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Summary

I have resubmitted my questions from D3 that were unanswered or inadequately so, expanded on ISH3, questioned the flood risk assessment, spoken about pollution from a BESS fire, and commented on the applicant's answers to 3 authorities.

Volume 9.0 Other post- Submission Documents

Applicants Response to Deadline 3 Submissions

Document Ref: EN010159/APP/9.31

Questions to ask the applicant again from my D3 submission:

D3R4. To be clear, I did not say there was no increase in the FRA from fluvial risk. I asked how an increase in flood depth of 2.4 and 4.1mms was not increasing flood risk on site and elsewhere? These are real increases even if the applicant views them as negligible and must go somewhere.

Further to your response to the above ref, what difference does the wording of tolerance rather than model tolerance make, now the EA is asking for this distinction?

No answer to either of the following 2 questions:

- 1, Could the applicant make the entire site safe and not take the sequential test?
- 2, Is the applicant alluding to the possibility that there are multiple sites available for their projects which they do not consider appropriate and `need` should override everything?

D3R18. Which synergistic possibilities specifically have been investigated, as opposed to `none anticipated`, and where are the results please?

ExQR24. Q13.0.1 What happens to all the calculations ref flood risk, if this season, the water level exceeds all expectations? At what point for physical or financial reasons would the proposal have to be looked at again?

EXQR3. Q13.0.1. Please explain why it is necessary for the cables to go along the south side of Trent Lane in North Clifton and the area of the car park, when this could have been a straight line extending from the adjoining field. This is despite the applicant's assertions of consulting the community. The applicant must be aware that the village fishing pegs are within this area and that this lane is a big part of village life. The area around it has no solar arrays. It is the functional floodplain. It appears that the applicant has taken it unnecessarily. When feelings are running so high against the possible imposition of this very large, unwelcome scheme, which will adversely and irreversibly

impact village life for all inhabitants, it seems a small sacrifice to leave the lane untouched and use the adjoining field for the cable access to the river.

Comments for Submission at Deadline 5, following ISH3

Sir, I respectfully ask if the following has any bearing on the provision of a future flood risk requirement?

Point 6.3 of the Guidance NSIP Advice Note Nine: Rochdale Envelope Updated March 2025

“Ensure where uncertainty exists and flexibility is sought the following is achievable: that there is a consistent approach to the description of the development addressing the uncertainty and necessary flexibility across all relevant application documents”.

In the ISH3 meeting I stated that I have little faith in the authorities ref the future flood risk assessment. This is because they were unaware of the extent of the flood water in 2000 and 2024, which were events with no added complications beyond flooding on an empty floodplain. These flood risk assessments are for complicated and unprecedented events. Trying to engage with the EA has been futile, only unanswered emails and calls to the call centre team who cannot answer questions and merely redirect queries.

In ISH3 I asked 3 consecutive times why it was acceptable to use hydraulic modelling now, when it had been dismissed by the EA in September 2024 as being too coarse and the volume quantifiable route was taken. I was not questioning the use of hydraulic modelling itself, but why, after all this prevarication on the applicants part and failure to address the issue of possible flood flow route alteration, (asked for by the EA since their comments on the PEIR) it was only now being considered acceptable/ necessary and as a result, a final FRA, a major consideration in this proposal, is not yet available.

The volume was initially addressed over the whole site and not allocated independently. Why then, is the site now being considered to have independent sites not hydraulically connected? Does this now apparent independence of sites affect the legal status of the scheme? Please can the applicant explain to me how the 2 sides of the river are not hydrologically connected? Is there not an exchange of water within the river channel and its adjoining land masses and groundwater?

At ISH2 the ExA said we all need to have confidence in the FRA. I have gone back to the flood risk assessment by Logika of April 2025 APP/6.21 because I could not reconcile the lost volume then, due to solar supports, table 3-2, page 26, of 618 cubic mtrs with the current assessment of 14149 cubic mtrs. It was described as the result for the

design flood event, yet used 10 to the power of minus 4, usually associated with the 1:10000yr flood event, not 10 to the power of minus 2, associated with 1:100yr plus climate change. Why was this and does that mean it was significantly underestimated then? Will there be a fully detailed and explanatory flood risk for deadline 5, with all measurements of structures so that IPs can form an opinion?

Why are the inverters being given the 300mm freeboard not 600mm, generally assigned to sensitive electrical equipment, that would make them safe for their lifetime, part of EN policy and especially as they are substantially in flood zone 3? The EA were still questioning the freeboard allowance of 600mms in the April 2025 Consultation Meeting, despite the applicant inferring at ISH3 that the 600mms, having been asked for “early on “had been dismissed. It evidently had not been. The EA surrendering the more robust 600mms freeboard before full knowledge of the large number of inverters, (sensitive electrical equipment, with considerable consequences should they flood) in flood zone 3 was surprising to say the least. A consequence of this premature lowering also meant many panels would be submerged. Why did the EA lower the freeboard allowance, thus removing the safety element and an undisputed non subjective amount, in favour of the subjective, disputable 5mm number?

There seems to be confusion after ISH3 as to whether any of the panels are being physically removed now. It appeared they would be, in the Response to the ExA Written Questions 2, 12.0.1 EA. “The applicant has now committed to removing solar panels that were previously inundated”, or did remove really mean adjust?

