One Earth Solar Farm

Volume 9.0: Other Post-Submission Documents [EN010159]

Sequential Test Assessment Addendum

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Revision 01

One Earth Solar Farm Ltd

1. Introduction

1.1 Purpose of this Addendum

1.1.1 This document responds to the ExA Action Points 16, 17, 18 and 19 relating to compliance of the Application with the Sequential Test for flood risk.

1.1.2 Action Point 16 requests evidence of how the site selection criterion applied by the Applicant complies with policy in NPS EN-1 and EN-3.

1.1.3 Action Point 17 requests a response to a question raised by Mr Walker (an interested person) regarding distance of cable versus power loss, in relation to the justification for the Search Area for the Sequential Test.

1.1.4 Action Points 18 and 19 relate to queries raised at ISH2 by LCC and WLDC relating to the appropriateness of the Search Area used by the Applicant in the **Sequential and Exception Assessment [REP2-080]** and the size of site considered when identifying reasonably available sites for the purposes of the Sequential Test. This document forms an addendum to the **Sequential and Exception Test Assessment [REP2-080]** and read together the two documents are the key submission documents containing the Applicant's approach to the sequential test in particular.

2. Background and Approach

2.1 Policy Summary

2.1.1 Before responding to the Action Points, the Applicant draws attention to the following overall principles which reflect the policy and guidance set out in Section 2.0 of **REP2-080**.

2.1.2 The consideration of alternatives for the purposes of the Sequential Test should reflect the overall policy on alternatives in EN-1 which include that:

- it should be proportionate (paragraph 4.3.22 of EN-1);
- only alternatives that can meet the objectives of the Proposed Development need to be considered (paragraph 4.3.22 of EN-1); and
- there needs to be a realistic prospect that the alternative delivers the same capacity in the same timescale as the Proposed Development.

2.1.3 In this context, it is relevant that no reasonably available alternative sites at lower flood risk (or indeed any alternative sites) have been identified by any of the LPAs or other interested parties. There is therefore no evidence before the Examination, that identifies an alternate site that could deliver the same capacity as the Proposed Development by the grid connection date in 2029 (as set out in the **Grid Connection Statement [APP-174]**).

2.1.4 All of the above is also set against the context of the identified critical national priority for renewable energy infrastructure in NPS EN-1 (paragraphs 4.2.4 to 4.2.9 of NPS EN-1). Further information on this urgent need is set out in the **Statement of Need [REP2-047].** If alternative sites at lower risk of flood do indeed exist, which no-one is saying they do, then these would be needed as well as the Proposed Development, not instead of it.

2.1.5 Notwithstanding this, the Applicant provided a detailed analysis of potential reasonably available sites within 15km of the Point of Connection (High Marnham National Grid Substation). Whilst the Applicant has been clear that this was in itself a retrospective exercise, it did take into account flood risk as part of its site selection exercise alongside other planning and environmental criteria (see response below in relation to site selection criterion) and the information presented demonstrated that there were no reasonably available sites at lower flood risk, appropriate for the proposed development, within the Search Area.

2.2 Purpose and application of the Sequential Test

2.2.1 The purpose of the Sequential Test is set out in paragraph 023 of the National Planning Practice Guidance (NPPG) as follows:

> "*Paragraph 023 outlines the purpose of applying the sequential approach which is that, in summary, areas at little or no risk of flooding from any source should be developed in preference to areas at higher risk. This sequential approach is considered the most effective way of addressing flood risk as it places the least reliance on flood measures. Applicants are advised to apply the sequential approach to locating development to make sure resources are not wasted in promoting developments that fail to meet the Sequential Test.*"

2.2.2 The first purpose is to direct development to areas of little or no risk of flooding before considering higher risk areas. In this context, the Applicant considered flood risk when selecting a site, but other planning and environmental considerations meant that areas of lower flood risk were discounted for good planning reasons as those sites were not appropriate for development of the type being proposed.

2.2.3 It is relevant that this same policy approach also applies to all development, much of which is solid buildings which require flood compensation measures and sometimes significant interventions when developing in high flood risk areas. This is typically not the same for solar panels, which use slender frames which have a negligible impact on flood risk as the water flows (in the majority of cases) underneath the panels. This approach has been agreed with the Environment Agency on this and other solar NSIPs.

2.2.4 The purpose of doing the Sequential Test first is to make sure resources are not wasted if sites fail to meet the test. In this case, the Applicant considered flood risk at an early stage and was content that there were no reasonably available sites at lower flood risk and so there were no 'wasted resources'.

2.2.5 In this context, there is no 'real world harm' from having carried out a retrospective exercise in relation to the Sequential Test. Retrospective Sequential Test assessments have been carried out in relation to other determined NSIPs, including Heckington Fen which was approved by the Secretary of State in January 2025 and Cottam Solar Project which was approved by the Secretary of State in September 2024 both of which were found to comply with policy on the Sequential Test (paragraph 4.29 of the Secretary of State decision letter on Heckington Fen and paragraph 3.11.31 of the ExA Recommendation Report on Cottam).

2.3 Policy Evidence for Site Selection Criteria

2.3.1 As recorded in the Applicant's Written Summary of Oral Submissions made at ISH2 **[EN010159/APP/9.22]**, the Applicant developed the site selection criterion having regard to national policy in NPS EN-1 and NPS EN-3.

2.3.2 Whilst summarised in paragraph 4.2.1 of the **Sequential and Exception Test Assessment [REP2-080]**, the criterion was originally presented in the Site Selection Assessment appended to the **Planning Statement** [**APP-168**].

