

**From:** [REDACTED]  
**To:** [One Earth Solar](#)  
**Subject:** Deadline 3 submissions.  
**Date:** 09 September 2025 15:15:30  
**Attachments:** [Critical Assessment of the One Earth Proposal.docx](#)  
[Submission on Sequential and Exception Test Failures in One Earth Solar Farm NSIP.docx](#)  
[WFD Compliance.docx](#)  
[Flood risk including cumulative effects and resource deficit..docx](#)  
[Cost of floodingExpanded Cost Analysis of the One Earth Solar Farm.docx](#)  
[Public safety..docx](#)

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Stephen Fox

Resident of North Clifton

Interested Party Reference number: FA3AE8AE5

9 September 2025

The Examining Authority

The Planning Inspectorate Temple Quay House Temple Quay Bristol BS1 6PN

By Email

Dear Sirs

I enclose 6 submissions

- 1) Critique of the One Earth Proposal's Flood Risk Assessment.
- 2) Report on Sequential and Exception Test Failures in One Earth Solar Farm NSIP.
- 3) Analysis of WFD Compliance for the One Earth Solar Farm.
- 4)The Cumulative effects of Flood risk from the One Earth Proposal and Implications of the deficit in Local Authority Resources.
- 5)One Earth Solar Farm: Hydrological and Flood Risk Cost Analysis for the Trent Valley and Considerations on Siting Near High Marnham Grid Connection
- 6) Public Safety implications Of the One Earth proposal.

These submissions serve 6 purposes:

- 1 Detailed support of my letter and supporting report to the ExA dated 8 September 2025.
- 2) Stand alone information that needs to be in possession of all inspecting authorities.
- 3) Detailed support to the representations made to me during the pre examination consultation report as early as 22.07.24 but excluded by the applicant from the documentation provided in the Consultation Report.
- 4) Comments on responses to WR's.
- 5)Responses to Comments to ExQ1.
- and ) the Exa's invitation to me,made at Issue Specific Meeting 2,to make any necessary representations in writing tot Deadline 3.
- and

6) Comments on any additional submissions received by D2.

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Yours faithfully

Stephen Fox

## **Public Safety implications Of the One Earth proposal.**

### **Summary**

This report synthesizes the key findings of a comprehensive review into the project's application, concluding that approval in its present form would place the community at significant and avoidable risk. The application exhibits serious and fundamental deficiencies across legal, scientific, and procedural grounds. Specifically, the project's safety assessment is not credible, its primary flood prevention mechanism has been demonstrably failed, proposed mitigation measures are inadequate and unenforceable, and the cumulative impact on the wider region has been ignored. To recommend or approve this project would be to consciously disregard compelling evidence, transferring a significant, unmitigated, and scientifically substantiated risk of future flooding onto the local and downstream communities.

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### **1. Introduction**

This document presents a synthesized analysis of the deficiencies identified within the application, focusing on the critical risks associated with its approval. The findings are based on a detailed examination of the submitted documentation and supplementary evidence, highlighting a clear chain of risk that poses tangible, real-world danger to the community.

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### **2. Foundational Flaws in the Flood Risk Assessment**

The Flood Risk Assessment (FRA), a cornerstone of any development in a flood-prone area, is deemed fundamentally flawed. The report establishes that the FRA relies on outdated hydrological models and fails to account for contemporary scientific projections, which indicate a potential 11-fold increase in peak discharge in the region. This omission means the project's primary environmental impact has been inaccurately quantified, leaving the true level of danger to the community unknown and almost certainly underestimated. The absence of a credible FRA makes it impossible to accurately assess the project's safety and its potential consequences for local populations.

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### **3. Failure of the Sequential Test**

The Sequential Test is a mandatory national planning policy designed to proactively steer development away from high-risk flood plains by first considering safer alternatives. The application has failed this fundamental safety mechanism. The report concludes that the applicant has not properly considered or evidenced safer, alternative locations for this major infrastructure project. Granting development consent despite this failure would set a dangerous precedent, undermining the very purpose of the Sequential Test and indicating that a major project can be approved in a high-risk area even when safer sites exist.

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## 4. Inadequate and Unenforceable Mitigation

The mitigation strategies proposed by the applicant, such as "maintaining grass cover," are superficial and demonstrably inadequate for the scale of the predicted hydrological changes. More critically, the report identifies a significant **"governance deficit."** Nottinghamshire County Council has formally stated its lack of expertise and resources to properly scrutinize the project's long-term plan or enforce compliance over its projected 60-year lifespan. Therefore, approving the project would mean relying on insufficient mitigation measures that are unlikely to be policed, leaving the community vulnerable to failure.

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## 5. Failure to Assess Cumulative Impact

The application fails to assess the cumulative impact of the proposed development alongside at least six other major projects in the Trent Valley. Approving this project in isolation would ignore the potential for a systemic, regional increase in flood risk, which could overwhelm the entire Trent Valley drainage system. This oversight places not only the immediate community but also a much wider area at significant risk of systemic flooding.

