

One Earth Solar Farm (Application No - EN010159)

South Clifton Parish Council (SCPC)

Reg. No. – F950A45AB

Post Hearing Submissions – Deadline 3 – Tuesday 16 September 2025

South Clifton Parish Council continues to object to the proposed One Earth Solar Farm. Evidence presented at Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2), supported by independent analysis (Fox, 2025 – deadline 1 and 2 submissions) and submissions from [REDACTED], demonstrates that the application:

- Fails the statutory and policy tests for compulsory acquisition.
- Relies on a fundamentally flawed and outdated Flood Risk Assessment (FRA).
- Does not demonstrate compliance with the Water Framework Directive (WFD).
- Understates harm to residents, biodiversity, and local transport networks.
- Is advanced through a consultation process that has material omissions and misrepresented local opinion.

We respectfully request that the Examining Authority recommend **refusal of Development Consent** unless fundamental deficiencies are rectified.

1. Compulsory Acquisition and Land Rights

- **Outstanding consents:** Crown Estate and Department for Transport land rights are unresolved.
- **Common land:** Sparrow Lane will be subject to temporary interference from cable routes, reducing public benefit and failing the “no less advantageous” test. We feel the harm to the local community here is understated.
- **Land-take not justified:** Parish residents face compulsory purchase without sufficient evidence of necessity. Is all the land required genuinely needed for the development? With specific regard to the BESS sites, the ExA has already queried the size and necessity of the two large sites. The applicant admitted that the land applied for was on a ‘worse-case’ scenario rather than on a firm design.

SCPC feel that the applicant has applied for more land than is needed, over-allocating land without design certainty which has created stress and uncertainty amongst residents. The applicant has also failed to fully assess reasonable alternatives.

2. Flood Risk and Hydrology

(Analysis drawn from [REDACTED], *Assessment of the One Earth Solar Farm Proposal*, 8 Sept 2025 and also from the SCPC submission presented at deadline 2 in conjunction with the Say No to One Earth Action Group)

- **Sequential Test failure:** Improperly narrowed to 10–15km around a grid point, excluding safer sites; contrary to NPPF and recent case law (*Enterprise Hangars Ltd v Fareham BC*, 2023).
- **Outdated FRA models:** Ignores modern science. Baiamonte et al. (2015, 2023) show solar panels can increase peak discharge by up to 11.7 times on smaller plots. Whilst it doesn’t automatically equate that this will happen on an NSIP sized site, it is a risk that needs disproving.

- **Historical floods omitted:** The applicant fails to refer to 2007, 2013 and 2024 flood events.
- **Weak and inconsistent mitigation:** The mitigation around the affected properties and on the site generally is inconsistent. SCPC doesn't feel that the applicant has identified all properties correctly or assessed the severity of the impact. In fact, we feel the applicant has always downplayed the harm to residential amenity.
- **Cumulative impacts ignored:** At least six concurrent solar and housing projects in the Trent catchment are excluded from modelling. Despite the ExAs' requests to show how multiple effects combine – we still feel that this is under-explored.

Policy breach: NPPF, EN-1, and Water Framework Regulations 2017 require a robust, sequential, and cumulative flood assessment – this has not yet been done.

3. Water Framework Directive and Pollution Risk

- **Unresolved matters:** EA and Anglian Water raised concerns about drilling depth for cable crossings, pollution prevention and bentonite breakout plans.
- **Pollutant risk:** PFAS (forever chemicals), flame retardants, and microplastics – these are not monitored by the EA under old (1989) guidance, yet linked to panel degradation and contamination.

Conclusion: SCPC feel that the applicant cannot demonstrate compliance with the WFD at this stage. Safety cannot be proven without baseline testing and enforceable safeguards. How can assurances of 'no deterioration' be reliable given that modern contaminants are excluded from monitoring.

4. Landscape and Residential Amenity

- **Omissions and errors:** Several properties (e.g., Vicarage Farm Cottage, Station Cottages) were not properly identified or assessed.
- **Clustered assessments:** Properties have been grouped under 'representative viewpoints' rather than assessed individually. This risks underestimating the harm to specific homes. Despite requests from the ExA for detailed maps and details of each assessed property, this has still not been done.
- **Inconsistent mitigation:** The applicant has planned for woodland planting in some places but only hedges in others, with no justification or reasoning.

SCPC feel that the effect this development will have on individual households as well as our broader community has been not been taken seriously by the applicant or considered a priority. How our countryside will look and the views from the affected homes is uppermost in the minds of our community.

5. Transport and Access

- **Main construction access unresolved:** Stage 1 safety audit for A57 junction is still pending. This road is often an 'escape route' when the nearby A1 is closed so gets very busy. SCPC note that the ExA feel that not much progress has been made on this vital issue.
- **Unacceptable amenity and safety impact** for our rural communities. SCPC have consistently highlighted the regular accidents that occur on the A1133 within the order limits. (The latest, reported by residents, only last week at the junction with Moor Lane N.C.).

The traffic impacts of this development remain uncertain and inadequately assessed, posing risks of congestion, safety hazards and community disruption.

6. Biodiversity and Habitat Connectivity

- **Fence design:** The applicant has proposed gaps every 150m and we note that the Councils have asked for assurances that hedgerows will remain open as corridors with fence gaps aligned, which has been agreed in principle.
- **Deferred safeguards:** Key ecological protections are illustrative and have been left to the “detailed design”. This leaves uncertainty at this examination stage, especially over whether any future agreement will be effective when put into effect.

7. Governance and Consultation Failings

- **Capacity gap:** Nottinghamshire CC admitted in its Local Impact Report it lacks resources to scrutinise or enforce drainage/FRA over 60 years. Is it assumed the EA will do this? This will place a long-term burden on whichever authority oversees these issues. Can the local parishes be confident that their safety will not be compromised?
- **Consultation misconduct:** Evidence shows the applicant concealed records of community challenge and misrepresented engagement. Over 95% of our villagers’ object to this development and the survey results were submitted to One Earth as part of the statutory consultation feedback. A mental Health survey conducted by a resident GP was also submitted. Neither have appeared in the applicants’ submissions to the Planning Inspectorate.
- **Result:** The DCO process has been undermined by incomplete and misleading submissions.

8. Conclusion

The One Earth Solar Farm is:

- Non-compliant with NPPF, EN-1, and WFD.
- Hydrologically unsafe.
- Environmentally and socially harmful.
- Advanced through misleading consultation.

South Clifton Parish Council requests that the Examining Authority recommend refusal of Development Consent.

At minimum, the applicant must be required to:

1. Re-do the Sequential Test and FRA using up-to-date, solar-specific hydrological science.
2. Undertake a cumulative catchment-scale flood and pollution assessment.
3. Provide binding, independently monitored flood and pollution safeguards.
4. Secure safe, approved construction access before determination.
5. Minimise residential visual harm and enhance mitigation.
6. Rectify consultation failings through full disclosure and re-engagement.

References

- Baiamonte, G. et al. (2015, 2023). *Hydrological Response to Rainfall Events under Solar Panel Arrays*.
- Environment Agency (2023). *Trent River Basin Management Plan*.
- Nottinghamshire CC (2025). *Local Impact Report* (EN010159-000425).
- Stephen Fox (2025). *Assessment of the One Earth Solar Farm Proposal*.
- EN010159 Examination Hearings: CAH1 and ISH2 transcripts 【16–22】 .
- Enterprise Hangars Ltd v Fareham BC [2023] EWHC 2060 (Admin).
- Substation Action Save East Suffolk Ltd v SoS [2024] EWCA Civ 12.