

Ray and Sarah Armstrong



theskydiveco@yahoo.co.uk

To: The Secretary of State for Energy Security and Net Zero
By email to: oneearthsolar@planninginspectorate.gov.uk

Case Reference: EN010159

Application by One Earth Solar Farm Limited for a Development Consent Order for the One Earth Solar Farm

RESPONSE OF MR RAY ARMSTRONG TO THE SECRETARY OF STATE'S INVITATION TO COMMENT ON THE PUBLISHED RESPONSES

Dear Mr Dawkins,

I write as an Interested Party and member of the "Say No to One Earth Solar Farm" campaign in response to the Secretary of State's letter of 21 May 2026 inviting comments on the published responses to the Request for Information dated 1 May 2026.

I remain strongly opposed to the proposed development and, having reviewed the published responses, I do not consider that the amendments to Requirement 7 (Battery Safety Management) and Requirement 22 (Flood Risk Mitigation) resolve the fundamental concerns that have been raised throughout the examination.

In my view, the latest responses do not cure the central problem: this project still proposes to place a very large Battery Energy Storage System ("BESS") and associated electrical infrastructure in an exceptionally sensitive location, namely **within and immediately adjacent to a Drinking Water Protected Area, beside strategic drinking-water infrastructure, and in a landscape where flood risk and pollution pathways remain matters of serious concern.**

1. THE PUBLISHED RESPONSES DO NOT ADDRESS THE CORE LOCATIONAL RISK OF THIS SITE

My principal concern is not simply the wording of a management plan. It is the **location** of the proposed infrastructure.

A substantial part of the Order Limits east of the River Trent lies within the **Drinking Water Protected Area (DrWPA ID: UKGB104028058480)**. Within that same part of the scheme, the Applicant proposes a major BESS installation and associated plant in immediate proximity to highly sensitive water infrastructure, including:

- the **Anglian Water drinking water treatment plant at North Clifton**, which serves the city of Lincoln and is understood to supply **up to 2 million litres of drinking water per day**; and
- the nearby **North Clifton Reservoir**, together with connected drains, ditches, watercourses and the surrounding water environment.

This is not a minor or abstract point. It means the Secretary of State is being asked to approve a major battery installation **on top of a protected drinking-water catchment and next to infrastructure used to treat and supply public drinking water**.

The published responses do not, in my view, grapple with that fact in a meaningful way. Instead, they appear to proceed on the basis that if the wording of Requirement 7 and Requirement 22 is tightened, the underlying concern falls away. It does not. The problem is not merely whether a future management plan can be approved; it is whether this is an appropriate place for this development at all.

2. REQUIREMENT 7 CANNOT SOLVE THE PROBLEM OF SITING A VERY LARGE BESS BESIDE STRATEGIC DRINKING-WATER INFRASTRUCTURE

The amended wording of Requirement 7 appears to require the Battery Safety Management Plan to be submitted and approved before the relevant stage of development proceeds. However, that does not answer the much more important question: **should a BESS of this scale be consented in this location in the first place?**

The proposed eastern BESS area is not an isolated industrial estate or remote brownfield site. It is adjacent to strategic drinking-water infrastructure and located within a Drinking Water Protected Area that exists precisely because the raw water environment requires protection. That protected status is not decorative. It exists because deterioration or contamination of the water environment may have direct implications for drinking-water quality, treatment burden and public confidence in the safety of supply.

If there were a serious BESS fire, thermal runaway event or major system failure, the potential pollutant pathways are not limited to a single fenced compound. Potential routes include:

- **airborne deposition** of battery fire particulates and combustion by-products;
- **fire-fighting water runoff** and contaminated surface water;
- migration to **drains, ditches, soils, groundwater and connected watercourses**;
- deposition onto nearby land and water bodies, including areas hydrologically connected to the reservoir and treatment infrastructure.

These are precisely the kinds of risks that are especially serious in a protected drinking-water catchment.

3. THE RISK FROM A BESS FIRE IS NOT ANSWERED BY GENERAL ASSURANCES OR BY RELYING ON FAVOURABLE ASSUMPTIONS

One of my longstanding concerns is that the Applicant's material has repeatedly presented BESS fire consequences in a way that appears to emphasise the most favourable scenario rather than the full range of realistic outcomes.

In my earlier submission, I highlighted the Applicant's statement in the Outline Battery Safety Management Plan that, at the eastern BESS site, there are no sensitive receptors within the area where assessment levels may be exceeded in 90% of meteorological conditions, and therefore no significant adverse health effects are anticipated. I remain concerned that this presents the issue in an unduly reassuring way.

The eastern BESS is not located in an empty landscape. Sensitive receptors in the surrounding area include, among other things:

- the **North Clifton drinking water treatment plant**;
- **North Clifton Reservoir**;
- homes and settlements including **North Clifton village**;
- nearby roads and businesses;
- poultry units and agricultural receptors; and
- the wider protected water environment.

The difficulty with presenting outcomes by reference to "90% of meteorological conditions" is obvious: it leaves unanswered what happens in the remaining conditions, including conditions in which emissions, smoke, particulates or fire-related contaminants may travel towards water infrastructure, homes or other receptors.

In a case involving a large BESS beside drinking-water infrastructure, it is not good enough to rely on a broadly favourable generalisation about likely wind direction or typical conditions. The issue is the consequence of a serious incident if less favourable conditions occur. That is especially so where the site lies within a protected drinking-water catchment and where the treatment works and reservoir are in close proximity.

