

12 Aug 2025, 11:20 (6 days ago)

to One

FAO Edwin Maund Alex Jack

Dear Sirs

I enclose a chronology of documents and events relating to the conduct of One Earth. I believe it demonstrates that One Earth has deliberately and consistently failed to report to the Inspectorate a legitimate challenge to the validity of the way they were conducting the consultation on their project. They have also deliberately and consistently withheld relevant documents from the Consultation Report and examination with the intention of hiding from the Inspectorate the true nature of the consultation despite the Inspectorate's advice recorded in 3.7.2 of the Consultation Report and [REDACTED]

They also failed to consult properly and every piece of evidence they present in the Consultation Report should be forensically re-examined. It is after all part of the proposal as presented.

Such conduct is evident in other documents which form part of the proposal and is likely to be repeated during the further examination of the proposal and during the implementation of the project, should it be approved.

I submit that the conduct of One Earth renders them unfit as a provider of a National Infrastructure Project and that their proposal should be rejected.

Yours faithfully

Stephen Fox

Chronology

29.06.23 to 13.09.23 Non - Statutory Consultation

27.09.23 to 11.11.23 Statutory Consultation

29.06.24 Stephen Fox (SF) attends public information event and advises Emily of One Earth that they were vulnerable because the vast majority of the local residents felt that the consultation was inadequate. She responded saying that was important feedback.

Documents listed from and including 22.07.24 to 16.01.25 referred to below can be found under Relevant Representation by Stephen Fox submitted 4 May 2025

22.07.24 SF makes a submission to One Earth making clear that the consultation is unsatisfactory and which gave them advanced warning of the issues they would face at the meeting with North Clifton and South Clifton representatives on 1st August 2024.

1.08.24 Meeting between North Clifton Parish meeting, The Say no to One Earth Action Group, and South Clifton Parish Council with One Earth where a full script was presented to them and read verbatim.

1.08.24 A full recording of the 01.08.24 meeting is available.

2.08.24 SF emailed [REDACTED], Project Manager, One Earth, with a follow up to the meeting and a script that Margert Brumpton, the Chair of the 1.08.24 meeting had read, out to One Earth to ensure that it could not be ignored. This email was sent to ensure that One Earth would not be able to misrepresent the nature or content of the meeting, but they went on to misrepresent it in the Consultation Report.

8.08.24 Minutes sent of the meeting of 1.08.24 sent to One earth.

06.11.24

3.7.2 of the Consultation report.

"6 November 2024 The Inspectorate advised that the Applicant must include all necessary information on preapplication consultation activities in the Consultation Report when submitting the DCO application."

19.11.24 One earth responded to the 01.08.24 meeting but stated that the meeting had only been with North Clifton. It was a meeting with North Clifton Parish meeting, The Say No to One Earth Action Group and South Clifton Parish Council. I believe this was strategic because of the relative standing of the Parish Council vs the Parish Meeting and the Action Group. Would they have responded at all had the inspector not issued the edict in 3.7.2 of the Consultation Report quoted above, given the elapsed time from the meeting of 1.08.24? The response of 19.11.24 was a carefully sanitized and minimised to discontent revealed to them at the meeting and the questioning of the quality of their consultation and their willingness to engage because One Earth did not want the true nature of the consultation revealed when the documents were disclosed in the Consultation Report.

16.01.25 One Earth responds to SF's email of 2.08.24 avoiding all major issues. Another failure to engage. [REDACTED] confirms that all feedback would be included in the DCO.

16.01.25 SF by email responds to to One Earth's Email of 16.01.25 again repeating the inadequacies of the consultation and asking for assurances. This received no response.

27.02.25 Application Submitted

27.03.25 Consultation Report Presented with the Developers application, the Inspectorate having satisfied itself that it had been prepared correctly and that the consultation had been conducted correctly.

4.05.25 SF makes registration representation including copies of his of 22.07.24 and 02.08.24 and the script of the meeting of 01.08.24.

