

[REDACTED]  
Head of Planning

Department of Energy and Net Zero

Dear Sir

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010  
Application by Greenhill Solar Ltd (The Applicant) for an order granting Development  
Consent for the proposed Greenhill Solar Farm ( The Greenhill Solar Farm Project)

All Interested Parties - Invitation to comment on the responses provided.

Further to your letter dated 15th September 2026, I wish to comment on the response from  
Natural England and the Environment Agency, where you asked whether the Applicant's  
proposed mitigation in the Outline Battery Storage Safety Management Plan (REP5 -075)  
fully address their concerns regarding the waterborne pollution impact pathway to the  
Upper Nene Valley Gravel Pits Special Protection Area and Upper Nene Valley Ramsar Site.  
The Environment Agency and Natural England's response was that the proposed mitigations  
as set out in the Battery Storage Safety Management Plan and Requirement 6 process,  
addressed their concerns.

However the Applicant acknowledges in Environmental Statement Chapter 23 (Para  
23.8.23) that a potential battery fire at Greenhill BESS could result in the discharge of  
chemicals into the adjacent stream feeding into the river Nene. They also state that the  
embedded mitigation measures are planned to manage this risk.

The Applicant proposes mitigation on the OBSSMP safety plan (Rep 5-075) which they think  
fully addresses their concerns regarding waterborne pollution impact to the Nene valley.  
They consist of an impermeable liner, automatic and manually operated shut -off valves to  
isolate the drainage. Procedures for gravel cleaning and removal of batteries where  
necessary.

IGP have listed the Environment Agency as a named Consultee in the approval of the  
Battery Storage Management Plan. (REP7 -005)

In my view, The Environment Agency and Natural England, appear to have made little or no  
effort in the interrogation of these mitigation measures and consequently overlooked the  
most important aspects that could have a significant effect on a pollution impact on the  
Nene Valley SPA and the Upper Nene Valley Ramsar Site.

I would strongly contest that these mitigation measures are inadequate and would point out  
the following areas of weakness within their proposals.

I believe battery fires and the implications thereof have not been properly addressed by  
either of the Consultees and the risk of pollution from a battery fire at 'Greenhill Area C'  
and/or Greenhill BESS is significant.

To put this in perspective, BESS 'C' (Mears Ashby/Sywell) is proposed in the corner of a field  
at the end of an unmetaled track leading from a 'T' junction on the Sywell road opposite a  
large retail establishment on the corner of Glebe Road and Sywell Road, known as  
'Beckworth Emporium', only 1 mile from Mears Ashby on a single track road. The battery  
storage area is 20 metres from a local stream 'Sywell Bottom' and borders a significant area  
of 'Ancient Woodlands' known as Sywell Woods adjacent to the stream.

The documents establish that there is a water course (Sywell Bottom) adjacent to the BESS

site. This stream flows in a southerly direction into Sywell Reservoir, (formerly a reservoir for drinking water, as the area sits on a series of sensitive aquifers)

The reservoir is no longer a drinking water reservoir, but an important leisure facility for fishing, boating and open water swimming, as well as a significant country park in area attracting many visitors.

The overflow/outfall from Sywell Reservoir is a small stream that meanders down past the western side of Earls Barton and enters the Nene close to the locks on Station Road.

Consequently any pollution event at this proposed site will have a significant effect on the watercourse which will end up polluting the river Nene.

This location also happens to be adjacent to designated 'Ancient Woodlands', Sywell Woods. These woods are irreplaceable habitats and any contamination from an adjacent battery fire (smoke) or ground pollution would be catastrophic. The National Planning Policy Framework, explicitly includes impacts from adjacent developments, in particular 'Ancient Woodlands'

I believe battery fires and the pollution potential has not been properly addressed and I would suggest that there is a serious issue with the quantities of water for firefighting, the containment volumes, and the integrity of the automatic valve systems.

Overflowing of contaminated fire water is a significant risk and one which I believe has not been addressed by Greenhill Solar, Natural England or the Environment Agency.

Consequently any pollution with contaminants following a battery fire remains a serious issue which could easily enter local watercourses and cause contamination and pollution issues in the river Nene.

Water remains one of the most effective fire extinguishing agents for tackling BESS fires, but requires 1000's of litres. Given the batteries potentially harmful component and fume emissions (both gas and particulates) pollutants can easily dissolve into the run-off water. Water then becomes contaminated with heavy metals, such as cobalt nickel, manganese, aluminium, copper electrolytes and combustion by-products.

The water storage facility on site to fight any fire is to contain 228m<sup>3</sup> (1900litres)

The containment system is designed to hold 228m<sup>3</sup> (1900 litres) of contaminated water, which is the volume of water on site within a storage facility. It is unclear whether the containment area is full of gravel. However any gravel will reduce the volume available for polluted water storage within the containment area. If the containment area is full of gravel then the volume of water that can be contained will be 60% less, approx 137m<sup>3</sup>.

It appears from the documentation, that when the containment reaches capacity, a controlled burn strategy then takes place, with boundary cooling, spraying adjacent containers to block the fire. In a significant fire situation where all available water on site has been used up and the containment area is also full, further cooling (boundary cooling) by water from fire engines, will cause the containment area to overflow (as the automatic gate valve will be shut)

and contaminated water will overflow into the local stream 'Sywell Bottom' and ultimately pollute the river Nene.

If one assumes that boundary cooling will be managed by firefighters (Local Fire Brigade) on

site, they will use the water from their fire engines. However, these only hold between 500 and 1000 gallons of water, which at maximum pump rate, will last between 4 to 8 minutes. Unless there are a fleet of fire engines. This begs the question, 'where is all the water for this boundary cooling'?

In a worst case scenario, where an explosion at BESS occurs causing fire and thermal runaway the document states that emergency responders, will attend. Clearly if a fire occurs at night, where are these emergency responders going to come from and how long are they going to take to get to site? How much air borne pollution will have drifted the 30 meters and engulfed the adjacent woodlands? How much polluted water will overflow the containment system and pollute the local stream and end up in the river Nene?

The document states that 'if the on site water is used up 'responders' will deploy physical barriers, such as pollution booms, portable retention bunds and drain blocking mats at the site perimeter, to protect toxic water from polluting the water course'. However if boundary cooling is still taking place, excess water will still be significant and retention bunds and mats will not stop the amounts of water being deployed and overflowing and ground pollution will inevitably enter the adjacent stream and end up in the river Nene.

In conclusion, I wholly contest that the Environment Agency and Natural England have not given any consideration to the pollution potential of this scheme, either waterborne or airborne. It appears that their input has been minimal and their lack of local knowledge of the landscape, particularly with the locations of the BESS facilities is limited. Given the size of the documentation and the time required to scrutinise the relevant sections, and their limited resources this is hardly surprising.

Local residents such as myself and my colleagues who have lived in the area most of their lives, should be listened to. I have played in the stream as a child, I have camped in Sywell Woods. I have swam in Sywell reservoir and spent many hours birdwatching at the country park with my father and my own children. I fear for our future and the wildlife in the local area, if this scheme goes ahead.

Nick Frampton [REDACTED]