

From Mr David White

On behalf of the communities of North and South Clifton
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22 June 2026

To: The Planning Inspectorate
IP Ref: F1800218E
Case Reference: EN010159 – One Earth Solar Farm

Dear Mr Dawkins,

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

Response on behalf of Action Group and residents of North and South Clifton to the published responses concerning Requirement 7 (Battery Safety Management) and Requirement 22 (Flood Risk Mitigation)

We write on behalf of residents of North Clifton and South Clifton in response to the Secretary of State's letter of 21 May 2026 inviting comments on the responses to the information request dated 1 May 2026.

Our communities have engaged extensively throughout this examination because this proposal would industrialise a highly sensitive rural landscape and place nationally significant energy infrastructure in a location where the consequences of failure could be severe: within and adjacent to a Drinking Water Protected Area, immediately beside strategic drinking-water infrastructure, and across land affected by serious flood-risk constraints.

Having reviewed the published responses from the Applicant and other Interested Parties, we remain firmly of the view that the amendments to Requirement 7 (Battery Safety Management) and Requirement 22 (Flood Risk Mitigation) do **not** resolve the fundamental concerns raised throughout the examination. On the contrary, the responses confirm that important matters of principle and detail remain unresolved and that too much is still being left to post-consent discharge.

For the reasons set out below, we respectfully submit that the proposed development should **not** be granted development consent.

1. The published responses do not resolve the central problem: this is the wrong site for this development

At the heart of this issue is not simply the drafting of two DCO requirements. It is the **location of the development itself**.

The proposed scheme includes a very large Battery Energy Storage System ("BESS") and associated electrical infrastructure in and around land that sits within a **Drinking Water Protected Area**, close to **North Clifton Reservoir**, and immediately adjacent to the **Anglian Water drinking water treatment works at North Clifton**, which supplies treated drinking water onward to Lincoln and

surrounding communities. The treatment works lies within the Order limits and is effectively surrounded by elements of the proposed scheme, with the eastern BESS area immediately adjacent and solar infrastructure around it.

That is the context in which Requirement 7 and Requirement 22 must be considered.

The question for the Secretary of State is therefore not merely whether wording has been improved, but whether a project of this scale — including a major BESS and extensive associated infrastructure — should be consented **in this location at all**, given the combination of:

1. drinking-water sensitivity and strategic water infrastructure;
2. flood risk, including development in Flood Zones 2 and 3;
3. the risk of fire, fire-fighting runoff, smoke, particulates and contamination arising from BESS failure;
4. the interrelationship between flood conditions, pollution pathways and emergency response; and
5. the extent to which key safeguards are still deferred until after consent.

In our submission, the answer is plainly **no**.

2. Requirement 7 and Requirement 22 do not cure the underlying locational risks

We acknowledge that the wording of Requirement 7 and Requirement 22 has been amended and that some Interested Parties have indicated that the revised wording provides greater clarity than before. However, the fact that wording has been tightened does **not** mean the underlying planning and environmental objections have been resolved.

The Environment Agency's brief response stating that it is "satisfied" with the amended wording does not answer the more important question: whether a very large BESS and associated infrastructure should be permitted at **this location** in the first place, given the obvious sensitivity of the receiving environment and the proximity to strategic drinking-water assets.

Likewise, Nottinghamshire County Council's response does not amount to a conclusion that flood-risk concerns have been substantively resolved. NCC expressly highlighted the continuing concerns raised by local residents and other Interested Parties regarding the uncertainty that remains because too much detail is still left to be determined post-consent, and requested assurance that those concerns are given full consideration in the decision-making process. We strongly support that request.

Lincolnshire County Council's response is also limited. It records that Lincolnshire Fire and Rescue suggested that Requirement 7 should ensure the Battery Safety Management Plan is developed in accordance with national guidance and relevant safety standards, but it does not demonstrate that the site-specific concerns raised repeatedly by local communities — including the relationship between BESS fire risk, flood pathways, smoke and contamination risk to drinking-water assets — have been resolved.

In short, the published responses deal primarily with **wording**. They do not answer the more important question of **whether this is an appropriate location for the proposed development at all**.

3. Flood risk remains a live and serious issue, and the Examining Authority's own Rule 17 letter shows why

Flood risk has never been a peripheral issue in this examination. It has been one of the central concerns throughout, and the Examining Authority's own actions demonstrate that this is so.