In the Consultation report One Earth stated that

"6.2 Consultation under s42 of the PA 2008

6.2.38 The meeting with North Clifton Parish Meeting and South Clifton Parish Council on 1 August was formatted as a question-and-answer session. After the meeting, North Clifton Parish Meeting and South Clifton Parish submitted a list of detailed questions regarding the PEIR. These questions and the responses to them are included in Appendix J-2."

It became apparent that Appendix J-2 exclude both the script of the meeting and One earth's response of 19.11.24.

16.07.25 Stephen Fox asks One Earth which pages the Script of the 01.08.24 meeting, and the answers provided, are to be found in Appendix J-2

25.07.25 One earth reply "I cannot find the attachment as referenced. I know it was included in an earlier draft but appears to have been lost in the finalisation process. I'm updating that file now to submit at Deadline 1 with the attachment."

01.08.25 A revised version of Appendix J-2 is submitted to the Inspector. It provides a copy of One Earth's email to North Clifton Parish Meeting and South Clifton Parish Council dated 19.11.24 but excludes both the minutes of the meeting of 01.08.24 and the copy of the script of the meeting provide to [REDACTED] on 2 .08.24, [REDACTED]

The Applicant has persistently used [REDACTED] tactics to avoid the disclosure of the documents advised by the Inspectorate as being necessary on 6 November 2024 and recorded in 3.7.2 of the Consultation Report.

The meeting on 1 August 2024 was a forceful criticism of the way One Earth had consulted; their conduct and the quality of all the documents prepared for their proposal. By materially misrepresenting the meeting in Para 6.2.38 of the Consultation report and the omission of the script of the meeting and their responses from Appendix J-2 One Earth have deliberately hidden from Inspectors and the local authorities the deep dissatisfaction with and the criticism of the way One Earth had carried out the consultation and their conduct with the intent of having their proposal pass for examination. They continue, despite the strictures of the inspector at the Preliminary meeting, to fail account for their actions or engage constructively.

At no other point in their Consultation Report do One Earth record the deep dissatisfaction felt by members of the community with the way they have consulted and their consistent failure to engage in a constructive manner.

8.07.25 The inspector, at the Preliminary Meeting, rejects SF's challenge that the examination shouldn't proceed because the Consultation Report [REDACTED] as the Inspectorate had already approved it and the challenge was not a procedural issue. The inspector stated that he had seen and understood Mr Fox's registration representations. Since my registration representations were seen by the inspector more than a month after the Consultation Report was approved, he and the local councils could not have been aware of the consistent challenge the local community had made to One Earth regarding the validity of the consultation and their failure to respond to it. Consequently, both the Inspectorate and the local councils were presented with and passed a Consultation Report which deliberately excluded material information which would have impacted their decision had it been prepared honestly.

In the Written Summary of Applicant's Oral Submissions at the Open Floor Hearing 1 (OFH1) Document Reference: EN010159/APP/9.4 July 2025 One Earth state the following.

2.5.1 In response to a number of concerns raised, Ms Coleman said that the Applicant has prioritised early, consistent, and meaningful, engagement throughout the project. This has included having a single point of contact, [REDACTED], and hosting a range of outreach activities such as in-person events, webinars, home visits and parish council meetings

2.9.5 Mr Fox made comments regarding the adequacy of consultation. In response, Ms Coleman said that issues regarding the adequacy of consultation were considered earlier in the Preliminary Meeting, where it was noted that the 16 local authorities provided Adequacy of Consultation Representations [AOC-001 to AOC-017]. In those representations, all local authorities confirmed that the Applicant has complied with its statutory consultation requirements. Ms Coleman offered to provide references to where within the application materials, photomontages and other relevant application documents may assist in understanding the design of the Proposed Development and specific potential impacts. Post hearing submission: The Applicant's firm position is that robust and extensive engagement was undertaken with stakeholders, the community, and those potentially affected by the Proposed Development. Two phases of consultation were undertaken, both non-statutory and statutory. The consultation undertaken, and how this informed the evolution of the Proposed Development's design, is set out in the Consultation Report [APP-151].

