

[REDACTED]
Case Manager
National Infrastructure Planning
Temple Quay House
2 The Square
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Telephone: 01636 650000
Email: planning@nsdc.info

Your Ref: EN010159
Our Ref: 25/00377/CONSUL

Date: 11/03/25

Sent via email to:
Oneearthssolar@planninginspectorate.gov.uk

Dear [REDACTED]

Application by PS Renewables (PSR) & Ørsted for an order granting development consent for the One Earth Solar Farm

Section 55 of the Planning Act 2008 - Adequacy of consultation request

Overview

I write with reference to the above and following your letter dated the 27th February 2025 as received via email.

Please find attached the completed Proforma as requested (**attached as Appendix A**), which is also supplemented by the comments as made below.

Section 42 of the Planning Act 2008 – Duty to Consult

In respect of Section 42 of the Planning Act 2008 (PA2008), Newark and Sherwood District Council (NSDC) received consultation documents on the 30th May 2024 for the corresponding statutory consultation period. We also note that the Applicant chose to extend the consultation period by an additional 2 weeks, to coincide with the impacts of (at that time) the General Election and sought the views of NSDC in doing so.

The statutory consultation ran for just under 8 weeks between the 29th May and the 23rd of July 2024. During the statutory consultation period, the Applicant arranged additional briefings for both officers and members, to support the response to the statutory consultation process.

As such, from the perspective of NSDC as one of the relevant statutory consultees to the project, it is considered that the Applicant has complied with the requirements of Section 42 of the PA2008, as a matter of fact and that the duty to consult NSDC has been met.

Section 47 of the Planning Act 2008 – Duty to Consult Local Community

In respect of the Section 47 of the PA2008, the Applicant formally consulted NSDC on the 5th April 2024, with a covering email that stated that the consultation on the Statement of Community Consultation (SOCC) would run from the 5th April to the 2nd May 2024.

NSDC initially responded on the 9th April 2024 on a point of clarification confirming their view that the end of the statutory consultation period was in fact the 4th May 2024 on the basis that Section 47(3) of the PA2008 states that the local authority has until the end of the period of 28 days, that begins, with the day after the day of receipt of the consultation documents.

This clarification point was not disputed by the Applicant and NSDC issued their response on the SOCC consultation on the 3rd May 2024. As such, NSDC consider that the Applicant has therefore complied with the requirements of Section 47 (1), (2), (3) and of the PA2008 in that the SOCC was prepared, NSDC were consulted, and the appropriate deadline was set. In respect of Section 47(5) of the PA2008, which sets out that the Applicant must have ‘regard’ to the comments of the local authority, we offer the following comments below.

In respect of how the Applicant has had regard to the previous comments of NSDC on the SOCC, we have reviewed the Consultation Report and with particular reference to Appendix C4 (Regard had to host authority formal feedback on draft SOCC). Table C2 presents the comments of NSDC submitted at the formal stage of consultation on the SOCC and the Applicant response.

Whilst noting that this demonstrates the Applicant has taken into account the views of NSDC at formal consultation stage on the SOCC, we also note that the Applicant response is the same (other than small edits to make reference to the ‘Applicant’) as the response that was shared with NSDC, when they were informally consulted on the Adequacy of Consultation Milestone (AoCM) in November 2024.

In responding to the Applicant’s AoCM, NSDC raised some additional points and there is no evidence that we can find within the Consultation Report that these further comments have been responded to. Whilst noting and accepting that having ‘regard’ can still lead to a difference in opinion between the two parties, it is disappointing that the Applicant has not sought to provide additional responses to these further points from NSDC.

Whilst we are not suggesting that this results in any significant conflict with Section 47(5) of the PA2008, (and accepting these comments were made after formal consultation on the SOCC) best practice would suggest that the Applicant would pick up and evidence how these further comments were considered and a response provided within the Consultation Report. We enclose a copy of the response as issued to the Applicant on the AoCM in November 2024 as **Appendix B** to this submission.

Turning to the local community, NSDC is aware of some concerns on how the consultation was delivered and as such, we have recently received some direct representations in this regard. Although we note that the consultation under Section 55 of the PA2008 does not extend to the views of the community, we feel it appropriate to enclose these comments with our response. Please note, that we have not been afforded the opportunity to verify and consider the content of these representations given when it was received but are simply seeking to pass on these

representations to the Planning Inspectorate for information purposes and for their own consideration. A copy of these comments from the local action group are enclosed as **Appendix C**.

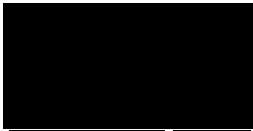
Section 48 of the Planning Act – Duty to Publicise

As the duty to publicise the proposed application under Section 48 of the PA2008 is a responsibility of the Applicant, NSDC have not sought or previously been provided with evidence of compliance with these requirements.

