



One Earth Solar Farm

Volume 9.0: Other Post-Submission Documents [EN010159]

Applicant's Response to Relevant Representation Responses

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Revision 01



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1. Introduction

1.1 Purpose of the Report

- 1.1.1 The purpose of this document is to provide the Applicant's response to the written submissions made by Interested Parties at Deadline 2.
- 1.1.2 To avoid repetition the Applicant has only provided a full response to comments that make points that have not been addressed by the Applicant previously in the Examination. Where the Applicant has not commented further on the responses of Interested Parties at Deadline 2, that should not be taken as being acceptance of the Interested Parties' position by the Applicant – the Applicant has sought to focus its responses in order to avoid unnecessarily creating additional written responses that only reiterate its position, as already set out. Therefore, where the submissions by Interested Parties do not raise new matters, or (2) raise matters which the Applicant considers it has already appropriately responded to, no further response to those submissions has been included in this response document. This document only includes matters the Applicant has new or further comments on which arise from the submissions of Interested Parties.
- 1.1.3 To further minimise duplication, the Applicant has sought to cross-refer where appropriate to responses provided in other relevant submissions that have been entered into the Examination

2. Applicant Response Table

App Ref	Ref	Respondent	Question Summary	Applicant Response
Flood Risk & Drainage				
RRR1	[REP2-109]	Heather Fox	The EA mention the mitigation measures within the WFD. The applicant confirms that a WFD compliance assessment will not be completed if the detailed assessment does not identify any likely significant effects. EA state, ' Depending on the methodology used the detailed assessment may not provide adequate evidence that the proposed development will not cause deterioration to the WFD status of any designated waterbodies, nor will it prevent the achievement of 'Good' status. Applicant will need to clearly identify in their documentation the implications of the proposed development for the objectives of the WFD and relevant RBMP's.' EA recommends the applicant reviews PINS advice note 18, to ensure that adequate assessment is carried out as part of their application. Where have they done this?	<p>In response to the ExA Written Questions 1, the EA provided the following statement with regards to the WFD Screening Assessment [REP2-095]:</p> <p><i>"We would expect all the normal pollution prevention protocols in the CEMP, OEMP and DEMP, and fluid breakout plan for HDD. This is discussed in the WFD report (sections 4 and 5). BESS drainage design is also mentioned; the relevant documents are not referenced but we know they exist and have seen them. Assuming all these are in place, sufficiently robust, and adhered to, I would anticipate any risks to WFD Groundwater bodies are not significant and the WFD can be complied with.</i></p> <p><i>The WFD Screening Assessment contains sufficient pollution prevention which are also listed in the CEMP, OEMP and DEMP. There is one discrepancy between section 5.1.7 of the WFD Assessment and the CEMP for the minimum distance below the bed of the watercourse for cable crossings that needs to be clarified. Additionally, the bentonite fluid breakout plan and the Water Management Plan have not yet been submitted and will need to be reviewed, however we consider that providing these are compiled with there are no outstanding WFD concerns."</i></p> <p>And</p>



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				<p><i>"We are satisfied by the WFD Assessment as long as any changes in the CEMP are reflected in the Screening Assessment. Further details on these matters can be found in our response to documents submitted at deadline 2 (ref: XA/2025/100427/01)."</i></p> <p>The minor amendments to the WFD Screening Assessment requested by the EA are being made and is to be submitted for Deadline 3. As set out, once these are made the EA are expected to be satisfied with the assessment provided.</p>
RRR2	[REP2-109]	Heather Fox	<p>There are numerous comments from the EA regarding the inadequacies of the scoping report regarding water related issues such as `The applicant does not appear to have considered the sensitivity of possible receptors within the local water environment` and `The applicant should complete a more thorough assessment of baseline conditions before assessing whether a detailed assessment of the impacts on the water environment is required`. I realise this refers to the initial part of the procedure, but I feel this all points to either their desire to do the least possible work or they are not experienced /competent to deal with the installation of a solar farm on a floodplain. Did they do a more detailed base line assessment?</p>	<p>As identified, the Scoping Report forms the initial stage of the EIA process and is used, among other things, as a means of gaining feedback from the relevant authorities. The purpose of the Report is to scope the approach to the assessment, to ensure the approach taken is in line with stakeholder feedback. The Scoping Report often does not contain as much information on baseline conditions as the ES Chapter or the ES technical appendices (the Flood Risk Assessment and Water Framework Directive Screening Assessment in this case), as, given the initial stage of the project, further information is yet to have been gathered. It is therefore the purpose of the ES Chapter and technical appendices to expand upon this, with reference to be made to the new information.</p> <p>The EA raised comments on the assessment of baseline conditions and sensitivity of possible receptors, and as suggested above, a more detailed assessment of baseline conditions and receptor sensitivity was undertaken as part of the ES.</p>

