

# **Green Hill Solar Farm**

## **EN010170**

### **Statement of Common Ground with Northamptonshire Fire and Rescue Service**

Prepared by: Lanpro Services

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APFP Regulation 5(2)(q)



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## Issue Sheet

Report Prepared for: Green Hill Solar Farm  
Examination Deadline 2

### Statement of Common Ground with the Fire and Rescue Service

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| Original | 19/11/2025 | AR          | PG          |



## **1 Introduction**

### **1.1 Purpose of the Document**

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Green Hill Solar Farm Development Consent Order (the Application) made by Green Hill Solar Farm Ltd (the Applicant) to the Secretary of State for Energy Security & Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate's website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process, of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

### **1.2 Parties to this Statement of Common Ground**

- 1.2.1 This SoCG has been prepared by (1) Green Hill Solar Farm Ltd. as the Applicant and (2) Northamptonshire Fire and Rescue Service.
- 1.2.2 Collectively, Green Hill Solar Farm Ltd. And Northamptonshire Fire and Rescue Service are referred to as 'the parties'.

### **1.3 Terminology and Referencing**

- 1.3.1 In the Tables in Section 3 of this SoCG below:
- "Agreed" indicates where the issue has been resolved;
  - "Not Agreed" indicates a final position; and
  - "Under discussion" indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.





## 2 Record of Engagement

### 2.1 Summary of Consultation

2.1.1 The parties have been engaged in consultation since July 2024.

2.1.2 A statutory consultation process took place between 7<sup>th</sup> November and 19<sup>th</sup> December 2024.

2.1.3 A summary of the meetings and correspondence that has taken place between Green Hill Solar Farm Ltd and Northamptonshire Fire and Rescue Service (NFRS) in relation to the Application is outlined in **Table 2.1** below.

**Table 2.1: Record of Engagement**

| Date                        | Form of Correspondence                               | Key Topics Discussed and Key Outcomes   |
|-----------------------------|--|---|
| 9 <sup>th</sup> July 2024   | Meeting (virtual via Teams)                          | Meeting to introduce the Scheme and Battery Energy Storage System (BESS) plans, explain the safety measures that will be embedded in the design and understand any concerns NFRS raised.  |
| 22 <sup>nd</sup> July 2024  | NFRS emailed the Applicant                           | NFRS emailed the applicant to confirm they are satisfied with the information provided and that they have no specific comments but expect the Applicant to continue to have regard to the National Fire Chiefs Council (NFCC) guidance.   |
| 26 <sup>th</sup> April 2025 | The Applicant emailed NFRS                           | <p>The Applicant emailed NFRS to advise that all documentation for the Scheme will be submitted to the planning inspectorate during May. The Applicant confirmed they will share all the requisite documentation with NFRS and would like to arrange a meeting / site visit once NFRS has had the opportunity to review all documentation.</p> <p>The Applicant also emailed additional safety materials for NFRS regarding:</p> <ul style="list-style-type: none"><li>• Emergency Response Plan (ERP) drafting information</li><li>• BESS full scale destruction test data</li></ul> |
| 9 <sup>th</sup> July 2025   | Site Meeting   | The Applicant and NFRS undertook site visits to Green Hill C and Green Hill BESS. The Applicant updated NFRS on the submission documents. Site access and water provision were discussed in detail and actions agreed including the production of a Statement of Common Ground (SOCG).  |
| 7 <sup>th</sup> August 2025 | Relevant Representation submitted by NFRS [RR-1245]. | The applicant has engaged with Northamptonshire Fire and Rescue Service (NFRS) and been very forthcoming in providing application details and supporting information. The Applicant has progressed the <b>Northamptonshire Fire and</b>   |



