

Interested Party Reference number: [REDACTED]

### Chronology Establishing [REDACTED]

I contend that the following chronology provides compelling evidence of [REDACTED]. The forensic evidence provided—detailing the three-month silence, the [REDACTED] minimization of meeting status, and the subsequent [REDACTED] of the critical "script" and the mental health report during the Examination—does not just suggest a procedural error; it **conclusively supports a finding of [REDACTED] and [REDACTED] of the statutory process** on the balance of probabilities. The sequence of events, together with the omission of key documents, is highly indicative, as is the Applicant's characterisation of the 1 August 2024 meeting as an informal question-and-answer session with no statutory bodies present, when in fact it involved a robust objection from South Clifton Parish Council, North Clifton Parish Meeting, and the Say No to One Earth Action Group.

- 22/07/2024: I wrote to One Earth, challenging their site selection, raising concerns regarding the rationale for connecting to High Marnham, flood risk, the impact of solar panels on runoff, cost-benefit analysis, and several other substantive issues relevant to the sequence test and Trent Valley area flooding. No reply was received. Further details are available in my Relevant Representation.
- 01/08/2024: The issues outlined in my 22 July email were expanded upon and presented to One Earth by the chairman of a meeting on behalf of South Clifton Parish Council (a statutory consultee), North Clifton Parish Meeting, and the Say No to One Earth Action Group.
- 02/08/2024: I wrote to [REDACTED], Principal Officer at One Earth, providing the script of the meeting (read verbatim at the meeting) and further elaborating on the points raised, emphasising their seriousness and the strength of local sentiment. I specifically referenced the need to address flood risk and Dr Sarah Fletcher's report on mental health. A full recording of the meeting, to which One Earth agreed, exists. The purpose of this correspondence was to ensure there could be no ambiguity regarding the challenges presented.
- 08/08/2024: Minutes of the meeting were sent to One Earth.
- No response was received until 19/11/2024 to either my email or the meeting minutes.
- 06/11/2024: The Planning Inspectorate advised the Applicant (Consultation Report, paragraph 3.7.2) that all necessary information relating to pre-application consultation activities must be included in the Consultation Report when submitting the DCO application.
- 19/11/2024: One Earth responded to the 1 August meeting, but incorrectly stated that the meeting was only with North Clifton. In fact, it included North Clifton Parish Meeting, the Say No to One Earth Action Group, and South Clifton Parish Council. This selective reporting appears strategic, given the different statutory standings of the Parish Council, Parish Meeting, and Action Group. The timing of this response—shortly after the Inspectorate's directive—raises questions as to whether any response would have been forthcoming otherwise. The response itself minimised the discontent expressed at the meeting and sidestepped criticisms regarding the adequacy of consultation and One Earth's willingness to engage, seemingly to avoid full disclosure in the Consultation Report.

- 16/01/2025: One Earth responded to my email of 2 August 2024, but avoided addressing the substantive issues. [REDACTED] confirmed that all feedback would be included in the DCO application.
- 16/01/2025: I replied to One Earth's email, reiterating the inadequacies of the consultation and requesting assurances. No response was received.
- 27/03/2025: The Consultation Report was presented with the Developer's application, with the Inspectorate having satisfied itself that the consultation process was conducted correctly.
- 04/05/2025: I submitted a Relevant Representation., including copies of correspondence from 22 July and 2 August 2024, as well as the script of the 1 August meeting.
- 16/07/2025: I requested from One Earth the specific pages in Appendix J-2 where the script of the 1 August meeting and related responses could be found.
- 25/07/2025: One Earth replied stating, "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."
- 01/08/2025: A revised version of Appendix J-2 was submitted to the Inspector. It included One Earth's email to North Clifton Parish Meeting dated 19 November 2024, but excluded both the minutes of the 1 August meeting and the script provided to [REDACTED] on 2 August 2024. This omission perpetuates the [REDACTED] of the meeting.

The Applicant has consistently employed questionable tactics to avoid disclosure of documents identified by the Inspectorate as necessary (6 November 2024, Consultation Report 3.7.2). The meeting on 1 August 2024 was a substantive critique of One Earth's consultation process and supporting documents. By [REDACTED] the nature of this meeting in paragraph 6.2.38 of the Consultation Report and omitting the script and responses from Appendix J-2, One Earth have withheld evidence of widespread dissatisfaction from both the Inspectorate and local authorities, with the apparent [REDACTED] of facilitating the progression of their application.

At no point in the Consultation Report does One Earth acknowledge the depth of community dissatisfaction or their repeated failure to engage constructively.

8 July 2025: At the Preliminary Meeting, the Inspector rejected my challenge regarding the Consultation Report's integrity, stating that it had already been approved and that the challenge was not a procedural matter. The Inspector confirmed that he had reviewed my registration representations and taken them on board. However, as these were submitted over a month after the Consultation Report's approval, neither the Inspectorate nor local councils could have been aware of the persistent concerns raised by the community regarding One Earth's consultation. As a result, the Consultation Report was accepted despite the omission of material information that could have influenced decision-making.

