

Deadline 6 Submission

Planning Inspectorate Reference: EN010159 – One Earth Solar Farm

Date: 03/12/25

Dear Sir

1. Introduction

South Clifton Parish Council ("SCPC") submits this Deadline 6 response in accordance with the Examination Timetable.

This submission provides:

1. Comments on additional submissions accepted at Deadline 5
2. Responses to new evidence raised within updated Applicant documentation
3. Comments informed by the Examining Authority's (ExA's) Rule 17 letters and ExQ3
4. Matters directly affecting the community of South Clifton

The Parish Council has reviewed a substantial body of recently submitted material, including:

- Updated Flood Risk Assessment & Drainage Strategy (EN010159-000984; EN010159-000972)
- Updated Battery Safety Management Plans (EN010159-000976; EN010159-001001)
- Updated Construction Traffic Management Plans (EN010159-001021; EN010159-001022)
- Updated ES, Hydrology, Soils, Cumulative Effects chapters (EN010159-000980; EN010159-000982)
- Statements of Common Ground with statutory bodies (e.g. EN010159-001010; EN010159-001008)
- Resident and expert evidence including Stephen Fox (EN010159-001046), Walker, Pumfrey, Radley
- Local authority submissions (e.g. NSDC ISH3 Landscape Note EN010159-001037)

SCPC believes that significant unresolved issues remain which materially affect the safety, amenity and environmental resilience of the parish.

2. Flood Risk – Support for ExA Rule 17 on Removal of Panels from Flood Zones 2 & 3

SCPC strongly supports the ExA's Rule 17 request that the Applicant consider removing all infrastructure from Flood Zones 2 and 3.

2.1 Evidence of unresolved problems

Key documents demonstrate significant residual deficiencies:

- The updated FRA & Drainage Strategy (EN010159-000984; EN010159-000972) still omits floodplain conveyance modelling requested by the Environment Agency.
- The Hydrology & Hydrogeology Chapter (EN010159-000980) still does not model frozen-ground runoff, despite evidence of this being a known, recurring local condition.
- Cumulative effects updated in Chapter 18 (EN010159-000982) continue to assess only a narrow set of other projects, omitting several significant NSIPs in the Trent Valley catchment.

2.2 Local flood vulnerability

Evidence from residents including Stephen Fox (EN010159-001046) and other IPs shows:

- Historical flood pathways from the proposed solar array area flow toward South Clifton
- The narrow valley configuration raises the risk of increased flood velocity and depth
- Panel posts, fencing and infrastructure may impede east–west flow patterns

2.3 SCPC Position

SCPC requests that the ExA require:

- The EA to provide a full flood history of the area, in view of the increased incidence of flooding in recent years
- A full redesign removing development from FZ2/3, or
- Detailed conveyance modelling before any recommendation for consent.

3. Drinking Water Protected Area & BESS Fire/Contamination Risks

The site lies within a Drinking Water Protected Area. Updated BESS plans (EN010159-000976; EN010159-001001) continue to:

- Defer plume modelling to a post-consent stage
- Provide no final written confirmation from fire services (as shown in SoCGs EN010159-001010 and EN010159-001008)
- Fail to address contamination pathways raised by multiple resident submissions (Pumfrey EN010159-001044; Walker EN010159-001020)

Evidence indicates that toxic products of lithium-ion thermal runaway (e.g. HF, PFAS) are credible risks.

SCPC Position

The Parish Council requests that the ExA:

- Require complete plume modelling now, not post-consent
- Require written operational assurances from Nottinghamshire and Lincolnshire Fire & Rescue
- Undertake precautionary assessment given the Drinking Water Protected Area designation

4. Consultation Failures & Missing Documents

Multiple resident submissions (e.g. Oates EN010159-000907; Russell EN010159-001000) identify missing consultation materials, including:

- Mental health impact survey
- Equestrian survey
- Chairman’s script for the 1 August 2024 meeting

The Applicant asserts these matters are “included”, but no such documents appear anywhere in the Examination Library.