| Date                        | Form of Correspondence                               | Key Topics Discussed and Key Outcomes  |
|-----------------------------|--|--|
|                             |  | <b>Rescue Statement of Common Ground [EX2/GH8.3.8].</b>  |
| 7 <sup>th</sup> August 2025 | Relevant Representation submitted by NFRS [RR-1245]. | NFRS would like to see improvements to the fire service access provision at site C should a BESS be located on this site, to include the provision of a staging area from which to base firefighting efforts and improvements to the proposed access road to ensure appropriate passing places for NFRS emergency response vehicles. The Applicant is updating the layout to provide additional laybys and space for vehicles to alight within a staging area within the Site. |
| 7 <sup>th</sup> August 2025 | Relevant Representation submitted by NFRS [RR-1245]. | The applicant and NFRS are in broad agreement about the suitability of the proposed provision of water for firefighting and the Applicant welcomes Northamptonshire Fire and Rescue Service's confirmation of agreement on the proposed firefighting water provision for the BESS, as set out in the <b>Outline Battery Safety Management Plan [REP1-143]</b> .  |
| 7 <sup>th</sup> August 2025 | Relevant Representation submitted by NFRS [RR-1245]. | NFRS expects the applicant to continue to have regard for NFCC guidance for grid scale energy storage systems as this develops. The Applicant notes this comment, any revisions to NFCC guidance as the Scheme develops will be incorporated into BESS safety planning and documentation. Any deviations from NFCC guidance will be fully agreed with NFRS.  |

- 2.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Green Hill Solar Farm Ltd and (2) Northamptonshire Fire and Rescue Service (NFRS) in relation to the issues addressed in this SoCG.



### 3 Matters of Discussion

#### 3.1 Overview

3.1.1 **Table 3.1** below will detail by the matters agreed, under discussion, or not agreed with Northamptonshire Fire and Rescue Service (NFRS) at the point of this document being published.

**Table 3.1: Fire Safety**

|       | Matter  | Details of Matters for Discussion  | Applicant Position  | Consultee Position  | Status |
|-------|---|--|---|---|--------|
| FR-01 | National Fire Chiefs Council (NFCC) Guidance for design of Battery Energy Storage System (BESS) sites | NFRS expects that the Applicant continues to follow NFCC guidance as the project develops. | <p>The Applicant confirms that NFCC guidance was a fundamental safety precept for the preliminary BESS site design. NFCC guidance is comprehensively referenced in the Outline Battery Storage Safety Management Plan (OBSSMP), and the BESS Fire Emissions Modelling Report (Appendix 16.2) fully aligns with the latest NFCC Plume Study scope recommendations. NFCC Guidance will continue to be a key safety component for the full lifecycle of the scheme.</p> <p>Further detail can be found in the OBSSMP (Table 1: NFRS Comments and Recommendations).</p> | <p>NFRS confirms that The Applicant has consistently complied with existing NFCC guidance</p> <p>The Applicant has further indicated willingness to adapt to the guidance as it is updated.</p> | Agreed |
| FR-02 | BESS Safety Standard commitments  | Core BESS safety standards, testing requirements, and risk                                 | The Applicant confirms that minimum safety requirements in the OBSSMP and secured through the DCO follow key recommendations outlined in National Fire Protection Association   | NFRS agrees and awaits details of the storage system and protective measures, to be   | Agreed |



|  | Matter          | Details of Matters for Discussion    | Applicant Position   | Consultee Position                  | Status |
|--|-----------------|--------------------------------------|--|-------------------------------------|--------|
|  | for the Scheme. | assessments required for the Scheme. | <p>(NFPA) 855: Standard for the Installation of Stationary Energy Storage Systems and European Association for Storage of Energy (EASE) Guidelines on Safety Best Practices for Battery Energy Storage Systems.</p> <p>The Applicant confirms that BESS system selected at the detailed design stage in addition to completing UL 9540A unit and / or installation level testing, will have undertaken Large Scale Fire Testing (LSFT) to validate minimum equipment spacing distances, this has become a mandatory requirement in the NFPA 855 (2026).</p> <p>Further detail on safe BESS design commitments can be found in the OBSSMP section 4.1.</p> <p>Further detail on BESS detection and suppression system commitments can be found in the OBSSMP section 4.1.29.</p> <p>Further detail on safe BESS explosion prevention and protection commitments can be found in the OBSSMP section 4.1.30.</p> <p>Further detail on safe BESS control and monitoring system commitments can be found in the OBSSMP section 4.3.2.</p> | provided at the later design stage. |        |





