Action Group for Campaign Against

One Earth Solar Farm

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Ref F1800218E

Responses to Environment Agency Documents
EN010159-000562-XA-2025-100428-01 and EN010159-000563-XA-2025-100427-01

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Email: saveourheritagevillages@gmail.com

To: The Planning Inspectorate, 16th September 2025

Subject: Responses to Environment Agency Documents EN010159-000562-XA-2025-100428-01 and EN010159-000563-XA-2025-100427-01

Dear Sirs,

Please find below our response to the above-named Environment Agency documents.

I must begin by stating that our communities are **deeply concerned** about the responses provided by the Environment Agency to numerous critical questions regarding the One Earth Solar Farm development. Residents feel that the Agency has **failed to provide clear and sufficient answers** on issues of vital importance, particularly those affecting public health, safety, and environmental protection. This lack of clarity and accountability leaves our communities **uncertain, anxious, and distrustful** of the Agency's ability to safeguard the environment and local residents.

The development zone sits almost entirely within a **drinking water protected area**, including the River Trent, the 20-acre North Clifton reservoir, and a substantial Anglian Water treatment plant, collectively supplying drinking water to **over 100,000 people** in the city of Lincoln. The Anglian Water sites, located only a few metres from the eastern BESS and substation, has recently undergone significant infrastructure upgrades, with potential for further expansion, including the possibility of a second reservoir north of the existing facility. Several nearby poultry farms, housing approximately **500,000 birds**, are also at risk.

Should a worst-case scenario occur, such as a **BESS fire event**, the consequences could be severe: major roads, including the A1133, could be closed, the water treatment plant supplying Lincoln could be temporarily shut down, possibly requiring substantial checks and clean-ups and the poultry farms may have to be closed to the outside, especially alarming during hot weather conditions. Yet, despite these potential risks, we remain unclear on many questions, including most importantly why a position such as this was chosen, and why the BESS is so large, considering the norms for other solar farms sites across Europe (between 10% and 30% of solar capacity). At 740MW the BESS capacity would be around 33% of the entire Solar BESS capacity for Germany and as the capacity becomes greater, the environmental risk profile intensifies. What systems exist in the event of internet or other connection loss to the central monitoring site, has the EA properly investigated the Battery Management Systems, including the country of origin.

Our communities are particularly concerned that the Agency appears to be making **assumptions rather than rigorous inquiries** regarding the Drinking Water Protected Area (inadequately labelled controlled waters) and the protection legislations and directives in place, BESS design, fire controls, and operational safety. Will air quality surrounding the

BESS be actively monitored during construction, operation, and in the event of a fire, and if so, by whom, using what methods and at what frequency? If a sprinkler system is proposed to contain and extinguish fires within the BESS containers, has the additional run-off capacity been accounted for, given that the real-world recommended fire-fighting water capacity is now clearly much much more than the very minimum two hours set by the current but out of date recommendations?

The eastern BESS site lies at a low elevation of just seven metres above mean sea level, also raises concerns over what effects of a flood event would be, and whether the drainage systems will function effectively under adverse conditions.

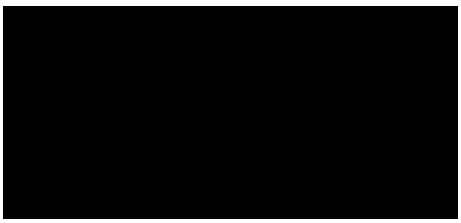
Furthermore, in response to our concerns regarding the lack of WFD specialists, and what many feel is inadequate answers, we respectfully request a full list of all EA specialists involved, including their qualifications and the dates they attended meetings with the developers, to ensure that appropriate expertise has been applied.

What base levels are the EA working to? With no rules in place for routine testing for Microplastics or PFAS compounds, how could they possible identify potential issues caused directly or indirectly by this proposed development?

