

From: [REDACTED]
Sent: Monday, September 28, 2026 09:23
To: Green Hill Solar
Cc: [REDACTED]
Subject: Fw: Greenhill Solar Farm - Ref: EN010170

Dear Sir/Madam

WRITTEN REPRESENTATION TO THE SECRETARY OF STATE - Green Hill Solar Farm – DCO Application EN010170
PURPOSE

I respectfully ask the Secretary of State **to refuse development consent for the Green Hill Solar Farm DCO**, notwithstanding the Applicant's further information and assurances provided during the decision stage.

I do not object to renewable energy or to the principle of solar generation. My concern is whether this particular proposal, at this scale and on this precious land, has demonstrated a sufficiently robust and evidenced public-interest case to justify the impacts and the long-term uncertainties identified by the Secretary of State.

The Secretary of State's decision-stage questions are significant as they address the credibility of the Applicant's mitigation case: battery safety and pollution risk near internationally protected wetlands; whether operational disturbance can be ruled out; whether Best and Most Versatile agricultural land can genuinely be restored after a proposed 60-year operational period; and whether the strategic grid arrangements are sufficiently certain to justify the development now.

The Applicant's responses provide useful attempts to assure, but in several important respects they remain as intent about future actions, future detailed design or future evidence and ask for 'carte blanche' approval without the need for detailed plans to be approved by relevant strategic parties. They do not remove the uncertainty or proven approach as there is no evidence as yet. Both proposed sites for BESS C & G are next to irreplaceable ancient woodlands and the RAMSAR site which could be devastated if a catastrophic event occurs.

BESS SAFETY, FIREWATER AND WATERBORNE POLLUTION

The Applicant has identified mitigation measures, however the question is whether the information now available gives sufficient confidence that a major battery incident could not cause unacceptable contamination of the water environment, particularly given the proximity of the BESS to the Upper Nene Valley Gravel Pits SPA and Ramsar site.

The Applicant's own Habitats Regulations Assessment has acknowledged the underlying risk. Earlier HRA material states that, without mitigation, a battery fire at Green Hill C or the BESS G could result in discharge of chemicals into watercourses feeding the River Nene and could degrade the water quality of the SPA. The Applicant's case therefore depends heavily on the effectiveness of containment, fire suppression, drainage and emergency response measures which are all untested and currently they don't want to engage strategic partners on the final design plans - this would be very naive and present an even higher risk.

The Applicant's Outline Battery Storage Safety Management Plan is also not a final plant-specific safety design. It expressly states that the final battery chemistry and system design remain to be determined, with the detailed Battery Storage Safety Management Plan to be prepared before construction. The Applicant describes a concept design based on lithium-ion

technology and proposes that future detailed design will incorporate prevailing standards and guidance.

That is a sensible development process for a project that has not yet been built, but it is not the same as demonstrating now that the specific installation proposed at this location has a sufficiently controlled environmental risk.

Of particular significance is the Applicant's own statement that there is currently limited UK-specific guidance for BESS. That reinforces the need for evidence and site-specific assurance rather than reliance on generic future compliance.

The Applicant proposes that firewater will be contained and tested before release, or removed for off-site treatment. That is a mitigation objective, not evidence that containment will remain secure under the credible worst-case conditions that matter here. The Secretary of State should therefore distinguish between:

- a commitment to design containment;
- a requirement to prepare a future safety plan; and
- demonstrated evidence that the complete system, including drainage, bunding, firewater containment, emergency access and response arrangements, will function together under the worst credible incident.

The environmental sensitivity of the location makes this decision even more important. The BESS is close to the Nene Valley protected wetland system. A failure of containment during a major fire or flood event would not be an ordinary operational nuisance; it could create a pathway for pollutants, both water and air, to enter a nationally and internationally important ecological system, which the government is responsible for protecting. During the recent extreme weather this summer there was a major fire in the fields adjacent to the Grendon BESS which could very easily and quickly have reached the BESS site.

I therefore submit that the Applicant has reduced the identified risk but has not provided sufficient reassurance to demonstrate that the risk is at an acceptably low level with no reasonable doubt about the effectiveness of the proposed controls. A disaster could be catastrophic. The government should not accept an approach which amounts to '*we tried to mitigate this*' it has to be confident and in no doubt as it has a duty of care.