|       | Matter   | Details of Matters for Discussion  | Applicant Position   | Consultee Position  | Status |
|-------|--|--|--|---|--------|
|       |  |  | Further detail on Pre-Construction Information Requirements can be found in the OBSSMP section 6. These requirements cover the range of risk assessment and consequence modelling tools that will be used to fully validate the final BESS site design.  |   |        |
| FR-03 | BESS area firefighting provisions and expectations for NFRS involvement. | The Applicant's commitment to providing test data, expected NFRS response strategies, emergency planning stipulations, BESS failure alert facilities, and NFRS site firefighting provisions. | <p>At the detailed design stage, the Applicant will select a BESS design that has undertaken Large Scale Fire Testing (LSFT) which will validate minimum equipment spacing distances, demonstrating that a BESS fire will not propagate to adjacent BESS enclosures and does not require boundary cooling intervention from firefighters.</p> <p>The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme.</p> <p>The Applicant confirms that in line with NFCC and NFPA 855 guidance that in all BESS failure scenarios NFRS are only expected to take a defensive firefighting strategy i.e. observation and only applying boundary cooling if</p> | <p>NFRS is satisfied with the proposed level of intervention called for in anticipated BESS failure scenarios.</p> <p>NFRS still has concerns relating to the proximity of BESS site(s) to Grendon National Grid Station, particularly around the potential for the carbon content of the smoke emitted by a fire within the BESS to be deposited on conductors within the Grid site and cause arcing and shorting.</p> | Agreed |



|  | Matter | Details of Matters for Discussion | Applicant Position  | Consultee Position | Status |
|--|--------|-----------------------------------|---|--------------------|--------|
|  |        |                                   | <p>necessary. The BESS area water supply system for NFRS allows for ease of access in all weather conditions and ensures that firefighters do not have to operate within a smoke plume.</p> <p>Further detail on BESS detection and suppression system commitments can be found in the OBSSMP section 4.1.29.</p> <p>Further detail on BESS site fire water provision commitments can be found in the OBSSMP section 5.3.</p> <p>Further detail on BESS site emergency planning commitments (including NFRS site familiarisation and training) can be found in the OBSSMP section 5.4.</p> <p>The Applicant confirms that at the detailed design stage, smoke plume impacts on Grendon National Grid Station will be fully risk assessed. This will be addressed through BESS LSFT data or through parallel emission testing integrating Fourier Transform Infrared Spectroscopy (FTIR) &amp; X-ray Fluorescence (XRF) analysis to define gas emission and particulate matter composition of a full burn of the battery system. This would be one of the risk assessments / consequence modelling reports at detailed design to</p> |                    |        |



|       | Matter  | Details of Matters for Discussion  | Applicant Position   | Consultee Position  | Status |
|-------|---|--|--|---|--------|
|       |   |  | demonstrate that there are no significant offsite impacts from a BESS failure event.   |   |        |
| FR-04 | NFRS site access and operational control requirements | BESS site design is appropriate to accommodate all NFRS appliances and integrate areas to allow for efficient set up of operational control personnel and equipment. | <p>The Applicant has worked with NFRS to ensure that emergency access routes are appropriate for NFRS appliances to operate in all weather conditions. Access roads will be maintained to ensure vegetation does not impede vehicle access.</p> <p>The Applicant has agreed appropriate vehicle passing places with NFRS on all BESS area access roads.</p> <p>The Applicant confirms that at the detailed design stage NFRS welfare areas and incident observation areas for the BESS areas will be fully agreed and accommodated for the scheme.</p> | <p>NFRS agrees that the Applicant has engaged in early conversations around the suitability of fire service access.</p> <p>NFRS agrees that, subject to finalised plans, access and facilities for firefighting should be adequate.</p> | Agreed |




## 4 Signatories


### 4.1 Overview

4.1.1 The above SoCG is agreed between Green Hill Solar Farm Ltd. (the Applicant) and Northamptonshire Fire and Rescue Service, as specified below.

4.1.2 Duly authorised for and on behalf of **Green Hill Solar Farm Ltd.**

|            |   |
|------------|---|
| Name:      | Lesley Giles  |
| Job Title: | Project Development Manager   |
| Date:      | 6 <sup>th</sup> November 2025   |
| Signature: |  |

4.1.3 Duly authorised for and on behalf of **Northamptonshire Fire and Rescue Service**

|            |   |
|------------|---|
| Name:      | Adam Simons   |
| Job Title: | Fire Protection Officer   |
| Date:      | 17 <sup>th</sup> October 2025   |
| Signature: |  |