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RRR3	[REP2-109]	Heather Fox	Worryingly they had to be told by the EA that 'Consideration for water quality impacts to surface water and groundwater bodies within the Water Protected Area should be considered as part of a wider WFD assessment'. The EA reminds them that EA flood risk models are not necessarily suitable for 3rd party developments, and they should conduct and show details of any modelling they do for themselves. Where have they done this?	A response relating to the use of the EA hydraulic modelling has already been provided by the Applicant as part of the Responses to Written Representations [REP2-082]. Refer to Internal Ref WR71 of the aforementioned document.
RRR4	[REP2-109]	Heather Fox	I have tried to discover who is responsible for delineating the Functional Floodplain where the Trent is tidally influenced. Without accurate measurements there is room for manoeuvre. I have been passed from the EA to NCC back to the EA then to NSDC from whom I am currently awaiting a response. When I look at the NSDC's SFRA it states 'The river Trent to the north of Cromwell Weir is tidally influenced and does not have a modelled functional floodplain outline. Where potential development falls within the flood zone 3a further modelling should be undertaken on a site-specific basis to determine the extent of the functional floodplain'. Has this been done? Otherwise, how has the applicant portrayed accurately the functional floodplain on Map Fig. 7.5 EN010159/APP/6.20?	<p>Section 3.1.4 of the FRA [REP2-043] sets out information of the functional floodplain and indicates the following:</p> <p><i>"The SFRA for Bassetlaw District Council defines the functional floodplain (Flood Zone 3b) as land which would flood with a 5% chance in each year and every year (i.e. a 1 in 20 year Annual Exceedance Event). However, since the production of the SFRA, guidance (set out by the EA) for the assessment of the functional floodplain has changed. Therefore, to ensure that the assessment is in line with the EA's current recommendations, the 1 in 30 year event has been considered to represent the functional floodplain"</i></p> <p>Although the Applicant has not prepared site specific modelling, they have used the EA's Tidal Trent 2023 model (which covers areas downstream of Cromell Weir and Lock) to review the 1 in 30 year flood extent which as set out above, is considered to represent the functional floodplain. The EA's Tidal Trent 2023</p>



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				model is considered to be the best available model and suitable for use in defining the functional floodplain.
RRR5	[REP2-109]	Heather Fox	How are flood flows safely managed and debris removed at the time of a flood?	It is not intended that maintenance activities or inspections be undertaken whilst a flood event is occurring. It is indicated in the FRA that any required inspections or maintenance will be undertaken following a flood event.
RRR6	[REP2-109]	Heather Fox	How does any structure on a flood plain have no impact on flow, direction or speed?	<p>The panel mounting structures and inverter voided structures can include a clear span between columns, thereby minimising the potential for blockages to occur and allowing free flow of water.</p> <p>It is noted that these concerns were raised and discussed in the recent Issue Specific Hearing 2 and has since been discussed further with the EA in a meeting held on the 11th September. The Applicant is in the process of updating the FRA to address these points with a view to submitting this at Deadline 4.</p>
RRR7	[REP2-109]	Heather Fox	What degree of incremental flooding would make the proposal unacceptable? Surely nil?	<p>The FRA [REP2-043] sets out that a conservative assessment of flood level change due to the development proposals could result in increases of 2.3mm and 4.1mm on the west and east respectively.</p> <p>As set out in the FRA, these increases are below the 5mm tolerance that the EA have indicated and are therefore considered to be negligible. The Applicant's view is that this is within the requirements of policy in terms of impact on flood risk.</p>



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RRR8	[REP2-109]	Heather Fox	As stipulated in EN 5.8.36 has land been set aside for future flood management?	<p>The wording associated with paragraph 5.8.36 of EN1 is as follows:</p> <p><i>"In determining an application for development consent, the Secretary of State should be satisfied that where relevant:</i></p> <ul style="list-style-type: none"> <i>land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance."</i> <p>The above does not indicate that land must be set aside for future flood management but rather that the future need for land is taken into consideration. In discussions with the EA, the Applicant has not been made aware of any future flood alleviation plans for the area and land required for this purpose is not anticipated.</p> <p>For clarity however, within the design, suitable offsets from watercourses and flood defences have been provided to allow access for maintenance and minimise impact on the existing features.</p>
RRR9	[REP2-109]	Heather Fox	Living in a listed building I have been included in the landscape and visual mitigation. Where is the same mitigation for flood risk?	<p>Flood risk mitigation is described in detail in Sections 3 (page 23 onwards with regards to fluvial flood risk) and 4 (section 4.2 onwards with regards to surface water drainage) of the FRA [REP2-043].</p>