These comments show that One earth wish to continue their [REDACTED] representation of how they have conducted their consultations and engagement. They further suggest that either One Earth have not been honest with their legal representatives or that the latter are content to [REDACTED] during the examination as they would not be able to honestly hold and present the position expressed in the comments above if they had been aware of the information in the documents referred to and the timeline presented above of One Earths responses. Specifically, the full script of the meeting on 1st August 2024. For example, they clearly document that the consultation was unsatisfactory and that we repeatedly ask for a scale model because the presentations were not sufficient to represent the scale and impact of the proposal.

That they fail to engage [REDACTED] is shown by the following exchange of emails.

Stephen Fox

16 Jul 2025, 11:37 (9 days ago)
to info

Good Morning [REDACTED]

This is a quote from The Consultation Report -

6.2.38 The meeting with North Clifton Parish Meeting and South Clifton Parish Council on 1 August was formatted as a question-and-answer session. After the meeting, North Clifton Parish Meeting and South Clifton Parish submitted a list of detailed questions regarding the PEIR. These questions and the responses to them are included in Appendix J-2
Would you let me have the page number or numbers in Appendix J -2 where the referred questions and answers appear please.

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Regards

Stephen

Stephen Fox

Fri 18 Jul, 08:18 (7 days ago)
to info

Hi [REDACTED]

My request of 16th July is important as I have undertaken to provide further information to the Inspector so a timely response would be helpful.

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Regards

Stephen

12:00 (38 minutes ago)
to me

Hello,
I apologise for the slow response. I cannot find the attachment as referenced. I know it was included in an earlier draft but appears to have been lost in the finalisation process. I'm updating that file now to submit at Deadline 1 with the attachment.

Thanks for bringing it to my attention.

Kind regards,

email was received at 12:00 on 25.07.25.

Ten Days to respond on such an issue during the glare of the Examination:

a) to the quality of their engagement.

b) Suggests they were wondering how to respond to the question as they realised that they

c) The answer given that it was in an earlier draft but appears to have been lost in the finalisation process given the legal oversight that they are engaged in.

01.08.25 A revised version of Appendix J-2 is submitted to the Inspector. It provides a copy of their email to North Clifton dated 19.11.24 but excludes both the minutes of the meeting 01.08.24 and the copy of the script of the meeting provided to on 2.08.24. This of the meeting, confirms that the Consultation Report was presented with a material and of One Earth's Consultation and the of claiming One Earth are committed to on-going engagement.

01.08.25 One Earth file 9.3 Applicant Responses to Relevant Representations.

One Earth have again failed to disclose the documents relating to the inadequacy of the consultation despite the Ex making clear to them at the preliminary meeting that "it will be our expectation that we will get a full and detailed response to those representations, including your criticisms, that answers haven't been given to questions raised"

When SF raised the issue of how the consultation was carried out at the preliminary meeting Mr Maund said the following - this is taken from the transcript of the meeting:

00:17:11:12 - 00:17:53:05 "Well, um, I hear what you're saying, and we obviously have reviewed the representations that people have made, including from yourself. And I can see you've included a long list of correspondence that you're not comfortable you've had answers to, but that isn't necessarily the same question about whether the statutory tests had been met on consultation. So I think that there are perhaps two things running in parallel. And, um, I would welcome any further detail that you have that you would wish to make because fundamentally, if, um,"

" 00:20:08:19 - 00:20:41:14 I hear what you're saying. Um, again, I'll come back to the applicant because they will have an opportunity to respond in writing to your representations you've already made, and it will be our expectation that we will get a full and detailed response to those representations, including your criticisms, that answers haven't been given to questions raised"

It cannot be clearer as to what the Inspectors expected of the applicant, yet they have failed to provide it. How will the Inspector enforce his expectation? This is the 6th time they have excluded these issues: After they were first raised on 1st August 2024 in their response on 19.11.24, and again in their response to me in January 2025, in the consultation report by misrepresenting the 1st August 2024 meeting and excluding the documents from Appendix J-2, again in their revised Appendix of J -2 published at deadline 1 and now in failing to respond to the Inspectors' expectation expressed at the preliminary meeting.