OPERATIONAL DISTURBANCE TO THE UPPER NENE VALLEY PROTECTED SITES

The Secretary of State has also sought clarification that operational disturbance will not adversely affect the protected wetland interests.

Again, the Applicant's response is principally mitigation-based. The difficulty is that the Green Hill scheme is not a single isolated solar field. It is a very large, multi-site development extending across nine distinct areas, with associated substations, fencing, access arrangements, cables and energy storage.

The Applicant's own ecological documents recognise the proximity and importance of the Upper Nene Valley Gravel Pits SPA. All sites other than Green Hill A and A.2 fall within the SPA consultation zone, and the SPA is closest to the Grendon BESS.

The Applicant has undertaken surveys and proposes ecological buffers and management measures. Those measures are relevant and should be acknowledged. However, the Secretary of State should be cautious about treating a future management regime as equivalent to evidence that operational disturbance can be ruled out over a 60-year project life.

The uncertainty is particularly relevant because ecological conditions will not remain static for six decades. The Applicant's own decommissioning documentation recognises that habitats and ecological value may change during the operational period and that future surveys and mitigation may be required when decommissioning begins. The same principle applies to the operational phase: conditions, bird use, surrounding land management and the protected sites themselves can change over time.

The key question is therefore whether the DCO provides a sufficiently strong and adaptable framework to detect and respond to operational disturbance if conditions change. If the answer depends on future monitoring and future management decisions, the Secretary of State should ensure that this is treated as an unresolved uncertainty rather than as a demonstrated absence of effect.

Given the sensitivity of the Nene Valley wetlands and the scale of the scheme, I respectfully submit that the Applicant has not provided sufficient evidence to turn the absence of demonstrated harm into a sufficiently secure assurance for a 60-year project. Natural England should be asked to clarify the exact risk to the Government.

IS THIS GOOD USE OF BMV AND CAN BMV LAND REALLY BE RESTORED AFTER 60 YEARS?

This is the most important unresolved agricultural issue.

The Applicant proposes an operational life of up to 60 years. The agricultural land classification survey identifies approximately 66.6% of the surveyed area as Best and Most Versatile agricultural land: approximately 784.2 hectares out of 1,177.8 hectares surveyed, comprising Grade 1, Grade 2 and Grade 3a land. This does not include the 31km of cabling which would increase this %. It would set a precedent and go against the EN1 and EN3 policies.

The Applicant says the land will be restored and that soil management measures will protect the resource. However, the Secretary of State's question goes beyond whether the land can be returned to an agricultural use. The relevant question is whether it can be restored to its former ALC grade and agricultural capability after six decades of changed land use.

The Applicant's Outline Decommissioning Statement states that all above-ground infrastructure will be removed, all piles will be removed, and below-ground infrastructure that cannot practicably be removed without major disturbance may be cut to 1.2 metres below ground. Crucially, the Applicant also states that the underground 33kV, 132kV and 400kV cables may be left in situ, depending on which option is considered least environmentally damaging at the time.

This proposal is therefore not a commitment to complete removal of all infrastructure. It is a commitment to a future decision about what should remain and what should be removed. This would be unacceptable to landowners who would want to have the ability to be able to claim any future subsidies that may be available once returned to agricultural land. The current legislation says all infrastructure MUST be removed to qualify and Natural England would have to assess the land to verify this..

The Applicant also relies on future Decommissioning Environmental Management Plans and future soil management. Those measures are helpful, but they do not create empirical evidence that BMV land subjected to this particular combination of hardstanding, substations, BESS infrastructure, access routes, piling, cable installation and decades of altered management will return to the same ALC grade.

There is an important distinction between:

- returning land to agricultural use;
- returning land to broadly similar physical condition; and
- demonstrating that the land will regain the same ALC grade and agricultural versatility.

The first may be achievable. The second and third has not been demonstrated or committed to. It amounts to best endeavours only which is not acceptable.

The evidence base is also unusually weak for the duration proposed. Grid-scale BESS is a relatively recent technology and there is very limited real-world evidence of a BESS site being decommissioned after anything approaching 60 years and then independently assessed for agricultural restoration.

