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By email to: oneearth solar@planninginspectorate.gov.uk

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One Earth Solar Farm (EN010159)

Response to the Secretary of State's letter of 21 May 2026 inviting comments on the published responses to the Secretary of State's information request of 1 May 2026

Dear Mr Dawkins,

We write as Interested Parties and residents of North Clifton in response to the Secretary of State's letter dated **21 May 2026** inviting comments on the responses published following the Secretary of State's information request of **1 May 2026**.

We have reviewed in particular the published responses relating to **Requirement 7 (Battery Safety Management)** and **Requirement 22 (Flood Risk Mitigation)**, including the **Environment Agency response dated 14 May 2026**, the **Nottinghamshire County Council response dated 15 May 2026**, the **Lincolnshire County Council response dated 14 May 2026**, and the Applicant's published response **EN010159-001434**.

We note that the **Environment Agency** states that it is satisfied with the amended wording of Requirements 7 and 22; that **Nottinghamshire County Council** does not object to the amendments in principle but expressly asks that local residents' flood concerns are fully considered; and that **Lincolnshire County Council** has raised no objection to the amended wording, whilst also recording input from **Lincolnshire Fire and Rescue** in relation to Requirement 7.

However, having reviewed those responses, we do **not** consider that the amendments to Requirements 7 and 22 cure the fundamental defects in this proposal. In our view, the published responses confirm that critical matters of **battery safety, flood risk, pollution control and drinking water protection remain unresolved**, and that the Secretary of State is still being asked to rely on **post-consent plans and approvals to manage risks which should have been addressed before any consent is granted**.

In particular, the published responses do not, in our respectful view, adequately address:

1. the siting of a very large **Battery Energy Storage System ("BESS")** and associated infrastructure in or adjacent to a **Drinking Water Protected Area** and close to strategic **drinking-water assets**;
2. the interaction between **battery safety, contaminated fire-fighting runoff, pollution pathways and flood risk**;

3. the extent to which important matters are still being deferred to **post-consent approval**, rather than being resolved before any decision is taken; and
4. whether the published responses properly address the **specific locational risks of this site**, rather than only the general principle of managing a battery installation in abstract terms.

For the reasons set out below, we respectfully submit that the amendments to Requirements 7 and 22 do **not** provide a sound basis for granting development consent and that the Secretary of State should **refuse consent** for the proposed development.

1. Requirement 7 – Battery Safety Management

We acknowledge that amendments have been proposed to Requirement 7 and that the **Environment Agency, in its response dated 14 May 2026, states that it is satisfied with the amended wording**. We also note that **Lincolnshire County Council’s response dated 14 May 2026** records that **Lincolnshire Fire and Rescue** suggested that Requirement 7 should include wording requiring the Battery Safety Management Plan to be developed in accordance with national guidance, minimum safety standards and relevant testing standards.

However, our concern is not whether a battery safety plan can be required after consent in principle. Our concern is whether the Secretary of State can be satisfied **now**, before any consent is granted, that a BESS of this scale can safely be located in **this particular setting**.

In our view, the answer to that question remains **no**.

The central problem is not one of drafting. It is one of **site suitability and unresolved risk**. A very large BESS and associated infrastructure are still proposed in or adjacent to a **Drinking Water Protected Area**, close to **North Clifton Reservoir** and strategic **drinking-water treatment infrastructure**, in a landscape where **flood risk and drainage pathways are already sensitive and contested issues**. The published responses do not demonstrate that this location is appropriate for infrastructure of this hazard profile.

(a) Fire-fighting runoff and containment remain unresolved

A central concern for us throughout the examination has been the risk of **contaminated fire-fighting water and other pollutants escaping from a serious BESS fire incident**. In our respectful view, the published responses do not explain with sufficient clarity why the proposed runoff containment arrangements should be regarded as adequate for a realistic major BESS fire scenario at this site.

We remain concerned that reliance is still being placed on broad assumptions about the likely duration and management of a fire incident, without a clear explanation at decision stage of how the adequacy of runoff containment has actually been tested against the consequences of a serious battery fire in this location.

That matters especially here because any failure of containment would not occur in isolation. It would occur in a landscape containing **ditches, drains, flood pathways, watercourses and strategic water infrastructure**. The issue is therefore not simply whether a fire can be managed on site, but whether the consequences of a fire event — including contaminated water, contaminated debris and wider pollution pathways — can be reliably contained in a location of this sensitivity.

In our view, neither the **Environment Agency’s response of 14 May 2026** nor the Applicant’s published response in **EN010159-001434** sufficiently explains why the proposed runoff containment

and emergency arrangements should be treated as adequate for a major BESS fire scenario in this particular location.

(b) The published responses do not resolve off-site environmental risks

We note that previous material during the examination referred to a review by the **UK Health Security Agency** indicating that, because this is a rural site with limited residential receptors within the modelled hydrogen fluoride plume area, public-health impacts from a controlled-burn approach would probably be low.