4. THE TREATMENT OF WATER POLLUTION RISK REMAINS INADEQUATE

The fact that the Environment Agency has indicated that it is satisfied with the amended wording of Requirements 7 and 22 does not, in my respectful view, resolve the substantive concerns raised by residents.

The issue is not merely whether a future plan can be produced. The issue is whether the examination and the decision-makers have sufficient evidence now to conclude that the risks to protected water resources and strategic drinking-water infrastructure are acceptable.

That is not presently clear.

A Drinking Water Protected Area is intended to safeguard water abstracted for public supply. The relevant legal and policy framework exists because prevention of deterioration and contamination is plainly preferable to attempting to manage the consequences after the event. Where development is proposed within such an area, and where that development

includes a very large lithium-ion battery installation adjacent to a drinking water treatment plant and close to a reservoir, a high degree of scrutiny and precaution is plainly required.

Yet the responses published following the 1 May 2026 request appear to focus largely on the adequacy of amended drafting rather than on whether the Secretary of State can be satisfied, on the evidence currently before him, that:

- contamination pathways to protected waters and strategic drinking-water assets have been fully assessed;
- the implications of a significant BESS fire, smoke plume, airborne deposition event, or contaminated fire-water release have been properly examined for this specific location;
- the treatment works and reservoir have been properly treated as sensitive receptors in their own right; and
- these matters have been resolved **before consent**, rather than postponed to a later approval stage.

5. IMPORTANT MATTERS REMAIN DEFERRED TO POST-CONSENT APPROVAL

A recurring concern throughout the examination has been the extent to which important details are left to be dealt with later through discharge of requirements.

That concern is particularly acute here. If the Secretary of State grants consent, the principle of locating this infrastructure in this protected and sensitive setting will already have been approved. At that point, a later Battery Safety Management Plan or Flood Risk Mitigation Strategy cannot revisit the basic siting decision. It can only attempt to manage the consequences of a development whose location has already been accepted.

In my view, that is the wrong way round.

The Secretary of State should not be asked to approve the principle of a very large BESS beside a drinking water treatment plant and within a Drinking Water Protected Area on the basis that the details of how to make it safe can be worked out afterwards. If the evidence does not presently establish that the risks are acceptable, then the appropriate course is not to defer them; it is to refuse consent.

6. FLOOD RISK AND BATTERY SAFETY CANNOT SENSIBLY BE SEPARATED AT THIS SITE

I am also concerned that flood risk and battery safety have been treated as though they are largely separate matters, when in reality they interact.

If battery infrastructure and associated electrical plant are located in or close to areas at risk of flooding, then flood risk is not merely a civil engineering matter. It becomes part of the overall safety and environmental risk profile of the BESS itself. Equally, if a fire or failure event were to occur, the movement of contaminated water through flood pathways, drains, ditches and watercourses becomes part of the flood-risk issue.

For that reason, I do not consider it sufficient simply to say that Requirement 7 has been amended and Requirement 22 has been amended. The Secretary of State must still ask whether the combination of:

- a major BESS installation,
- a Drinking Water Protected Area,
- immediate proximity to a drinking water treatment plant and reservoir,
- and unresolved flood-risk concerns

creates an unacceptable overall risk such that the development should not be consented in this location.

7. THE PRECAUTIONARY APPROACH SHOULD LEAD TO REFUSAL

In my respectful submission, the answer to that question is yes.

This is not a case where objectors are merely expressing a general dislike of energy infrastructure. The concern is more specific and more serious than that. It is that a nationally significant energy project is proposed in a location where the consequences of failure could affect protected waters, strategic drinking-water infrastructure, nearby residents, local businesses and the wider environment, yet key issues remain unresolved and are still being pushed into post-consent plans and future approvals.

The Secretary of State is not confined to asking whether a battery management plan could theoretically be drafted. He is entitled to ask a more basic and more important question: **is this the right place for this infrastructure at all?**

In my view, the evidence before the Secretary of State does not justify consent for:

- a very large BESS immediately adjacent to the North Clifton drinking water treatment plant;
- infrastructure located within or beside a designated Drinking Water Protected Area;
- development in a setting where concerns remain regarding flood risk, contaminated runoff, smoke and airborne pollutants, and impacts on connected water resources.

8. CONCLUSION

For those reasons, I respectfully submit that the responses published following the Secretary of State's request for information do **not** resolve the underlying concerns in relation to Requirement 7 or Requirement 22.

On the contrary, they reinforce the fact that the Applicant is still seeking consent for a form of development in a location where the consequences of failure could be severe, while relying on post-consent controls to manage risks that should have been resolved before any consent is granted.

I therefore urge the Secretary of State to give full weight to the exceptional sensitivity of this site, including:

- the presence of the **North Clifton Anglian Water drinking water treatment plant** serving Lincoln;
- the location of the scheme within and adjacent to a **Drinking Water Protected Area**;
- the proximity of the **20 Acre North Clifton Reservoir** and connected water environment; and
- the continuing uncertainty over the interaction between **battery fire risk, contamination pathways and flood risk**.

In my view, the proper and precautionary course is to **refuse development consent** for the proposed development.

Yours sincerely,

Ray and Sarah Armstrong