Notwithstanding this, we have in particular reviewed Section 6.3 of the Applicant's Consultation Report and Appendix I-1 that provides copies of all newspaper and publication notices. As such, we are satisfied that the Applicant has complied with their duties under Section 48 of the PA2008 – Duty to Publicise and that the publication methods are in accordance with Part 4 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

I trust these comments are of assistance to the Planning Inspectorate and should you wish to discuss further, please contact the undersigned.

Yours sincerely,



Planner, (Major Projects) Planning Development Business Unit
On behalf of Newark & Sherwood District Council

Enc – Appendix A – AoCR Proforma – One Earth Solar Farm
Appendix B – NSDC Response to Applicant on AoCM
Appendix C – Representations from Local Action Group



Adequacy of Consultation Representation Proforma – Appendix A

Under *Section 55(4)(b) of the Planning Act 2008* (PA2008) the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent, and this will be published should the application be accepted for examination.

An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42, 47 and 48”.

Project name	One Earth Solar Farm
Date of request	27 February 2025
Deadline for AOCR	13 March 2025
Return to	Oneearthsolar@planninginspectorate.gov.uk

Please complete the proforma outlining your AoCR on the above NSIP.

Local Authority	Newark and Sherwood District Council (NSDC).
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In the opinion of the local authority, has the applicant complied with the legislative requirements listed below?

Please note that this is specifically about the statutory consultation(s) undertaken.

Assessment of Compliance - Required	
S42 Duty to consult	Yes*
S47 Duty to consult local authority	Yes*
S48 Duty to publicise	Yes*

If you would like to give more detail on any of the above, please do so below.

Please keep it as succinct as possible and refer to facts and evidence related to consultation, rather than the merits of the application.



Additional comments - <i>Not compulsory</i>	
S42 Duty to consult	*Yes, in so far as it relates to NSDC as one of the 'host local authorities, but we are not able to offer confirmatory advice on other parties the Applicant has consulted under Section 42.
S47 Duty to consult local authority	*We can confirm the Applicant has met their basic duties to consult NSDC on the Statement of Community Consultation (SOCC) within the minimum required timescales.
S48 Duty to publicise	*In so far as NSDC are aware, but on the basis that the authority has not been asked to or sought to check that all duties to publicise the application in the prescribed manner have been met and given the burden of responsibility for compliance with Section 48 falls with the Applicant.
Any other comments	Please refer to the separate letter with the further comments of NSDC in response to this formal adequacy of consultation request.

[REDACTED]
Associate Director
DWD
69 Carter Lane
London
EC4V 5EQ
Sent via email to: [REDACTED]

Telephone: 01636 650000
Email: planning@nsdc.info

Your Ref: EN010159
Our Ref: 24/00888/CONSUL

Date: 27/11/24

**Appendix B – NSDC Response to Planning Inspectorate
– Adequacy of Consultation Response**

Dear [REDACTED]

Application by One Earth Solar Farm Ltd (the Applicant) for an Order granting Development Consent for the One Earth Solar Farm (the Proposed Development)

OESF Adequacy of Consultation Milestone

Overview

We write in response to your email received on the 6th November 2024, that also enclosed an adequacy of consultation statement.

We note that the applicant has an obligation to seek the views of the Council, before proceeding to the submission of the written Adequacy of Consultation Milestone (AoCM) to the Planning Inspectorate. Our written comments are provided below, which have taken into account the governments written guidance on the pre-application stage of NSIP projects.¹

Prior to providing our response, however, we would make clear that these comments are made on an informal basis only, taking into account the information available at this time and are made without prejudice to the formal view (on the adequacy of consultation) that will be provided under the provisions of Section 55 (4) (b) of the Planning Act 2008, during the 'acceptance' stage and following the submission of the application.

Early Adequacy of Consultation Milestone – Guidance

We note that taking account of pre-application guidance (as referred to above) the AoCM should be submitted in written form to the Planning Inspectorate and should include '*elements of consultation which have been carried out compared with the components set out in the Programme Document and the SoCC. The statement should include the views and any relevant supporting material from local authorities if available.*'

¹ [Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects - GOV.UK](https://www.gov.uk/government/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects)

Further to this, we also note the NSIP guidance on the Pre-application Prospectus sets out that the statement should summarise consultation responses and the way in which they are shaping the application.²

Applicant's Response to the SOCC – Appendix 1

We note that Appendix 1 of the AoCM statement provides a response to Newark and Sherwood District Council's (NSDC) previous formal comments on the SOCC and how they have been taken into account.

We set out our further comments in the table below, as to how the applicant has addressed these points, following our original submitted comments.

