

Deadline 7 Submission

Planning Inspectorate Reference – EN010159 – One Earth Solar Farm

Date – 14th December 2025

Dear Sir

Updated comments on the Applicant's Deadline 6 submissions

Flood Risk Assessment & Drainage (Rev 5) and EA SoCG

SCPC acknowledges that:

- The Applicant has updated the FRA & Drainage Strategy to Rev 5 and undertaken additional modelling requested by the Environment Agency;
- The Statement of Common Ground with the Environment Agency records broad agreement on methodologies, breach scenarios, maintenance plans and WFD screening approach.

However, SCPC maintains that:

- Independent technical objections (Stephen Fox forensic critique, Trent Valley IDB representation and others) have not been substantively answered, particularly on the choice of modelling parameters, conveyance/storage impacts, and the treatment of uncertainties.
- Agreement between the Applicant and the EA on methodology does not automatically equate to an acceptable level of risk for local residents or to compliance with the mitigation hierarchy and Sequential Test.

SCPC therefore requests that the ExA give significant weight to the unresolved independent critiques and to the Rule 17 exchange when evaluating whether the Applicant has met the necessary tests.

Battery Energy Storage System (BESS) and fire safety

SCPC notes that:

- The Outline Battery Safety Management Plan has been updated to Rev 6;
- A Final Draft SoCG with Nottinghamshire Fire and Rescue Service has been produced, recording broad agreement on emergency access, water supplies and operational arrangements.

SCPC remains concerned that:

- No quantitative risk assessment has been provided which sets out credible worst-case fire, explosion or toxic plume scenarios and their interaction with flood conditions and limited evacuation routes.
- The interaction between BESS fire-water runoff, flood events and local drainage capacity has not been modelled in a way that residents can understand and the ExA can test.

SCPC invites the ExA to consider whether a scheme of this scale and proximity to small rural settlements should proceed without such quantitative evidence.

Cumulative effects and grid connection

SCPC welcomes that:

- The Applicant's updated Chapter 18: Cumulative Effects (Rev 4) and 9.30.1 Inter-project Effects report now include more detail on the relationship between One Earth, the proposed High Marnham substation expansion and other solar NSIPs in the region.

However:

- The treatment of cumulative flood risk, sequential test considerations and BMV land remains largely qualitative and does not model scenario-based outcomes across the Trent catchment;
- The interdependency of One Earth on High Marnham and wider National Grid reinforcements is acknowledged but not secured by robust DCO requirements or clear "no grid, no build" conditions.

SCPC's view is that the cumulative and inter-project material still falls short of what is required for a scheme in such a constrained and heavily NSIP-loaded location.

Affected residential properties and engagement

SCPC previously requested an **index and audit trail of affected residential properties**, showing how each property within defined distance bands of arrays, substation and BESS had been identified, consulted and assessed.

We note that:

- The Applicant has provided a Residential Property Location Plan (EN010159/APP/9.40) identifying properties relative to the scheme.

SCPC submits that this is an improvement but **does not yet amount to the requested index**, because:

- It does not show, for each property, the dates and nature of engagement, nor the specific predicted effects (visual, noise, traffic, flood risk, construction disturbance, etc.)
- It does not provide a simple tabular tool for residents or the ExA to understand "which homes are affected by what, and how".

SCPC therefore maintains that the "affected properties" point remains only partially addressed.

Use of Artificial Intelligence in the Applicant's evidence

SCPC is aware that both the Applicant and Independent Parties (including Stephen Fox) have submitted material relating to the **use of Artificial Intelligence (AI)** in the preparation and critique of technical documents.

We welcome the ExA request for transparency, to seek clear assurances and, where necessary, further information on this point.

To conclude, SCPC asks that the ExA

1. Give substantial weight to the **independent technical critiques** of flood risk, drainage, cumulative effects and BMV land, which have not been substantively answered by the Applicant;
2. Note that key SCPC concerns on **cumulative NSIP impacts, affected properties, BESS risk and long-term floodplain function** remain unresolved at Deadline 7; and
3. Recommend that, unless these matters can be satisfactorily addressed, the Application should not be granted in its present form.

South Clifton Parish Council has prepared an annex (A) below outlining progress and present status in the key issues of concern, in the hope that it will aid the ExA as the Examination draws to a close.

