

Green Hill Solar Farm - EN010170

Response to the Secretary of State consultation

Submitted by: Sylvia Tilaks; Interested Party Number [REDACTED]

Whilst I recognise the national need for renewable energy and do not object to solar energy or battery storage as technologies I have notable concerns over this scheme:

- its exceptional scale,
- its location around Grendon and the cumulative the concentration of battery and high-voltage infrastructure in a small rural area,
- the risk to internationally protected wetlands,
- the loss of productive agricultural land, and
- the matters that remain unresolved even at this late stage.

I have limited confidence in relying on *assurances* from the Applicant. Important aspects of the Scheme, its design parameters, assessed impacts and proposed mitigation continue to change or require clarification during the Examination and subsequent Secretary of State information requests. I am not suggesting that the evidence supplied by the Applicant should be disregarded BUT that material safety and environmental conclusions are independently tested against objective and impartial evidence from the relevant statutory and technical bodies, rather than accepted simply because the Applicant considers its own proposed and still unconfirmed mitigation sufficient.

Habitats Regulations, BESS pollution and the Upper Nene Valley wetlands

I remain concerned about the considerable risk of pollution and do not believe the proposed mitigation strategies submitted by the Applicant are adequate. Whilst I acknowledge that the Environment Agency considers the proposed waterborne pollution mitigation capable of addressing the identified pathway from a BESS incident to the Upper Nene Valley Gravel Pits SPA and Ramsar Site, *provided the agreed safeguards are implemented*, their conclusion is dependent upon containment, isolation and future management systems working as intended during an emergency. However, the receiving environment is not an ordinary drainage ditch or watercourse. It is an internationally protected wetland. If substantial contamination reaches it, some of the damage may be extremely difficult, or impossible, to reverse.

This is why I remain particularly concerned about the Habitats Regulations. The assessment should not look only at the probability of an incident. It must also consider the consequences if mitigation fails, and the effects of Green Hill in combination with other existing and consented development.

Additionally, the EA's response has not considered that the Green Hill BESS would not sit in isolation. Around Grendon Substation there is existing 400 kV and associated high-voltage infrastructure, previously approved battery storage infrastructure, the separate 49.99 MW Grendon Lakes BESS consented in 2025, and the proposed Green Hill BESS. Green Hill proposes storage of up to 500 MW. I believe this cumulative configuration matters.

A major incident could involve more than the behaviour of one isolated battery container. **The assessment should test realistic worst-case and cascading scenarios** and include fire propagation and re-ignition, toxic smoke and combustion products, effects on neighbouring electrical infrastructure, emergency access, prolonged firefighting and water demand, contaminated firewater capacity, heavy rainfall or flooding during an incident, and the consequences if containment is overwhelmed or fails.

I am glad of the Secretary of State's request that ecological survey and monitoring information should be regularly shared with relevant environmental records centres and recording schemes, and the Applicant's subsequent amendments to its ecological documents. Greater transparency of environmental monitoring is positive however the proposed monitoring only records what happens; it will and does not prevent a major pollution event, and it cannot restore an internationally protected wetland from irreversible damage has already occurred.

The September revisions do not remove my concern that important ecological detail remains to follow after consent. **The Ecological Protection and Mitigation Strategy remains an outline document**, with a detailed final version to be

produced and approved before construction. **Where mitigation is necessary** to support the Habitats Regulations conclusion, I believe the essential safeguards and performance standards **should be sufficiently certain and enforceably secured before consent is granted**.

Consider the impact of the Wheal Jane pollution event

The Wheal Jane mine-water pollution incident in Cornwall is a reference I feel strongly about. I am not suggesting that a BESS fire would have the same chemistry or reason. The comparison is about consequence, persistence and irreversibility.

In January 1992, failure at the abandoned Wheal Jane mine released about 50 million litres of highly acidic, metal-contaminated water into the Carnon River system and ultimately the Fal Estuary. It became a stark example of how contaminants entering a connected aquatic system can cause damage that does not end when the immediate incident is over. Long-term treatment and remediation followed.

That is why Wheal Jane matters to me. I am not comparing mine-water chemistry with a battery fire. I am looking at what can happen when confidence in containment proves misplaced. Once persistent contamination has escaped into an aquatic environment, the question is no longer how good the mitigation looked on paper. It is whether the damage can ever genuinely be undone. **I do not believe an internationally protected wetland is an environment in which that lesson should be tested again.**

A significant release of contaminated firefighting water could affect water quality, sediments, aquatic organisms and the food chains upon which protected bird populations depend. An internationally protected wetland cannot simply be reconstructed if it is substantially contaminated.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the competent authority must be satisfied that the project will not adversely affect the integrity of the protected site, taking account of effects in combination with other plans and projects. I therefore ask the Secretary of State to be satisfied, on the best scientific evidence available, that the cumulative BESS risk and the consequences of a credible failure have genuinely been assessed before reaching that conclusion.