Other Appendices

In respect of Appendix 2 (Summary of Consultation Activities), we note and can confirm that the applicant chose to extend the statutory consultation period until the 23rd July 2024 in consultation with NSDC. We have no comments on the dates and events as this is a responsibility that falls with the applicant and NSDC have no way of verifying whether various activities have been undertaken or not.

Turning to Appendix 3 (Compliance with the Statement of Community Consultation (SOCC)) again we have no means to verify whether certain specific actions were undertaken, as these were undertaken at a project level and as they are not fulfilling a statutory requirement, we have no comments to make.

Finally in respect of Appendix 4: (Summary of Consultation Responses and How they are being addressed), we note and can confirm that the updated masterplan as seen by NSDC has removed areas of development in and around Thorney, North Clifton and South Clifton but have no other comments to make on this appendix.

Next Steps

It is noted that a request is made under 'next steps' to confirm whether the AoCM meets with the requirements for Consultation under Sections 42, Section 47, and Section 48 of the Planning Act 2008. We have reviewed the associated guidance on the AoCM and can see no obligation for NSDC to provide a confirmatory response on this at this stage, indeed, it would be premature to do so, given the level of evidence available at this stage. Such confirmation would be provided on a formal basis in the usual way at the acceptance stage of the application and under the provisions of Section 55 of the Planning Act 2008 as referenced earlier in this correspondence.

² [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115444/Nationally_Significant_Infrastructure_Projects_2024_Pre-application_Prospectus.pdf)

Reference/ Pages	Description	Original NSDC's Comments (Formal Response to SOCC – letter dated 2.5.24).	Applicant Response as set out in AoCM document.	Further comments from NSDC in response to applicant.
Pg. 2-5.	Introduction and About Us, including Components of a Solar Farm.	NSDC have no comments to make on this section, which comprises a factual presentation and overview of the PA2008, the Applicant, and the scheme.	<i>No comment.</i>	No further comment.
Pg. 6-7	The Planning Process	NSDC welcome the inclusion of the flow charts on both the DCO process and consultation activities, including a timeline. We consider which will assist the community in review of the SOCC, upon the point of publication. We note under the heading of 'Scoping' a hyperlink is provided to a copy of the Scoping Opinion on the PINS website, which makes an assumption that an electronic version of the SOCC is being read. We would recommend that the full web address be	<i>The full link has been updated along with a QR code. We do not think the scoping opinion is necessary to provide in hard copy as it is largely technical.</i>	NSDC note that the full link and QR code was added. We note the comments of the applicant, but the Scoping response may have been a useful document to provide alongside other hard copy material, given that it guides how the

		provided in the document at this point. Whilst we note that the EIA Scoping Opinion is a document produced and published by PINS, we would further recommend the applicant consider whether a hard copy of this document should also be made available for review during the statutory consultation period, alongside other hard copies of documents, that will be provided for review in the Community Access Points (See Page 10 of the SOCC).		environmental assessment work will be undertaken.
Pg 8-9	Our Approach to Community Consultation/What are we consulting on?	Paragraph 1, page 8, refers to 'We have developed the approach set out in this document taking into account what has worked well in <u>previous rounds of consultation</u> .' For clarity, we would recommend reference is made to the single previous round of non-statutory consultation at this point.	<i>This was updated to clarify one round of consultation.</i>	Noted.

		<p>Under the heading of ‘Feedback from Local Authorities’ firstly, in terms of the period of consultation, we note that reference is made to the incorrect consultation period for the SOCC document. As noted above, the end of the statutory consultation period is the 4 May 2024 and not the 2 May 2024. We also have concerns with the following comments in the same paragraph which states: <i>‘Our strategy has been updated to include their feedback (insert details here). XX confirmed that they supported this approach.’</i> NSDC consider this to be a pre-emptive comment and it is particularly concerning that an assumed reference to support is made which prejudices the outcome of the consultation on the SOCC itself. NSDC considers it would have been more appropriate to omit this reference or simply refer to</p>	<p><i>The section has been updated to show how we have updated the SOCC per feedback, with no statement that any of the LPAs confirmed they agreed.</i></p>	<p>NSDC welcome the changes to the text in respect of removal of the pre-emptive comments, although NSDC note that this revised paragraph within the published SOCC on ‘Feedback from Local Authorities’ (page 8) implies that extending events into evening hours, adding an additional community access location, and providing a second webinar, were the only comments provided by NSDC and the other authorities, which is perhaps an oversimplification.</p>
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		<p>the fact that the comments of the Local Authorities would be taken into account following the conclusion of the statutory consultation period on the SOCC and prior to its publication and commencement of the statutory consultation. NSDC considers that this pre-emptive approach undermines the statutory duty of the applicant to 'have regard' to the response to the consultation, under Section 47(5) of the Planning Act 2008.</p>		
Pg. 10-11	Who are we consulting?	<p>NSDC note and welcome the presentation of a Consultation Zone that includes the boundary of the scheme and the further inclusion of additional addresses in the proposed Zone 1 consultation. However, for the avoidance of doubt, it is recommended that all named settlements within Zone 1 that are to be</p>	<p><i>We have updated the map to add more village labels. However, note that Harby is not within the consultation zone because it is more than 3km away from the project boundary.</i></p>	<p>The changes are noted, as is the point about the extent of the consultation zone.</p>