18.08.25

FAO Edwin Maund and Alex Jack

Dear Sirs

I have attached further evidence of One Earth's material information from the Inspectorate regarding the quality of the consultation and the validity of the Consultation Report and thereby have the proposal advance to examination together with further evidence of One Earth's contempt for the examiners and the examination process and those involved in examination and especially the local community.

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Yours faithfully

Stephen Fox

18.08.25

Mental health and the Conduct of One Earth.

Prior to the meeting between North Clifton Parish Meeting, South Clifton Parish Council and the Say No to One Earth Action Group with One earth on 01.08.24 had sent a survey of with responses from 109 local people on the impact of the One Earth Proposal on their mental health. During the meeting the Project Manager acknowledged that he had the survey, and he was considering how best to use it. He and other members of his team went to great lengths during the meeting to emphasise how important local mental health was to them and they stated that they would come back to the meeting with proposals as to how they could help.

When they came back on 19th November 2024 it was essentially to say that local mental health would not be considered. This was a message to be repeated at the Issue Specific meeting part 6 by both their expert on mental health and their legal representative. And in 9.3 Applicant Responses to Relevant Representations. They went further and effectively said that local mental health was not a consideration.

Of further concern is that the survey conducted by was omitted from the consultation report and its appendices despite their assurance to me on 16 January 2025 that it would be and despite

3.7.2 of the Consultation report.

"6 November 2024 The Inspectorate advised that the Applicant must include all necessary information on preapplication consultation activities in the Consultation Report when submitting the DCO application."

It is clear from the transcript of that of the Issue Specific Meeting part 6 that both Mr Griffiths and MS Field claimed no knowledge of [REDACTED] Mental health report. This suggests that either [REDACTED]

This is further evidence of One [REDACTED] from the Inspectorate regarding the quality of the consultation and the validity of the Consultation Report and thereby have the proposal advance to examination [REDACTED]. Denying the existence of [REDACTED] report at the Issue Specific meeting is further evidence of One Earth's contempt for the examiners and the examination process and those involved in examination and especially the local community.

18.08.25

Flood Risk and Runoff Impacts of Large Solar Farms Including Cumulative Effects

The One Earth Solar proposal should not be approved, as the proposal is to build on a flood plain and the flood risk assessment fails to demonstrate that there will be no rise in flood risk either locally or elsewhere, nor does it provide assurances regarding the safety of the project itself.

Furthermore, the assessment does not incorporate current scientific understanding or appropriate modelling to support its claims concerning runoff and peak discharge rates. With existing research indicating uncertainties about the impact of solar panels on runoff, and evidence from reputable scientific studies suggesting that run off increases by between 99 and 154%, peak discharge rates increase by 11.7 times and the speed of runoff by 2.7 times, and soil erosion rate of 76% the potential for severe flooding cannot be overlooked. This also has important implications for WFD compliance of the proposal. Considering the risks to the communities local to the flood plain and beyond, a prudent approach would be to restrict the construction of solar farms on flood plains until comparable installations have been built, monitored, and their true effects accurately assessed.

Additionally, it is probable that the collective impact of other solar projects within a 30-mile radius—either already approved or under consideration—will contribute cumulatively to flood risk, especially for solar farms established on flood plains.

There is no attempt to properly assess this in the One Earth proposal.

Without a proper assessment of the risks of flooding it is not possible to assess whether the claimed benefits of the proposal outweigh its costs.

The statement in 3.10.75 of EN 3—that solar PV panels generally do not have a significant impact due to drainage to existing ground—is outdated and contradicted by current much scientific research. That One Earth seek to rely on it demonstrates that they are not a responsible developer as they must be aware of the current state of knowledge on these matters.

The Wallingford Procedure model used in the flood risk assessment is not designed for solar farms and does not adequately account for solar panel runoff or peak discharge rates.. Therefore, this model is not sufficient for evaluating solar farm flood risks in the absence of empirical evidence to the contrary. Custom modelling and monitoring of similar-sized solar farms outside flood plains are necessary before considering this proposal.

