

## David White, Resident of North Clifton and Action Group Member

Please find below my verbal submission regarding our communities severe concerns regarding the environment agency's handling and responses regarding the One Earth Solar Farm application, including EIA and risk assessments etc News Articles Supporting Our Concerns are further down this document, and as requested by the ExA, we have emailed the links for these articles separately. We will also submit documents showing our FOI requests to the EA, Defra and the Drinking Water Inspectorate and their replies, which explain either no involvement or not able to answer.

Dear Sirs, My names is David White and as well as planning officer for North Clifton, I'm representing over 99% of the villagers of North and South Clifton through our action group Say No To One Earth Solar Farm.

Thank you for giving me the opportunity to speak today. I am here on behalf of hundreds of local residents who feel strongly that their concerns should be formally on record. I hope you can bear with me as I highlight some specific examples many are very concerned about and also where the applicant's submissions raise questions about diligence and accuracy.

The Environment Agency is responsible for protecting and improving the environment in England, including managing flood risk, ensuring sustainable water resources, and regulating industries to prevent pollution. It operates under legislation such as the Environment Act 1995, the Water Framework Directive, and the Environmental Protection Act 1990, which collectively empower it to safeguard water quality, conserve biodiversity, and promote sustainable development.

Public confidence in the Agency depends on its ability to act fairly, transparently, and consistently, balancing environmental protection with the needs of communities — particularly small rural ones that are often most affected by environmental decisions.

The **precautionary principle** is a widely recognized environmental management concept, embedded in EU and UK law and policy frameworks:

- **Core idea:** Where there is scientific uncertainty about a potentially serious or irreversible environmental or health impact, regulators should **take preventive action** rather than wait for full scientific certainty.

At present, there is a noticeable loss of trust among our rural communities. This undermines cooperation, fuels concern, and reduces the shared commitment needed to protect and manage the environment effectively. Our communities' objections to this application are a matter of public record, reflecting a desire to protect the landscapes and resources that are important to us. As we have investigated further, we have identified areas where the Agency's actions appear inconsistent with its statutory responsibilities

## Plastic Pollution, PFAS and BESS and Inverter Fire Risks

A vast part of our concerns all fall under the responsibility of the EA , and are communities have every right to expect the EA to fulfill their statutory duties, and **precautionary principles** particularly when our communities can see clear pathways to future pollution we believe is highly likely to occur, including the permanent burial of cables and we do not believe the Environment agency are fulfilling their statutory duties and recent articles relating to the EA might in many eyes point to a lack of effectiveness

### UK River pollution trends show escalated levels of chemicals but not being tested for?

1. EA Internal Documents Reveal Staff Shortages Have Forced Major Cuts to Environment Agency Water Quality Monitoring. According to an analysis by Greenpeace, the EA failed to meet its own response-time targets for around three-quarters of serious pollution incidents (2017-2023). (The Standard) **Relevance:** Communities impacted by pollution feel the regulator is not responding swiftly enough, potentially increasing local harm.
2. **Lincolnshire councillors warn EA lacks funding to protect from flooding**  
Lincolnshire County Council warned that the EA is under-resourced and that this leaves residents, businesses and farmland at “unacceptable and ever-increasing” risk. (LincsOnline) **Relevance:** Funding and resource shortfalls hamper EA’s ability to act, leaving local communities vulnerable.
3. Toxic PFAS above proposed safety limits in almost all English waters tested An analysis of EA data (in partnership with NGOs such as Wildlife & Countryside Link and The Rivers Trust) found that out of 117 monitored rivers/lakes/ponds in England, 110 would **fail** newly-proposed safety standards for PFAS ("forever chemicals") (The Guardian) **Relevance:** This suggests large-scale environmental contamination and questions whether the EA and other bodies are adequately regulating PFAS, monitoring water bodies, and protecting local communities.
4. ‘Forever chemicals’ found in up to 10,000 sites in England (The Times), **Relevance:** Communities living near such sites can feel exposed, especially if monitoring/testing is limited and responsibilities are unclear.
5. Investigation found the EA had cancelled around 10,000 water quality tests over a three-month period due to staff shortages at its main lab. The regulator paused “inorganic” water quality testing for 10 national programmes. **Relevance:** Directly describes how the EA’s capacity to monitor is compromised, which impacts communities’ ability to trust that their waterways are being appropriately regulated
6. **Environment Agency refuses to reveal directors’ possible conflicts of interest –**  
Published by *The Guardian*, 1 July 2024
7. **“Revealed: watchdogs and water bosses had dinner at private London club to discuss future”** – also *The Guardian*, 1 Feb 2024.
8. There *have* been credible concerns raised about potential conflicts of interest and vested interests involving Environment Agency (EA) directors and senior officials.