Even if that conclusion were accepted at face value, it does **not** resolve the separate and critically important question of **off-site environmental consequences**.

In particular, it does not answer the question of what would happen in the event of a major BESS fire to:

- **North Clifton Reservoir;**
- the nearby **drinking water treatment works** and associated infrastructure;
- nearby ditches, drains and watercourses;
- agricultural land, grazing land and ecological receptors;
- and the wider water environment in the event of smoke deposition, contaminated runoff, flood-related transport of pollutants, or other fire-related contamination pathways.

A conclusion that public-health impacts to nearby residential receptors may be limited is **not** the same as demonstrating that risks to protected waters and strategic drinking-water assets are acceptable. In our view, the published responses do not confront that distinction with anything like the seriousness it requires.

(c) This is the wrong location for a BESS of this scale

Our objection is not to battery storage in the abstract. It is to the siting of a BESS of this scale **in this particular location**.

The proposed BESS is not being sited on a remote industrial site or in a location plainly separated from sensitive water receptors. It is proposed in close proximity to **North Clifton Reservoir** and the nearby **drinking water treatment works**, and within or immediately adjacent to land identified as a **Drinking Water Protected Area**. In our view, those locational factors are not peripheral matters. They go to the heart of whether the proposal is acceptable at all.

The published responses do not come close to demonstrating that this location is suitable for infrastructure of this hazard profile. On the contrary, they reinforce the extent to which the consequences of a serious battery incident, and the implications for protected waters and strategic drinking-water assets, remain uncertain.

(d) These are not matters that should be left to post-consent discharge

Requirement 7 appears to assume that the principal answer to these concerns is a stronger Battery Safety Management Plan to be approved after consent. We do not accept that approach.

Where the proposed development includes a very large BESS in such a sensitive location, the key questions of **site suitability, contaminated firewater management, pollution containment,**

interaction with flood pathways and protection of drinking-water infrastructure should not be deferred to post-consent approval. Those are matters which go to the basic acceptability of the proposal and should have been resolved before any Development Consent Order is made.

In our respectful view, the Secretary of State should not accept a post-consent management plan as a substitute for demonstrating, now, that this site is safe and suitable for a BESS of this scale.

2. Requirement 22 – Flood Risk Mitigation

We also remain firmly of the view that the published responses do **not** demonstrate that the amended wording of **Requirement 22** resolves the flood-risk issues raised during the examination.

We note that the **Environment Agency response dated 14 May 2026** states that it is satisfied with the amended wording of Requirement 22. We also note that **Nottinghamshire County Council**, in its response dated **15 May 2026**, states that it does not object to the further amendments proposed to Requirements 7 and 22, but expressly highlights the continuing concerns raised by **Save Our Heritage Villages** and local residents regarding the uncertainty that remains in relation to flood risk and the level of detail still left to be determined after consent. **Lincolnshire County Council**, in its response dated **14 May 2026**, states that it has no further comments on the amended wording of Requirement 22.

However, in our view, these responses do not answer the real question before the Secretary of State: **whether this development, in the form proposed and in this location, has been shown to be acceptable in flood-risk terms before consent is granted.**

(a) Flood risk and battery safety are inseparable on this site

For this project, flood risk and battery safety are not separate topics. They are linked. The potential consequences of a battery fire, contaminated fire-fighting runoff, damage to electrical infrastructure, and the spread of pollutants must be considered in the context of the site's flood-risk characteristics and drainage pathways.

In our view, the amended wording of Requirement 22 does not resolve that problem. It merely postpones important parts of it.

If substantial associated electrical and battery infrastructure remains in **Flood Zones 2 and 3**, then the question is not simply whether a flood mitigation plan can later be approved. The question is whether the Secretary of State should grant consent for such infrastructure to be located in that setting at all.

(b) The published responses do not answer the local flood evidence

Our family has lived in North Clifton for many years and we know from direct experience that this area is sensitive to **heavy rainfall, drainage pressure and local flooding conditions**. In previous submissions we have explained concerns about the way water moves through and around North Clifton, including the interaction between local drainage, sloping land and the wider flood environment.

We have previously referred in particular to the field sloping down toward the village, where runoff can move toward **Croft's farmyard** and the northern edge of North Clifton, especially during heavy rainfall and when local drainage is already under pressure. We have also referred to a **natural spring**

in that area during wet conditions. Those are not abstract concerns. They are based on long-term local observation of how water behaves on the ground in and around our village.

We appreciate that local observations are not a substitute for formal hydrological assessment. But they are plainly relevant evidence of site sensitivity and of the practical consequences of getting the flood assessment wrong. In that respect, we note that **Nottinghamshire County Council's response of 15 May 2026** specifically asks that the representations made by local residents and other Interested Parties on flood risk throughout the examination are given full consideration. We respectfully submit that those concerns are **not** answered merely by amending the wording of Requirement 22.

