium-ion fire emergency.
 - **Emergency Firefighting Water Infrastructure:**
 - *The Applicant's View:* The Applicant states that on-site water storage tanks will be installed to provide a dedicated supply for firefighting purposes, meeting basic emergency requirements.
 - *The LFRS View:* LFRS has mandated that managing a sustained lithium-ion thermal runaway incident requires immense volumes of water over an extended period. Because the rural infrastructure surrounding Thurlby lacks high-capacity water mains, LFRS has demanded strict structural layout guarantees. These include specific tank sizing, dedicated high-flow pump connections, and permanent, unobstructed all-weather access roads capable of supporting heavy emergency tenders during a prolonged incident.
 - *Parish Reply:* The requirement for dedicated, large-scale water storage tanks explicitly highlights the dangerous lack of existing infrastructure in our rural area. If a multi-container fire occurs, local water pressure is completely inadequate to control it. The Applicant has failed to provide final, engineered blueprints showing the exact size, capacity, and visual impact of these massive water tanks near Thurlby, nor have they proved that runoff from thousands of gallons of contaminated firefighting water can be safely contained on-site without polluting the local fenland water table.
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3. Failure to Address Proximity and "Rochdale Envelope" Flexibility

The Applicant defends the lack of specific infrastructure locations by citing the standard "Rochdale Envelope" framework.

- **Parish Reply:** While flexible parameters are standard for solar panel placement, they are fundamentally unsafe for high-risk BESS installations. Using maximum "envelopes" means the precise distance of volatile battery containers from residential windows remains variable. We reiterate our demand that the BESS footprint be fixed to maximum safety distance thresholds, or removed entirely from the immediate vicinity of the historic hamlet. We maintain that the position/concept of "Rochdale Envelope" does not equate to "an unrestricted blank cheque" nor excuse the provision of appropriate details and information.
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4. Legal Accountability and Corporate Transfers

The Applicant notes that any future owner of the site will be legally bound by the DCO requirements.

- **Parish Reply:** While legally correct, a corporate entity purchasing the asset in the mid-2030s will have no established relationship with, or accountability to, the Thurlby community. The reliance on enforcement action after a transfer takes place provides entirely inadequate peace of mind to all the parishes facing a 60-year operational disruption.
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5. Conclusion

Thurlby Parish urges the Examining Authority to reject the Applicant's assertions that BESS risks are mitigated. Until the final, manufacturer-specific plume modelling and structural containment demands mandated by LFRS are fully detailed, examined, and open to public scrutiny, the BESS component of the Fosse Green Energy application represents an unacceptable and unquantified risk to public safety, which it is believed would be even further exacerbated if a decentralised layout was installed rather than the original planned centralised one.


Chairman, Thurlby Parish

Submitted on behalf of Thurlby Parish.

Mandatory PINS AI Disclosure Statement

- **Tool Used:** ChatGPT (OpenAI)
 - **Application:** Assisted in structuring, summarizing, and drafting the text of this reply submission based on the official EN010154 examination documents.
 - **Date of Use:** 9 June 2026
 - **Human Verification:** All text, regulatory details, document references, and arguments have been manually reviewed, verified against the PINS document library, and approved by the author.
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