Increased Run off, Peak Runoff and Peak Discharge rates and Runoff Speed

A 4,000-acre solar farm, even with ground vegetation, may significantly raise the potential for flooding due to higher peak runoff and faster water movement. Although solar panels are often considered relatively permeable, altered site hydrology and localized runoff can intensify flood risks. Peak discharge rates may rise by more than 11.7 times and run off speed by 2.7 times. The One Earth proposal assumes there will be no change in these runoff measures so they make no attempt to establish what level of these measure the existing drainage and waterway systems will cope with.

Floodplain Impacts

An elevenfold increase in peak discharge rates from a 4,000-acre solar farm would greatly heighten flooding risk and severity. Panels direct much more rainwater into drainage systems, causing faster, higher flood peaks that threaten infrastructure, property, and safety. Water movement also leads to erosion, sediment accumulation, and changes to the landscape.

Cumulative Impact of Multiple Solar Farms

Multiple large solar farms within a 30-mile radius can collectively overwhelm drainage systems and waterways.

Increased runoff may affect downstream communities, infrastructure, and ecosystems.

It is critical that there is professional coordinated consultation and planning by the affected drainage authorities and the Environment agency to understand these cumulative effects of, and assess the adequacy of the drainage systems' capability to cope with the combined impact, of multiple solar farms. The first thing to establish would be to be what level of run off, speed of run off and peak discharge rates that existing drainage systems and waterways can cope with. The One Earth FRA does not adequately address this.

Summary of Key Effects

- Increased runoff, runoff peaks, speed and discharge rates expose solar farms and neighbouring areas to greater flooding.
- Existing drainage systems may not cope with surges, resulting in widespread inundation.
- Cumulative effects amplify flooding beyond what any single project would cause.
- Managing increased runoff will require significant investment in drainage infrastructure and may limit future development in high-risk areas.
- Large installations and major increases in runoff raise flood risk across the region.

The Need to Model

Customised modelling of runoff volume, peak rates, and speed is essential for large-scale solar farms. The One Earth FRA lacks this specific modelling. Hydrologic impacts must be evaluated to account for surface permeability, drainage system effects, mitigation needs, and cumulative risks.

Calculating Increased Runoff and Mitigation

To mitigate potential flooding, calculate increased runoff volume and velocity due to panel installation and design measures to manage or detain the flow. For a 4,000-acre solar farm, this means addressing a more than 11.7 times increase in peak discharge, and 2.7 times increase in runoff speed, using hydrological models and local data.

- Runoff: Assess baseline runoff for various rainfall events using local models.
- Peak Discharge: Multiply baseline values by 11.7 to estimate post-construction rates.

- Increased Volume: Calculate total runoff for each event, factoring in speed and duration.

Mitigation Needs and Design

- Identify flood-prone areas and set targets for acceptable flood levels and flow rates.
- Design mitigation measures such as detention basins, swales, permeable pavements, erosion control, controlled outflows, appropriately sized culverts, and green infrastructure.
- Coordinate with local authorities and the Environment Agency to meet scientific and regulatory standards. Ensure that these standards incorporate current scientific evidence

Hydrological Modelling and Monitoring

- Refine designs with theoretical and empirical modelling, ensuring peer review and independent assessment.
- Iteratively adjust mitigation features based on findings.
- Implement regular inspection and maintenance, with flexibility to modify measures as new data emerges.

Current Knowledge and understanding of solar panel effects on runoff, especially given multiple farms and a flood plain, is insufficient to approve large-scale solar development without further research. The empirical findings of increased peak discharge and runoff speed, combined with the presence of other planned farms, call for comprehensive hydrological assessment and robust mitigation strategies. One Earth's FRA does not come close to qualifying.

In summary, the construction of large-scale solar farms—particularly on flood plains—can dramatically alter runoff patterns and increase flood risks. Cumulative impacts from multiple installations require careful planning, advanced modelling, and ongoing management to minimise environmental consequences and protect communities. These are all lacking from the One Earth FRA.