In its Rule 17 request, the Examining Authority expressly asked the Applicant to consider whether, if the Sequential Test had not been passed, a version of the scheme excluding panels and associated infrastructure from Flood Zones 2 and 3 could still proceed as the same NSIP. That was an important and highly revealing request. The Examining Authority would not have issued it unless flood risk — and specifically the inclusion of development within Flood Zones 2 and 3 — was considered a material and unresolved issue.

That point matters greatly. It shows that the examination itself recognised a live question as to whether development in Flood Zones 2 and 3 is genuinely necessary at all. If the project could be reconfigured to exclude such areas, that directly undermines any suggestion that the current extent of flood-zone development is unavoidable or justified.

We therefore submit that the Secretary of State should attach substantial weight to the fact that the Examining Authority itself considered it necessary to explore whether the scheme could proceed **without** development in Flood Zones 2 and 3. That is wholly inconsistent with any attempt to treat the present flood-risk concerns as a minor matter that can simply be managed later through discharge of Requirement 22.

4. We support the concerns raised by Mr Stephen Fox on flood risk and local drainage

We also wish expressly to support the flood-risk concerns raised by **Mr Stephen Fox**, whose submissions reinforce what local residents have been saying throughout the examination: that this is not merely a theoretical or desk-based issue, but one rooted in the real behaviour of water in and around North and South Clifton.

Mr Fox's evidence is important because it highlights the practical local consequences of allowing extensive solar and associated infrastructure on land that is already hydrologically sensitive and closely connected to village drainage routes, ditches, low points and flood pathways. His concerns are consistent with long-standing local knowledge that the area is vulnerable when intense rainfall coincides with high river levels and when drainage systems are already under pressure.

Our communities support Mr Fox's concerns in particular where they underline that:

- surface-water behaviour and local drainage interactions matter just as much as mapped flood zones;
- the effect of development on runoff, concentration of flows, culverts, ditches, drains and receiving land must be considered in real-world conditions, not merely by reference to broad theoretical mitigation commitments;
- the practical consequences of runoff moving toward roads, farmyards, low-lying land and the village itself remain a serious concern; and
- it is not acceptable for local residents to be asked simply to trust that these matters can be resolved after consent when the development footprint is already fixed.

Those concerns remain highly relevant to Requirement 22. A more tightly worded requirement does not alter the fact that the proposal still places extensive infrastructure into a flood-sensitive landscape where the consequences of error would be borne by existing communities and by sensitive water infrastructure.

5. Flood risk cannot be separated from battery safety and pollution risk

A major weakness in the published responses is that they continue to treat battery safety and flood risk as if they were essentially separate matters. They are not.

At this site, they are closely connected.

If a major BESS fire or thermal runaway event were ever to occur, the resulting environmental risk would not be confined to flames alone. It could include:

- fire-fighting water and contaminated runoff;
- mobilisation of pollutants through drainage ditches, field drains and flood pathways;
- smoke, particulates and airborne deposition onto land and water;
- contamination of soils, surface waters and potentially groundwater; and
- increased difficulty of emergency response if access or conditions are compromised by flooding or saturated ground.

These are not abstract concerns. They are precisely the kinds of cumulative, interacting risks that ought to be resolved **before consent** if the site lies in or adjacent to a Drinking Water Protected Area, next to a drinking water treatment works, and within a wider flood-sensitive landscape.

Yet the published responses do not demonstrate that this integrated risk has been properly addressed. Instead, the approach remains fragmented: Requirement 7 addresses a Battery Safety Management Plan; Requirement 22 addresses flood-risk mitigation; but the Secretary of State is still being asked to assume that the interaction between the two can be safely managed later.

That is not good enough for a project in this location.

6. The proximity to strategic drinking-water infrastructure is a critical issue and has still not been properly addressed

The proposed development is not simply near ordinary agricultural drainage land. It is adjacent to **strategic drinking-water infrastructure**.

The **North Clifton Anglian Water treatment works** lies within the same landscape of the Order limits and is a critical part of the drinking-water supply system serving Lincoln and surrounding communities. It sits immediately beside the proposed eastern BESS area and within a landscape of ditches, drains, reservoir infrastructure and water-management features.

That should have triggered an especially cautious approach throughout the examination. Instead, from the perspective of local residents, the treatment works and the wider drinking-water

environment have too often been treated as background context rather than as sensitive receptors of the highest importance.

In our submission, the Secretary of State should proceed on the basis that the strategic importance of the treatment works and the associated drinking-water environment materially increases the seriousness of the unresolved concerns under both Requirement 7 and Requirement 22.