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				Flood risk mitigation measures are typically undertaken within the development limits and tend to be associated with provisions such as buffers to watercourses/defences, raising of infrastructure or lowering of land. These items help form the basis of design for the landscape and visual proposals and are embedded into the design. With this in mind, specific consultation with residents on flood risk and drainage mitigation is not typically undertaken.
RRR10	[REP2-109]	Heather Fox	We move from an area at medium risk of flood now to an area of High risk from 2036. Has any account been taken of this?	<p>It is assumed that where the respondent refers to “we”, they are referring to their specific residence. Although this exact location is not known, changes in classification of flood risk from medium to high between now and 2036 is a consequence of climate change.</p> <p>In line with EN-1, the impacts of climate change have been included for in the assessment of future flood risk and is referenced throughout the FRA [REP2-043] and more specifically in Sections 2.4, 3 and 4.</p>
RRR11	[REP2-109]	Heather Fox	At the 3rd Virtual Meeting (September 26, 2024), OE claimed upstands do not obstruct flow around panels, but this was based on consideration rather than scientific modelling. There appears to be no modelling for debris accumulation around the predicted seven pairs of upstands per panel. EA stressed maintaining unaltered flood routes—it's unclear if this advice was followed. OE requested further guidance from EA on modelling	It is noted that these concerns were raised and discussed in the recent Issue Specific Hearing 2 and has since been discussed further with the EA in a meeting held on the 11 th September. The Applicant is in the process of updating the FRA to address these points with a view to submitting this at Deadline 4.



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			roughness patches; although OE later quantified upstand volume, EA asked to see the calculations and recommended flood flow directions be included in the model to add weight to the assessment. It remains uncertain whether these steps were completed.	
Replacement and Maintenance				
RRR12	[REP2-109]	Heather Fox	During construction, operation and decommissioning water will be encountering the metal upstands, most likely galvanised steel. What is the allowance for the inevitable corrosion of these and needing to be replaced?	Table 2-2, Indicative Design Life of Scheme Components in the Outline Operational Environmental Management Plan (oOEMP [REP2-051]) provides the indicative design life of racking and mounting systems, replacement is not anticipated because the design life is for the full operational period.
Land and Soils				
RRR13	[REP2-109]	Heather Fox	Land and Soils Table 8.1 states ` There are no recorded current or historical landfill sites within the site`. The EA states, ` Our records show that there are two historic landfills associated with the High Marnham Power Station present within the site boundary - waste was accepted there 1978-1994. These should be given some consideration`. Have these potential sources of contamination been included elsewhere?	It has not been possible to identify the Table 8.1 referred to here. The relevant chapter of the Environmental Statement (Chapter 8: Land and Soils, EN010159/APP/6.8 [APP-037]) and supporting appendix for the ES chapter (Appendix 8.2 Preliminary Risk Assessment, EN010159/APP/6.21 [APP-099 to APP-104]) refer to the existence of two historical landfill sites close to the location of the former High Marnham Power Station. One is in the location of the former sewage treatment works, which is within the Order Limits, and the other is close to the location of the former station buildings at Clifton railway station, which is outside the Order Limits. The locations of these features are shown on Figure 8.2 (Environmental Statement Volume 3, EN010159/APP/6.20 [APP-054]). It should be noted