National Grid – unresolved protective provisions

Scale, emergency response and the very limited UK experience at 500 MW

I am particularly concerned about the practical emergency-service experience available for a development of this magnitude. I have been told verbally by Northamptonshire Fire and Rescue Service that it has never attended a BESS fire. I appreciate that this was a verbal statement and I cannot provide a published NFRS document confirming it. I therefore refer to it only as information given to me by a Northants fire officer.

This becomes much more significant when the scale of Green Hill is considered. The proposed BESS would provide storage of up to 500 MW. Coalburn 1 in Scotland, a 500 MW / 1 GWh lithium-ion BESS, only commenced commercial operation on 12 August 2026. Its developer describes it as the largest operational battery in Europe. Before Coalburn 1, the 300 MW / 600 MWh Thurrock Storage scheme was described as the largest operational BESS in Great Britain.

At the date of this representation, UK operational experience of individual BESS installations at the 500 MW scale is therefore measured in weeks, not years. I do not suggest that this makes a 500 MW BESS inherently unsafe. It does mean that there is not yet a mature UK operational history at this individual scale from which long-term practical experience can be drawn.

That is particularly relevant at Grendon. This is not a stand-alone 500 MW battery in an otherwise empty landscape. It would sit beside nationally significant high-voltage infrastructure and in an area where other BESS development is already approved or consented. Approval of emergency arrangements for an individual, substantially smaller BESS is not the same as practical experience of responding to a major incident within this cumulative configuration.

I would therefore like the Secretary of State to obtain clear evidence that Northamptonshire Fire and Rescue Service has assessed the final proposed configuration at Grendon and is satisfied that a credible major incident can actually be managed with the personnel, appliances, specialist resources, water supplies, access arrangements and mutual-aid support that would be available in practice **AND that polluted fire run off water can be guaranteed to be contained and not spread into the adjacent internationally significant, irreplaceable and protected wetlands.**

The assessment should cover thermal runaway, re-ignition, toxic smoke, prolonged firefighting, contaminated firewater, containment failure and potential effects upon neighbouring BESS and National Grid infrastructure.

The latest National Grid evidence increases my concern

The latest position of National Grid Electricity Transmission is also particularly important to me. The Secretary of State's second information request records that NGET raised fire-risk concerns about Work No. 2 and sought involvement in the approval process for the final Battery Storage Safety Management Plan. The Secretary of State then specifically asked the Applicant to justify why NGET should not be part of that process.

The Applicant argues that NGET is not a BESS safety specialist and that its input into the BSSMP would be limited. I think that misses the central point. NGET does not need to be a battery expert to have a legitimate interest in whether a BESS incident could affect the safety and security of its existing and future transmission infrastructure. Greenhill cannot be considered a battery expert and their reports are client biased.

What concerns me most is the contrast between the certainty asserted by the Applicant and the uncertainty that remains in the design. The Applicant states that its outline measures mean there is 'no credible risk' to NGET's assets from the BESS near Grendon Substation yet:

- the final BESS design has not been fixed,
- the final Battery Storage Safety Management Plan has not been produced, and
- NGET has sought involvement because of potential risks to its infrastructure.

NGET's latest position is especially significant because it states that the level of risk is not yet known because the Project design has not been finalised. Agreement on protective provisions also remains outstanding on issues including protection of existing and future National Grid infrastructure, insurance and indemnity.

I therefore struggle to understand how 'no credible risk' can already be stated as a conclusion when important elements of the design and final safety arrangements remain to be determined. I would much rather see the risk independently demonstrated than simply asserted by the developer.

The insurance discussion reinforces the need for a properly evidenced assessment. The Applicant's proposed wording provides for substantial third-party liability insurance and specific pollution liability cover where relevant. Insurance does not prove that a major accident is likely. It does show that the consequences of interaction between the Scheme, pollution events and NGET infrastructure are matters requiring formal allocation and protection.

Taken together, these matters concern me greatly:

1. a proposed BESS at a scale that has only been operational in the UK since August 2026;
2. a Fire and Rescue Service which, I have been told, has no previous operational experience of attending a BESS fire;
3. a final BESS design and final safety plan that have not yet been determined;
4. other existing and consented BESS infrastructure around Grendon; and
5. continuing concerns from the operator of adjoining nationally significant transmission infrastructure.