The Applicant's own documents show that restoration may require soil profiling, reseeded, compaction remediation and other works. They also acknowledge that established habitats may develop during the operational period and that the future landowner may choose whether to return land to arable use. I would suggest this is an 'intention' not a plan to set and agree to measurable objectives until it is restored.

There should be a **guaranteed return to the agreed pre-development agricultural baseline**, protecting the interests of both current and future landowners. The long-term risks are real and include soil compaction, drainage disruption, changes to soil structure and biology, buried infrastructure and the difficulty of recreating the pre-development condition after 60 years.

The Applicant's proposals are therefore better described as a mitigation and restoration strategy, rather than evidence that the land will be restored to its original ALC grade and agricultural capability. This is particularly important because approximately two-thirds of the surveyed land is BMV — around 784 hectares, before taking into account the 31km cable network. The scale of this loss should carry significant weight, particularly where alternative locations have not been fully explored.

The restoration requirement should be outcome-based, not simply activity-based. Preparing a Soil Management Plan, undertaking aftercare and monitoring recovery are processes; they are not proof that the agricultural resource has been restored. Before construction, a clear agricultural baseline should therefore be established for each relevant parcel. Following decommissioning, the land should be independently assessed against that baseline, including the cable routes, to demonstrate that its ALC grade and agricultural capability have been restored.

A fixed five-year or similar aftercare period should not automatically bring the matter to an end. Aftercare should continue, with further remediation where necessary, until the agreed agricultural outcomes have been demonstrated.

For a project affecting such a large area of BMV land for up to 60 years, the restoration commitment needs to be measurable, enforceable and independently verified. Without that, the Applicant has demonstrated an intention to restore the land, but not that the agricultural resource will actually be restored.

Whilst DENSZ have not specifically asked about site selection I would ask you reconsider this as the proposed site sits in the middle of the largest cluster of mega warehouses in the UK as it is located in the M1/M6/A14 corridor, with additional A roads across Northamptonshire and Buckinghamshire full of mega sheds without solar. This is a prime missed opportunity. The massive concentration of distribution hubs along these major corridor routes in Northamptonshire and Buckinghamshire represents the UK's single largest untapped opportunity for commercial rooftop solar energy and should be thoroughly investigated especially as the applicant is now proposing disparate sites with lots of cabling,

before considering a massive project like this on quality rural land which will materially change the area beyond all recognition.

GRID CONNECTION, STRATEGIC CAPACITY AND DELIVERY CERTAINTY

The grid issue is serious. The current connections queue for BESS projects is double what the UK requirements are and the 2035 queue is quadruple the UK needs (source:- Cornwall Insight). The Applicant does not have an exact connection position; it would be wrong to suggest otherwise.

The Applicant reported in March 2026 that both the solar and BESS components continued to have extant grid connection offers. However, the positions were materially different. The solar component was expected to move to a Gate 2 Phase 1 offer, with a firm connection date expected to be 2030 or earlier and confirmation anticipated by the end of September 2026. The BESS component was expected to move to Gate 1, with no indicative connection date yet confirmed and any proposed dates are not expected to be communicated until 2027 and after the current confirmed gated projects.

This matters because the BESS is an important part of the proposed scheme and is also the component giving rise to some of the most serious environmental and safety concerns. The applicant will be relying on both the solar arrays and the BESS to gain approval but these are two separate projects on the NESO TEC Register.

The Applicant says that Gate 1 status does not affect the scheme because it intends to seek a Gate 2 connection for the BESS in a future queue-prioritisation round. That is an intention, not a confirmed connection. The Secretary of State should therefore avoid treating the whole scheme as though every element has the same level of grid certainty.

We already know from Ofgem there is intense BESS bottlenecking in the queue and fees to be introduced, so why risk materially impacting rural communities when there is no clear gate status?

There is also a wider strategic issue. The existence of an extant connection offer is not necessarily the same thing as demonstrating that the wider transmission system, reinforcement programme and sequencing of related National Grid projects will enable the proposed development to proceed on the assumed timetable.