2.3.3 The criterion were initially informed by the ***factors influencing site selection*** at paragraph 2.10.18 onwards of NPS EN-3 and then by other policy in NPS EN-1 and EN-3, not all of which are listed as factors influencing site selection in NPS EN-3 (including flood risk), as follows:

Site Selection Criterion	Policy justification
Would contribute to meeting the UK's urgent need for low carbon energy generation.	NPS EN1 identifies a critical national priority for renewable energy infrastructure at paragraphs 4.2.4 to 4.2.9 of NPS EN-1. This is a clear national policy priority.
Would be as close as possible to an available grid connection or part of the transmission network in which capacity exists.	Factor influencing site selection in NPS EN-3. Paragraph 2.10.25 states that: "*To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity*." Numerous decided solar NSIPs have supported a site selection starting point of an agreed grid connection.
Would avoid impacts on sensitive landscapes and environments as far as practicable.	This is a wide-ranging criterion, but there are numerous references in NPS EN-1 and EN-3 to avoiding and mitigating impact on sensitive ecological and landscapes. Paragraph 5.10.6 of NPS EN-1 states that: "*projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate*." There are various policies in NPS EN-1 that apply in relation to ecological designations. Paragraph 5.4.42 requires that: "*As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives*." It is therefore reasonable for the Applicant to include a criterion which seeks to avoid those impacts as far as practicable, at a site selection level.

	This approach is also in keeping with the general requirement in NPS EN-1 to apply the mitigation hierarchy (see 4.1.5, 4.2.10, 4.2.11), in order to avoid, reduce and mitigate environmental effects where possible. This is achieved in part through site selection.
Would be situated away from densely populated residential receptors and communities.	Factor influencing site selection in NPS EN-3 - Proximity of a site to dwellings. Paragraph 2.10.7 states that: "*The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare.*" There are no specific policies in the NPS which specifically seek to locate infrastructure development away from residential communities, however paragraph 5.7.4 of NPS EN-1 states in relation to emissions: *"For energy NSIPs of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. The aim should be to keep impacts to a minimum, and at a level that is acceptable."* It is therefore reasonable for the Applicant to include a criterion which seeks to reduce impact on communities by seeking to locate the site away from densely populated areas.
Would as far as possible be located outside of Best and Most Versatile (BMV) Agricultural Land based on the information known at the time taken from Provisional Agricultural Land Classification (ALC) (England) Map produced by Natural England, noting that this could not always be avoided depending on the	Factor influencing site selection in NPS EN-3 – agricultural land classification and land type. Paragraph 2.10.29 states: "*While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible*." The Applicant sought to select a site which reduced the use of BMV land, based on publicly available data published by Natural England and Defra.

overall land quality in the area.	
Would not be located wholly within the Flood Zones (meaning Flood Zones 2 and 3), to ensure that more sensitive electrical infrastructure could be located outside of areas at risk of flooding.	NPS EN-1 states at paragraph 5.8.3 that "*All projects should apply the Sequential Test to locating development within the site*." The Applicant considered that it was important that the selected site would have areas in Flood Zone 1 to satisfy this part of the Sequential Test and ensure that more sensitive electrical infrastructure (BESS and substations) could be located outside of flood zones 2 and 3. Through the application of this criterion, a preference was given to sites that had higher areas of flood zone 1 and therefore lower flood risk.
Would be readily accessible from existing strategic road network to facilitate construction access.	Factor influencing site selection in NPS EN-3 – accessibility. To reduce impacts on the local highway network, sites should be easily accessible from the existing strategic road network. Paragraph 2.10.35 states: "*Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues*."
Would be delivered on land which could be acquired voluntarily thereby avoiding or minimising the need for large scale compulsory acquisition (and, in the case of BMV Agricultural Land, could potentially help identify the least productive areas of land using local knowledge from farmers).	The Applicant addressed why this criterion has been applied in REP2-080 submitted at D2 at paragraphs 5.2.11 to 5.2.14. Including land within a solar NSIP where there is a completely unwilling landowner has a number of issues which increases risk of delivering the project (and indeed any project) by the date of the grid connection agreement, thus delaying the delivery of critical national infrastructure including site access issues, risk of significant objection and being able to demonstrate that the necessary steps had been taken to acquire the land voluntarily first. This is therefore a reasonable consideration in site selection.

Numerous determined solar NSIPs to date have accepted the starting point of a grid connection agreement and willing landowner(s).

2.3.4 The Applicant took a balanced approach to applying these criteria to select a site that was appropriate for the use proposed, weighing up a number of varying factors. Whilst sites in Flood Zone 1 were preferred on the basis of lower flood risk, sites in Flood Zones 2 and 3 were not ruled out on the basis that there is a technical solution to allow solar to be safely accommodated in Flood Zones 2 and 3, without increasing flood risk elsewhere, as explained in the **Flood Risk Assessment [REP2-043],** and to the satisfaction of the Environment Agency.

2.3.5 Whilst the Applicant was mindful of needing to satisfy the Sequential Test without reference to technical solutions, as is demonstrated in the **Sequential and Exception Test Assessment [REP2-080]** there were no suitable sites which were readily available solely within Flood Zone 1 or Flood Zones 1 and 2. It was therefore appropriate to consider sites, such as the Application Site within Flood Zones 1, 2 and 3.

2.4 Case Law: R (Mead and Redrow) v SoS LUHC [2024] EWHC 279 (Admin)

2.4.1 2.4.1 In the Applicant's Sequential and Exception Test Assessment [REP2-080] we set out key points from the High Court's decision of R (Mead and Redrow) v SoS LUHC [2024] EWHC 279 (Admin) (a decision that was subsequently upheld by the Court of Appeal) in relation to the application of the sequential test (in the context of planning permissions under the Town and Country Planning Act 1990 and considering the NPPF and PPG provisions in relation to reasonable available sites). We have further expanded upon that commentary here, in order to address points arising at ISH2

2.4.2 The claimants in this case submitted that in applying the sequential test under the NPPF, the Inspector was required to consider whether there were alternatives sites which could accommodate the development that was in fact being proposed, in its various particulars, including form, quantum and intended timescales for delivery, rather than some hypothetical development.