**“Smokescreen’: Campaigners call on Thérèse Coffey, the then Environment Secretary responsible for oversight of the EA to investigate potential EA conflicts of interest, recently.**

- 9. The Information Commissioner’s Office (“ICO”) ordered the EA to disclose interest-forms for Directors (not just Board members) because the EA’s withholding was found to be not justified in one case.**
10. Finally, not taking responsibility for infrastructure such as the flood gates protecting our village. They say they belong to someone else (Severn Trent), even though we often see the environment agency maintaining and managing these gates when flood events occur, they’re well known in the village as the environment agency gates because one year they failed. We’re yet to confirm what the exact details on this as this was a recent response from the EA.

We took out FOIs on the Drinking Water Inspectorate, Defra and the EA on the 10<sup>th</sup> of October, both the DWI and Defra very quickly wrote back and said they have not been involved in any discussions or meetings regarding this application. Considering the scale of this application, this concerns our communities.

We wrote to the EA in all good faith and tried to point them towards specifics regarding their discussions and meetings with the developers and other stake holders. Disappointingly it took almost 4 weeks to tell us they could not answer our FOI due to it being too broad. We will try again, but because we only got our reply 2 days ago, it’s not possible for us to report anything additional today.

**In summary, many members of our communities have expressed serious concerns about the Environment Agency’s ability to fulfill its statutory duties, particularly in light of reported job and funding cuts, missed targets, and ongoing pollution in local rivers. Concerns over potential conflicts of interest among directors, as highlighted in the Guardian (July 2024), further undermine trust. Given these issues, our communities have little confidence that the EA could adequately assess or manage the environmental risks posed by the proposed One Earth Solar Farm. Emerging pollutants, including PFAS and microplastics, remain inadequately monitored, and in line with the precautionary principle, developments of this scale should only proceed when risks are fully understood and mitigated. On this basis, we strongly recommend that the Planning Inspectorate advise the Secretary of State for Energy to refuse the application, as reliance on the statutory regulator under current conditions cannot provide the necessary assurance to protect both the environment and local communities.**

Many in our communities say they do not believe the EA are following their own very clear advice on Drinking Water Protected Areas such as ours (see below)!

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Date: June 2022



## Drinking Water Protected Areas: challenges for the water environment

### The problem

We must protect our drinking supplies so they are not polluted, making them more resilient to future pressures and climate change. The rivers, lakes and groundwater that currently (or will in the future) supply more than 10m<sup>3</sup> per day of water for human consumption, or serve more than 50 people, are identified as Drinking Water Protected Areas (DrWPAs). This includes public drinking water supplied by water companies to their customers and private water supplies for domestic dwellings or the food and drink industry. |

The objectives for Drinking Water Protected Areas are:

- to ensure that, under the water treatment regime applied, the drinking water produced meets the requirements of the Water Supply (Water Quality) Regulations 2016
- to ensure the necessary protection of the supply by avoiding deterioration in water quality to reduce the level of purification treatment required in producing drinking water
- for groundwater, to meet good chemical status and reverse upward trends in pollution

Protecting supplies by avoiding deterioration in water quality and, for groundwater, reversing upward trends in pollution requires pollution to be prevented from entering the environment. This, in turn reduces the need for expensive and unsustainable treatment.

