

South Clifton Parish Council – [REDACTED]

Deadline 6 Submission - Absence of an Index of Affected Properties and Incomplete Engagement Evidence

Planning Inspectorate Reference: EN010159 – One Earth Solar Farm

Date: 03/12/25

Dear Sir

South Clifton Parish Council (SCPC) wishes to draw the Examining Authority's attention to a significant omission in the Applicant's documentation: the absence of any clear, comprehensive index of all properties and receptors affected by the proposed development.

While the Book of Reference (BoR) identifies land interests for the purposes of compulsory acquisition, and the Land and Rights Negotiations Tracker outlines the Applicant's contact with certain landowners, neither document constitutes an engagement index. Neither provides:

- a list of all residential properties within defined distances of infrastructure or construction routes;
- a record of which households were contacted, when, and how;
- a schedule of responses received;
- a log of issues raised by residents;
- a map of all potentially impacted non-landowning receptors (including those affected by flood risk, hydrology, glint & glare, BESS safety, noise, or construction traffic);
- a record of the Applicant's engagement with vulnerable or high-risk residential locations.

In other NSIPs, Applicants typically provide a Consultation Report Annex or Engagement Schedule that logs all properties affected and all engagement activity conducted. No such document is present here.

1. Implications for Adequacy of Consultation

Without a clear index of affected properties, it is impossible for the ExA or the wider public to determine:

- whether all potentially affected households have been properly informed;
- whether consultation reached all relevant receptors;
- whether specific community concerns (e.g., flood pathways, emergency access, traffic impacts, glint & glare, BESS risk) were ever acknowledged or addressed;
- whether engagement has been targeted and proportionate.

This raises concerns about the adequacy of the consultation process, and particularly the Applicant's duty to consult under the Planning Act 2008.

2. Implications for Assessment of Impacts

The absence of a receptor index also undermines the robustness of several technical assessments, including:

- the Flood Risk Assessment (where downstream receptors have not been catalogued);
- the Hydrology ES chapter (which does not identify residential receptors affected by changes to flow pathways or storage/displacement);
- the Glint and Glare Assessment (which lacks a full receptor table for nearby dwellings);
- the Construction Traffic Assessment (which does not identify or assess impacts on properties along potential or undesignated access routes);
- the BESS safety assessment (where nearby receptors should be explicitly listed and modelled).

Without an index, the Examining Authority cannot be confident that receptors have been correctly identified, assessed, and mitigated.

3. Implications for Compulsory Acquisition

The Applicant's Land and Rights Negotiations Tracker only cover land parcels required for acquisition and does not provide any visibility of engagement with non-landowning properties that nonetheless experience significant construction, traffic, flood, or operational impacts.

This weakens the Applicant's case that the project has been developed with proportionate, transparent, and fair engagement, as required under the compulsory acquisition tests.

4. Request to the ExA

SCPC respectfully requests that the Examining Authority consider inviting the Applicant to submit a full, certified Index of Affected Properties including:

- all dwellings within 250m, 500m, and 1km of development parcels, haul routes, compounds, and BESS units;
- a record of engagement with each property;
- a summary of issues raised and how they were addressed;
- mapping of affected receptors in relation to Flood Zones 2 and 3, watercourses, drainage pathways, visual receptors, and designated construction routes.

Such an index is essential to allow the ExA to properly understand the adequacy of consultation, the completeness of the ES, the identification of receptors, and the wider community implications of the scheme.

Yours faithfully

Gill Cobham – on behalf of

South Clifton Parish Council