The National Grid Electricity Transmission have major concerns about important grid upgrades for electricity into North London from both WMEL and SGRE projects which will link into NLR all colliding at the same time increasing the risks. NGET's concerns included ensuring sufficient space for its re-conductoring works and coordinating construction programmes so that projects do not interfere with one another. Protective provisions were promised to be resolved by March 2026 and they are still unresolved. NGET quote a potential **catastrophic risk** for their infrastructure. I would go further than this and say its a catastrophic risk for all infrastructure projects and local communities both people businesses and our rural countryside, and one the Secretary of State should not approve. All the Councils and Parish Councils have raised serious concerns and these should also be taken into account.

My point is narrower: the Secretary of State should distinguish between resolving legal or contractual interfaces and demonstrating the physical and strategic certainty of the wider network programme.

If the Applicant's solar connection position was still awaiting confirmation at the end of September 2026, and the BESS connection position remained dependent on a future Gate 2 process, that should not be treated as an immaterial detail. It bears directly on whether the

scale and timing of the development assumed in the environmental and economic case can be relied upon.

The public-interest case should therefore be assessed against the connection position that is actually secured, rather than against an intended future possible connection pathway. in a congested queue.

CONSTRAINT COSTS

Constraint costs are rising and approving a 500MW project in a congested transmission zone without a guaranteed, stable energisation profile threatens network stability. The project faces deep grid integration uncertainties. Forcing a highly intermittent 500MW into the regional infrastructure threatens to trigger massive **constraint costs**, where the National Grid must pay the operator to switch *off* to prevent network overloads. This speculative allocation of capacity bottlenecks the grid, actively choking out secondary, strategically superior regional infrastructure projects that offer more predictable energy generation.

WHY THE APPLICANT'S FURTHER INFORMATION DOES NOT FULLY RESOLVE THE SECRETARY OF STATE'S CONCERNS

Taken together, the Applicant's responses show a consistent pattern.

The Applicant has identified mitigation. It has prepared outline management plans. It has proposed future monitoring. It has committed to future detailed design. It has stated that land will be restored. It has stated that the BESS will be designed to current and future safety standards. It has stated that it intends to secure a future Gate 2 position for the BESS.

But the Secretary of State's questions have arisen precisely because reassurance was not sufficient at the earlier stage and should have been resolved at the Recommendation stage by the Planning Inspectorate. The additional information should therefore be reviewed and tested against evidence, not simply against whether another commitment has been made.

For BESS safety, the point is whether the final, site-specific system will demonstrably contain firewater and pollutants in a worst-case event next to the Nene Valley protected wetlands.

For operational ecology, the point is whether a 60-year operational management regime provides sufficiently robust protection if ecological conditions change.

For agricultural land, the point is whether the land will return to the same ALC grade and agricultural capability, rather than merely being capable of some future agricultural use.

For grid delivery, the point is whether the whole project, including BESS, has a sufficiently certain connection pathway rather than relying on future queue progression.

Overall is the government consideration of this proposal line with government policy or is it at risk of legal challenge? Can they be sure if this project is sold on that it maintains the relevant compliance in all downstream contracts.

These are not minor technical details. They affect the reliability of the principal assurances on which the Applicant's case depends.

OTHER RECENT IMPORTANT CONSIDERATIONS

Strategic Realism: Incorporating the [REDACTED] (GWPF) Warnings

In evaluating the public interest balancing test, the Secretary of State must weigh the recent, urgent warnings delivered by former MI6 Chief [REDACTED] at the [2026 GWPF Annual Lecture](#).

The "Cliff Edge" Warning: [REDACTED] warned that the UK has *"negligently wandered close to an energy security cliff edge"* by allowing climate policy to blindly dictate infrastructure without calculating severe geopolitical and technological single points of failure. [REDACTED] said that the UK's approach to energy had been shaped too heavily by climate policy while failing to give sufficient weight to the strategic vulnerabilities created by dependence on foreign manufacturing, imported components and an increasingly weather-dependent electricity system.

He argued that Britain had already lost much of the industrial capacity needed to manufacture and repair critical infrastructure.

- **Foreign Dependency Risk:** He highlighted the acute national security threat of becoming over-dependent on foreign manufacturing, imported sub-components, and international corporate intermediaries for critical grid infrastructure.
- **The Strategic Error:** The Applicant, a subsidiary of **Island Green Power (IGP)**, operates via complex international corporate shielding. The underlying investment vehicles mirror the exact high-leverage, foreign equity financial models that stripped core infrastructure assets from **Thames Water**, leaving the state and the taxpayer to inherit systemic liabilities. Approving a sprawling project reliant on adversarial supply chains and asset-stripping financial structures introduces an unacceptable sovereign operational risk.

