

Deadline 8 Submission

Planning Inspectorate Reference – EN010159 – One Earth Solar Farm

Date – 27th December 2025

Dear Sir

South Clifton Parish Council (SCPC) welcomes the opportunity to submit its Deadline 8 response. This submission is intended to assist the Examining Authority (ExA) by clearly identifying which matters have now been resolved or substantially progressed, and which issues remain outstanding and material to the ExA's recommendation on the application.

SCPC's comments are focused on decision-critical matters arising under the Planning Act 2008, the relevant National Policy Statements, and the Environmental Impact Assessment (EIA) Regulations. The Parish Council does not seek to re-open matters that have been substantively resolved through the Examination.

1. Matters Now Resolved or Largely Resolved

SCPC acknowledges that the following matters have progressed since earlier deadlines and are now largely resolved at a procedural or methodological level:

- Engagement with Nottinghamshire Fire and Rescue Service and other emergency responders has been completed, with Statements of Common Ground finalised.
- Flood Risk Assessment modelling methodology has been discussed and agreed in principle with the Environment Agency.
- Additional narrative has been provided on inter-project relationships, grid connection strategy, and construction phasing.

SCPC does not seek to re-litigate these matters. However, resolution of engagement processes or modelling methodologies does not, of itself, resolve whether the statutory and policy tests have been satisfied, as set out below.

2. Sequential Test and Flood Risk – Application of the Mitigation Hierarchy

SCPC remains concerned that the Sequential Test has not been adequately demonstrated, and that the mitigation hierarchy has not been properly applied in accordance with the relevant National Policy Statements and EIA principles.

The core issue is not whether mitigation measures are technically capable of reducing flood risk, but whether flood risk has been avoided in the first instance. The continued inclusion of extensive areas of Flood Zones 2 and 3 within the proposed Order limits indicates that avoidance has not been demonstrated.

The Examining Authority's Rule 17 request explicitly recognises this uncertainty by asking the Applicant to consider whether the exclusion of panels and associated infrastructure from Flood Zones 2 and 3 would still constitute the same Nationally Significant Infrastructure Project. The existence of this request demonstrates that, at the close of Examination, the ExA does not yet have sufficient evidence to conclude that the Sequential Test has been passed.

While the Applicant has provided further commentary and revised Flood Risk material, SCPC considers that this remains an exercise in mitigation rather than avoidance. No quantified, site-selection-level comparison has been provided to demonstrate that alternative layouts or locations in areas of lower flood risk have been robustly discounted.

For the avoidance of doubt, SCPC's position is not that additional mitigation measures are required, but that the first step of the mitigation hierarchy — avoidance — has not been satisfactorily evidenced.

3. Implications of the Rule 17 Response

SCPC notes the Applicant's response to the Rule 17 request. However, that response does not remove the underlying policy concern.

If the Applicant's case is that removal of development from Flood Zones 2 and 3 would fundamentally alter the nature or viability of the project, this reinforces the conclusion that flood risk constraints are a determining factor in site selection. That position would weigh against a finding that the Sequential Test has been passed, rather than in favour of consent.

4. Affected Properties and Residential Impacts

SCPC continues to raise concern regarding the absence of a clear, consolidated index of affected properties, linking individual dwellings to specific impact pathways, mitigation measures, and residual effects.

While mapping and narrative descriptions have improved, the Examination record still lacks a property-by-property schedule that would allow the ExA to readily trace how residential impacts have been identified, assessed, and mitigated on a dwelling-by-dwelling basis.

In the absence of such an index, the ExA is unable to easily verify the completeness of the residential assessment or to confidently understand how conclusions on acceptability have been reached for individual receptors.

5. Battery Energy Storage System (BESS) – Fire, Pollution and Flood Interaction

SCPC acknowledges that engagement with fire authorities has progressed and that outline management plans have been refined. However, substantive concerns remain regarding the absence of a quantified assessment of:

- credible worst-case fire scenarios;
- plume dispersion and pollutant pathways;
- interaction between fire-water runoff and the site's floodplain context.

Given the scale of the BESS, its proximity to residential receptors, and its location within a constrained floodplain environment, SCPC considers quantitative risk assessment to be proportionate and necessary, rather than exceptional. Reliance on outline plans and future discharge of requirements does not provide the ExA with sufficient certainty at this stage.

6. Mental Health and Community Wellbeing

SCPC welcomes the increased recognition during the Examination that mental health and wellbeing impacts are capable of being material planning considerations.

However, SCPC remains concerned that these impacts have not been fully integrated into the EIA's assessment of significance. In particular, the evidence submitted by local residents indicates that stress, anxiety, and loss of wellbeing arise not only from visual effects, but from prolonged uncertainty, scale of change, and cumulative development pressure.

These effects cannot be meaningfully understood in isolation from cumulative visual, construction, and uncertainty impacts arising from multiple NSIPs and major infrastructure schemes within the locality.

7. Cumulative Effects and Inter-Project Relationships

While the Applicant has provided additional cumulative effects documentation, SCPC remains of the view that the cumulative assessment remains largely descriptive rather than evaluative.

In particular, the Examination record does not yet provide a clear explanation of how cumulative flood risk, construction impacts, traffic effects, and community wellbeing pressures have been assessed in combination, rather than as parallel narratives.

8. Summary and Closing Position

SCPC recognises the extensive work undertaken during the Examination and the areas where progress has been made. However, the Parish Council considers that the following matters remain unresolved and material to the Examining Authority's recommendation:

- Demonstration that the Sequential Test has been passed through avoidance, not mitigation;
- Proper application of the mitigation hierarchy in accordance with national policy and EIA principles;
- Adequacy of residential impact identification and assessment at the level of individual properties;
- Quantified assessment of Battery Energy Storage System (BESS) fire, pollution, and flood-interaction risks;
- Integration of mental health and wellbeing impacts into the assessment of significance;
- Robust and evaluative assessment of cumulative effects, including inter-project interactions.

SCPC respectfully reminds the Examining Authority that where material uncertainty remains at the close of the Examination — particularly in relation to flood risk, application of the mitigation hierarchy, and residential impacts — such uncertainty must weigh against the grant of Development Consent. The Parish Council's concern is not that these matters have been inadequately discussed, but that they have not been conclusively resolved to the standard required by national policy and the Environmental Impact Assessment Regulations.

SCPC also notes that, as the Examination has progressed, the focus has increasingly shifted from whether the proposed site selection avoids key constraints, to how impacts arising from those constraints might be managed or mitigated. In the Parish Council's view, this shift risks obscuring the fundamental policy requirement to demonstrate site suitability and avoidance before reliance is placed on mitigation or the future discharge of requirements.

Finally, SCPC observes that the Examination has involved an exceptionally high volume of late-stage revisions, tracked documents, and explanatory clarifications. While the Parish Council acknowledges the Applicant's engagement and responsiveness, the cumulative effect has been to make it increasingly difficult for affected communities to understand with certainty the final form of the proposed development and its impacts. This context reinforces the importance of resolving, rather than deferring, material uncertainties at this stage.

SCPC submits that these matters are not minor or technical issues, but go to the heart of whether the application complies with national policy and the EIA Regulations. The Parish Council therefore respectfully invites the Examining Authority to give these issues significant weight in reaching its recommendation.

Yours faithfully

████████ (on behalf of South Clifton Parish Council)