In summary, our community's concerns are urgent, substantial, and ongoing, and considering this, we intend to extend our questions further to the Environment Agency, including communications with regional EA heads and DEFRA. Should satisfactory responses continue to be withheld, we will consider raising a formal complaint with the **Parliamentary Ombudsman**, who is empowered to investigate EA failures in procedure, misuse of powers, and the failure to provide information or respond appropriately.

In the meantime, please find our **Deadline 3 response** detailed on the following pages.

Yours sincerely,



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Our Detailed Response

EA Reponses to 1.0.19 Fire Safety

Q. Can the EA, the Councils Environmental Health Teams, Nottinghamshire and Lincolnshire Fire and Rescue Services, and UK Health Security Agency advise from your different areas of responsibility whether you are satisfied with the proposed approach to fire safety?

EA Response

1) Water will be contained within the BESS Sites as part of the BESS Site drainage design to prevent the release of polluted water.
   Our Answer: Real world findings and recommendations go way beyond the capacity proposed, we have already presented these findings, but will do so again.

2) Activation of the fire suppression system will automatically trigger a penstock valve located downstream of the attenuation basins to isolate any potentially contaminated runoff and preventing its discharge to surrounding watercourses.
   Answer: Has this additional water from the suppression systems been accounted for in the 2 hour fire-fighting water capacity.

3) Firewater used to cool the adjacent units shall be collected by an appropriate drainage design with an impermeable lining in areas under the units and prevent infiltration of potential contaminants to the ground and groundwater.
   The firewater shall be gathered into the water containment area adjacent to the BESS Sites, which will hold capacity for all the firewater. There shall be no firewater runoff released to the environment before appropriate testing has been carried out.

   Our Answer: Firewater cooling adjacent (this is on top of the water used to fire fight, has this additional water from the suppression systems been accounted for in the 2 hour fire-fighting water capacity. What is the nature of these tests, who will perform the tests and under what regulatory framework.

4) The attenuation basins have been sized to accommodate the volume of runoff generated by a 1 in 10 year rainfall in addition to 228 m3 of firewater with no resultant discharge to surrounding environments.

   Our Answer: We are concerned about this answer. Typically a single fire appliance would deliver a steady 2,000 L/min, therefore it would use 228 cubic metres of water in 1.9 hours. Firstly, this does not take into consideration real life situations, or new recommendations – but instead is based on bare-minimum and out of date advice. Also, this leaves no room for items 2 or 3, i.e. suppression water and water to cool adjacent units.

   In short, firefighters fight fires, with so little room for water run-off, it would be ridiculous to expect a man with a clip board to stand over them and tell them to turn

everything off because it could break environmental laws. They will of course keep fighting the fire, cooling adjacent units and doing their job.

5) It would provide us greater surety of design if there is a backup manual operation of the penstock valve, in case the automatic activation fails. The maintenance schedule should also include periodic inspection and testing of the automatic penstock closure to minimise the risk of the mechanism seizing.
   Our Answer: This *should*n't be a question or suggestion.

6) Section 4.8 on Post-incident Recovery and End of Life Management could have reference to after a fire event it should be made clear that both the lined detention basin and SuDS system would ideally need to be thoroughly drained and cleaned, prior to the penstock re-opening and allow flow of drainage water. Therefore, we would advise against gravel substrates used in the BESS and Substation compounds and surrounding drainage system as contaminants can more easily bind to their surfaces.
   Our Answer: *would ideally need* to be thoroughly drained and cleaned (not acceptable language), *advise against* gravel substrates (also unacceptable). The EA are there to ensure our environment is protected, not make quiet suggestions on incredibly important potential issues.

3.0.2
Environmental Statement (1) With a 60 year lifespan please explain the frequency with which you would expect to have to replace components, for example BESS, Inverters, Panels.

(1) Replacement of components is dependent on the design life recommended by the manufacturer … The applicant should confirm if this is the case for this scheme. As such, any replacement of components would be above ground only (panels, BESS containers, etc.), with minimal impact on the subsurface environment, and no more likely to cause harm than the initial construction period.