Understanding the risks posed to drinking water sources in a catchment is a central part of the World Health Organisation's water safety planning approach<sup>1</sup>. Investing in collaborative catchment management reducing pollution at source is a more cost-effective approach than removing the pollutants or blending with clean water.

As requested these news article Links have been submitted in a separate email

## Environment Agency late to attend 74% of serious pollution incidents – analysis

Greenpeace found that the regulator has failed to meet its own response time targets for around three-quarters of England's worst pollution incidents.



The Environment Agency has been late to attend most serious pollution incidents over the past five years, according to an analysis by Greenpeace.

The environmental group's investigation unit Unearthed obtained data on the agency's attendance at pollution incidents between January 2017 and October 2023 under freedom of information (FOI) laws.

It found that the regulator has failed to meet its own response time targets for around three-quarters of England's worst pollution incidents, which include major sewage, oil and slurry spills.

**The Environment Agency  
has been so hamstrung by  
such savage funding cuts  
by successive Conservative  
governments that it's now  
practically defunct**

DOUG PARR, GREENPEACE



## Lincolnshire County Council warns that the Environment Agency does not have the funding it needs to protect us from flooding

By James Turner, Local Democracy Reporter

Published: 14:20, 19 February 2025

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Councillors have warned that the current funding arrangements for the Environment Agency are not providing the level of flood resilience **Lincolnshire** needs.

In recent years, the county has faced multiple storms that have resulted in flooding. **Storms Babet and Henk**, in October 2023 and January 2024, are just two examples, together causing the flooding of more than 900 households, 13 breaches of main rivers, and hundreds of hectares of agricultural land being inundated.

A report compiled by a working group of members of Lincolnshire County Council's Flood and Water Management Scrutiny Committee highlighted that, while **Environment** Agency staff work as well as they can with the resources available, the failure of government to ensure the agency's flood risk and water management assets are properly resourced is putting residents, businesses, and farmland in Lincolnshire at an unacceptable and ever-increasing risk.



Waterside Garden Centre at Baston was one of the places affected by last year's floods. Photo: Travis Vinicombe

Furthermore, the Environment Agency's funding mechanisms are focused on protecting homes at the expense of agricultural land.

During a meeting on Tuesday (February 18), Chairman Tom Ashton (Conservative) stated: "We believe that residential properties are rightly given a high priority in terms of flood resilience funding, but agricultural land, which supports the nation's food security, cannot be overlooked.

"Also, our main river systems need to be funded at a level where their design capacity can be maintained or, where necessary, improved."



This article is more than 4 months old

## Toxic Pfas above proposed safety limits in almost all English waters tested

Exclusive: 110 of 117 bodies of water tested by Environment Agency would fail standards, with levels in fish 322 times the planned limit

Exclusive: 110 of 117 bodies of water tested by Environment Agency would fail standards, with levels in fish 322 times the planned limit



Pfas are human-made chemicals used in industrial processes and products such as non-stick pans, clothing and firefighting foams. Photograph: Connect Images/Alamy

Nearly all rivers, lakes and ponds in [England](#) tested for a range of Pfas, known as “forever chemicals”, exceed proposed new safety limits and 85% contain levels at least five times higher, analysis of official data reveals.

Out of 117 water bodies tested by the Environment Agency for multiple types of Pfas, 110 would fail the safety standard, according to analysis by Wildlife and Countryside Link and the [Rivers](#) Trust.

They also found levels of Pfos - a banned carcinogenic [Pfas](#) - in fish were on average 322 times higher than planned limits for wildlife. If just one portion of such freshwater fish was eaten each month this would exceed the safe threshold of Pfos for people to consume over a year, according to the NGOs.

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## Staff Shortages Have Forced Major Cuts to Environment Agency Water Quality Monitoring, Internal Documents Reveal

Conservationists warn that cancellation of thousands of tests since May will leave a "regulatory and ecological blind spot".



By Clare Carlile and Ellie O'Donnell on Jul 23, 2025 @ 16:01 PDT

7 min read



*This investigation was published in partnership with [Unearthed](#) and the [BBC](#)*

The Environment Agency (EA) has dropped 10,000 water quality tests from its work to ensure the health of England's rivers and lakes over the past three months, due to staff shortages at the regulator's main lab.

