

**Deadline 6 Submission on Cumulative Effects**

**Planning Inspectorate Reference: EN010159 – One Earth Solar Farm**

**Date: 03/12/25**

Dear Sir

South Clifton Parish Council (SCPC) wishes to highlight significant gaps in the Applicant's treatment of cumulative effects, particularly in relation to flood risk, hydrology, traffic, construction impacts, and grid connection. These omissions materially affect the robustness of the Environmental Statement (ES), the Flood Risk Assessment (FRA), and the wider planning balance.

**1. Absence of Meaningful Cumulative Flood Risk Assessment**

Although the Applicant has submitted ES Chapter 18 (Cumulative Effects) and the document "Inter-project Effects with Other NSIPs and Major Development Schemes", neither contains any technical cumulative hydrological modelling. This is a fundamental omission given that:

- The site lies within a highly sensitive, interconnected floodplain system of the Trent Valley.
- Multiple large infrastructure schemes exist or are emerging in the region (including solar, grid reinforcement, and industrial projects).
- The project proposes development in Flood Zones 2 and 3, where cumulative effects are most critical.

There is no modelling showing how this proposal interacts with:

- upstream or downstream flow pathways
- storage displacement
- conveyance loss
- climate-change uplift in combination with other development
- drainage or abstraction pressures
- EA-identified modelling uncertainties (e.g., the lack of conveyance modelling, frozen-ground scenarios)

NPS EN-1 and EN-3 require cumulative effects to be assessed quantitatively where they may materially alter risk. The Applicant has not done so. The Parish Council therefore questions whether the Sequential Test or Exception Test can be relied upon without a sound cumulative hydrology evidence base.

**2. Cumulative Grid and Infrastructure Pressure Not Assessed**

The Applicant asserts, in passing, that there are no expected cumulative effects on grid capacity. However:

- No cumulative demand, loading, or constraint analysis is provided for High Marnham, Cottam, West Burton, or the broader transmission reinforcement programmes.
- No assessment is provided of cumulative land take, access corridors, construction overlaps, or grid route congestion arising from other NSIPs in the Trent Valley.

Given the heavy concentration of renewable and grid-scale projects in this area, the absence of cumulative grid modelling is a serious deficiency. It also undermines any claim that the development represents an optimal or necessary use of this specific flood-affected land parcel.

### **3. No Cumulative Construction Traffic Assessment**

The Applicant's traffic submissions (including the CTMP and Transport Assessment) provide no assessment of overlapping construction programmes with other major schemes in the region. The following issues are unaddressed:

- Combined HGV demand on the A1133 and local rural network
- Construction workforce overlap
- Cumulative construction noise, dust, and vibration
- Increased risk from construction vehicles using unsuitable routes
- Interactions with other schemes' construction compounds or abnormal loads

This is particularly concerning as local authorities (NCC, NSDC, LCC) have already raised uncertainty regarding construction routing. The lack of a Barred Routes Plan further complicates the ability to consider cumulative effects on vulnerable rural lanes such as Moor Lane in South Clifton.

### **4. No Consideration of Cumulative BESS or Emergency-Response Impacts**

The Applicant does not address:

- cumulative demands on fire service resources from multiple BESS installations
- potential clustering of battery storage sites
- overlapping lightning, electrical, or fire-risk responsibilities across the district
- cumulative air quality implications from worst-case BESS incidents

Given the scale of energy development in the region, cumulative emergency-response burden is a non-trivial matter and should form part of the ES.

### **5. Inadequate Assessment of Nearby NSIPs**

While the Applicant lists nearby developments in the "Inter-project Effects" document, the discussion is descriptive rather than analytical. It provides:

- no modelling
- no quantified assessment
- no receptor-based evaluation
- no scenario comparisons
- no policy-aligned cumulative risk analysis

Statements asserting that "significant effects are not expected" are unsupported. This falls below the standard required for NSIP-level cumulative assessment.

### **6. Policy Compliance Concerns**

The cumulative effects omissions described above undermine compliance with:

- NPS EN-1 (Sections 4.2, 4.8, 5.7 – Flood Risk; 5.8 – Hydrology)
- NPS EN-3 (Solar Energy – Site Selection, Flood Risk and Hydrology)

- The Mitigation Hierarchy, which requires avoidance and minimisation to be informed by cumulative effects
- Planning Practice Guidance – Flood Risk and Coastal Change
- EIA Regulations 2017 – Schedule 4, which require cumulative effects assessment to be proportionate and evidence-based

Without robust cumulative analysis, neither the ExA nor the Secretary of State can safely conclude that the environmental harm has been adequately identified, avoided, or mitigated.

## **Conclusion**

SCPC respectfully submits that the Applicant's cumulative effects assessment is materially deficient and cannot support a safe or policy-compliant grant of consent. These gaps are directly relevant to the ExA's ongoing concerns regarding flood risk, the Sequential Test, and the wider viability of the project as currently designed.

Yours faithfully

Gill Cobham – on behalf of

**South Clifton Parish Council**