



- Further clarification on technical matters has continued into the post-examination stage, including requests for additional information from the Department for Energy Security and Net Zero.

Taken together, these factors indicate that flood risk and infrastructure resilience are currently being assessed through a distributed framework of responsibilities rather than through a single consolidated and decision-ready technical assessment.

## **2. Concern regarding staged mitigation and component-level responses**

We also note that, in response to flood risk concerns, the applicant has proposed increasing the elevation of certain infrastructure elements, including inverter platforms, to heights exceeding modelled flood levels.

While we recognise this as a mitigation approach, we are concerned that this represents a component-specific response rather than evidence of a fully integrated flood resilience strategy for the entire development site.

In particular, the development includes multiple flood-sensitive infrastructure components beyond inverter platforms, including:

- Battery Energy Storage System infrastructure;
- transformer and switching equipment;
- electrical connection and junction infrastructure;
- control systems and supporting cabling networks.

It is not clear from the evidence base that:

- a single integrated flood resilience standard has been applied across all such components;  
or
- a complete and tested flood design envelope has been fixed at the point of determination.

This raises concern that mitigation is being addressed incrementally or on a component-by-component basis rather than through a fully integrated system-wide approach tested against combined and extreme event scenarios.

## **3. Drinking Water Protected Area and environmental sensitivity**

We also note that large parts of the development area are identified as environmentally sensitive in relation to being a Drinking Water Protected Area (DWrPA), containing protected drinking water resources.

In our view, this further increases the importance of ensuring that flood risk, drainage behaviour, firefighting runoff management, and infrastructure resilience have been assessed through a fully integrated and precautionary framework prior to determination.

Given the inclusion of Battery Energy Storage System infrastructure within the proposed development, we are concerned that the publicly available evidence does not yet clearly demonstrate a single consolidated assessment of how extreme flood events, drainage exceedance, emergency response measures, and potential contamination pathways would interact within such a sensitive environmental setting.

## **4. Lincolnshire Fire and Rescue consultation concerns**

We also note that Lincolnshire Fire and Rescue has confirmed, in response to an Environmental Information Regulations request, that it holds consultation material and internal deliberations relating to:

- fire safety considerations;
- firefighting runoff capacity;
- emergency response capability; and
- infrastructure resilience associated with the proposed development.

While we recognise the legal basis upon which disclosure has currently been withheld during the live examination process, the response nevertheless confirms that significant technical consultation and deliberation concerning infrastructure resilience and emergency response remains ongoing across multiple authorities and consultees.

In our view, this further reinforces concern that the publicly available evidence base does not yet demonstrate a fully integrated and transparently evidenced assessment of flood resilience, infrastructure safety, emergency response capability, and residual risk prior to determination.

## **5. Community concern regarding decision-stage certainty**

While we recognise that NSIP processes often involve staged assessment and outline-level design, our concern is that the current position does not yet provide sufficient cross-authority and cross-boundary assurance regarding:

- cumulative flood interactions across surface water, groundwater, and fluvial systems;
- the finality and enforceability of drainage design assumptions;
- the consistency of modelling assumptions under extreme or combined event scenarios;
- and whether all relevant authorities are able to confirm a fully joined-up assessment of residual flood and infrastructure resilience risk.

We therefore consider that there remains a material degree of uncertainty at the point at which the Secretary of State is being asked to make a determination.

## 6. Request to the Councils

In light of the above, we respectfully request that both councils:

1. Formally consider whether the current evidence base provides sufficient cross-authority and cross-boundary technical certainty and integrated infrastructure resilience to support the grant of development consent at this stage;
2. If not satisfied, clearly communicate to the Secretary of State / Department for Energy Security and Net Zero that:
  - further integrated flood risk assessment and infrastructure resilience clarification is required prior to determination; and
  - reliance on post-consent detailed design development does not provide sufficient certainty at decision stage;
3. Ensure that any council representation does not frame flood risk and infrastructure resilience resolution as matters capable of being adequately deferred to post-consent design stages where material uncertainties remain unresolved at the point of decision.

## 7. Closing statement

We fully recognise the respective roles of the authorities within the planning process. However, given the scale of community concern, the complexity of flood risk interactions, the sensitivity of the surrounding environmental setting, and the inclusion of Battery Energy Storage System infrastructure within the development, we believe it is essential that decision-making is informed by a fully integrated, transparently evidenced, and clearly resolved understanding of residual risk prior to determination.

We would be grateful if this representation is formally recorded and reflected within the councils' submissions to the Secretary of State as part of the ongoing determination process.

Yours faithfully,

██████████

On behalf of residents of North and South Clifton  
(Supported by 150+ in-person or web sign-up petition signatories – attached to this correspondence)