		<p>consulted are either identified within the map or are listed for clarity. It would appear to NSDC that all of the settlements within the district boundary at this location to include North Clifton, South Clifton, Thorney, Spalford, Wigsley and Harby would be directly consulted. If that is the case, we are supportive of the proposed Consultation Zone 1.</p> <p>Under the Heading of Zone 2: 'Additional members of the community, groups, and elected officials' it is stated that 'We have identified organisations and community groups that serve the broader community, including organisations that support seldom heard groups.' Firstly, we have provided specific comments on the community groups to be consulted, as provided under separate cover.</p>	<p><i>We have added a clarifying section to explain that we've identified the groups and the ways we will contact them. The contact methods are described on the following page.</i></p>	<p>We can find no additional detail within the final version of the SOCC on the specific means by which 'hard to reach' groups will be engaged and remain concerned on this point on the basis of the SOCC.</p>
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		<p>However, there is no reference to how the applicant will endeavour to engage with these groups and support their ability to feed back as part of the consultation. NSDC seeks reassurance on the measures that will be deployed to positively engage with seldom heard groups, as part of the consultation process. This needs to extend beyond mere identification of the groups.</p>		
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		<p>In respect of the actions listed on page 11, we are broadly supportive of the approach, but would make the following comments, some of which we have provided previously, when undertaking an informal review of the SOCC:</p> <ul style="list-style-type: none"> • A copy of the consultation leaflet and poster to be displayed, should be appended to the final version of the SOCC and in the case of posters, confirmation of where they will be displayed. • A copy of the public notices should also be appended to the SOCC. • NSDC should be provided with a copy of any press notices issued and the media outlets that they have been provided to. 	<p><i>The consultation materials will not be available until the start of the consultation period. In order to provide the SOCC in advance of the start of consultation, it is not possible to publish it with all of the consultation materials attached.</i></p>	<p>We note this point, but are unaware as to when the SOCC was published under the requirements of Section 47 (6) of the Planning Act 2008, as we have not been provided with a copy of this for information purposes.</p>
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		<ul style="list-style-type: none"> Finally, we would ask what consideration has been given to the role of social media in supporting consultation and as a supplement to the project website. This may also help with regard to the approach to engaging with hard-to-reach groups. 	<i>We will use social media through Facebook advertisements and clarify this in the SOCC.</i>	<p>We note the planned approach. It would be useful to clarify the strategy for how engagement via social media has been/will be deployed and how this might be useful in engaging with hard to reach groups.</p>
Pg. 12-13	Providing Information About One Earth	<p>In respect of 'in person' events, we welcome the inclusion of an additional event to be held at South Clifton Coronation Hall, following the proposal of a single event only during the informal consultation stage. Whilst noting that South Clifton Hall is an appropriate venue for a consultation, NSDC would encourage consideration for whether St Helen's Church in Thorney, could also support an additional community consultation event, noting it is currently also listed as a Community</p>	<i>We have considered this option, but do not believe it to be suitable for an event because it is a small, non-wheelchair accessible location.</i>	<p>This response it noted, but NSDC would question how effective it was a community access point given that it is not wheelchair accessible and would ask whether there were any problems noted in this regard.</p>

