

By email to: greenhill@planninginspectorate.gov.uk

24th September 2026

PINS ref: EN010170

Application by Green Hill Solar Farm Ltd. for an Order granting Development Consent for a proposed solar development on land between Northampton and Wellingborough

CPRE Northamptonshire
Comments on DENZ questions and responses
Deadline: 29th September 2026

Introduction

This document contains the reactions of CPRE Northamptonshire to the questions raised by DENZ in their August 10th letter and to the responses to those questions that have now been published.

The questions were:

- ***Habitats Regulations Assessment***

Paragraph 7.2.99 of the Applicant's shadow Habitats Regulation Assessment [REP5-079] states that the measures detailed within Method Statement 13 of the outline Ecological Protection and Mitigation Strategy [REP7-017] will be followed in order to rule out an adverse effect of the Upper Nene Valley Gravel Pits Special Protection Area and the Upper Nene Valley Ramsar Site from operational disturbance. The Applicant is requested to update the outline Operational Environment Management Plan [REP6-043] to appropriately secure this mitigation, specifically for impacts during the operational phase, and to provide a copy of this to the Secretary of State.

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.

- ***Use of Best and Most Versatile Agricultural Land***

The Applicant is requested to provide further justification for concluding that approximately 4.3ha of land under the substation and BESS can be satisfactorily restored to its former Agricultural Land Classification ("ALC") Grade following 60 years under concrete hard standings.

- ***Protective Provisions***

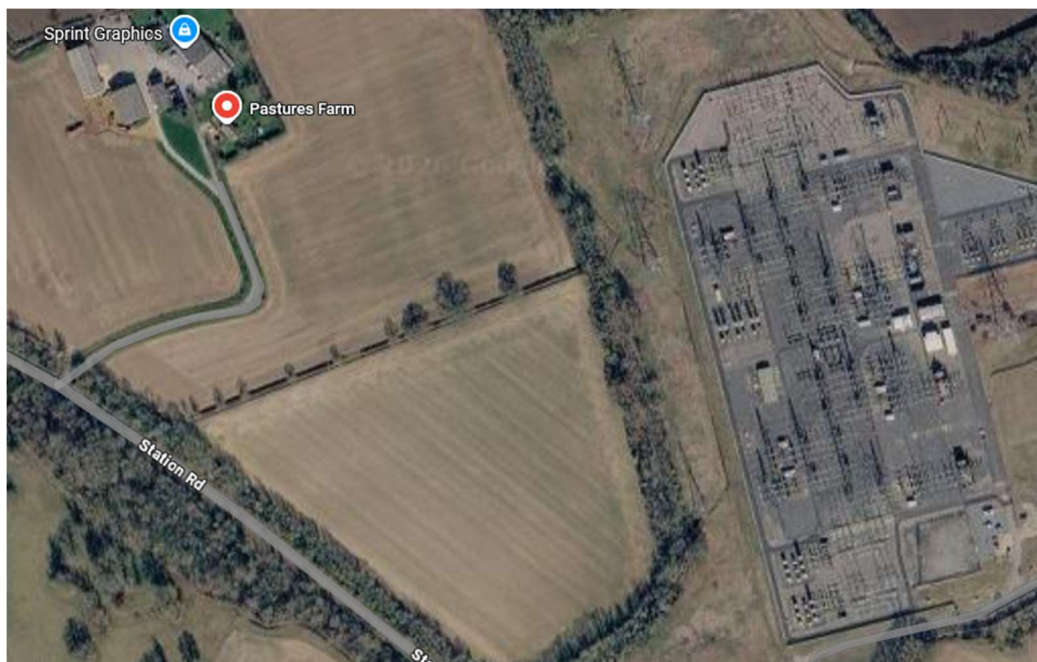
The Applicant and National Grid Electricity Transmission Plc are requested to provide updates regarding whether protective provisions have been agreed. If agreement has not been reached, provide the reasons why, and when agreement is expected to be reached.

Habitats Regulations Assessment

This question suggests that the report from the Examining Authority raised concerns because the evidence submitted during the examination process did not give adequate assurance that the Upper Nene Valley Gravel Pits Special Protection Area and the Upper Nene Valley Ramsar Site could be guaranteed to be protected during the lifetime of the scheme. Whether or not this is actually the case, CPRE Northamptonshire certainly feel that the applicant's evidence was inadequate in this regard.

During the examination process we raised a number of concerns about the way in which we felt that the risks associated with a battery fire at the Grendon BESS were not being adequately assessed or addressed. The applicant seemed to seek first to almost dismiss the possibility of a battery fire and then to suggest that even if one occurred, it would be rapidly dealt with despite it being known that battery fires that can last for days.

From the outset CPRE has considered that the location chosen for the Battery Energy Storage System at Grendon posed a high risk. Although this was primarily because the site is extremely close to the Upper Nene Valley Gravel Pits Special Protection Area and the Upper Nene Valley Ramsar Site, it was also because it is very close to the village of Grendon and extremely close to farms and other isolated dwellings creating the likelihood that these might need to be evacuated in the event of a battery fire. In our initial Written Representation, we also raised the concern that in the event of a battery fire, the occupants of the Pastures Farm site would have to put themselves in increased danger by travelling towards the BESS in order to evacuate their site (see below). This concern was never addressed in the applicant's responses.



Returning to the specific point about the risk of pollution/contamination of the Upper Nene Valley Gravel Pits Special Protection Area and the Upper Nene Valley Ramsar Site, we questioned whether there was adequate capacity within the water retention reservoir to store the volume of contaminated water that would be generated during a battery fire. The proposed reservoir did not seem adequate to hold the runoff that would be generated by the many hours during which a battery would burn (72 hours in the case of the battery fire in Liverpool).