This is not a case where a battery installation is being proposed on an isolated industrial estate. It is being proposed next to strategic water infrastructure and within a protected water environment. That distinction matters, and it should weigh heavily against consent.

7. The Drinking Water Protected Area is not a label of convenience; it is a protected water environment that should carry real weight

A substantial area of the proposed development — particularly to the east of the River Trent — lies within a **Drinking Water Protected Area**. That designation exists because the area contributes to water used for public drinking-water supplies and is supposed to receive protection under the legal and policy framework governing water quality and water environment objectives.

The significance of that designation has, in our view, never been satisfactorily reflected in the treatment of this proposal.

The Secretary of State is required to have regard to the policy and legal framework concerning the water environment, including the **Water Environment (Water Framework Directive) (England and Wales) Regulations 2017** and the relevant river basin planning framework. During the examination, the Inspectorate itself recorded the important policy position that the Secretary of State **must refuse development consent** where a project is likely to cause deterioration of a water body or jeopardise the achievement of its objectives, unless the requirements of Regulation 19 are met.

That is not a trivial point. It goes to the heart of whether the project is lawful and acceptable in principle.

The problem here is that the present responses on Requirement 7 and Requirement 22 do not provide confidence that the Secretary of State can safely conclude that there is no unacceptable risk of deterioration, or that all relevant pathways have been fully examined before consent. The existence of a post-consent management plan is not the same thing as demonstrating **now**, before consent is granted, that there is no unacceptable risk to the protected water environment.

8. The published responses do not satisfactorily address BESS fire, smoke, particulates and fire-water contamination in this location

Local residents have repeatedly raised concerns about the consequences of a serious BESS fire, including:

- toxic smoke and gaseous emissions;
- airborne deposition of particulates and battery-derived contaminants;
- contamination from fire-fighting water or fire-water runoff;

- the difficulty of controlling or extinguishing battery fires;
- the possibility of re-ignition or prolonged incidents; and
- the implications for nearby homes, livestock, poultry units, roads, reservoir infrastructure and drinking-water assets.

Those concerns have not been invented for the purposes of objection. They reflect both real-world incidents and the obvious locational sensitivity of this site.

The current difficulty is that the published responses still do not properly confront the consequences of such an event **at this site** — i.e. in a Drinking Water Protected Area, adjacent to a drinking water treatment works, close to North Clifton Reservoir, and within a landscape where flood pathways and drainage routes matter.

It is not enough to say, in effect, that a Battery Safety Management Plan can be prepared later and that emergency procedures can be agreed post-consent. If the Secretary of State is being asked to authorise a very large BESS in such a location, the burden must lie firmly on the Applicant to demonstrate **now**, before consent, that the siting is acceptable and that the relevant risks have been robustly addressed. In our submission, that has not happened.

9. Too much is still being left to post-consent discharge

This remains one of the most serious problems with the application.

The published responses may show that the wording of Requirements 7 and 22 has been tightened in certain respects and that some bodies consider that this reduces flexibility. But even on that basis, a large amount of important detail still remains to be provided after consent.

That matters because once consent is granted, the key planning judgment — whether this development should be allowed in this location at all — has already been made.

In our submission, matters of the following kind should not be left to post-consent resolution in a case of this sensitivity:

- the adequacy of battery-fire mitigation in a protected drinking-water environment;
- the adequacy of containment and management of contaminated fire water;
- the interaction between flood conditions and pollution pathways;
- the protection of the nearby treatment works, reservoir and connected water environment;
- the real-world drainage and runoff consequences for North and South Clifton and surrounding land; and
- the extent to which emergency response assumptions are workable in practice.

The Secretary of State is not being asked to approve a harmless development on an uncomplicated site. He is being asked to approve a very large scheme in a highly sensitive location and to trust that the detail can be sorted out later. That is exactly the kind of approach that should be rejected where the stakes include drinking-water protection, flood risk, public safety and environmental harm.

10. The responses from statutory bodies do not justify consent

We recognise that the Environment Agency has indicated satisfaction with the amended wording of Requirements 7 and 22, and that local authorities have not objected to the wording changes themselves. But that should not be mistaken for a conclusion that the substantive planning and environmental objections have been overcome.

The Environment Agency's short response is especially unsatisfactory from the perspective of local residents because it does not explain **why** the agency considers the amendments sufficient in the specific context of:

- a large BESS;
- a Drinking Water Protected Area;
- adjacent strategic drinking-water infrastructure; and
- a site with significant flood-risk and drainage sensitivities.