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				<p>that earlier revisions of Figure 8.2 did show the landfill site at Clifton Railway Station to be partially within the Order Limits. This is not the case, and the correct boundary for the landfill is now indicated on Figure 8.2, which shows it to be outside the Order Limits.</p> <p>The available detailed information relating to these two historical landfill sites is presented in Appendix 8.2 Preliminary Risk Assessment, EN010159/APP/6.21 [APP-099 to APP-104] in Table 6 (page 9). These locations are considered by the assessment of potential environmental impacts within Chapter 8: Land and Soils, EN010159/APP/6.8 [APP-037], in terms of the potential for impacts during construction (see Section 8.6.2 for impacts to land and Section 8.6.7 for impacts to groundwater), operation and maintenance (see Section 8.6.37 for impacts to groundwater) and decommissioning (see Section 8.6.53 for impacts to land and Section 8.6.55 for impacts to groundwater). The environmental impact assessment concludes that there are no significant effects as a result of the Proposed Development in relation to contamination from existing sources.</p>
RRR14	[REP2-109]	Heather Fox	What regard has been given to zinc polluting the environment, particularly the water supply and not leaving the land fit for purpose after 60yrs? What happens to the land when millions of these [metal upstands] are pulled out and some break off? Who verifies all the calculations?	<p>The solar PV panel mounting structures are most likely to be constructed from galvanised steel. The galvanisation process involves coating the steel pieces with zinc in order to provide an external protective barrier which prevents the steel from corroding or rusting. The galvanisation increases the overall lifetime of the pile, and makes it suitable for using in situations where the mounting structures are located within wet conditions (for example where groundwater is present beneath the surface), ensuring that there is no leaching of metals from the steel element of the pile, and any release of zinc from the galvanised layer into the ground or groundwater environment is</p>



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				<p>unlikely to be significant, as the coating is designed to prevent degradation. Galvanised steel is widely used for applications that include an element that is beneath the ground surface (including the bases of electricity pylons/towers), where the design life for these structures is similar to, or longer than, the proposed lifetime of 60 years for the One Earth Solar Farm.</p> <p>With respect to the thickness of the zinc layer, this is determined based on the results of assessment work to identify the chemical characteristics of the ground and groundwater. Results that show a more corrosive below-ground environment will require the project design to incorporate a thicker galvanised layer, to ensure that the mounting structures will not degrade within the lifetime of the Proposed Development. This design also incorporates a factor of safety, that minimises the chances of premature failure of these metal elements.</p> <p>The method used for extracting the piles from the ground will be finalised at the time of decommissioning, to ensure that industry best practice techniques at that time can be employed. The method used to withdraw piles from the ground would be specifically selected to ensure minimum damage to the infrastructure on removal, so ensuring that the number of piles that do get damaged is kept to a minimum.</p> <p>Any calculations relating to the galvanisation applied to the piles is the responsibility of the Applicant (for example to determine the thickness and composition of the zinc layer that is most appropriate for the ground and groundwater conditions), and they will ensure that this process is undertaken correctly in order to minimise any failure of infrastructure. Ensuring that the galvanised structures do not corrode or degrade during the lifetime of the Proposed Development will reduce requirements for replacement of infrastructure during the operational phase of the Proposed Development, and ensure that the decommissioning phase involving removal of the piles allows</p>



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				them to be removed in one piece (as corroded piles are at greater risk of breaking).
RRR15	[REP2-109]	Heather Fox	REF a commission by The Welsh Government undertaken by RSK ADAS in response to a large number of large-scale solar PV applications on BMV land coming forward and evidence submitted (or lack of it) by applicants regarding soil/land quality impacts and reversibility. The work, under the Welsh Government's Soil Policy Evidence Programme SPEP 2021-22/03, is to inform Welsh Government and Natural England specialists when dealing with solar photovoltaic (PV) planning applications. The key impact of solar PV sites on land and soil may be caused by compaction leading to soil structural damage resulting in reduced permeability to water and air and in turn increased surface runoff and erosion. The reversibility of soil compaction may take many years and in some cases compaction may be permanent. Utility scale solar PV sites are land intensive and can have negative impacts, such as extensive landscape modifications that transform soil ecological functions, thereby impacting hydrologic, vegetative and carbon dynamics. Runoff from the panels can form rivulets or channels along the edges of the panels with ensuing soil erosion. Maintenance activities can cause further compaction and pile removal may be complex with piles fracturing and requiring further work to dig	<p>The Applicant recognises these risks, and this is precisely the reason why a soil resource survey is undertaken, and a soil management and aftercare plan is prepared. The measures in the soil management plan are set down to reduce the risk of soil damage and ensure that suitable monitoring and remedial actions are undertaken.</p> <p>The Applicant recognizes these risks and this is precisely the reason why a soil resource survey is undertaken, and a soil management and aftercare plan is prepared. The measures in the soil management plan are set down to reduce the risk of soil damage and ensure that suitable monitoring and remedial actions are undertaken. Key to reducing soil damage will be the control of trafficking, stripping and working of soils so that these only take place when the soils are at a suitable moisture content for the operation being undertaken. Soil structural conditions will be assessed by a suitably qualified and experienced person during the decommissioning phase and any remedial cultivations and/or drainage works undertaken as found to be required.</p> <p>The runoff from the panels will be addressed through the outline Surface Water Drainage Strategy [APP-017]. While it can lead to some soil loss it is more an issue of water quality from sediment transport.</p> <p>Zinc (Zn) occurs naturally in rocks, soils, plants and animals, and is an essential element for plant and animal growth. The risk to the environment and human health associated with zinc (or any heavy metal) is a function of both mobility and bioavailability. In soil, Zn is present in different chemical forms either in soil solution or in a loosely</p>