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 stated:

- 2.5.1: In response to concerns raised, [REDACTED] asserted that the Applicant prioritised early, consistent, and meaningful engagement, including a single point of contact ([REDACTED]) and various outreach activities such as in-person events, webinars, home visits, and parish council meetings.

- 2.9.5: In response to comments on consultation adequacy, [REDACTED] referenced the 16 local authorities' Adequacy of Consultation Representations [AOC-001 to AOC-017], all of which confirmed the Applicant's compliance with statutory consultation requirements. She also offered to indicate where application materials might assist in understanding the proposal's design and impacts. The Applicant's position is that engagement with stakeholders and the community was robust and extensive, encompassing both statutory and non-statutory phases, as outlined in the Consultation Report [APP-151].

These statements suggest that One Earth continues to present an inaccurate account of their consultation and engagement efforts. Either the Applicant has not fully informed their legal representatives, or the latter are willing to [REDACTED]. The omission of the full script of the 1 August 2024 meeting is particularly concerning, as it documents repeated requests for a scale model and dissatisfaction with the consultation process and challenges their site selection, raising concerns regarding the rationale for connecting to High Marnham, flood risk, the impact of solar panels on runoff, cost-benefit analysis, and several other substantive issues relevant to the sequence test and Trent Valley area flooding.

The following email exchange further illustrates the issue:

Stephen Fox [REDACTED]

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 please provide the relevant page numbers in Appendix J-2 where these questions and answers appear?

Regards,

Stephen

Stephen Fox [REDACTED]

Hi [REDACTED],

My request of 16 July is important, as I have committed to providing further information to the Inspector. A prompt response would be appreciated.

Regards,

Stephen

info@oneearthsolarfarm.co.uk

Hello,

I apologise for the delay. I cannot find the referenced attachment. I know it was included in an earlier draft but appears to have been lost in the finalisation process. I am updating that file now to submit at Deadline 1 with the attachment.

Thank you for bringing this to my attention.

Kind regards,

██████████

██████████ response was received at 12:00 on 25 July 2025. Taking ten days to respond during a critical phase of the Examination raises concerns regarding the quality of engagement and suggests hesitation in addressing the omission. The assertion that the document was “lost in the finalisation process” lacks credibility given the legal scrutiny involved.

On 1 August 2025, a revised Appendix J-2 was submitted, again excluding the minutes and script of the 1 August 2024 meeting. This perpetuates the ██████████ of the consultation process and undermines claims of ongoing engagement.

Furthermore, in their Applicant Responses to Relevant Representations (file 9.3), One Earth again failed to disclose documents relating to consultation inadequacy, despite the Examining Authority’s clear expectation at the Preliminary Meeting that all criticisms and unanswered questions would receive a full and detailed response.

When I raised concerns about the consultation at the Preliminary Meeting, ██████████, as recorded in the transcript, acknowledged the representations but distinguished between statutory consultation requirements and the issues I raised, inviting further detail. The Inspectorate’s expectation for a thorough and detailed response from the applicant remains unmet. This is the sixth instance of these issues being excluded: following their initial submission on 1 August 2024, One Earth’s responses in November 2024 and January 2025, the Consultation Report’s ██████████ and omission of documents from Appendix J-2, the revised Appendix J-2 at Deadline 1, and the failure to respond to the Inspector’s expectation at the Preliminary Meeting.

## Mental Health and the Conduct of One Earth

Prior to the 1 August 2024 meeting, Dr Sarah Fletcher conducted a survey of 109 local residents regarding the mental health impacts of the One Earth proposal. During the meeting, ██████████ acknowledged receipt of the survey and indicated that the team would consider how best to address its findings. The importance of local mental health was repeatedly emphasised, with assurances that proposals would be forthcoming. However, when One Earth returned in November 2024, the message was that local mental health would not be considered—a position reiterated at Issue Specific Meeting Part 6 by both their expert and legal representative, and in their Applicant Responses to Relevant Representations.

Of particular concern is the fact that Dr Fletcher’s survey was omitted from the Consultation Report and its appendices, despite assurances on 16 January 2025 that it would be included, and despite the Inspectorate’s directive that all relevant pre-application consultation materials must be submitted (Consultation Report 3.7.2, 6 November 2024).

At the Issue Specific Meeting Part 6, both ██████████ and ██████████ denied knowledge of Dr Fletcher’s report, raising questions as to whether its existence was ██████████ from the Applicant’s own experts. This represents further evidence of a pattern of withholding material information from the Inspectorate and undermines the integrity of the consultation process.

Despite multiple submissions to One Earth up to and including Deadline 3—and notwithstanding that the issues I first raised on 22 July 2024 have been a central focus of the Examination—the Applicant has consistently failed to engage constructively or respond to the substantive concerns raised.