2.4.3 The judgment referred to the approach taken to the sequential assessment in the context of retail policy and the need for "flexibility and realism" in the approach. This referenced that there was a balance between a developer taking an inflexible approach to their requirements and on the other hand, that a local planning authority refusing permission based on an alternate site may be effectively taking an entirely inappropriate business decision on behalf of the developer. In the retail cases cited in the judgment in this context, it was reported that regard should be had to the circumstances of the particular town centre but

also that planning authorities should be responsive to the needs of retailers. The judgment recorded that *"Turning to retail policy in the NPPF, in R (Aldergate Properties Limited) v Mansfield District Council [2016] EWHC 1670 (Admin) Ouseley J decided that "suitable" and "available" referred to the broad type of development proposed in a planning application by approximate size, type of retailing and range of goods, incorporating flexibility, but excluding the corporate attributes of an individual retailer [35] to [38]."*

2.4.4 In the context of the sequential test for flood risk, the judgment states, at paragraphs 98 and 99 –

"98. This takes us back to the "inbuilt difficulty" of a sequential approach referred to in Tesco at [28]. The policy to steer new development to areas with the lowest risk of flooding would be defeated if any examination of alternative sites is restricted by inflexible requirements set by developers. But a broad, non-specific approach by planning authorities to sequential assessments which generally disregards development requirements could lead to inappropriate business decisions being imposed on developers or the market. There is a need for realism and flexibility on all sides.

99. It is not difficult to see why para. 162 of the NPPF has been expressed so broadly as compared, for example, with the retail policies considered in the Tesco case. Paragraph 162 applies to all types of development. Some development may be of a specialised or highly specific nature with particular or intrinsic requirements as to the site, form and scale of development, access, and catchment. Examples could include a power station, transport infrastructure, a school or waste disposal facilities. Other forms of development, such as residential, may have no, or fewer, specific requirements for the purposes of a sequential assessment."

2.4.5 At paragraphs 102 – 104 the judgment records that –

"A developer may put forward a case that the specific type of development he proposes is necessary in planning terms and/or meets a market demand. It then becomes a matter of judgment for the decision-maker to assess the merits of that case and to decide whether it justifies carrying out the sequential assessment for that specific type or for some other, perhaps broader, description of development. Paragraph 162 of the NPPF does not exclude either approach, but leaves to the decision-maker the selection of the approach to be taken. …

103. A need and/or market demand case could be based on a range of factors, such as location, the mix of land uses proposed and any interdependence between them, the size of the site needed, the scale of the development, density and so on. But the decision-maker may also assess whether flexibility has been appropriately considered by the developer and by the local planning authority.

104. So far, I have been dealing with an applicant's case on a specific need for the type of development proposed. Depending on the merits of the case put

forward, this may be relevant to deciding the appropriate area of search and whether other sites in lower flood risk zones have characteristics making them "appropriate" alternatives."

2.4.6 The decision continues, rejecting the claimants' highly prescriptive interpretation of the sequential test and emphasising the need for flexibility on all sides.

2.4.7 With respect to smaller sites, the judgment records at paragraphs 109 and 110 –

"109. The PPG also states that reasonably available sites may include "a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development." Whether such an arrangement is so capable depends on the judgments to be made by the decision-maker on such matters as the type and size of development, location, ownership issues, timing and flexibility. Taking into account his assessment of any case advanced by the developer on need and/or market demand, the decision-maker may consider smaller sites (or disaggregation) if appropriate for accommodating the proposed development.

110. I note that the PPG refers to a "series of smaller sites." The word "series" connotes a relationship between sites appropriate for accommodating the type of development which the decision-maker judges should form the basis for the sequential assessment. This addresses the concern that a proposal should not automatically fail the sequential test because of the availability of multiple, disconnected sites across a local authority's area. The issue is whether they have a relationship which makes them suitable in combination to accommodate any need or demand to which the decisionmaker decides to attach weight."

2.4.8 With respect to the Applicant's application of the sequential test, this has not been undertaken in an overly prescriptive manner reflecting only the corporate attributes and requirements of this specific developer. For example, the Proposed Development is 1,409 ha and that reflects choices by the Applicant to provide a specific amount of mitigation and biodiversity net gain, and to approach the design of the scheme in a specific way including providing various offsets. The sequential test has been undertaken looking for a smaller site of 985 ha, in order to ensure flexibility in the approach and accepting that there may be different approaches to the design of the site, and mitigations and enhancements proposed within the project. The approach has been informed by the need in this location and centred around this grid connection point, as established and explained in the **Statement of Need [REP2-047] and Planning Statement [APP-168]**. The characteristics applied as to what will be an appropriate site and location reflect considerations that are suitable for a large scale solar development, rather than the specifics of the Proposed Development or the specific requirements of the Applicant. The factors informing what is an appropriate site and location reflect the application of national policy and the need to apply the mitigation hierarchy to a range of impacts as well as balancing typical engineering and technical requirements. It is a matter of judgment for the decision maker in this case to decide whether the Applicant is justified in carrying

out the sequential assessment in the way it has. The Applicant considers it has achieved the required balance of flexibility and realism, and has taken a robust, reasonable and proportionate approach.

2.4.9 In terms of considering a series of smaller sites, the Applicant has set out its approach previously and the reasons for its preference for one contiguous site. Reflecting the case law and the need for realism and flexibility, the Applicant also considered the availability of smaller sites (despite there being examples of other applicants for solar NSIPs having a preference for a single contiguous site in their site selection exercises, so it is not accurate to suggest this preference is entirely specific to the Applicant in this case), to ensure a robust approach to the sequential test, despite two smaller sites not being its preference for reasons that are set out in the **Sequential and Exception Test Assessment [REP2-080].** The requirement of the Applicant that two smaller sites be no greater than 6km apart is consistent with the case law and that such smaller sites have a relationship between each other appropriate for accommodating the type of development which the decision-maker judges should form the basis for the sequential assessment. To further ensure flexibility in the approach and reflecting the comments from the ExA and Interested Parties at ISH2 the Applicant has now looked at even smaller sites, going down to at least 250 ha, the assessment and conclusion of which is set out in Section 4.

3. Search Area Justification

3.1.1 The original Search Area used was 10km from the Point of Connection (POC) of High Marnham Substation, as set out in the **Site Selection Assessment, Appendix 1 of the Planning Statement, [APP-168]**. This is justified in the **Sequential and Exception Test Assessment [REP2-080]** at paragraphs 4.3.3 - 4.3.9 and is summarised below.

3.1.2 The initial 10km Search Area was driven by the desire to be as close to the point of connection as possible, in order to minimise the risk of environmental impacts, disruption to multiple landowners, challenges with crossings and process losses, and the cost and delay of a longer cable route.