Our Answer: This whole answer doesn't allow for increased capacity of solar panels, and other above ground equipment, with all the important XLPE combiner to inverter cables buried, it could eventually become much more difficult to take advantage of new developments which might possibly involve a change to the cable specifications – without necessitating new cable trenches and yet more buried plastics and heavy metals.

Still No Mention of Heaving?

12.0.5

1) We would expect all the normal pollution prevention protocols in the CEMP, OEMP and DEMP, and fluid breakout plan for HDD. This is discussed in the WFD report (sections 4 and 5). BESS drainage design is also mentioned; the relevant documents are not referenced but we know they exist and have seen them. Assuming all these are in place, sufficiently robust, and adhered to, I would anticipate any risks to WFD Groundwater bodies are not significant and the WFD can be complied with.

Our Answer: Assuming all these are in place, sufficiently robust, and adhered to (unclear, wishy-washy, who is going to police this, and how – so many questions on this?)

2) … however we consider that providing these are compiled with there are no outstanding WFD concerns.
Our Answer: Our community and other involved and affected communities are currently being approached for their feedback on this, and evidence is being gathered as we are highly concerned in this over-simplified, what some might say, dismissive response.

12.0.6

Can each party advise on its position in respect of the Proposed Development, its relationship to any relevant River Basin Management Plan and the requirements of the WFD. Can each party confirm their position in respect of whether there is likely to be any deterioration of a water body, or that any water body would not achieve a 'good status' or 'good potential' as a consequence of the Proposed Development, and

1) We are satisfied by the WFD Assessment as long as any changes in the CEMP are reflected in the Screening Assessment. Further details on these matters can be found in our response to documents submitted at deadline 2 (ref: XA/2025/100427/01)
Our Answer: Currently being considered.

12.0.11

In your WR [REP1-103], the EA state they expect to see commitments to the use of standard construction good practice methods to manage surface water, siltation, spills and leaks and other issues for all elements of the Scheme within the Outline Construction Environmental Management Plan (oCEMP) and its supporting documents, to ensure sufficient mitigation is provided for the protection of controlled waters.
Are you content all the measures listed are secured in a robust way within the oCEMP and dDCO?
If not what further measures are required to be added?

1) In general, yes, we are content that all measures listed provide sufficient mitigation for the protection of controlled waters. However additional containment measures around storage of materials and clarifying details about the foul water strategy should be provided in the CEMP.
2)

Our Answer: this is probably the most disturbing for our communities to read.

This is a drinking water protected area. It's different from controlled waters they overlap, but they are not the same!

Drinking Water Protected Areas (DrWPAs) are a **specific subset** within controlled waters. They are defined where surface water or groundwater is used (or could be used) for public drinking water supply.

- They get **extra protections** aimed at preventing pollution that would make treatment costly or impractical.
- Under the WFD, authorities must protect them from deterioration and aim to reduce the level of treatment needed for drinking water.

So:

- **All Drinking Water Protected Areas are Controlled Waters.**
- But **not all Controlled Waters are Drinking Water Protected Areas.**

Drinking Water Protected Areas (DrWPAs)

These are **a subset of controlled waters**, defined under **Article 7 of the WFD**.

Examples:

- Reservoirs, rivers, lakes, and aquifers used for drinking water abstraction.
- Catchments that supply public water companies.

Extra protections beyond general WFD rules:

- Authorities must prevent **deterioration in raw water quality** that would **increase the level of treatment required** to make it safe.
- Activities in the catchment (e.g. industrial development, agriculture, chemicals, waste, drainage) face tighter controls.
- The Environment Agency (EA) or relevant body may object to or restrict permits/planning if there's a risk of contamination (nitrates, pesticides, hydrocarbons, metals, etc.).
- **Safeguard Zones** may be designated: within these, additional restrictions apply (e.g. on land use, discharges, or development practices).

Again, our communities are very concerned in many of the answers given by the EA, we are investigating *all* ways forward.

Thank you for your time, and we sincerely hope we will be given the chance to bring up much of this and more in future planned hearings.

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