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			<p>them out. There is also the issue of pile corrosion, which is complicated and not entirely understood (Pritchard et al 2013) and potential loss of zinc from the galvanising coating on piles and contamination of the soil. Zinc levels in soils affects the soil biological activity (Moffett et al, 2003). (Piles on this site will be 1.5 mtrs - 3 mtrs deep) Research work was undertaken at the Swiss Soil Observatory (Keller et al, 2021) to quantify and monitor short-term recovery after prescribed compaction. After 2 years bulk density and air permeability had not recovered to pre-compaction values. Various timescales for recovery are given in published papers with 30 years (Batey,2009) and Hakansson (1988) reporting that compaction can be persistent and permanent. There is limited evidence specifically relating to solar PV sites to confirm the benefits to soil health but even in the most successful cases (of soil carbon capture, health and structure improvement) improvements are likely to be temporary and decrease with disruption at decommissioning,</p>	<p>or strongly bound state in soil fractions. These different chemical forms determine mobility, bioavailability and potential toxicity. Factors that regulate Zn bioavailable levels in soil include the total Zn content, clay content, soil moisture, organic matter, pH, redox conditions, calcium carbonate content. Soil pH is the most important determinant, and zinc becomes more mobile and bioavailable under acidic soil conditions, particularly when the pH is <5 (Kabata-Pendias, 2011).</p> <p>Galvanising applies a protective zinc coating to iron or steel to prevent corrosion and enhance durability. Potentially the breakdown of this coating over time could increase the concentration of zinc in the soil. Factors that influence the rate of metal corrosion in soil include acidity, soil conductivity, moisture and oxygen content. In 2008, it was estimated that zinc inputs from corrosion of galvanised steel was 28 t/ha/year which equated to <1% of the 3,336 t/year total zinc inputs to soil (the biggest sources were atmospheric deposition, livestock manures and biosolids) (Nicholson et al., 2010). However, increases in soil zinc content have been noted close to electricity pylons in North American studies, although the effect decreased with distance from the pylon and was at background concentrations within 6-9 m of the pylon (American Galvanizers Association, 2023).</p> <p>The only UK regulations controlling metal inputs to agricultural soils are the Sludge (Use in Agriculture) Regulations which are complemented by the Sewage sludge in agriculture: code of practice for England, Wales and Northern Ireland. In the code of practice, the maximum permissible concentration of zinc in the soil is 200 mg/kg dry solids at pH 5 to 7, increasing to 300 mg/kg dry solids at pH>7, with a maximum permissible average annual rate of addition of 15 kg/ha over 10 years. These limit</p>



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				<p>values are deemed sufficient to protect plants animals and humans from zinc toxicity. Providing the soil concentrations on site do not exceed these limit values, risks will be minimal.</p> <p>There has been research (list previously supplied before the last hearing) on the impact on soil conditions and health from different land management techniques e.g. modern arable rotation reversion to low intensity grassland (which will be the management regime under the solar farm). These found that under grassland there is a build-up of organic matter which is key to increased soil flora and fauna. Increased organic matter also increased rainfall infiltration, water retention and carbon capture. After decommissioning the level of soil organic matter, carbon, flora and fauna will over time evolve to fit the limits of the subsequent land management practices.</p>
Compulsory Acquisition				
RRR16	[REP2-106]	J G Pears	As previously noted, the proposed OESF DCO requires the use of compulsory acquisition powers to permanently acquire rights over land owned by JG Pears Group. However, the area over which it is proposed these rights could be acquired is significant (i.e. over 1.3 million square metres/320 acres) and is clearly an excessive use of powers of compulsory purchase. The Applicants Response states that the application of powers under Article 23 of the draft DCO are strictly limited to the acquisition of rights and the benefits of restrictive covenants for the purposes set out in Schedule 8 of the draft DCO, but that the	The matters referred to in JG Pears' response were discussed as part of the Compulsory Acquisition Hearing held on 3 rd September 2025. The Applicant's responses to the matters raised are set out in the Applicant's Oral Submissions from Compulsory Acquisition Hearing [EN01059/APP/9.21].