3.1.3 Further to the first written questions from the Examining Authority (ExAQ1), the Applicant extended the Search Area to 15km as a sensitivity test, which as demonstrated in the **Sequential and Exception Test Assessment [REP2-080]**, did not show any additional alternative sites within lower areas of flood risk that would be appropriate for development of the type of the Proposed Development. There were questions on the size of these alternative sites, and criteria used, which is assessed elsewhere in this Addendum.

3.1.4 In terms of the 15km sensitivity test, it is considered that this is a reasonable distance for the reasons outlined above and in the **Sequential and Exception Test Assessment [REP2-080]** at paragraphs 4.3.3 - 4.3.9. During the site selection process, one of the main criteria set by the Applicant was to be as close to the POC as possible. As the Applicant noted in its oral submissions at ISH2 [see the **Applicant's Written Summary of Oral Submissions from ISH2 [EN010159/APP/9.22],** it is also well established through numerous determined solar NSIPs that the POC is an appropriate starting point from which to carry out a site selection exercise. This is also acknowledged in NPS EN-3 in paragraph 2.10.25, as noted in the table above in relation to site selection criterion. The Applicant therefore does not agree with LCC's position that it should be considering sites outside of this region, or indeed beyond the Search Area.

3.1.5 As stated in the Applicant's oral submissions at ISH2 [see the **Applicant's Written Summary of Oral Submissions from ISH2 [EN010159/APP/9.22]**, if this Search Area was extended even further, notwithstanding the further cost and environmental impacts, the characteristics of this area mean that further constraints would be encountered, including proximity to the urban areas of Lincoln to the east, Newark-on-Trent to the south, Gainsborough to the north and Retford and Worksop to the west.

3.1.6 In addition, if the Search Area was increased further, to say 20km, it would not be logical to propose a project that connects into High Marnham Substation, but instead into one of the other nearby connections, such as Cottam (9 km away) Gate Burton (15.5 km away) or Staythorpe (18 km away). The Applicant is aware that these connection points now have consented solar NSIPs which connect into them, between the 10-15km distances from the One Earth POC, which would

result in further cumulative effects and impacts on communities. If there was further capacity available at these substations, any potential alternative sites should reasonably connect into one of these connections which would not be making use of the available capacity at High Marnham.

3.1.7 In terms of the technical justification for the 10km and 15km search area as requested in ISH2 and ExA Action Point 17, anticipated losses for a 400kV cable route at rated power (740MW) at 10km, then 20km and 30km from the point of conection, are set out below:

Length (km)	10	20	30
Power loss (%)	0.037	0.074	0.111
Cost (£m)	40	80	120

(note, the figures are totals for the full distance, not what is incurred in addition to the shorter distance, for example figures for 30km are for the full 30km cable route, not just what is incurred over and above a 20km cable route).

3.1.8 Whilst the actual power loss is not significant, the estimated cost amounts to just over £5,000 to move 1 MW by 1km, and the total cost implications of extending the search area is set out in the table above. It is noted that these costs are estimated based on an installation in an open field without the obstructions of 'engineering challenges' such as going under roads/rail/river/trees etc. which would have an even greater impact on the cost.

3.1.9 In summary, every additional 10km which is added to the cable length adds an additional £40 million to the overall project costs which impacts the levelised cost of electricity the scheme can produce, meaning higher electricity costs for the consumer. There are therefore clear reasons why it is preferable to be as close to the POC as possible. In the context of the High Court decision in Mead set out earlier in this Addendum, it is realistic that these considerations would inform the search area and desire for as short as cable route as possible (given this and the other factors set out in the Sequential Test Assessment) for most if not all developers looking for a site suitable for large scale solar, and these are not factors that are the corporate attributes of the individual Applicant in this case.

3.1.10 As such, for the reasons set out above, it is considered that the original 10km Search Area is reasonable, and the additional 5km which was extended in the Deadline 2 submission of the **Sequential and Exception Test Assessment [REP2-080]** provided a robust sensitivity test to confirm the appropriate application of the Sequential Test. There is no reason for the Applicant to go any further to continue to search for possible alternative sites to do so would be unreasonable and disproportionate.

4. Alternative Sites Assessment

4.1 Justification for methodology used - 6km distance between potential alternative sites

4.1.1 The distance of 6km the Applicant set between potential alternative sites considered in the **Sequential and Exception Test Assessment [REP2-080]** was also queried at ISH2. The reasons for this 6km maximum distance is set out in the **Sequential and Exception Test Assessment [REP2-080]** at paragraphs 5.2.3 and re-provided below. It is worth again noting the context here, which is the PPG which states that reasonably available sites "could include" a "series of smaller sites", meaning firstly there is no set approach and this will be informed by what is reasonable to consider is appropriate for a development of this type, and secondly, that when smaller sites are considered, there does need to be a relationship between them, which is particularly pertinent in the case of a large scale solar development where those sites will need to be physically connected.

4.1.2 As the sites are split the efficiency in connection strategy is lost, and anything further than 6km requires large cable corridor widths if using a 33kV connection, with less ability to avoid sensitive environmental receptors and more disturbance. If multiple sites are required further away, additional substations may also be required. It was also considered that if more than two disparate sites were to be proposed, this would significantly add to timescales for delivery and have an impact in the efficient use of land and therefore land that would constitute more than two smaller sites would not represent a realistic alternative to the Proposed Development as such sites would not be suitable and could not be delivered in a similar timescale.

4.1.3 Notwithstanding this, whilst the 6km was a criteria set by the Applicant in the methodology for identifying potential multiple sites which could together form potential alternatives sites, it is important to note that the 6km was not a determining factor and no sites were identified that could be connected via cabling in theory but were discounted because they were more than 6km apart. All 490ha sites were mapped and assessed by the Applicant, and had two been assessed as reasonable alternatives, the 6km maximum distance may have then been used to confirm if the two sites could be coupled together to form one project. No appropriate alternative sites were identified, so the 6km distance was never used to discount any sites, as the Applicant did not reach this stage of assembling multiple sites.

