

[REDACTED]

From: [REDACTED]
Sent: 29 June 2026 20:54
To: One Earth Solar
Subject: Written Representation in Response to the Secretary of State's request, dated 23rd June 2026, for Comments on the Funding Statement relating to One Earth Solar Farm.

Formal submission to the Secretary of State

Interested Party Reference: [REDACTED]

Project: One Earth Solar Farm EN010159

Written Representation in Response to the Secretary of State's request, dated 23rd June 2026, for Comments on the Funding Statement relating to One Earth Solar Farm.

Dear Secretary of State,

I write to formally object to the current adequacy of the Funding statement provided by the Applicant for the One Earth Solar Farm project. As an interested party, my concern surrounds the disconnect between the project's long term financial structure and the significant, site-specific climate risks, specifically regarding flooding and environmental containment.

What happens to the public if the developer's flood prediction is wrong? A pertinent question is, given the site's vulnerability (straddling the River Trent with 56% of the site in Flood Zones 2 and 3), what specific financial mechanism prevents the developer from walking away from a damaged, flooded site, if the cost of repair exceeds the remaining revenue potential?

The Applicant has treated flood risk as a design issue to be engineered out rather than a potential multi-million-pound liability event to be insured against. I repeatedly asked during the examination what would happen if the area floods because of the solar farm installation and despite these repeated attempts to have this question answered, or even discussed, the matter has not been addressed.

In the current DCO submission there is no clear mechanism that ring fences funds specifically for retroactive flood mitigation regarding funding for communities if flooding increases after the solar farm is operational. There is lack of explicit liability security since there are no financial bonds or guarantees specifically tied to the plausible failure of drainage systems over the 60-yr project lifespan. There is no prefunded liability pool for the credible degradation of surrounding property or land caused by altered water tables or surface water redirection.

The Applicants Flood Risk Assessment FRA relies on models that assume engineering mitigation will perform flawlessly over a 60-yr operational period. However, the current Funding statement fails to provide a financial backstop for the residual risk that occurs if these mitigation measures fail or are overwhelmed by extreme weather events.

The Funding statement does not delineate a ring-fenced contingency fund for catastrophic flooding. There is no evidence of a dedicated reserve for environmental remediation should BESS units or solar infrastructure be damaged by floodwater, potentially leading to ground contamination or hazardous waste leakage.

The financial model relies on historical data and current design standards which are insufficient to cover the escalating frequency of the 1-in 100 year events expected towards the end of the project's life cycle. The funding model fails to account for the increasing costs of climate adaptation and mid-life flood mitigation upgrades.

The project is held by a Special Purpose Vehicle (SPV) with limited assets. In the event of a significant flood incident rendering the site a financial liability rather than an asset, there is a danger that the developer could divest or liquidate the SPV, leaving the public or the landowners to bear the cost of site restoration and environmental clean-up.

There is a lack of financial security as the Funding Statement provides no Flood Contingency Bond or independent escrow that is legally triggered by flood related damage. To satisfy the requirements of a robust and responsible NSIP development the Applicant must address these financial vulnerabilities.

I respectfully request that the Secretary of State considers the requirement of a formal ironclad Parent Company Guarantee from the ultimate owners that covers all environmental and flood related liabilities, remaining in force for the entire duration of the project, irrespective of any future sale of the SPV.

The requirement of a supplementary financial statement that explicitly quantifies the cost of environmental remediation work following a worst-case scenario flood event at the site.

A requirement by the Applicant to lodge a liquid performance - based bond to cover potential flood mitigation failure or site abandonment, ensuring the burden does not fall on the public purse.

Require the Applicant to provide a sensitivity analysis of the project's financial viability using 2080s epoch climate change projections for flood risk rather than current standards.

I thank the secretary of State for their time and consideration of this response.

Yours sincerely

Heather Fox