

From: [REDACTED]
Sent: Monday, September 28, 2026 10:29
To: Green Hill Solar
Subject: Fw: Response to Consultations 3&4

Dear Sir/Madam,

I am responding to Consultations 3 and 4 as an Interested Party; please see attached word document.

Yours faithfully

Dr. Linda Twohey

IP [REDACTED]

DESNZ Consultations 3 & 4

From Interested Party no. [REDACTED] Dr. Linda C. Twohey,
Resident of Walgrave village and member of Stop Green Hill Solar.

My comments on the responses to questions directed at the
Applicant, Natural England, the Environment Agency and National
Grid Electricity Transmission in DESNZ Consultations 1&2

- 1) I will focus my comments on the matter of potential
damaging pollution effects from the proposed massive
500MV Battery Energy Storage System near Grendon. I have
already pointed out significant omissions and
inconsistencies in the plans submitted by the Applicant,
as part of [REP5-121], please refer to the comments on
RQ17, all of which comments still stand. For ease, I have
attached them as Appendix 1.
Please note that all use of bold and underlining in this
response is mine.
- 2) Revision C of the Statement of Common Ground between
the Applicant and Natural England [REP7-0338] deals with
survey methodology and mitigation for Functionally Linked
Land associated with the Upper Nene Valley Gravel Pits
Special Protection Area and Ramsar Site. There is no
mention of waterborne nor airborne pollution pathways.
- 3) Subsequently, point 4 in Consultation 1 has asked for
assurance from Natural England and the Environment
Agency that the proposed mitigation in the Outline Battery
Storage Safety Management Plan fully addresses concerns
about waterborne pollution pathways on the UNVGPSA and
the Upper Nene Valley Ramsar site.
- 4) I note the response of Natural England is that they have no
further comments to make on the application by Green.

Hill.Solar"| This also fits with their late submission [REP5-129] during the examination where their answer to RQ17 (Examiners' questions) was that "NE.have.no.comments.to.make.on.the.proposed.mitigation.measures.for.control.of.waterborne.pollution". This does not imply any agreement, it suggests that it is outside their remit, or they feel unable to confirm this, perhaps considering the EA as the more appropriate body. If this is the case, they should state this overtly, as their own description of their statutory purpose in their response to Consultation 2 is: "to.ensure.that.the.natural.environment.is.conserved?enhanced.and.managed.for.the.benefit.of.present.and.future.generations?thereby.contributing.to.sustainable.development". So to fulfil their purpose, they ought to comment on all aspects of any proposed development that could cause harm to the natural environment.

- 5) The Environment Agency's response to Consultation 1 is that they are satisfied with the Applicant's mitigation plans as stated in the OBSSMP, and the plan to include them as a consultee in a definitive BSSMP if a DCO is granted. However, there are serious questions about the detail and engineering practicalities of what has been suggested to prevent waterborne pollution on a floodplain; please see responses from Interested Parties Judith Lynne Smith and Nick Frampton.
- 6) The Environment Agency's strapline is "creating.a.better.place.for.people.and.wildlife"| It is not apparent how they will be fulfilling this mission, particularly as Natural England have opted out of any consideration of pollution pathways from the BESS on the adjacent European designated site for wildlife.
- 7) Neither NE nor EA have properly addressed the issue of airborne pollution in the event of a battery failure and

thermal runaway event. And it has been omitted in the DESNZ consultation questions, in reference to potential pollution affecting the UNVGPSPA and Ramsar Site.

- 8) In the OBSSMP Revision B, the Applicant states the following points under 2.3.1 – 2.3.3: Causes of battery cell failure, which could lead to a thermal runaway event, include manufacturing defects (contaminants, imperfections), electrical abuse (overcharging, over-discharging) and physical or mechanical damage (puncture, crushing); BESS hazards for first responders in the unlikely situation of a battery failure and thermal runaway event depend on the BESS design but are typically defined as fire hazards, explosion hazards, electrical hazards (shock or arc flash) and chemical hazards (i.e. the release of toxic gases); Regardless of the type of failure or the cause, the main potential hazard is thermal runaway where a battery cell enters an uncontrolled self-heating state and ultimately, if not controlled, a significant flaming or battery gas venting incident and therefore this plan focusses on reducing fire and explosion risks associated with the BESS and managing the hazard in the unlikely event that it occurs;
- 9) I pointed out in [REP5-121] that the proposed Emergency Response Plan does not consider any actions to be taken to protect wildlife from airborne pollution, most particularly within the UNVGPSPA and Ramsar site, only actions to reduce harm to humans.
- 10) I also quoted the findings from the Moss Landing BESS fire and explosion in California in January 2025, (only 300MW) that debris and ash rained down for miles around, and that the smoke plume released not only hazardous gases but also soot and charred fragments of burned batteries. Levels of heavy metals from the battery cathodes were sharply increased on the surface of nearby wetlands.

11) The response of National Grid Electricity Transmission to the Consultation 2 [C2-003] provides excellent evidence about the degree of threat posed to their infrastructure from the construction of and operation of a nearby massive BESS. Point 3.7 states ›The.principle.of.insurance.coverage.for.the.use.of.third_party.BESS.apparatus.in.proximity.to.NGET.apparatus.is.also.precedented.under.NGET's.standard.lease.terms.on.the.basis.that.the.risk.profile.does.not.disappear.on.energisation;.Once.the.BESS.is.operational?the.third.party.will.be.operating.potentially.hazardous.infrastructure?and.there.remains.ongoing.risks.including.third_party.injury?property.damage?environmental.contamination?damage.to.NGET.apparatus.and.liabilities.arising.from.operational.activities;. NGET have insisted on insurance to the sum of £50 million pounds for the duration of construction and operation. This clearly indicates the degree of risk that they assign to proximity to this BESS, despite all the applicant's proposed mitigation within the OBSSMP. If the risk was considered negligible, then this level of insurance would not be needed.