4.2 Size of Sites considered in Sequential Test

4.2.1 In the **Sequential and Exception Test Assessment [REP2-080]** the Applicant identified 12 potential alternative sites which have been assessed from a flood risk perspective, and other matters such as, but not limited to, agricultural land, landscape and visual considerations and ecological designations.

4.2.2 Initially a size of at least 985 ha was used as an appropriate size of site, which is the same land take as the solar PV area, and associated infrastructure only. In addition, whilst there is a strong preference for one contiguous site, smaller sites were also identified that could be combined to make one single project site the same size of the solar infrastructure area (reflecting the PPG guidance as to what constitutes reasonably available land, as noted above), which comprised sites that were at least 490 ha in size.

4.2.3 It is noted that for other projects, notably Heckington Fen Solar Farm [EN010123] (which comprises 97% Flood Zone 3, 2% Flood Zone 2 and 1% Flood Zone 1), only sites with a "g*eographical extent similar in scale to Heckington Fen (circa 550 hectares)*" (paragraph 3.2 of the Sequential Test Appendix D of the Flood Risk Assessment [EN010123/APP/6.3.9.1]) were identified and assessed as reasonable alternatives. No consideration of smaller or split sites was included in the sequential assessment. The approach undertaken by the Applicant has therefore gone one step further than Heckington Fen Solar Farm in terms of looking for even more alternative sites, by splitting the sites into smaller areas of at least 490 ha.

4.2.4 In response to the ISH2 actions, the Applicant has undertaken a further review and searched for potential sites that could be combined which are even smaller of at least 250 ha, as a further sensitivity test. A further search through the GIS platform was undertaken to identify any 250 ha sites which could present an alternative site, with the understanding that four of these sites would need to be identified in order to constitute a reasonable alternative to the Application Site. The majority of the smaller sites identified were located within the larger sites already assessed within the **Sequential and Exception Test Assessment [REP2-080]** so these have not been reassessed in this Addendum. However, five small sites of at least 250 ha have been identified as potential alternatives, as shown on the Assessment Mapping at Appendix B. Of the five sites identified, two of them were either wholly within Flood Zones 2 and 3 (AP13) or predominately within Flood Zones 2 and 3 (AP16), as such these sites were not assessed in full, because they are not sequentially preferable in terms of flood risk to the Order Limits. The other three sites are located outside of the flood zones, however the sites only comprise approximately 750 ha in total, and AP14 is approximately 21km way from AP17 and 24km away from AP15, so alone do not provide enough land take to be considered a reasonable alternative to the Proposed Development, and are not all sufficiently connected so as to comprise a series of smaller sites. To ensure a robust approach has been taken, the Applicant has still undertaken an assessment of these 3 smaller sites. They have been assessed in full in Appendix A, and summarised below:

Site Ref	Location	Assessment
AP14	South of Retford	The site is located in Flood Zone 1, so is sequentially preferable to the Order Limits. However, due to the proximity to Retford and Gamston Airport and the amount of

		Grade 2 ALC land, the site is not considered to be suitable. It is noted as well that the landowners were not forthcoming in the initial site selection process.
AP15	South of the A46	The site is located in Flood Zone 1 so is sequentially preferable to the Order Limits. Ancient woodland abuts the southern boundary of the site, which would cause significant impacts without setbacks and mitigation. The site is also approximately 13km from the POC so the cables would need to cross the River Trent, and the A1133, the railway lines and the A46. On balance the site could be considered suitable, subject to detailed technical assessments. It is however noted as well that the landowners were not forthcoming in the initial site selection process.
AP17	South of Collingham	The site is located in Flood Zone 1 so is sequentially preferable to the Order Limits. However, the site is in very close proximity to a large village (Collingham) to the north which includes a Conservation Area, and a large number of listed buildings. The parcels of land closest to Collingham, within the site boundary, are covered by Article 4 Direction which would make the site unsuitable for solar. It is noted as well that the landowners were not forthcoming in the initial site selection process.

4.2.5 As set out above and in Appendix A, only one of the smaller sites could be considered potentially suitable for solar development, subject to detailed technical assessments (AP15). However, the landowners of these parcels did not come forward to offer their land during the initial site selection process, and as such it is not considered possible to confirm that the sites are reasonably available.

4.2.6 More importantly, this one site alone could not deliver the same amount of capacity as the current Proposed Development, because it comprises only approximately 25% of the land required for a project of the same size (740MW), without any enhancement or mitigation land. The total Order Limits of the Proposed Development is 1,409 ha, so realistically AP15 only provides

approximately 18% of the total land required to deliver a similar project. The Applicant has also considered a situation where this parcel of potentially suitable land is used in combination with the parcels of the Proposed Development Order Limits within Flood Zone 1, however this would not be realistic or reasonable because AP15 is located approximately13km from the parcels of the Order Limits in Flood Zone 1. Connecting AP15 with a cable route of approximately 13km, crossing the River Trent, A1133, A46 and the railway line would be prohibitively expensive. Proposing one smaller parcel 13km away from other development parcels also conflicts with the intention of the PPG which states that 'a series of smaller sites' could be proposed, and as stated at paragraph 110 of the judgement R (Mead and Redrow) v SoS LUHC [2024] EWHC 279 (Admin) (set out in more detail in Section 2.4) *"The word "series" connotes a relationship between sites appropriate for accommodating the type of development which the decision-maker judges should form the basis for the sequential assessment. This addresses the concern that a proposal should not automatically fail the sequential test because of the availability of multiple, disconnected sites across a local authority's area. The issue is whether they have a relationship which makes them suitable in combination to accommodate any need or demand to which the decision-maker decides to attach weight*". There is no relationship between AP15 and the Proposed Development, and as such it would not be reasonable to combine these parcels to form one project, regardless of the flood zone designations.

4.2.7 It is also unlikely that the same timescales could be met if AP15 was used, because as set out at paragraphs 5.2.11 – 5.2.17 in the **Sequential and Exception Test Assessment [REP2-080]** land that is not offered voluntarily would likely take longer to acquire through compulsory purchase powers, delaying the process, making it very challenging to meet the connection date of 2029.

