

OUTLINE RESPONSE TO NSIP LETTER FOR COMPLETION AND SUBMISSION BY 27/9/26

COMMENTS ON THE RESPONSES PROVIDED FROM THE APPLICANT AND OTHER INTERESTED PARTIES TO INFORMATION REQUEST DATED 10TH AUGUST 2026.

1. This response is submitted by Stop Greenhill Solar, an Interested Party (Registration number [REDACTED])
2. We welcome the opportunity to comment, as part of the local community which would be severely impacted by the development should it proceed. As requested, our comments are focussed on the four issues raised by John Wheadon in his letter to key parties on 28th August and the wider invitation to all Interested Parties for comments on responses subsequently received and published on the project website.

Habitat Regulations Assessment:

3. The updated outline Operational Environmental Management Plan [REP6-043] is the relevant reference document.
4. We note the response of the Environment Agency (EA) 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 must be actively engaged with the final Battery Safety Storage Plan if this application goes forward.
5. We note that the Applicant proposes or has proposed the following measures [REP5-075]:
 - An impermeable liner
 - An automatic and manual drainage shut off valve
 - Gravel cleaning /removal procedures

- Battery removal where necessary
6. The question we therefore wish to address is whether this is both sufficient and realistic to ensure 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). This question is particularly important because the BSSMP is **not yet agreed**.
 7. The proposed BESS location at Grendon sits above highly permeable sand and gravel deposits over an aquifer which links into local brooks and the River Nene. The placing of an impermeable barrier beneath the footings of the BESS installation would involve the removal of an enormous quantity of soil and the placement of the barrier beneath the proposed footings for the BESS together with highly complex procedures to attempt to ensure that no contaminated water can escape into the protected area. This installation processes will inevitably interfere with the current natural ecology of the area. The “impermeable barrier” itself must be guaranteed for 60 years and details on the materials to be used is required.
 8. The elaborate processes described by the applicant in its efforts to assuage any concerns about contamination of the surrounding area is itself a reflection of the difficulty of achieving absolute protection of the environment. They also reflect suspicions raised during the examination process that the site preferred by Greenhill Solar for Grendon BESS is not appropriate. In the range of possible scenarios of flood and fire at the site, the seeping of particulates into the ground from an incident at the BESS site and from there into the local waterways is not **precluded** by these proposals. We add the reminder that the proposed BESS site is surrounded by surface water on three sides.
 9. In light of these factors we regard the response of the Environment Agency as seriously inadequate and request that the Inspectorate seek further clarification on these points. We also note that Natural England have indicated that they have no further comment to make on the proposals. Natural England and the Environment

Agency appear to have made little or no effort in the interrogation of this proposal by Greenhill Solar and thereby miss the most important points; they are failing in their responsibility to provide the Inspectorate with informed and comprehensive information.

Use of Best and Most Versatile Land

- 10.** The Applicant has been requested to provide further justification for concluding that land beneath the BESS can be satisfactorily restored to its former “ALC” Grade following 60 years under concrete hard standing
- 11.** We do not regard the justifications as being in any way sufficient confirmation that the land can be restored. The applicant is unable to provide meaningful evidence because, given the brief history of solar development, none exists.
- 12.** The policy provisions of EN-1 and EN-3 preferring the use of lower quality agricultural land in preference to Best and Most Versatile land is clearly framed. This applies as much to the area proposed for battery storage as the land for solar panels. The applicant has refused to comply with the requirement for an effective search for lower quality land. The land being proposed for use is, largely, productive wheat growing farmland of good quality, and this includes the area earmarked for the BESS at Grendon. We submit that, owing principally to climate change, increasing geopolitical insecurity and a push to more regenerative farming techniques, this is likely to become more important in coming years. This perspective is supported by numerous recent high-level discussions taking place within the farming industry, climate science, DEFRA and UK Government national security bodies. As just one recent example we cite the National Audit Office Report (Resilience of the food supply chain to disruptions, published 4th September 2026) which catalogues serious threats to food security and the need for more resilience. Retaining local, productive farmland is an essential element of such resilience.

- 13.** It is our understanding, based on current rules, that in order for land classifications to be re-approved the removal of **all** trunking, road structures, compounds, metal, pile foundation screws etc must be undertaken. The aftercare programme should be a 5-year statutory programme and Natural England will complete a review by drilling bore holes to a depth of 1.2mtrs. This should be included in the DCO with clear responsibilities and accountabilities. We request that this issue is also referred to DEFRA to approve so that quantitative measures can be established to ensure compliance.
- 14.** The Applicant has indicated that cabling beneath the ground would, after 60 years, be left in situ. This will include cabling into and out of the BESS as well as the other 31 kilometres of installed cabling across all the sites. We refer to evidence provided orally and in writing by Professor Dobson during the examination phase pointing to the potential contamination of the land that would arise from this (REP 1-219 and REP 1-220). If cabling is left in place after decommissioning of the solar farm then the land will not return to its former state.
- 15.** In addition, we wish to point out that the topsoil mounds that would be created for reinstatement after 60 years will, in that time, become new habitats themselves. As a consequence, the reinstatement procedures will cause still further disruption to the environment.