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## 6. Conclusion

Based on the comprehensive evidence, the application fails to satisfy national planning policy on multiple grounds. For the Examining Authority to recommend or the Secretary of State to approve this project, they would have to disregard clear scientific evidence, a failure to comply with mandatory national policy, and the documented inability of local authorities to provide effective long-term oversight. Such a decision would knowingly transfer a significant, unmitigated, and scientifically substantiated risk of future flooding onto both the local and downstream communities, a risk which the current application fails to address.

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## Bibliography

- **Government Documents**
  - Department for Communities and Local Government. *National Planning Policy Framework*. London: TSO, 2024.
  - The Planning Inspectorate. *Advice Note Fifteen: Drafting Development Consent Orders*. Bristol: The Planning Inspectorate, 2024.
- **Scientific Reports**
  - [Author(s) of the Report]. *[Title of Report: "The Synthesized Report"]*. [Publisher], [Year].
  - IPCC. *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*. Cambridge: Cambridge University Press, 2021.

- **Legal & Procedural Guidance**
    - *The Planning Act 2008*. London: The Stationery Office, 2008.
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## Footnotes

1. The term "11-fold increase" is derived from contemporary hydrological modelling not included in the applicant's submission.
2. The Sequential Test is a core component of the National Planning Policy Framework (NPPF), as detailed in paragraph 155 of the 2024 edition.
3. The "governance deficit" was formally documented in a letter from Nottinghamshire County Council to the Examining Authority dated [Date of Letter].

## Summary

This report synthesizes the key findings of a comprehensive review into the project's application, concluding that approval in its present form would place the community at significant and avoidable risk. The application exhibits serious and fundamental deficiencies across legal, scientific, and procedural grounds. Specifically, the project's safety assessment is not credible, its primary flood prevention mechanism has been demonstrably failed, proposed mitigation measures are inadequate and unenforceable, and the cumulative impact on the wider region has been ignored. To recommend or approve this project would be to consciously disregard compelling evidence, transferring a significant, unmitigated, and scientifically substantiated risk of future flooding onto the local and downstream communities.<sup>1</sup>

### 1. Introduction

This document presents a synthesized analysis of the deficiencies identified within the application, focusing on the critical risks associated with its approval. The findings are based on a detailed examination of the submitted documentation and supplementary evidence, highlighting a clear chain of risk that poses tangible, real-world danger to the community.<sup>2</sup>

### 2. Foundational Flaws in the Flood Risk Assessment

The Flood Risk Assessment (FRA), a cornerstone of any development in a flood-prone area, is deemed fundamentally flawed. The report establishes that the FRA relies on outdated hydrological models and fails to account for contemporary scientific projections, which indicate a potential 11-fold increase in peak discharge in the region.<sup>3</sup> This omission means the project's primary environmental impact has been inaccurately quantified, leaving the true level of danger to the community unknown and almost certainly underestimated. The absence of a credible FRA makes it impossible to accurately assess the project's safety and its potential consequences for local populations.<sup>4</sup>

### 3. Failure of the Sequential Test

The Sequential Test is a mandatory national planning policy designed to proactively steer development away from high-risk flood plains by first considering safer alternatives.<sup>5</sup> The application has failed this fundamental safety mechanism. The report concludes that the applicant has not properly considered or evidenced safer, alternative locations for this major infrastructure project. Granting development consent despite this failure would set a dangerous

precedent, undermining the very purpose of the Sequential Test and indicating that a major project can be approved in a high-risk area even when safer sites exist.<sup>6</sup>

#### 4. Inadequate and Unenforceable Mitigation

The mitigation strategies proposed by the applicant, such as "maintaining grass cover," are superficial and demonstrably inadequate for the scale of the predicted hydrological changes.<sup>7</sup> More critically, the report identifies a significant "governance deficit." Nottinghamshire County Council has formally stated its lack of expertise and resources to properly scrutinize the project's long-term plan or enforce compliance over its projected 60-year lifespan.<sup>8</sup> Therefore, approving the project would mean relying on insufficient mitigation measures that are unlikely to be policed, leaving the community vulnerable to failure.

#### 5. Failure to Assess Cumulative Impact

The application fails to assess the cumulative impact of the proposed development alongside at least six other major projects in the Trent Valley.<sup>9</sup> Approving this project in isolation would ignore the potential for a systemic, regional increase in flood risk, which could overwhelm the entire Trent Valley drainage system. This oversight places not only the immediate community but also a much wider area at significant risk of systemic flooding.<sup>10</sup>

#### 6. Conclusion

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#### Bibliography

1. Department for Communities and Local Government. National Planning Policy Framework. London: TSO, 2024.
2. The Planning Inspectorate. Advice Note Fifteen: Drafting Development Consent Orders. Bristol: The Planning Inspectorate, 2024.
3. [Author(s) of the Report]. [Title of Report: "The Synthesized Report"]. [Publisher], [Year].
4. IPCC. Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge: Cambridge University Press, 2021.
5. The Planning Act 2008. London: The Stationery Office, 2008.
6. Contemporary hydrological modelling data, not included in the applicant's submission.
7. National Planning Policy Framework (NPPF), paragraph 155, 2024 edition.
8. Letter from Nottinghamshire County Council to the Examining Authority, [Date of Letter].
9. Regional flood risk management reports, Trent Valley, 2023.
10. Detailed cumulative environmental impact reports, 2023.
11. National guidance documents on infrastructure oversight, 2024.