4.2.8 In addition, the preference to have one contiguous site, rather than smaller dispersed parcels fed into the site selection process and should not be overlooked. Where there is a larger area of solar, a higher voltage is needed to connect between the solar PV panels. Higher voltage cables require wider corridors and deeper cables, and this is done to mitigate losses within the route. For example, in the Great North Road project, there are small, dispersed parcels, which can be interconnected at lower voltages, but this results in more substations which has greater visual and other impacts. Therefore, there is a choice of either many dispersed substations or condensing the site into fewer parcels and therefore less infrastructure overall for the scheme, and the preference for one contiguous site is one shared with many large-scale solar developers and is not an unreasonable approach based on the factors that have been identified. As there is no set approach on the development of a large-scale solar farm, it is for each developer to determine their preferred strategy within the confines of the sites available to them.

4.2.9 One of the key objectives of the Proposed Development was to provide low cost and low carbon electricity to the Grid, and the Applicant considers that a contiguous site, closer to the grid connection would deliver this objective. As

such, there was a clear preference for one contiguous site which was the approach taken to looking for sites. EN-3 states at paragraph 2.10.17 that a solar farm requires between 2 to 4 acres for each MW of output, and using this as a guide, it was determined that 2 parcels (either side of the River Trent) at approximately 400ha would be required to deliver the capacity secured by the grid connection agreement, which was considered at the site selection stage.

4.2.10 However, the Applicant recognised the guidance in terms of whether a smaller series of sites may also be appropriate, and the case law in terms of needing to take a realistic but flexible approach and as therefore considered this in this Addendum. This confirms that there are no other alternative sites that could have been combined as alternatives to the Order Limits.

5. Conclusion

5.1.1 The Applicant has responded to the ExA Action Points 16, 17, 18 and 19 relating to compliance of the Application with the Sequential Test for flood risk.

5.1.2 Site selection exercises will vary from by applicant to applicant, and there is no definitive guidance on precisely what criterion should be applied. It is clear the approach should be realistic and flexible. The reality is that these are multi-million-pound projects and applicants inevitably need to consider deliverability, including cost, financial viability and landowners, in addition to planning and environmental considerations, using professional judgement and their knowledge of developing solar projects. Nevertheless, within this Addendum, evidence of how the site selection criterion applied by the Applicant complies with policy in NPS EN-1 and EN-3 has been provided in section 2.

5.1.3 The Applicant has also provided further justification for the 10km and 15km search areas in Section 3, which demonstrates that the extended 15km Search Area is appropriate, reasonable and logical in the context of being as close to the POC as possible to mitigate disruption, to avoid conflict with the hard constraints in proximity to the POC (such as urban areas, railway lines, National Parks and designations), and other POCs and associated existing NSIPs.

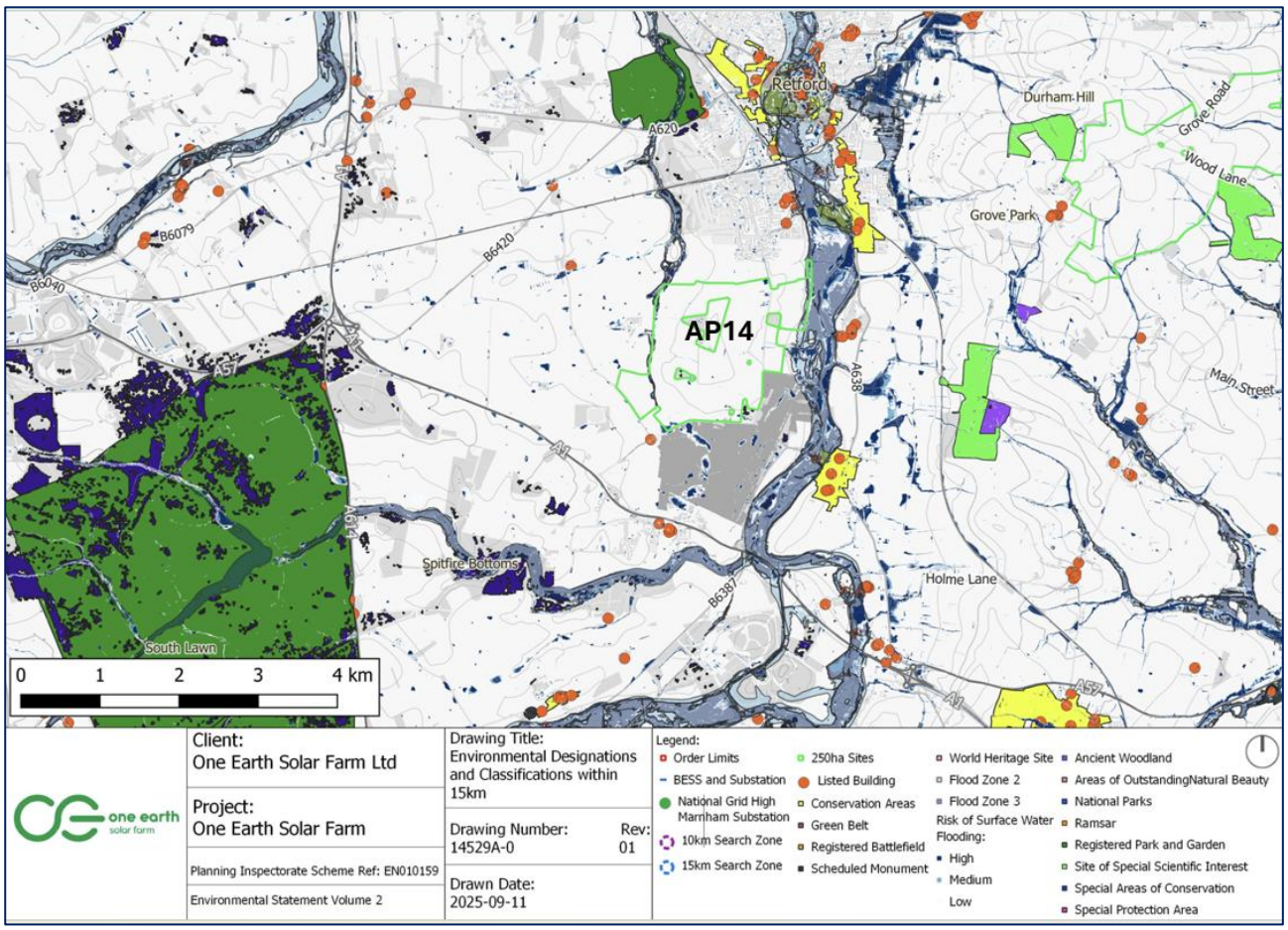
5.1.4 The Applicant has provided further justification in terms of the reasonably alternative sites previously identified in the **Sequential and Exception Assessment [REP2-080]** and the size of site considered. As a sensitivity test, and to respond directly to the queries raised by LCC and WLDC, the Applicant has also undertaken an additonal search of even smaller sites at 250 ha, which is set out in detail in Section 4 and in Appendix A and B. The conclusion of this sensitivity test, is that there are no smaller reasonably alternative sites that could be combined to form an alternative development site.

