

From: Aaron

Sent: Monday, September 21, 2026 16:53

To: Green Hill Solar

Subject: Fw: EN010170 – Comments on responses to Secretary of State's Second Request for Information dated 28 August 2026

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Dear Sir or Madam,

Green Hill Solar Farm – EN010170

Comments on responses to the Secretary of State's Second Request for Information

I am an Interested Party and write in response to the Secretary of State's invitation dated 15 September 2026 to comment on responses to the further Request for Information dated 28 August 2026.

I have previously submitted comments concerning the responses to the Secretary of State's first Request for Information. I do not repeat those representations here. I wish instead to comment on two matters arising from the latest responses.

1. National Grid and the Battery Storage Safety Management Plan

I note that the latest submissions clarify the position between the Applicant and National Grid Electricity Transmission plc ("NGET").

The Applicant considers that NGET need not be consulted on the detailed Battery Storage Safety Management Plan because the Northamptonshire Fire and Rescue Service and Environment Agency provide the relevant specialist advice on fire safety and environmental contamination respectively.

NGET, however, has requested that Requirement 6 be amended so that the relevant planning authority must **consult** NGET, alongside the Fire and Rescue Service and Environment Agency, before approving the detailed Battery Storage Safety Management Plan.

I respectfully ask the Secretary of State to distinguish between giving NGET responsibility for determining BESS safety and giving the owner/operator of the adjacent transmission infrastructure an opportunity to comment upon risks to its own apparatus.

This appears particularly relevant because NGET states that the detailed design has not yet been finalised and that it is therefore not yet in a position to determine the full level of risk to its infrastructure.

I therefore ask the Secretary of State to consider whether the consultation proposed by NGET would provide an appropriate safeguard without transferring responsibility for approval of the Battery Storage Safety Management Plan away from the relevant planning authority.

2. Outstanding insurance provisions

I acknowledge that the position has developed since the first consultation and that the Applicant has now proposed £50 million insurance during operational use of Work No. 2 where it constitutes specified works.

However, NGET continues to seek £50 million cover for operational use of authorised works which constitute specified works and states that, until the detailed design is available, it cannot fully determine what other elements of the Scheme may adversely affect its apparatus.

I do not seek to express a view on the appropriate commercial insurance wording. I respectfully ask the Secretary of State to ensure that the final DCO clearly resolves this remaining difference, having regard to NGET's responsibility for the adjacent nationally significant electricity transmission infrastructure and its evidence concerning the possible consequences of damage to that infrastructure.

3. Ecological monitoring data

The Secretary of State requested provision for pre-construction, construction, post-construction and operational survey and monitoring data to be regularly shared, in appropriate formats, with Local Environmental Records Centres and relevant national and regional recording schemes.

The Applicant has amended the OLEMP and OEPMS to provide for records of notable species identified during construction and operational ecological monitoring to be submitted to those bodies.

I would be grateful if the Secretary of State could satisfy himself that the amendments fully secure the scope of the original request, including:

- pre-construction and post-construction survey information as well as construction and operational monitoring;
- regular sharing rather than only the submission of individual notable-species records; and
- sharing in appropriate formats with all relevant local, regional and national recording bodies.

If the existing drafting does not fully secure those matters, I respectfully request that they are expressly secured in the final DCO documentation.

Conclusion

I recognise that a number of matters raised in the 28 August Request for Information have now been clarified, including the Natural England and Cadent matters.

My remaining comments are therefore limited to ensuring that the unresolved NGET issues are expressly determined and that the ecological data-sharing obligation ultimately secured by the DCO reflects the full scope of the Secretary of State's request.

Yours faithfully,

Aaron Ward