

From: Lynne Smith

Sent: Monday, September 28, 2026 09:22

To: Green Hill Solar

Subject: Fw: EN010170 response to SOS questions re Green Hill Solar [REDACTED]

Dear SOS

I attach a response to the recent questions you have asked in respect of the above project and strongly believe that the scheme should not go ahead.

Kind regards

Judith Smith

[REDACTED]

[REDACTED]

[REDACTED]

25 September 2026

Dear SOS

As an interested party (ref number [REDACTED]) and representative of Stop Green Hill Solar I am responding to your letter dated 10 August 2026 to Natural England and the Environment Agency and the reply from the Environment Agency (EA).

The question you asked is below:

Natural England and the Environment Agency are invited to confirm that the Applicant's proposed mitigation in the outline Battery Storage Safety Management Plan [REP5-075] fully addresses their concerns regarding the waterborne pollution impact pathway to the Upper Nene Valley Gravel Pits Special Protection Area and the Upper Nene Valley Ramsar Site.

The EAs response states that Island Green Powers (the Applicant) proposed mitigation as set out in the Outline Battery Storage Safety Management Plan (OBSSMP) fully addresses their concerns about waterborne pollution because the following works are proposed:

- An impermeable liner
- An automatic and manual drainage shut off valve
- Gravel cleaning /removal procedures
- Battery removal where necessary

The EAs conclusion relies upon measures which are partly to be dealt with through the future Battery Storage Safety Management Plan (BSSMP) & Requirement 6 process.

Is this sufficient certainty that there will be no waterborne pollution pathway from the Grendon BESS to the SPA/Ramsar sites, as required by the Governments Habitats Regulation Guidance (HRA guidance) because the BSSMP is not yet agreed?

Another site specific factor which I don't think has been fully taken into consideration when predicting whether IGP's proposed mitigation fully addresses protection of the SPA, Ramsar site and River Nene is the local geology around the proposed Grendon BESS site.

The applicant's Preliminary Geo-Environmental Risk Assessment indicates that the BESS site sits outside a designated public Source Protection Zone (SPZ). However, the underlying geology consists of highly permeable superficial sand and gravel deposits forming an active shallow valley aquifer. This subterranean aquifer is dynamically linked to the baseflow of Grendon Brook, Grendon Lakes, and the internationally protected Upper Nene Valley Gravel Pits Special Protection Area (SPA) and Ramsar site.

The high connectivity between the sub-surface water table and the SPA and Ramsar wetland dictates that surface-level bunding cannot protect the environment if sub-surface seepage occurs. Contaminating the groundwater is functionally identical to dumping chemicals directly into the protected nature reserve.

Given these hydrogeological conditions, What specific safeguards has the Environment Agency mandated to prevent the rapid vertical migration of toxic leachate (including lithium, cobalt, nickel, and hydrofluoric acid) into the shallow gravel aquifer if a thermal runaway event overlaps with fluvial flooding or extreme rainfall?

IGP is proposing Structural Piling foundations for the BESS. Unlike surface runoff that can be channelled or dammed, once a plume of hazardous lithium-ion combustion products sinks into a highly permeable gravel aquifer, it becomes impossible to contain or remediate, leading to decades of chronic ecotoxicity.

Has the EA reviewed the risk of driving heavy structural industrial pile foundations through the topsoil to secure battery racks and substations which risks puncturing the natural clay or breaching confining low-permeability protective mudstone band layers, thereby creating artificial, permanent vertical pathways for contaminant migration into deeper groundwater layers?

In the response of the Environment Agency regarding agreement on common ground in respect of waterborne pollution risks to the Special Protected Area around the Upper Nene Valley and the RAMSAR site; the EA requested the construction of an impermeable liner and procedures for gravel cleaning and removal, automatic and manual drainage shut off valves and battery removal where necessary. However, it was also stated in the Statement of common ground that the flood risks associated with the site chosen for the BESS may mean that penetration of contaminants into the protected area may result in impacts in the waterway.

Has the EA actually confirmed that the agreed mitigation in HYD-09 fully addresses their concerns in a worst case scenario if the BESS experiences a fire during a flood event (such as in August 2024), including where floodwater could interfere with containment causing operational failure, drainage isolation or removal of contaminated firewater?

Finally, looking at the response from Addleshaw Goddard dated 24 August 2026 on behalf of National Grid Electricity Transmission PLC and the outstanding matters between IGP and NGET it is noted that NGET have requested an appropriate level of insurance cover of not less than £50 million per occurrence to cover the presence of the BESS next to a live substation which introduces a fire risk and NGET therefore need to be comfortable that there is sufficient insurance to cover any remedial work as a result of a battery fire.

Should the Environment Agency also be looking for indemnity insurance on a similar level to enable decontamination works in the event of waterbourne pollution from the proposed BESS at Grendon?

Thank you for enabling Interested Parties to comment on the points you have raised and I hope that the local knowledge in respect of the proximity of the proposed BESS at Grendon to the River Nene and the increasingly regular flooding of the area is useful.

Judith Smith