Nor does it explain how the Secretary of State can be satisfied that no unacceptable risk remains to the protected water environment when so much detail is still deferred.

Similarly, Nottinghamshire County Council's response cannot be read as a clean bill of health for the scheme. NCC explicitly drew attention to the ongoing concerns of local residents regarding flood risk and uncertainty, and asked that those concerns be fully considered. We ask the Secretary of State to do precisely that.

11. The cumulative effect of the unresolved concerns points to refusal, not reassurance

Viewed individually, each of these matters is serious. Viewed cumulatively, they point overwhelmingly in one direction.

This proposal would place major energy infrastructure, including a very large BESS, in and around:

- a Drinking Water Protected Area;
- North Clifton Reservoir and its associated water environment;
- the North Clifton Anglian Water treatment works, which serves Lincoln and surrounding communities;
- land affected by flood risk and sensitive drainage conditions; and
- communities that have repeatedly raised evidence-based concerns about flood pathways, runoff, fire-water contamination and the consequences of BESS failure.

The published responses do not remove those concerns. They do not demonstrate that this is an appropriate location for the proposed development. They do not show that flood risk, battery safety and drinking-water protection have been satisfactorily resolved before consent. And they do not answer the Examining Authority's own concern, reflected in the Rule 17 request, as to whether development in Flood Zones 2 and 3 is genuinely necessary at all.

12. Conclusion

For all of the reasons above, and having reviewed the responses published following the Secretary of State's information request of 1 May 2026, we maintain our strong objection to the proposed development.

In particular, we submit that:

1. the amended wording of Requirement 7 and Requirement 22 does **not** resolve the underlying planning and environmental objections;
2. the development remains fundamentally **unsuited to this location** because of the combination of **flood risk, battery safety risk, drinking-water sensitivity** and proximity to **strategic water infrastructure**;
3. the Examining Authority's own Rule 17 request demonstrates that flood-zone development remains a serious and unresolved issue;
4. the concerns raised by **Mr Stephen Fox** and other local residents about local flooding, runoff and drainage remain highly material and should be given substantial weight;
5. too much of the detail is still being deferred to post-consent discharge, which is inappropriate for a scheme of this nature in such a sensitive location; and
6. the Secretary of State should not grant development consent for a project that places a very large BESS and associated infrastructure in and around a **Drinking Water Protected Area** and immediately adjacent to strategic drinking-water assets without complete confidence that the risks have been fully examined and resolved.

Our communities have consistently made clear that this proposal is unacceptable in this location. We therefore respectfully urge the Secretary of State to **refuse development consent** for the One Earth Solar Farm.

Yours sincerely,

David White

For and on behalf of residents of North and South Clifton

Drinking Water Protected Area (DrWPA) and associated Infrastructure images on next page

(Including side by side with development area)

Drinking Water Protected Area

- Site overlaps Drinking Water Protected Area GB104028058480 (Map)

Department for Environment Food & Rural Affairs | Data Services Platform

Environment Agency | Catchment Data Explorer | Home Search Help API

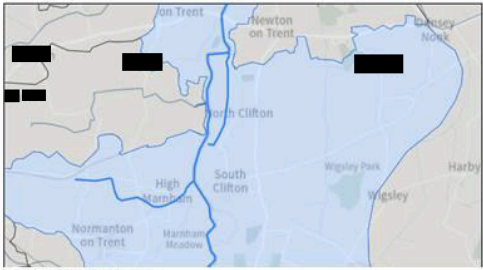
Home / Humber / Trent Lower and Erewash / Trent and Trib / Trent from Carlton-on-Trent to Laughton Drain

Trent from Carlton-on-Trent to Laughton Drain Water Body

Moderate ecological status

GB104028058480 is a legally recognised protected catchment for drinking water sources.

The image shows the zone's boundaries and context.



Protected areas

PA Name	Id	Directive
Trent from Carlton-on-Trent to Laughton Drain	UKGB104028058480	Drinking Water Protected Area

Included in the solar farm development zone are the 20 acre North Clifton Reservoir And the Anglian Water: Hall Water Treatment works Together providing up to 2 million litres of drinking water per day to the city of Lincoln (image below)



Drinking Water Protected Area

- 'DrWPA' Map

- One Earth Solar Farm Map

from Carlton-on-Trent to Laughton Drain Water Body

Reservoir | Drinking water Treatment Plant | BESS Site



North and South Clifton