I believe this requires a particularly precautionary approach. The cumulative BESS and electrical-infrastructure risk around Grendon Substation should be assessed as one connected risk environment, not as separate developments on paper.

Best and Most Versatile agricultural land

I am also concerned by the Applicant's response on restoration of the land beneath the BESS and substations. The Secretary of State specifically asked about approximately 4.3 hectares expected to remain beneath hardstanding for around 60 years. **The Applicant has described a process of soil stripping, storage, restoration and aftercare. That is a proposed method. It is not the same as objective evidence** that the land will actually return to its former Agricultural Land Classification and productive quality after six decades.

The scale of the wider agricultural impact matters. The Applicant's Agricultural Land Classification evidence identifies 784.2 hectares (about 1,938 acres), or 66.6% of the surveyed agricultural land, as Best and Most Versatile land. That includes 311 hectares (about 769 acres) of Grade 1 and Grade 2 land.

Almost 2,000 acres of BMV land being constrained for roughly 60 years is not insignificant or short term in any meaningful human sense. Restoration at the end of that period does nothing to replace productive capacity if it is needed during those six decades. That concern is stronger in light of the Government's 2026 national-security assessment of food-

system vulnerability, declining productive land and the UK's reliance on food imports. This is significant and there needs to be an irrefutable and evidence backed guarantee that the land WILL return to its ALC classification AND that its removal from the food production chain for 60 years WON'T exacerbate the high risk to national food security during these years.

For me the distinction is simple. An intention or methodology to restore land is not evidence that land beneath major infrastructure for six decades will return to its former agricultural quality. I ask the Secretary of State to distinguish carefully between the two.

Compulsory acquisition

I also remain concerned about permanent compulsory acquisition for a development presented as temporary and subject to a 60-year operational period. Where permanent ownership is not genuinely necessary, voluntary agreements, temporary possession or time-limited rights is more appropriate AND proportionate. **Permanent acquisition should not be authorised simply because it is convenient.**

Conclusion

My objection is not to renewable energy. It is to placing a scheme of this scale in this location while important questions about cumulative BESS risk, protected wetlands, National Grid infrastructure, emergency response, long-term soil restoration and land rights remain unresolved.

I am particularly concerned that several safeguards relied upon to make the Scheme acceptable depend on future detailed design, management plans or agreements. That matters most where failure could have consequences that cannot easily be undone.

The Upper Nene Valley Gravel Pits SPA and Ramsar Site is irreplaceable. If additional containment, separation or emergency measures later prove unnecessary, the consequence is principally extra engineering and cost. If the assumptions are wrong and significant pollution reaches the wetland, the ecological consequences could be severe and long lasting. That imbalance is why I believe the precautionary approach matters so much here.

I therefore ask the Secretary of State not to grant the DCO unless satisfied, on independently tested evidence, that the cumulative BESS and electrical-infrastructure risks have been properly assessed; that credible worst-case and cascading incidents are covered by operationally deliverable emergency arrangements; that the Habitats Regulations conclusion is supported by robust and enforceable mitigation; that NGET's outstanding concerns are resolved; and that claimed restoration of agricultural land is supported by evidence rather than intention alone.

For those reasons, I maintain my objection to the Green Hill Solar Farm Development Consent Order and ask the Secretary of State to refuse development consent.

Sources referred to

- Secretary of State, second Request for Information, 28 August 2026, EN010170.
- National Grid Electricity Transmission plc submissions to the Secretary of State, including 24 August 2026 and the subsequent September 2026 response.
- Green Hill Solar Farm Ltd, Applicant's responses to the Secretary of State's first and second Requests for Information.
- Environment Agency response dated 13 August 2026 concerning the waterborne pollution pathway to the Upper Nene Valley Gravel Pits SPA and Ramsar Site.
- Green Hill Solar Farm, Outline Ecological Protection and Mitigation Strategy, Revision F, September 2026.
- Green Hill Solar Farm, Outline Landscape and Ecological Management Plan, Revision F, September 2026.
- Green Hill Solar Farm, Concept Design Parameters and Principles, Revision D, August 2026.
- Green Hill Solar Farm, Agricultural Land Classification Technical Report.
- HM Government, Global biodiversity loss, ecosystem collapse and national security - A national security assessment (2026).
- Environment Agency/Government material on the Wheal Jane mine-water treatment scheme and legacy pollution.
- Copenhagen Infrastructure Partners, Coalburn 1 commercial operation announcement, 12 August 2026.
- Statkraft UK, Thurrock Storage commercial operation announcement, 3 November 2025.