I would ask the question – How can one agency consider this level of insurance necessary for their infrastructure, and yet the EA and NE choose to ignore this same risk with it's subsequent inevitable harmful sequelae to the local environment and wildlife? This would be potentially devastating to the Ramsar site and SPA - it is self-evidently impossible to rule out adverse effects on the integrity of the habitats site. The Precautionary principle must be applied.

12) This latest version of the OBSSMP [REP5-075] continues to state in para 1.1.13 that one of the anticipated BESS failure safety provisions is:

›The.location.of.the.BESS.has.been.chosen.to.minimise.
impacts.on.offsite.receptors.(albeit.this.is.inherent.in.the.
DCO.Application?more.particularly.Embedded.Mitigation.for.
the.Scheme?as.it.has.been.factored.into.the.design.process.
to.date)\".

This is so patently obviously not the case. If one was starting with a blank canvas to find a suitable site for a large BESS, the last place that would be chosen by any rationale person is on a floodplain, immediately upstream and upwind of a European Designated Site with conservation objectives related to overwintering protected and endangered bird species and the whole waterbird assemblage.

- 13) I believe I have thus demonstrated clearly yet again, that the Applicant's proposed BESS with it's acknowledged real potential for harmful pollution must be regarded as a threat to the integrity of the UNVGPSPA and Ramsar Site. I understand from The Conservation of Habitats and Species Regulations 2017, that for the purposes of these regulations, 'any Minister of the Crown, government department,' etc.... is deemed a Competent Authority. My understanding is thus that the Secretary of State for Energy Security and Net Zero is not permitted to grant development consent if there is any reasonable scientific doubt as to the absence of adverse effects on a designated site (such as the UNVGP SPA and Ramsar).

Linda Twohey

24.09.2026

(See over for appendix)

Appendix: Extract from [REP5-121]

Q17: To NE: Do you have any comments on the applicant's proposed mitigation measures for control of waterborne pollution through the OBSSMP, para 1.1.13 [REP1 143] with regard to the waterborne pollution impact-pathway? Can NE confirm whether it is satisfied that there are no AEol from this impact pathway on all qualifying features of UNVGP SPA and UNVRS?

SGHS would like to make some comments about a statement made by the Applicant in the OBSSMP, para 1.1.13, listing that one of the anticipated BESS failure safety provisions is:

‘The location of the BESS has been chosen to minimise impacts on offsite receptors (albeit this is inherent in the DCO Application, more particularly Embedded Mitigation for the Scheme, as it has been factored into the design process to date)’

We take absolute issue with this as it is patently not the case that the site of the BESS would minimise impacts on off-site receptors (particularly species within the UNVGP SPA and UNVRS); quite the reverse. It is in the one position that would maximise impacts of waterborne pollution, being immediately upstream. The Applicant's choice of siting has presumably been driven by it's proximity to Grendon Substation and the grid transmission network.

We would also like to take this opportunity to point out that another very important source of potential contamination by a BESS fire/explosion seems to have been omitted for consideration on wildlife and nature. In the OBSSMP, para 2.4.2, Safety Objectives, the Applicant states that the Emergency Response Plan is: ‘to ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first

responders, and the local community; There is no mention of trying to reduce the harm of airborne pollution on the nearby wildlife. Later in 5.5.10, the Applicant states that ‘the ERP could contain the following measures or protocols relating to air quality for sensitive receptors located downwind from a fire plume: Notification of potentially affected residents including advice on the health effects of smoke and ways to reduce exposure (e.g. close windows and stay indoors); Notification of potentially affected members of the public to move to a cleaner air location; Cancellation of outdoor events and potentially moving affected residents to a cleaner air location’. Therefore the Applicant accepts that this would be necessary to safeguard human health, but does not consider wildlife, most notably the bird populations of the RAMSAR site and SPA, as sensitive receptors. It is self-evidently not possible to notify the wildlife to move to safer locations.

The site of the Proposed Green Hill BESS is within 100 – 200m of the most southerly edge of the RAMSAR site, which extends in a northeast direction within the Nene Valley. The prevailing winds here are from the southwest, so the most likely direction of any plume from a battery fire is towards the northeast, directly over the adjacent UNVRS. A wind direction, speed and power analysis for this area can be found in the open access Global Wind Atlas produced by the Danish Technical University, which shows this clearly.

The Applicant has submitted Plume Analysis Modelling APP-167 which discuss the potential effects of toxic fumes on human health, which include most notably hydrogen fluoride, but also carbon monoxide, formaldehyde, hydrogen chloride, hydrogen cyanide, ammonia, nitrogen dioxide and particulates. It is also self-evident that these will be toxic to other animal life, not just humans.

In January 2025, a runaway fire and explosion happened at the Vistra BESS facility (300MW) at Moss Landing in California. It was noted that debris and ash rained down for miles around with illness experienced by humans, pets and livestock. Although air quality was deemed back to within federal safety standards within 2 days, the smoke plume released not only hazardous gases such as hydrogen fluoride but also soot and charred fragments of burned batteries. The levels of heavy metals from the battery cathodes (nickel, manganese and cobalt) were found to have sharply increased on the surface of the nearby wetlands, peaking at 2 weeks, but then remaining for months within the ecosystems, and bioaccumulating up through the food chains.

Thus we would contend that the proposed siting of Green Hill BESS, immediately adjacent, upstream and upwind from the UNVGP SPA and RAMSAR site, would threaten the site's entire integrity of as a result of the potential for short-term and long-term toxicity.