		<p>Access Point, facilitating access to hard copies of the SOCC, project booklet and questionnaire. If deemed a suitable venue, it would provide more convenient access to those members of the community that reside to the eastern side of the proposed development and have a greater distance to travel to access an 'in person' consultation event.</p> <p>In addition to the above and irrespective of whether the applicant chooses to add any additional events, NSDC consider that the current planned timings of the events are not sufficiently flexible to support maximum attendance. The event planned for Wednesday the 12th of June is proposed as 2-6pm. This is considered too small a time window in general terms. It excludes the ability for people in employment to attend over lunchtime and is</p>	<p><i>We do not expect any single event to be universally accommodating for everyone who may want to attend, which is why we have proposed a series of events, across different times of day and days of the week, including two Saturday events to accommodate those who work traditional 9-5 hours. In our experience, 4 hours is a sufficient amount of</i></p>	<p>We note the explanation provided, but we are not convinced that the adjustment to timings made the most of opportunities available. Whilst the timings were adjusted to include after work hours, they did not include hours over lunchtime for work days, which would have supported people that work locally (including home workers) to attend the events during these hours. Our view is that for large scale NSIP projects,</p>
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		<p>considered to finish too early, to allow those people who wish to attend after work, particularly if they do not work in the locality and have to travel home and/or to the venue. To address this point, we would suggest the event run for a minimum of 12 noon – 8pm. Similarly, whilst being on a weekend, which in itself offers more flexibility, NSDC consider that the hours of opening for the 29th of June event should be increased and operate for a minimum of 8 hours.</p> <p>Finally, given the level of organisation required is more limited and it is convenient for all parties (that have access to the internet) we would recommend a minimum of at least one further webinar event. In our view one webinar at the beginning of the consultation period, one at</p>	<p><i>time for an event, and adding additional hours does not increase attendance. However, we are shifting the hours of the 7 June event further into the evening (4pm-8pm) outside of traditional working hours.</i></p> <p><i>We have added a second consultation webinar.</i></p>	<p>the maximum flexibility should be applied to support attendance, including the timing and overall length of the in-person consultation events. We also note that one of the Saturday in person events took place outside of the NSDC area.</p> <p>This is noted and welcomed. Whilst the minimum recommended one further Webinar was added, we still consider 3 webinars at the beginning, midway point and towards the end of the consultation period, would have been an effective strategy.</p>
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		<p>the midway point and one further and final one at the end of the consultation period would complement the planned in-person events.</p> <p>NSDC consider it imperative that the planned consultation is suitably proportionate to the size and scale of the proposed development, as an NSIP, that is located within a rural part of the district, with significant potential impacts. As noted in NSDC's Statement of Community Involvement, (which is currently the subject of its own consultation on planned updates Draft-Statement-of-Community-Involvement-for-consultation.pdf (newark-sherwooddc.gov.uk)) at paragraph 3.7 <i>'Some applications, particularly for larger scale or controversial developments, have the potential to affect whole</i></p>	-	<p>We cannot find a response to these overarching points and therefore it would be helpful if clarification could be provided as to how this has been taken into account.</p>
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		<p><i>communities rather than just residents of neighbouring properties.'</i></p> <p>This paragraph goes on to state that: <i>'large scale ground mounted solar photovoltaic farms can also be controversial and the Council will expect developers to show evidence of meaningful community consultation.'</i></p> <p>Further to this, the table under paragraph 3.8 sets out the consultation that would typically be requested by the District Council. In relation to Large Scale Ground Mounted Solar Photovoltaic Farms, it is stated that:</p> <p><i>'The developer should show that they have consulted with representatives of the Parish Councils or Meetings of all affected parishes, as well as residents. The Council will expect to see evidence that people were fully informed about the proposal and given</i></p>		
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		<p><i>adequate time to respond to the consultation. The developer should show how account has been taken of views expressed.'</i></p> <p>NSDC consider that the proposed suggested revisions to the SOCC as referred to above are necessary to ensure that local communities are engaged with via a robust set of measures that ensures they have the maximum opportunity to engage in this process. It is important that a full cross section of the community have the ability to respond to the process, so the applicant can subsequently take those comments into account, as required by Section 49 of the Planning Act 2008.</p>		
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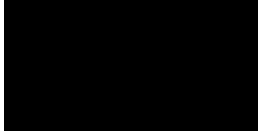
		<p>Turning to the ‘Information Materials’ we note that reference is made to (amongst other things) maps to be produced and made available on the project website. We would encourage use of an interactive mapping tool that enables interested parties to search on a micro scale of their area of interest, that provides information on both the proposals and constraints. Given the scale of development, we consider that tools such as this are important in understanding the impacts of the project and therefore support meaningful engagement.</p>	<p><i>We are providing a 3d model which will be available at the events with a video flyover on the website. We believe this is more helpful than a searchable map, which would not provide context.</i></p>	<p>We note the views on this point. To clarify, a 3d model and a flyover is very useful, but we also consider that a searchable map, to focus in on specific areas would also have been useful, noting that this is often a feature on other NSIP projects. Understanding scale is important, but it can also be somewhat overwhelming and tools that enable understanding of specific areas of impact to the local community is also important.</p>
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		<p>Finally, in respect of Communication Channels, we would encourage the applicant to consider the use of social media. In accordance with the Council's SCI, we actively deploy social media channels, with regard to consultation on the local plan and other strategic proposals. We consider it useful in engaging with different parts of the community, including 'hard to reach groups.'</p>	<p><i>We have updated to include advertisements on Facebook.</i></p>	<p>This is noted, but we would question whether other social media channels were also included.</p>
Pg. 14-15	<p>Receiving Feedback & After the Statutory Consultation</p>	<p>In respect of Receiving Feedback, NSDC considers that it would be useful in this section to link back into the Communication Channels with greater explanation on:</p> <ul style="list-style-type: none"> • How feedback will be recorded via the freephone number. • How feedback will be recorded verbally in person and via the planned webinars and in respect of the 	<p><i>We are not able to use verbal feedback because we cannot adequately record it, however, we will offer transcription services if needed, upon request. The SOCC has been updated to confirm this. We are happy to post the recorded webinars.</i></p>	<p>This is noted.</p>