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			<p>wider landholding owned by JG Pears Groups has been included to provide construction flexibility, given the uncertainty around the route for the cable to connect into the proposed High Marnham substation.</p> <p>Whilst JG Pears Group accept that some flexibility is needed in this regard, it remains of the opinion that the level of flexibility sought, by including the whole of JG Pears site at High Marnham, is excessive. For at least the duration of the DCO examination/determination period and (assuming the DCO is confirmed) until a final easement strip is determined, JG Pears Group land at High Marnham is effectively incapable of being brought forward for other development.</p> <p>The Applicant has clearly had discussions with National Grid Transmission regarding the likely location of the proposed High Marnham substation (and JG Pears note that there are parts of its site where the substation cannot be accommodated) and therefore the Applicant should be able to limit the area of which it is seeking to acquire rights under the DCO in this regard. It is not unreasonable for there to be a review and reduction of the land which is currently contained in the draft DCO for the cable route to the proposed High Marnham substation. If such a review was carried out effectively, this would reduce the ongoing</p>	

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			<p>limitations on development which JG Pears are currently facing.</p> <p>Notwithstanding the Applicants Response, JG Pears still maintain that the OESF DCO lacks clarity and detail as to the rights and works that will affect JG Pears Group's land, with very wide ranging and generic rights applied across the whole OESF DCO. The rights sought go beyond what is necessary and are an excessive use of compulsory purchase powers and a thorough review of what is needed by way of compulsory acquisition should be carried out as set out above.</p> <p>The Applicant goes on in the Applicants Response to state that it would continue to engage with JG Pears Group to explore possibilities to reduce disruption and accommodate, where possible, future development plans. This is a clear acceptance that there is an impact/limitation on JG Pears Group's ability to bring forward future development on its land, despite suggestions earlier in the Applicants Response that no such impact/limitation exists.</p> <p>Additionally, the Applicant refers to six meetings between the parties and continuous dialogue since July 2021 (although in the Land and Rights Tracker this is stated as being July 2022). Unfortunately, JG Pears consider that</p>	



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			<p>this dialogue as not necessarily been continuous and that the Applicant not always forthcoming with information. For example, JG Pears raised a number of queries by email on 7 February 2022 that went unanswered.</p> <p>JG Pears Group also highlight that until correspondence issued by the Applicant in November 2024, their dealings with the Applicant were always in the context of the JG Pears Group being a landlord for solar PV and / or BESS elements of the scheme. It was only after JG Pears Group saw consultation papers on the project that they became aware of the Applicant's need to cross JG Pears Group land with a cable. It was then only November 2024 that the Applicant first approached JG Pears Group in relation to the need to a cable easement.</p> <p>Furthermore, it is noted in the Applicants Response and the Land and Rights Tracker that it has agreed to JG Pears Group's request for a non-disclosure agreement, this is completely untrue. JG Pears Group requested a unilateral nondisclosure agreement from the Applicant in March 2025 (i.e. to protect JG Pears Groups commercial interests, not the Applicants) but this has very recently (early August 2025) been rejected by the Applicant. Whilst discussions are ongoing, to date, no such agreement has been reached.</p>	

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			<p>Without this unilateral non-disclosure agreement, JG Pears Group is to be able to provide the Applicant with further details of JG Pears Groups strategy and future development plans for its land at High Marnham (information which the Applicant notes in the Applicants Response would be encouraged) and this therefore impedes any ongoing discussions of a commercial nature between the parties. JG Pears Group is disappointed with the position taken by the Applicant in this regard, but more so with the misrepresentation of the position in the Applicants Response and Land and Rights Tracker.</p> <p>In light of the above, it remains JG Pears Groups position that there has been very limited meaningful engagement by the Applicant, which is contrary to guidance on the use of compulsory purchase powers. JG Pears Group also reiterates that the Applicant has not made proper attempts to acquire the rights sought under the OESF DCO by voluntary agreement. Whilst the Land and Rights Tracker refers to the Applicant continuing to engage with JG Pears Group, there has been no attempt to re-negotiate terms since the Heads of Terms, issued by the Applicant in February 2025, where rejected by J G Pears Group.</p>	



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