(c) Wording changes do not resolve the underlying flood-risk problem

In our view, the amendments to Requirement 22 do not cure the underlying difficulty that too much remains uncertain and too much is still left to be settled later.

Where a proposal of this scale includes a very large BESS, associated electrical infrastructure and development in a flood-sensitive landscape close to protected water resources and strategic drinking-water infrastructure, the Secretary of State should not be asked to assume that the necessary detail can safely be resolved after consent. If the flood consequences of the scheme, and its interaction with battery safety and pollution control, are still dependent on later plans, that is not a sign that the problem has been solved. It is a sign that the problem remains unresolved.

3. Drinking Water Protected Area and strategic drinking-water infrastructure

This remains, in our view, one of the most serious unresolved issues in the entire proposal.

A substantial area of the proposed development east of the River Trent, including the area around the proposed eastern BESS, lies within or immediately adjacent to a **Drinking Water Protected Area**. The proposed BESS is also very close to **North Clifton Reservoir** and to strategic **drinking-water treatment infrastructure** serving Lincoln and surrounding communities.

The published responses do not, in our respectful view, adequately explain:

- how the significance of the **Drinking Water Protected Area** designation has been weighed in considering the acceptability of this location;
- how the risks from a major battery fire, smoke, contaminated fire-fighting runoff, flood-related spread of pollutants, or longer-term contamination pathways would be prevented from affecting nearby water assets;
- why these matters can safely be left to post-consent discharge rather than being resolved before any Development Consent Order is made; or
- how the Secretary of State can be satisfied that a genuinely precautionary approach has been applied in a location of this sensitivity.

We are particularly concerned that the published responses fail to grapple with the **combined significance** of the following factors:

1. a very large BESS and associated electrical infrastructure;
2. proximity to **North Clifton Reservoir** and strategic **drinking-water treatment infrastructure**;
3. the presence of a **Drinking Water Protected Area**;
4. the site's **flood-risk and drainage sensitivity**; and

5. continued reliance on **post-consent plans** to resolve key details.

Taken individually, each of those matters may be said to be manageable. Taken together, they raise a much more serious question: **whether this is simply the wrong place for infrastructure of this nature and scale.**

In our respectful view, the Secretary of State should not treat the fact that amended wording has been agreed with some statutory bodies as answering that broader and more fundamental question.

4. The fundamental problem is not drafting: it is that the proposal still has not demonstrated that this site is suitable

We recognise that the Environment Agency, Nottinghamshire County Council and Lincolnshire County Council have not objected to the amended wording of Requirements 7 and 22. We do not dismiss those responses. But we respectfully submit that they do not answer the central issue now facing the Secretary of State.

The issue is **not** whether the amended Requirements are better drafted than before. The issue is whether the Secretary of State can properly grant consent for a development which still proposes:

- a very large BESS and associated infrastructure in or adjacent to a **Drinking Water Protected Area**;
- development close to **North Clifton Reservoir** and strategic **drinking-water treatment infrastructure**;
- infrastructure in a landscape where **flood risk, drainage and runoff pathways remain contentious and sensitive**; and
- a scheme where key matters of **battery safety, contaminated runoff, pollution control and flood mitigation** are still substantially dependent on post-consent approval.

In our view, the answer is **no**.

These are not minor drafting issues or matters of detail. They go to the **basic suitability of the site, the safety of the proposed development, and the adequacy of the evidence before the Secretary of State.**

5. Conclusion

For the reasons above, we respectfully submit that the published responses — including the **Environment Agency response dated 14 May 2026**, the **Nottinghamshire County Council response dated 15 May 2026**, the **Lincolnshire County Council response dated 14 May 2026**, and the Applicant's published response **EN010159-001434** — do **not** remedy the substantive problems with **Requirement 7 (Battery Safety Management)** or **Requirement 22 (Flood Risk Mitigation)**, nor do they provide a proper basis for concluding that this development is acceptable in this location.

The central problem is not one of drafting. It is that a very large BESS and associated infrastructure are still proposed in or adjacent to a **Drinking Water Protected Area**, close to **North Clifton Reservoir** and strategic **drinking-water infrastructure**, in circumstances where **flood risk, contaminated firewater, pollution pathways and wider environmental consequences remain insufficiently resolved.**

In our view, these are not matters that should be left to post-consent discharge. They go to the **basic suitability of the site** and the **safety of the proposed development**. The Secretary of State should not accept amended wording to Requirements 7 and 22 as a substitute for resolving those issues before consent.

We therefore respectfully ask the Secretary of State to give substantial weight to the unresolved objections raised by local residents and Interested Parties throughout the examination and to conclude that **development consent should be refused**.

Yours sincerely,

Sheila Pumfrey
Jane Pumfrey