Protective Provisions

- 16.** Stop Greenhill Solar wishes to acknowledge that the outstanding issues between NGET and the Applicant have both technical and commercial substance on which comment is not appropriate. However, the Applicants Cover Letter (GH8.1.54) and the submission made on behalf of National Grid Electricity Transmission (NGET) by Addleshaw Goddard (24th August 2026) highlight critical practical concerns on which we do believe it is appropriate to comment.

17. The first example of this relates to the levels of insurance being discussed between NGET and Greenhill Solar. Whilst the actual insured amounts are not a matter for us, the *implications* of the requirement are. We note that NGET seeks coverage against “damage arising from works in the wider Order Land that are more than 15 metres from the apparatus” (4.12). Greenhill Solar point out that the edge of the relevant works (Nos. 2 and 3A) is “a minimum of 47.5 metres from the fenceline of Grendon Substation” (GH8.1.54, section 6). In January 2025 fire at the 300-megawatt capacity BESS at Moss Landing, California, was estimated to have deposited around 25 metric tons (55,000 pounds) of heavy metals across an area of 1.2 square kilometres (Prof. I. W. Aiello, reported in *The Conversation*). The metals included large pieces of debris from the BESS as well as smaller particles which were deposited in the wetland area. In this context we would refer again to the evidence of Professor Dobson at the examination [REP 1-220] wherein the dangers of nano-particulates were also pointed out. We draw attention, therefore, to the efforts being made by the Applicant to minimise the risks of damage both to physical energy infrastructure of national significance, but also to wildlife and to people in the area. In this respect the demands of NGET are aligned with those of the local natural and physical environment.

18. In a comment (via personal email) on fire hazards Professor Dobson has added that Electricity substations are highly vulnerable to carbonaceous smoke particles, because they carry a high risk of causing catastrophic insulator flashovers, short circuits, and equipment corrosion. Carbonaceous particles (such as soot, char, and carbon black) are inherently electrically conductive, their presence in the air or on equipment surfaces actively undermines the insulation mediums that keep high-voltage systems stable. The generally prevailing wind from the West or Southwest will carry such particulates towards and not away from the substation.

19. A second example of the different perspectives of the Applicant and NGET is the Battery Safety Storage Management Plan (Rep5-075). The inclusion of NGET in the final approval process for this plan, together with Northamptonshire Fire and Rescue

Service, appears to us to be self-evidently essential. We request that the Inspectorate require that this be the case and cite the problems identified in para 16 (above) in support.

- 20.** NGET is required by the government to deliver significant upgrades to the energy infrastructure. This is particularly important with respect to the WMEL (EN0210007) and Sundon to Grendon (SGRE) upgrading projects (para 3.1 in NGET submission). The question to be decided, therefore, is the priority which should be given to the upgrade of national energy infrastructure as opposed to the installation locally of novel equipment. In our view, protection for NGET to pursue the upgrade for the transmission grid *must* take priority if the government is to achieve all its objectives in this area. The Applicants' proposals should be viewed as dependent on the progress of the WMEL and SGRE projects. It is part of the wider NGET priority that these two projects (together with the NLR project) are fundamental to providing secure power and continuous transmission from the north into London. These projects should **not** be undertaken concurrently with the Greenhill development as this would add unacceptable risks to each project, together with an unprecedented amount of material risk and physical upheaval in and around the Grendon Substation.
- 21.** We also draw the attention of the Inspectorate to the proposed development of the STATERA Bess at Grendon Lakes which was approved by North Northants Planning Committee in 2025 and is planned for installation next year. The Inspectorate is asked to acknowledge the upheavals that could be caused through the development of three significant projects in the same area at the same time. We request some protection from the Planning Inspectorate.
- 22.** Prioritising the upgrade to the National Grid may mean that progress on development of the Greenhill Solar Farm is impacted. We wish to point out, here, that from the outset of their submissions to install the solar farm, Greenhill Solar have failed to take proper account of the realities of the situation they are dealing with. Thus, the Applicant has maintained throughout the project that necessary

permissions are either in place or close to being agreed (we refer to the Applicants response in March 2026). It now appears that all required Gate connections into the substation are still to be confirmed. In addition – it now appears that the Applicant now wishes to undertake the Greenhill solar development *concurrently* with upgrade work to the Grid. This would, as pointed out above, bring risks and upheaval to the local minor roads, the natural surroundings and protected environmental areas, and the local community.

- 23.** Our view of the content of the latest submissions from the Applicant is that they are illustrative of the overall risks that the developments would entail, if pursued as the Applicant wishes. The problems and risks associated with the proposed BESS Grendon installation are increasingly apparent. In addition, they also exemplify the understandable but unacceptable wish to prioritise financial returns above human, environmental and physical safety.