CONCLUSION

I respectfully ask the Secretary of State to **refuse development consent for Green Hill Solar Farm**.

The Green Hill Solar Farm application fails every standard of spatial efficiency, safety, and strategic policy alignment. The severe localised environmental injuries, unmitigatable BESS chemical fire threats, and systemic corporate risks heavily outweigh its nominal energy output.

The case for refusal is not based on opposition to renewable energy. It is based on the cumulative lack of sufficient evidence or reassurance on four issues that remain material and at odds to the governments own policies to protect the environment and its communities as summarised below:-

1. BESS safety and pollution – the Applicant has identified mitigation but the final BESS design, chemistry and detailed safety arrangements remain future matters, while the location is particularly sensitive because of the nearby protected wetland system.
2. Operational disturbance – the Applicant has proposed monitoring and mitigation, but a 60-year development near an internationally important wetland system requires confidence that operational effects can be controlled throughout changing ecological conditions, not merely at the point of consent.
3. Agricultural restoration – the Applicant has described a restoration process, but has not demonstrated that approximately 784 hectares of surveyed BMV land can reliably return to its former ALC grade after up to 60 years, particularly where some underground infrastructure may remain.

4. Grid certainty – the solar and BESS elements do not have identical connection certainty, and the BESS position in particular depends upon future Gate 2 progression. An intended future connection should not be treated as equivalent to a secured connection.

5. The growing acknowledgment and weight of evidence to ensure our country has an integrated National plan that incorporates Defence, Energy and Food Security and provides a stronger preparedness for any extreme circumstances.

The Secretary of State is therefore being asked to make a decision about a very large, multi-site industrial development on highly productive agricultural land for a period of up to 60 years, with a major BESS close to sensitive wetland interests when the argument for alternatives sites has not been fully investigated.

In those circumstances, I respectfully submit that the public-interest case has not been demonstrated with sufficient certainty.

The Secretary of State **should therefore refuse the DCO** rather than rely on a chain of future assurances whose effectiveness cannot yet be demonstrated.

If, notwithstanding these concerns, the Secretary of State is minded to grant consent, the outstanding matters should at minimum be treated as matters requiring firm, enforceable and independently verifiable controls before any relevant works commence. In particular, agricultural restoration should be independently monitored against a documented baseline; BESS safety and firewater containment should be site-specific and agreed with the relevant emergency and environmental authorities; and the grid position for both solar and BESS should be demonstrably secured before construction assumptions are relied upon.

The central point remains simple: a 60-year development should be judged not only on what the Applicant promises to do, but on what the evidence demonstrates can reliably be achieved.

KEY SOURCES:-

- Planning Inspectorate, Green Hill Solar Farm, Agricultural Land Classification Technical Report, May 2025 – records 66.6% BMV across the surveyed area (784.2 ha of 1,177.8 ha).
- Planning Inspectorate, Green Hill Solar Farm, Outline Battery Storage Safety Management Plan Revision B, February 2026 – records that final battery chemistry and detailed design remain to be determined and that a detailed BSSMP is to be prepared before construction.
- Planning Inspectorate, Green Hill Solar Farm, Habitats Regulations Assessment Revision B, February 2026 – addresses the Upper Nene Valley Gravel Pits SPA and Ramsar interests.
- Planning Inspectorate, Green Hill Solar Farm, Outline Decommissioning Statement Revision C, March 2026 – provides for a 60-year operational life, removal of piles, possible retention of underground cables, future decommissioning plans and soil restoration measures.
- Planning Inspectorate, Applicant's Responses to ExA Third Written Questions, March 2026 – records the different Gate 2 / Gate 1 positions for the solar and BESS components.
- Planning Inspectorate, National Grid Electricity Transmission Statement of Common Ground Revision A, April 2026 – records the interaction between Green Hill and other transmission projects around Grendon and the need for coordinated arrangements.

- Secretary of State decision-stage correspondence for EN010170 and the subsequent invitation to Interested Parties to comment – current decision-stage material to which this representation responds.

Kind regards

Kay Brown