5.1.5 It is therefore considered that the Applicant has responded to ExA Action Points 16, 17, 18 and 19 and has provided further evidence of the compliance of the Applicant with the Sequential Test for flood risk, which is one of the policy tests the Application is required to respond to, but as set out in Section 1 of this Addendum, this should be balanced with the other equally important planning considerations that should be weighed up in the planning balance.

A.1 Appendix A – Alternative Site Assessments

Alternative AP14 – Approx. 250 ha

See Appendix B for full assessment mapping results



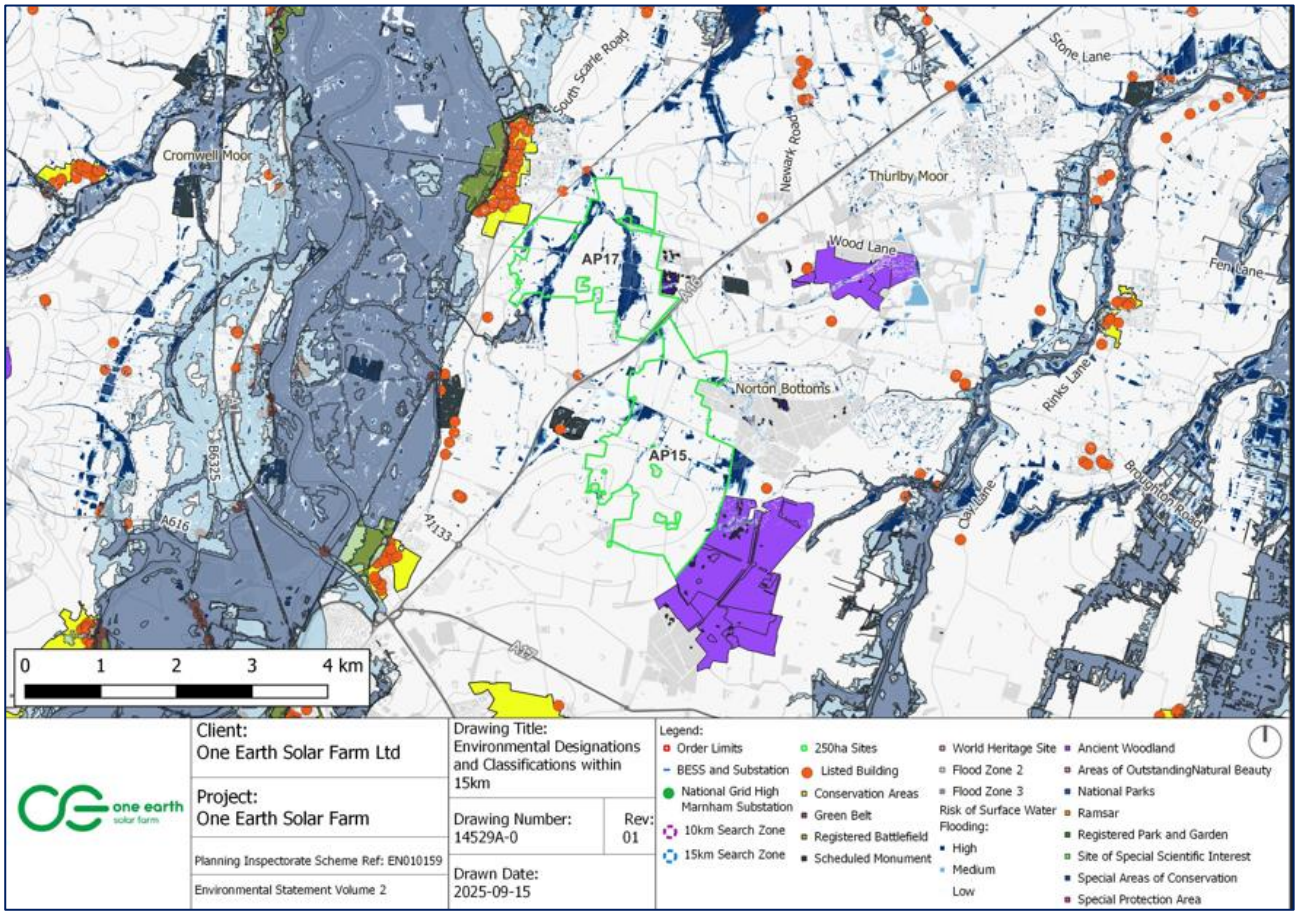
Assessment

Topic	Assessment
Land Use and Availability	A review of recent aerial imagery indicates that the site is currently in active use for agricultural purposes, primarily grazing. The land appears to have no evidence of built structures. This suggests that the site is presently part of the rural agricultural landscape. In terms of landowners, AP14 has 20 different land titles associated with the parcels, and previously no willing landowners had come forward to volunteer their land for the project.
Grid Connection	Is located 12 km from the point of connection (POC) at High Marnham and the cable route would have to cross the A57, A1 and the railway lines.
Hydrology and Flood Risk	AP14 is located predominately in Flood Zone 1, with a small area of the site located in Flood Zone 2 and 3, indicating low possibility of flooding.