SCPC Position

SCPC requests that the ExA:

- Require the Applicant to submit these documents
- Consider the extent to which the consultation record is incomplete
- Assess whether statutory consultation duties have been met

5. Construction Traffic & CTMP Ambiguity

Updated CTMPs (EN010159-001021; EN010159-001022) still contain:

- Ambiguous road references (Moor Lane, Mill Lane, Trent Lane) where North Clifton and South Clifton have identically named but very different roads
- No sufficiently clear mapping of barred routes. Despite repeated community requests and discussions during hearings, the Outline CTMP does not identify Moor Lane as a prohibited construction route, nor is any schedule of restricted routes secured via the dDCO Requirements. Without an explicit barred-routes map, secured on the face of the DCO and in the CTMP, construction HGVs could legally use Moor Lane. The Parish Council therefore requests that the ExA require the Applicant to submit a certified “Barred Routes Plan” and to include Moor Lane as a legally restricted route within Requirement wording.
- Overreliance on official accident records despite extensive unrecorded near-misses reported locally

The updated Transport Assessment (EN010159-001024) does not resolve these issues.

SCPC Position

We request that the ExA require:

- Clear, village-specific road naming
- Definitive barred-route mapping
- Prohibition of construction traffic on Moor Lane (South Clifton), as stated above.

6. Cumulative Effects & NSIP Interactions

Updated Chapter 18 (EN010159-000982) still does not adequately assess:

- Combined hydrological effects of multiple large-scale projects (STEP, hydrogen plant, other solar NSIPs)
- Floodplain synchronisation effects
- Soil compaction + groundwater interaction

Resident submissions (e.g. Say No To One Earth NSIP Cluster EN010159-001032) reinforce this concern.

SCPC Position

We request a catchment-wide hydrological cumulative assessment before the Examination closes.

7. Document Errors & Reliability Concerns

Multiple SoCGs contain copy–paste errors referencing the Springwell Solar Farm DCO, including:

- Lincolnshire CC SoCG (EN010159-000992)
- Nottinghamshire CC SoCG (EN010159-001004)

- National Highways SoCG (EN010159-001008)

This raises serious concerns regarding document reliability and consultation accuracy.

SCPC Position

We request the ExA require corrected SoCGs and consider implications for consultation integrity.

8. Compulsory Acquisition (CA) Uncertainty

The Land & Rights Negotiations Tracker (EN010159-000978; EN010159-000958) shows ongoing uncertainty in land rights.

If panels must be removed from FZ2/3, the land requirement will materially change, undermining the Applicant's CA justification.

SCPC Position

We request confirmation that no CA powers will be exercised until:

- Final layout changes are complete, and
- A revised land-need case is submitted.

9. Grid Connection Dependency

The project relies on the High Marnham grid upgrade, which is not yet committed. SCPC remains concerned that preparatory works could begin without certainty of deliverability.

SCPC Position

We request a **DCO Requirement** preventing any pre-connection works.

10. Best & Most Versatile (BMV) Soils

Updated Soils Chapter (EN010159-000981; EN010159-000964) continues to understate:

- Soil compaction impacts
- Food security implications
- Regional cumulative BMV loss

SCPC Position

We ask the ExA to give significant weight to BMV loss and the limits of proposed mitigation.

11. Conclusion

South Clifton Parish Council respectfully submits that:

- Flood risk modelling remains incomplete
- BESS risk remains insufficiently assessed
- Consultation record gaps remain unresolved
- Traffic management lacks clarity and enforceability

- Cumulative effects are insufficiently evidenced
- Documentation errors raise concerns about reliability
- CA powers cannot be justified until layout uncertainty is resolved

The Parish Council therefore considers that the Application, in its current form, does not provide a safe or robust basis for a positive recommendation.

Yours faithfully

Gill Cobham – on behalf of

South Clifton Parish Council