



# One Earth Solar Farm

**Written Summary of Applicant's Oral Submissions at the Open Floor Hearing 3 (OFH3) [EN010159]**

**EN010159/APP/9.36**

Revision 1

November 2025

One Earth Solar Farm Ltd

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# 1. Introduction

- 1.1.1 This note summarises the oral submissions made by One Earth Solar Farm Ltd (the **Applicant**) at Open Floor Hearing 3 (**OFH3**) held on Thursday, 6 November in relation to the application for development consent (the **Application**) for the One Earth Solar Farm (the **Proposed Development**).
- 1.1.2 Where the Examining Authority (the **ExA**) requested further information from the Applicant on specified matters, or the Applicant undertook to provide further information during the course of OFH3, that further information is either set out in this document or provided as part of the Applicant's Deadline 5 submissions.
- 1.1.3 This note does not purport to summarise the oral submissions of other parties, and summaries of submissions made by other parties are only included where necessary to give context to the Applicant's submissions, or where the Applicant agreed with the submission(s) made and so made no further submissions (this is noted within the document where relevant).

## 2. Written summary of the Applicant's oral submissions at OFH3 on Thursday 6 November 2025

- 2.1.1 The OFH3 was held virtually at 9:30 on 6 November 2025 using Microsoft Teams.
- 2.1.2 Mr. Richard Griffiths, on behalf of the Applicant, thanked those who made oral submissions and responded in closing.
- 2.1.3 In response to submissions made by Mr. Stephen Fox, an Interested Party, the Applicant confirmed that it has seen the submissions made by Mr. Fox on the PINS website and that the Applicant will respond in writing to these at Deadline 5. The Applicant clarified that all statutory duties have been complied with and that all request from the ExA have been complied with and responded to in full.
- 2.1.4 In response to submissions made by Mr. White, in relation to errors on the Statements of Common Grounds, the Applicant noted these errors and confirmed that these have been corrected.
- 2.1.5 In response to submissions made by Mr. White, in relation to the cumulative effects on the Anglian Water Lincolnshire Reservoir Project, the Applicant noted that the Lincolnshire Reservoir is outside of the zone of influence for cumulative effects for the Project and therefore was outside of the longlist that was agreed with the Local Planning Authorities prior to the assessment of cumulative effects.
- 2.1.6 In response to submissions made by Mrs. Heather Fox, an Interested Party, to note that the EA has confirmed that the 5mm tolerance was acceptable. The Applicant noted the agenda of the Issue Specific Hearing 3 and confirmed that it would also be responding on this issue comprehensively at that hearing.
- 2.1.7 In response to submissions made by Mrs. Rebecca Walker, an Interested Party, in relation to the risk at the BESS sites and water run off, the Applicant confirmed that the outline Battery Safety Management Plan [REP4-028] is secured by a requirement in the DCO [REP4-004] and that the requirements in the Battery Safety Management Plan at detailed design stage must be agreed to by the Local Planning Authorities and other relevant bodies. The Applicant further confirmed, in relation to the appropriateness of Water Framework Directive Assessment [REP4-018], that the EA has agreed to this assessment.
- 2.1.8 In response to submissions made by Mr. Barry Steele, an Interested Party, about the risk to food security, the Applicant noted that this is no evidence that has been presented that the temporary loss of land presents a risk to food security. The Applicant further noted the recent grant of Tillbridge Solar Project DCO, which referred to the lack of evidence in relation to an impact on food security.

**Post hearing note:** the Applicant confirms that the reference to the Tillbridge Solar Project DCo is to paragraph 5.2.10 of the Recommendation Report to the Secretary of State dated 14 July 2025 submitted as part of that application, which refers to “no robust evidence” that there is a “material impact” from the temporary loss of BMV on the UK’s food security.



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