		<p>latter, whether those webinars will be recorded and made available to all parties, including (as relevant) the period of time for which they will be made available.</p> <p>Finally, in respect of 'After the Statutory Consultation' we consider it appropriate to make clear that the applicant has a Statutory Duty under Section 49 of the Planning Act 2008 to have regard to the response to the consultation, as a point of clarity and consider this could sensibly be added where reference is made to the Consultation Report.</p>	<p><i>We have updated to clarify that it is a statutory requirement.</i></p>	<p>This is noted.</p>
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We trust that the informal comments provided in this response are of assistance, but if you wish to clarify matters, please do not hesitate to get in touch.

Yours sincerely,



Planner, (Major Projects) Planning Development Business Unit
On behalf of Newark & Sherwood District Council

Newark and Sherwood District Council

██████████ MRTPI, Planning Development Business Unit
Castle House, Great North Road, Newark,
NG24 1BY

Mar 8th 2025

**Subject: A Lack of Effective Consultations by 'One Earth Solar Farm'
– Appendix C**

Dear ██████████

I hope this letter finds you well. I am writing to you as part of the 'Say No To One Earth Solar Farm' action group, which is helping to represent a large number of residents in and around the parishes of North and South Clifton, Newark, Notts.

We are fighting to stop or reduce to a much more pragmatic scale, the proposed 4000 acre NSIP; 'One Earth Solar Farm', which we understand has recently been presented to NSDC for consideration. Part of the reason for our objections is what residents have said, in relation to the consultation stages of this application.

Despite the long term effects of this application to our community and beyond, many residents feel the consultations throughout have both lacked transparency and meaningful engagement, people have not been provided with adequate information or answers to many of their question, and many are also reporting what they feel are incorrect or misleading statements in their documentation.

As such the majority of people we have polled and spoken to, say the consultations have fallen far short of what people believe to be an acceptable standard. The fact that so many people have been left confused, troubled and disappointed especially considering the impacts of the proposed development is quite disturbing, and we wanted to bring this important matter to your attention.

Note: As an action group, consisting of a number of concerned citizens, we have taken considerable time and effort to accurately measure both the nature and the level of our community's objections, through the use of two quite detailed community questionnaires', which were distributed and collated after the end of both the non-statutory and statutory consultations.

Community reaction to the developer consultations; in summary:

The Majority of Villagers are Unhappy

Over 90% of North and South Clifton residents took part in the study and over 90% of those are objecting to the plans for a number of reasons, including their feelings that the consultations were inadequate.

Lacking Empathy and Unable to Engage, Vague and Unsubstantiated Claims

Many feeling both consultations were vague and developers were unable to answer many important questions relating to the statements they were making, leaving many who were able to attend frustrated and confused. Some residents compared conversing with the developers to talking to 'animatronics' who just kept repeating the mantra that everything will be fine in the end – some left in the consultation in tears. **NB.** This was partly why we decided to complete our own Mental Health Study, conducted with the help of a GP resident – the findings of this highlighted a number of issues, which are being handed into the council.

Not Engaging with People as they Promised

Many things were done badly or seemingly not at all, including a supposed 'door-knocking stage', where only a very small number of people were actually engaged in this way.

Website Not Secure

Not far into the start of consultations, the [SSL \(Secure Socket Layer\)](#) security certificate on their Official 'Contact Us' web page - designed for collecting customer feedback - actually expired, and remained that way for months, meaning most people who would have wanted to engage with the developers would have been met with a website security warning – this was not corrected by the developers until spring 2024.

Changed from 40 years to 60 years with No Explanation

Our communities was initially informed the life-span of the development would be for a maximum of 40 years, comments and feedback that was collected by the developers was based on that important fact. However, by the time of the 2nd consultation came about, people were very upset to learn that this time-scale had changed to 60 years – with no explanation at all.

Confused Ownership

According to the National Grid Tec-Register Database, One Earth Solar Farm own only 500MWs of connection, with the balance of 240MW owned by TRANQUILITY ENERGY LIMITED? which we know nothing about? If an additional '3rd' company is involved, why is this not mentioned in their consultation documents?

One Earth Solar Farm	ONE EARTH SOLAR FARM LIMITED	500mw
HIGH MARNHAM	TRANQUILITY ENERGY LIMITED	240mw

Lack of Engagement and Acknowledgements

A reported lack of thoughtful response to comments and concerns raised by even the most heavily affected residents. Many who did send comments or questions in, reported either no acknowledgement at all, or, amongst the small number of residents who did report receiving a response, one reported a one sentence reply of "Thank you for your comments, we will file this accordingly.". A statement which could - maybe you might agree – was curt at best, and could actually have multiple meanings – leading to even more confusion and frustration to worried families. Note: One Earth have been asked to confirm the names of residents who had engaged and had been responded to, but we have been unable to confirm this with them.