Yours faithfully

Gill Cobham

(on behalf of South Clifton Parish Council)

Annex A

1. Flood risk, Sequential Test and FRA

What SCPC raised at D6

- Concern that the Sequential Test was not robust and that FZ1 alternatives (including “constellation” options) had not been genuinely considered.
- Doubts about FRA Rev 4 – lack of transparent run-off coefficients, storage/conveyance analysis, and inadequate treatment of uncertainty and breach.
- Request that ExA consider the need for further information and/or changes to remove panels from FZ2/3.

What has happened since

- Updated FRA & Drainage Strategy Rev 5 submitted, plus WFD Screening (Rev 4) and additional modelling as requested by EA.
- EA’s ExQ3 response states they are content with the modelling methodology and 1–3mm increases, within a broad tolerance.
- Rule 17 letter issued; Applicant response (9.44) argues removal of FZ2/3 elements would harm viability/capacity but does not present detailed quantified alternative options.

Status

- **Partially addressed but not resolved.**
The Applicant has added modelling and achieved a SoCG with EA, but independent critiques (Fox, IDB) and the underlying Sequential Test concerns remain live.

2. Cumulative effects and NSIP inter-relationships

What SCPC raised at D6

- That the Applicant’s cumulative assessment was overly high-level and did not properly account for:
 - Multiple solar NSIPs across the Trent Valley;
 - The dependence on, and interaction with, High Marnham substation and transmission reinforcements;
 - Combined effects on flood risk, BMV land and rural amenity.

What has happened since

- Updated ES Chapter 18 Cumulative Effects (Rev 4) and Inter-project Effects report (9.30.1 Rev 2) discuss other NSIPs more explicitly, including High Marnham, Great North Road and Cottam.

Status

- **Improved description but still not resolved.**
There is more narrative content, but still no integrated modelling or scenario-based assessment of cumulative flood and land-use impacts.

3. Affected properties and community engagement

What SCPC raised at D6

- Request for a clear **index of affected properties**, showing:
 - Distance from arrays/substation/BESS;
 - Type of expected impact (visual, noise, traffic, flood risk, etc.);
 - Evidence of engagement/consultation with each property.

What has happened since

- Applicant has submitted a **Residential Property Location Plan** (App 9.40) mapping properties relative to the scheme.

Status

- **Partially addressed.**
The mapping is progress, but the full index and engagement/impact audit trail requested has not been produced.

4. BESS safety and emergency response

What SCPC raised at D6

- Concerns about the risk of BESS fire, explosion and toxic plumes, particularly in combination with flood events and constrained local roads.
- Query as to whether fire-fighting water, foam or contaminated runoff could exacerbate flood or pollution risks.

What has happened since

- Outline Battery Safety Management Plan updated to Rev 6; Final Draft SoCGs with Nottinghamshire Fire and Rescue Service and Lincolnshire Fire and Rescue Service produced, indicating agreement on general principles.

Status

- **Procedural engagement improved; technical concerns still not fully answered.**
There is still no published quantitative risk assessment of worst-case scenarios, including plume dispersion and combined flood–fire events.

5. Environment Agency, WFD and drainage authorities

What SCPC raised at D6

- Concern that the WFD implications and the views of drainage bodies (including Trent Valley IDB and Nottinghamshire County Council as LLFA) were not fully resolved.

What has happened since

- WFD Screening updated; EA SoCG records agreement on approach.
- Trent Valley Internal Drainage Board and others have submitted strong representations indicating continued concerns with drainage and flood risk.

Status

- **Formally advanced but substantively contested.**
EA is broadly content with the approach, but IDB and independent experts disagree.

6. Mental health and wellbeing impacts

What SCPC raised at D6

- Submission of the **Impact of OE Solar on Mental Health Study** and request that decision-makers take seriously the cumulative mental health burden on small rural communities.

What has happened since

- The study has been acknowledged by Newark & Sherwood District Council and other parties; UK Health Security Agency has also responded to ExQ3 in relation to health matters.

Status

- **Acknowledged but not deeply analysed.**
The issue is now in the record and SCPC would like to remind the ExA at D7 that mental health impacts are real, cumulative and should not be dismissed as “non-planning”.