The agency took a last-minute decision to pause or cancel the tests in spring, a joint investigation by [Unearthed](#) and DeSmog has found.

A manager at the environmental regulator emailed colleagues in late March to say the plan was to pause "inorganic" water quality testing in its "entirety" for 10 national programmes, documents obtained under freedom of information laws show. A further five programmes faced a partial pause.

This pause has run from May into July, and has hit programmes including those that track chemical pollution in rivers, lakes and estuaries, and another that monitors the regulator's local responses to drought. While this testing has been on hold, [five English regions](#) have officially gone into drought, after the "driest spring in 132 years".



## Revealed: watchdogs and water bosses had dinner at private London club to discuss future

**Exclusive: Meal attended by Environment Agency and Ofwat chairs attacked as outrageous example of 'regulatory capture'**



 The Royal Automobile Club in Pall Mall. Photograph: Goddard on the Go/Alamy

Water company bosses and the chairs of the regulator Ofwat and the Environment Agency went for dinner at an exclusive private members' club to discuss how to quell public anger over [bill rises](#) and sewage spills, the Guardian can reveal.


Campaigners have said the private meeting is an outrageous example of "regulatory capture" as Ofwat and the [Environment Agency](#) are supposed to hold water companies to account, rather than help with their public relations.

Iain Coucher, the chair of Ofwat, and Alan Lovell, who chairs the Environment Agency, met for dinner with Gill Rider, the chair of South West Water, Christine Hodgson, who runs Severn Trent, and Keith Lough, the chair of Southern Water. Heidi Mottram, the CEO of [Northumbrian Water](#), was also invited but did not, it is understood, attend.

## Drinking Water Inspectorate ordered action over 'forever chemicals' risk

Analysis finds regulator for England and Wales raised issues with untreated water at facilities serving millions



 A report has shown that water companies have been ordered to improve their drinking water assets because of contamination from 'forever chemicals' or Pfas. Photograph: Martin Godwin/The Guardian

The drinking water watchdog for **England** and Wales has ordered companies to act after "forever chemicals" linked to cancer and other conditions were found in untreated water sources at levels it said "could constitute a potential danger to human health".

Per- and polyfluoroalkyl substances (Pfas) are a group of manmade chemicals used for their waterproof and grease-resistant properties. These forever chemicals persist in the environment, can build up in the body and some have been linked to cancer, hormone disruption and fertility problems. Two of the most notorious, PFOS (perfluorooctane sulfonate) and PFOA (perfluorooctanoic acid) are now banned after being classified as carcinogens by the World Health Organization.

An analysis of Drinking **Water** Inspectorate (DWI) data by Watershed Investigations and the BBC found that the regulator had flagged Pfas issues in untreated water at hundreds of water treatment works, reservoirs, boreholes and supply systems serving more than 6 million people. The true number of people potentially affected will be much higher, as population data was not available for all the affected sites.

The analysis reported that water companies who have been ordered to improve their assets because of Pfas contamination include Anglian Water, where untreated supplies serving 4.2 million people are affected, and Wessex

Reference: IC-309325-B0K4



## **Freedom of Information Act 2000 (FOIA)**

### **Decision notice**

**Date:** 18 September 2024

**Public Authority:** Environment Agency

**Address:** Horizon House  
Bristol  
BS1 5AH

### **Decision (including any steps ordered)**

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1. The complainant has requested declaration of interest forms for staff in the roles of Area and Regional Directors at the Environment Agency (Deputy Directors and Directors respectively). The Environment Agency refused the request under section 40(2).
2. The Commissioner's decision is that the for the less senior position of Deputy Director the Environment Agency was correct to withhold the information in the declaration of interest forms. However, for the more senior position of Director the Commissioner considers section 40(2) has not been correctly engaged.

# ‘Forever chemicals’ pollute up to 10,000 sites in England

Per- and poly-fluoroalkyl substances are linked to cancer, low birth weight, higher cholesterol levels and more — but cleaning them up could cost £121bn