Vague Promises on Community Benefits

Many residents asked if there were any community benefits to this scheme, only to receive a vague promise that this will be looked at should the scheme go ahead. At one point a small number (ten) of small community grants were available, many felt this was totally inadequate compared to how much could be lost to the area, made worst by the fact this small number was also shared with communities well outside the development zone. This seemed nonsensical to many, and actually insulting, particularly when compared with other developers who were promising community grants of up to £1 million annually.

Missing Plans

On a number of occasions now, One Earth Solar have sent out very basic, unclear and muddled maps and plans – possibly to meet their own deadlines, but this only adds to the upset and confusion. We have yet to see the latest plans, as the last ones provided had little detailed on important infrastructure such as inverter sites etc.

Free-Post Letters Returned

Many residents have received letters from the developers and their representatives, asking them to confirm land that they own and the corresponding boundaries. This information has been provided via the free-post envelopes provided, only for many to be returned back to the residents, as 'No Postage' with a yellow postage 'fee to pay' sticker requesting a £5 payment.

Inaccurate Consultation Claims

Consultation documents which many people felt made totally inaccurate statements such as the amount and level of noise omitted from planned infrastructure such as inverters. As per the two images below. One Earth reported very low amount of noise, we visited a local solar farm and measured the actual sound of these inverters up to 80 decibels and beyond.

One Earth Solar Farm
Vol. 1 - Preliminary Environmental Information Report



- > Operational noise from plant and equipment: the solar panels do not generate any noise. At a very local level (within 300m) noise maybe noticeable for inverters, transformers, other substation equipment and battery storage equipment. This noise is similar to the noise from an electrical telephone exchange box on a pavement. For the purposes of the assessment a distance of 500m from electrical equipment such as inverters, transformers, other substation equipment and battery storage equipment has been considered, to ensure all potential impacts are identified.

Figure 16-1 below shows the study area based on the preliminary information

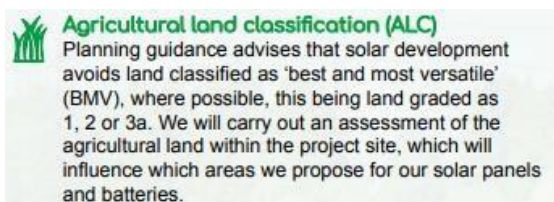


You can see this for yourself by watching the video covering the noise and other points, on YouTube, using the link here; [\[REDACTED\]](#)

Confusion Over Policy Statements

Many people felt their consultation documents were also misleading to the rules and advice set in national policy statements for renewables (EN-3) which states “normally underground cabling would be removed at the end of a project”, whereas they are stating the exact opposite. Many people felt they are making unsubstantiated claims, such as the land will be improved and at the end be better for farming, despite the fact that hundreds of tonnes plastic coated cables will be permanently buried.

One Earth also informed us in their consultation documents (diagram below) that planning guidance is to avoid BMV grades 1, 2, 3 and 3a land. However One Earth Solar Farm have admitted in their own analysis that over 55% of this land is exactly that; Grade 1 & 2: 22%. Grade 3a: 34%, yet they are seemingly ignoring the very guidance that was presented to us.



Unwilling to Work with Our Communities

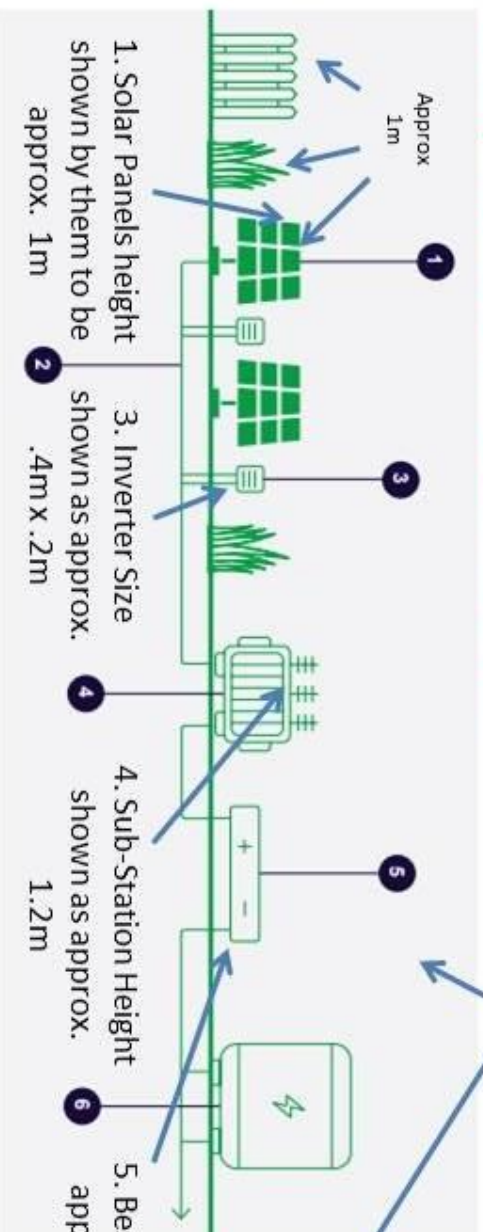
Following a sit-down meeting with One Earth, we asked if they would be interested in looking at some suggestions we had on making the plans more acceptable to our communities, through the introduction of 'dual use' - as advised in the government Renewables Energy Policy Statement (EN-3). Working with our communities to help develop a combined wind and solar farm, meaning more mitigation could be made available around family homes and more farmland/countryside and publically accessible areas such as the 'sustrans' cycle path could be put over to mitigation and bio-diversity gains. They eventually reported back saying they are unwilling to consider this.