The applicant is now being asked to refer to the 5mm tolerance as a tolerance not a model tolerance as before. Guidance is averse to adding tolerances because the freeboard allowance, along with climate change allowance both act as safety margins to account for uncertainties. If a site is being assessed when it has already been assessed using the same hydraulic modelling as that going forward, then to keep adding tolerances would be compounding the amount. All planning policies expect, if not demand, that the development will result in no increase in flood risk outside the site boundary. Accepting negligible risk increases would mean the cumulative effect over time becomes an undeniable increase in risk.

The EA, at the ISH2, took issue with the concept of voided inverters and tolerances, both of which have now been agreed to by the EA in principle, and they are not anticipating any problems regarding the results of the hydraulic modelling, either in terms of flow route alteration or the ability to compensate for lost volume, should that be required. I am still at a loss as to how to understand how hundreds of thousands of upright structures on a floodplain will not affect the movement of water over the site and beyond. The laws of physics simply do not align with no alteration to fluid flow, notably when that fluid has debris being carried along with it.

I submit that the full amount of lost flood storage capacity has not been included. Due to the scale of this development and the sheer volume of underground flood plain capacity that would be inhabited by piles, cables, fencing posts, and inverter pads, the lost volume is considerable. That space is no longer available for storage capacity and every time the structures are put into the ground the soil is compacted, further restricting infiltration, particularly immediately during and after construction. The fact that although the applicant stated the fencing volume would be negligible, the applicant gave no consideration to the inability of silage bales, fallen but floating trees and assorted debris to pass through 15cm deer fencing. I wonder if anyone has monitored or calculated the various objects that get taken into the river Trent when it floods? Has the applicant watched the river flooding with its unstoppable force? King Canute knew he couldn't do it.

In defence of their dismissal of cumulative effects on flood risk, APP/9.31 D3R19 South Clifton, the applicant states "it is important to note that each development will be subjected to its own site -specific Flood Risk Assessment and Surface Water Drainage Strategy, as required by the planning process. These assessments must demonstrate that there will be no increase in flood risk as a result of these proposals". What certainty is there that all those schemes were consented to and had no increase in flood risk, in the true sense of no meaning 0, and not `no` with a tolerance added? The cumulative effect would be quite different then.

I would like to know if there are more accurate, precisely outlined flood area maps than the ones supplied by the applicant. Once these have been enlarged, they distort. Does the applicant have access to more accurate EA flood maps or Local Authority Maps to work from, or will they just be enlarging the ones submitted?

The question of these vexed flood flaps/ gates will not go away by disowning them. They belong to someone and are responsible for water discharging into North Clifton when it floods. The examiner has seen photographs of the results of this. Are none of the authorities concerned they might be theirs? Has the environment agency double checked?

Is the natural spring in the field near the reservoir getting the same treatment of, ignore and hope it will go away?

In response to the news of another Lincolnshire reservoir taking water from this area, with the potential for water pollution from a BESS fire and pollution from micro/nano plastics in the underground cables, I express my concern about the possible consequences for water quality and public health. Much has been made of the mitigation measures surrounding the containment of firewater but there is no remedy for the containment of smoke and particles. A BESS fire, aside from the firefighting run-

off, releases airborne contaminants that can settle on a reservoir surface e.g. heavy metals, and harmful organic compounds. A fire involving a BESS enclosure can accelerate the release of nanoparticles into the air as well as nano plastics being released through the degrading cables. Putting 2 reservoirs at risk is surely unconscionable?

The concentration of relevant policy revolves around a few of the EN policy statements but there is one more, which in its entire simplicity, speaks volumes and which merits some consideration by all parties.

EN -1 5.8.1 Flooding is a natural process that plays an important role in shaping the natural environment. However, flooding threatens life and causes substantial disruption and damage to property.

Flooding disproportionately affects marginalised and low-income communities who lack resources to recover. The moral imperative is to not knowingly increase harm to others, especially when the consequences of that harm, flooding, are severe. Accepting a negligible increase sets a precedent, adding more risk each time that happens. It is ethically questionable to allow one party to benefit by imposing a risk on a powerless third party. The calculation that a risk is negligible, given the scientific uncertainty of future climate conditions, applying the risk averse approach would be more responsible. The negligible increase might be the tipping point that is the difference between a flood that almost happens and one that does.

The cost of flooding extends way beyond physical and financial damage. Experiencing or even being threatened by a flood is traumatic, leading to psychological issues including anxiety, depression and PTSD. There is increased vulnerability for older and ill individuals and children experience distress and behavioural problems. The sense that home is a place of safety and comfort is eroded.

Draft Statement of Common Ground with West Lindsey District Council

EN010159/APP/8.4

05-01 Loss of BMV -Food security. For the applicant to respond by taking agricultural land loss because of this development and comparing it to the whole country is distorting the figures and minimising the impact. It should be viewed in context, in this area, and more importantly judged cumulatively given the quantity of solar farms already consented.

Draft Statement of Common Ground with Lincolnshire County Council

EN010159/APP/8.2.2

06-02 Loss of BMV. The applicant responds, “if all the reasonably foreseeable schemes within Lincolnshire proceed, the change in land use would be 0.26%”. Please could the applicant be more precise in the wording to explain the phrase `change in land use`. Is that representative of the percentage loss of all land in Lincs county or of the agricultural land?

What will happen in 60yrs time when the sites should be returned to agriculture? When the Selby coalfield development went through planning 40 yrs ago, they were approved with conditions attached, that required the development to be returned to agricultural use when they were no longer needed. All mining in Selby ceased in 2004 but the sites are now redeveloped for other industrial purposes. None have been returned to agricultural use. What credence can be given to the suggestion that this land will ever see another harvest?