Furthermore, the toxic fumes generated during a fire were only assessed for a two-hour duration during normal weather conditions which is not consistent with the Rochdale Envelope approach. There was not an assessment of the build-up of toxic fumes that could occur when there was, for example, a temperature inversion when the fumes would not be dispersed by the wind. There was also no assessment of whether rain occurring at the same time as a fire would bring toxic water back to earth and into the catchment of the protected areas (another issue that we raised to which the applicant gave no response).

Another extremely concerning revelation from the consultee responses is that the consultees have not been consulted on the Battery Storage Safety Management Plan and that the applicant has shown a distinct reluctance to allow them to do so before the DCO is made. We felt that there was insufficient detail in the plan submitted to the examination and that the applicant was seeking to avoid proper scrutiny of their plan until the DCO was made.

While we acknowledge that battery fires are currently rare, they do occur and as batteries age, they may occur more frequently. Because of the number of battery units already at Grendon, those approved but not yet installed and the number that would be introduced by this scheme, sheer force of numbers means that the odds of a fire at Grendon would be much greater than at sites with far fewer units.

We therefore consider that it would not be safe to allow a BESS at the Grendon site without first demonstrating that a worst-case battery fire could be safely managed. It is therefore vital that a Battery Storage Safety Management Plan is agreed with the emergency services, local authorities, environmental stakeholders and the grid operators prior to considering granting the scheme.

Use of Best and Most Versatile Agricultural Land

We note the Soil Management Plan submitted by the applicant, but are unconvinced that it can return the site to its current condition as suggested. The reason for this is that, as expressed by the Inspector and Secretary of State in the Blackberry Lane appeal decision (file ref: DNS/3245065), *“the structure of agricultural soil is fragile and easily damaged”*. It is inevitable that during a period of over 60 years the sheer weight of the batteries and infrastructure would cause irreversible compaction of the subsoil which would in turn alter the behaviour of the restored soil that overlaid it. It is also of concern that only the surface layer of the stored soil heaps would have any chance of retaining its structure and microorganisms and so the underlying soil would take many years to have any hope of reestablishing the conditions that were in place before it was removed.

There are wider concerns about the loss of BMV beyond the question of whether the BESS site BMV can be restored to its initial condition. We have highlighted in our submissions that the scheme is extremely inefficient in its use of land when compared to similar capacity schemes and that 50% more land would be taken out of production than is anticipated as the upper limit for land take that is suggested in EN3 and that is taken at other comparable sites. The consequence of this is that 60 years of food production from 1,000 acres of land would be unnecessarily lost because of the poor design of this scheme.

The Inspector at Blackberry Lane also considered that even the land on which panels are installed would suffer irreparable damage during the construction, operation and decommissioning processes.

The practical details of the restoration of the land are quite possibly a moot point given that there is no mechanism within the DCO to guarantee that at the end of the scheme's life that funding will have been accumulated to carry out decommissioning and restoration. We repeatedly asked that this should be addressed because we fully expect that in the absence of guaranteed funding for decommissioning, the final operator is very likely to simply abandon the scheme due to lack of funds.

Protective Provisions

The responses to the protective provisions question raise concerns both because the applicant has resisted providing the level of provision requested, and also that the consultees feel that the level of harm that could be caused is so much greater than the applicant estimates.

The reluctance of the applicant to accept the consultees requirements suggests that the insurance industry considers that the likelihood that harm will occur is such that it needs to charge a significant premium in order to cover the risk. Had the risk been low, then increasing the cover to meet the consultees' requirements would not be such an issue.

In combination, this dispute suggests both that high levels of harm are possible and that the insurance industry considers that such harm is relatively likely to occur. This underlines the above concerns raised about the potential environmental harm to the protected sites and to the substation infrastructure s detailed below.

NGET Concerns

The response from NGET introduced concerns that we had not previously considered. They express concerns that the construction and operation of the scheme could impact upon the delivery of the grid upgrade that is so important to enable the output from other renewables schemes to be accommodated within the grid. They also suggest that there is an ongoing risk to the substation during operation of the BESS. It is also important to note that they highlight that the Grendon substation is critical grid infrastructure.

Finally, having identified that the substation is critical infrastructure it raises concerns that it could already be a prime target for bad actors. The Ukraine war is showing how energy infrastructure can be a key target and a co-located substation and BESS would be a particularly attractive target both because of its significance to the grid, but also because attacking a BESS would require little more than a cheap drone.

From these responses it is possible to conclude that having the BESS in such close proximity to the substation creates a significant risk to a critical component of the grid and it could delay the incorporation of other renewables into the grid.

Conclusion

Far from reassuring us, the responses received to the August 10th questions increase our concerns about the proposed scheme. They make it clear that the BESS at Grendon:

- creates a significant level of risk to the protected sites
- could impact upon the delivery of the grid upgrade and
- would make this critical substation more vulnerable to accidental and malicious damage.

In our summary submission we expressed the opinion that this scheme would be uniquely harmful and oppressive and that the benefits of the scheme are insufficient to warrant the number and extent of harms that it would cause and so should not be permitted. Our view has only been reinforced by the additional information.

Given the number of solar schemes being proposed, we cannot see how such a harmful scheme can be justified and if it is permitted, we would question what level of harm would be necessary for an NSIP scheme to be refused.

CPRE Northamptonshire

Registration identification number: [REDACTED]