Inaccurate Consultation Images

Many people felt the images and diagrams in the developer's consultation documents were highly inaccurate or even misleading, as to the size of the different elements of the infrastructure (please see images comparisons example in this letter). This is of particularly importance as people were completed unaware as the massive scale of the infrastructure and assumed that you could almost 'look over' the solar panels. We actually built an – almost to scale – 3.8m representation of the solar array outside the village hall and people were shocked.

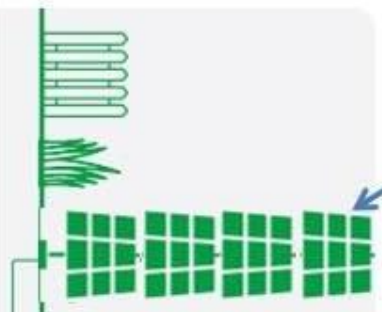
Introduction to One Earth Solar Farm Components of a solar farm

This image below is copied from One Earth Solar Farm Consultation Documents



It is clear that the scale of all infrastructure is being wildly understated in their documentation. Using their example of a picket fence and wheat as their key, we can show the actual scale and the differences, which many are saying is deliberately misleading.

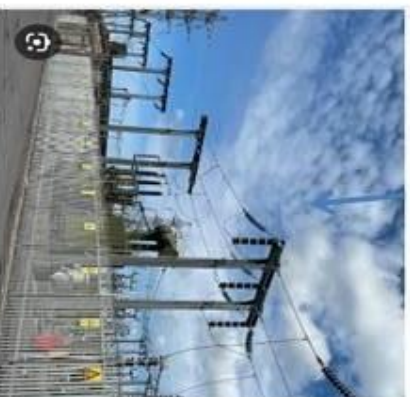
1. Actual planned Height up to 3.8m



3. Actual Size approx. 2.4m x 6m



4. Actual Sub-Station Heights can go up to 13m



5. Bess are housed in shipping containers, Actual Size approx. 2.4m x 6m



- (1) Solar photovoltaic (PV) panels
- (2) On-site cabling
- (3) Solar Inverter Stations
- (4) On-site substation
- (5) Battery Energy Storage System
- (6) Grid connection

In light of all this;

Our communities concerns are real, valid and have been measured. It therefore imperative to us that this is reported, and our hopes are, that the council demonstrates its commitment to transparent and inclusive governance by addressing these concerns.

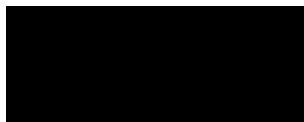
Therefore, given the significance of this application, and how badly many in our community feel the consultation processes were, we respectively urge the council to refuse this application outright, or at the very least insist the developers:

- Remove the BESS altogether or relocate it away from the water treatment plant, poultry farms and family homes and reservoir and outside the water-catchment area.
- Restart the consultation processes, ensuring proper notice is given to all affected residents and provide much more effective communication with residents, particularly the most heavily affected.
- Organize additional public meetings at accessible times and venues.
- Provide clear and detailed information on how public feedback has been studied and influenced the final decision.
- Investigate the opportunity to work with the communities on developing a more land efficient dual purpose scheme, which will allow much more mitigation around family homes and publically accessible rights of way etc.
- As part of a renewed consultation, be immediately clear on community benefits should be scheme eventually be given the go-ahead.

I trust that you will take these issues seriously and look forward to your response outlining the steps that will be taken to rectify the shortcomings of the consultation process.

Thank you very much for your attention in this matter.

Yours sincerely,



Mr David White

Email 

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Tel: 