

From: [Stephen Fox](#)
To: [One Earth Solar](#)
Subject: Conduct of One Earth
Date: 12 August 2025 11:20:42

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 [REDACTED] 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 [REDACTED] withheld relevant documents from the Consultation Report and examination with [REDACTED] [REDACTED] from the Inspectorate the true nature of the consultation despite the Inspectorate's advice recorded in 3.7.2 of the Consultation Report and that they are now deliberately defying the expectation of the Examiners expressed at the Preliminary Meeting that they should honestly address the issues. T

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.

The deficiencies of One Earth have now moved from validity of the Consultation Report to the respect that they have shown to the examination process and the examiners.

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 [REDACTED] 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. Emily confirms that all feedback would be included in the DCO.

16.01.25 SF by email responds 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 [REDACTED]
[REDACTED]

The Applicant [REDACTED] 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 [REDACTED] 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 [REDACTED] 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, [REDACTED] 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 [REDACTED] made comments regarding the adequacy of consultation. In response, [REDACTED] 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. [REDACTED] 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 and act dishonestly is shown by the following exchange of emails.

Stephen Fox [REDACTED]

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.

--

Regards

Stephen

Stephen Fox [REDACTED]

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.

--

Regards

Stephen

info@oneearth solar farm.co.uk

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,

[REDACTED]

[REDACTED] 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) [REDACTED] to the quality of their engagement.
- b) Suggests they were wondering how to respond to the question [REDACTED]
[REDACTED]
- c) The answer given that it was in an earlier draft but appears to have been lost in the finalisation process is not credible 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 [REDACTED] on 2.08.24. This [REDACTED] presentation of the meeting, confirms that the Consultation Report was presented with a material [REDACTED] of One Earth's Consultation and the [REDACTED] 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.