Ecology and Biodiversity	There are no ancient woodlands located within the boundary of the site. The nearest designated ancient woodland lies approximately 2 kilometres to the east of the site. There are no Local Nature Reserves (LNRs) or Sites of Special Scientific Interest (SSSIs) within the site boundary. The closest SSSI is located approximately 2 kilometres to the east.
Landscape and Visual	The site is entirely situated within the Sherwood National Character Area. There is also an airport and flying school (Gamston) adjacent to the site to the south, and there would likely be significant impacts on the operations of the airport. There are no National Landscapes within or adjacent to the site. As such, the site does not fall within nationally designated landscapes of high scenic or conservation value. The site is located outside of the Green Belt.
Cultural Heritage	There are a number of listed buildings in proximity to the boundary of the site, but none within the boundary. There are no Conservation Areas within proximity of the site.
Residential/Communities	The site is located in close proximity to Retford, with residential properties approximately 0.4km from the site boundary. Retford is a market town with a population of approximately 24,000 (2021 census).
Access	Site can be access from the A1 which lies to the south or the A638 to the east.
Agricultural Land Classification	The site is located predominately within Grade 2 ALC, with some smaller areas of Grade 3.
Cumulative Impact	Site is to the north west of the Proposed Development and does not interface with any of the other NSIPs which are to the north east and south.
Conclusion	The site is located in Flood Zone 1, so is sequentially preferable to the Order Limits. However, due to the proximity to Retford and Gamston Airport and the amount of Grade 2 ALC land, the site is not considered to be suitable. It is noted as well that the landowners were not forthcoming in the initial site selection process.

Alternative AP15 – Approx. 250 ha

See Appendix B for full assessment mapping results



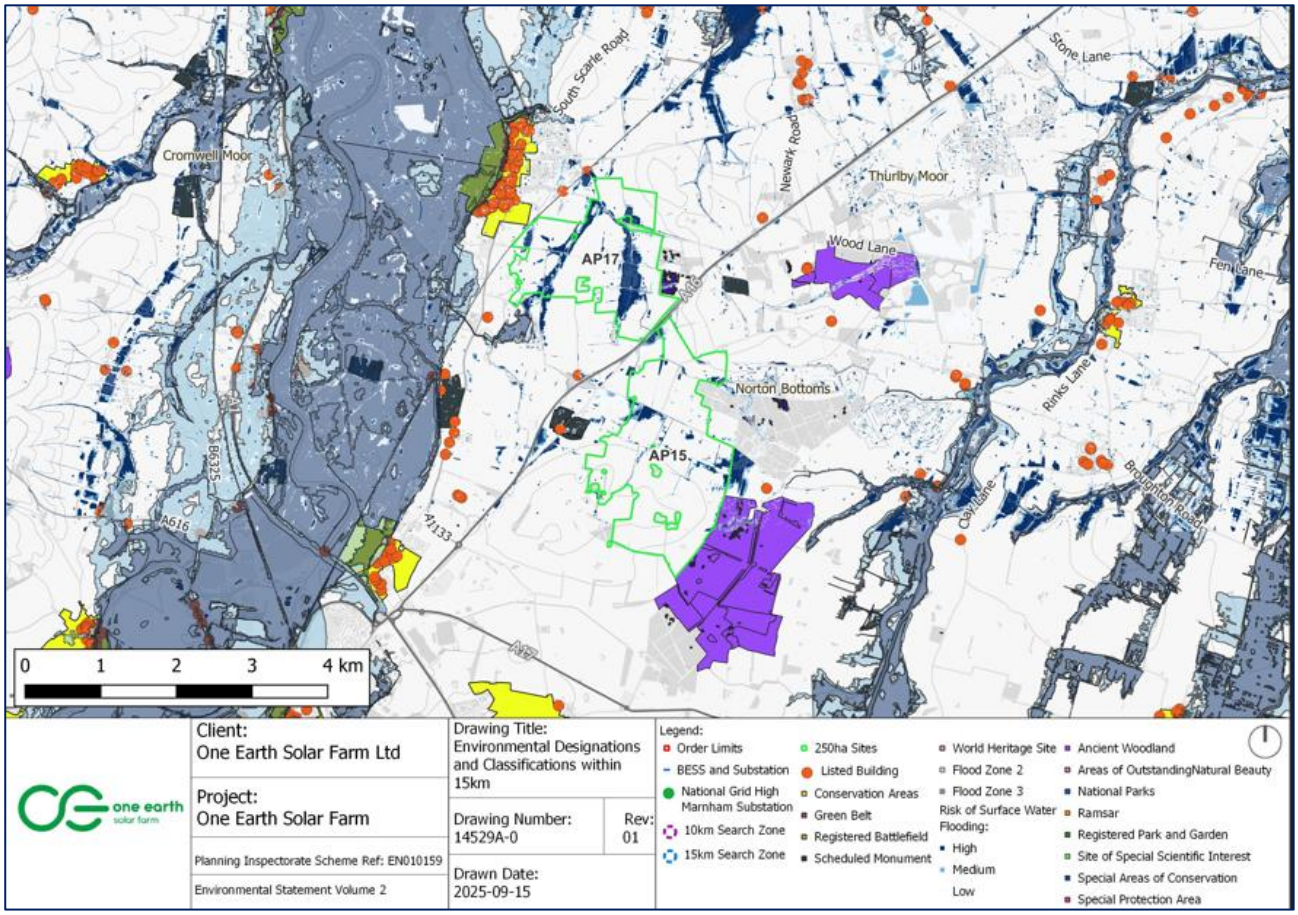
Assessment

Topic	Assessment
Land Use and Availability	A review of recent aerial imagery indicates that the site is currently in active use for agricultural purposes, primarily grazing. The land appears to have no evidence of built structures. This suggests that the site is presently part of the rural agricultural landscape. In terms of landowners, AP15 has 39 different land titles associated with the parcels, and previously no willing landowners had come forward to volunteer their land for the project.
Grid Connection	AP15 is located approximately 13 km from the point of connection (POC) at High Marnham and the cable route would have to cross the River Trent, and the A1133, the railway lines and the A46.
Hydrology and Flood Risk	AP15 is located wholly within Flood Zones 1, indicating low possibility of flooding.

Ecology and Biodiversity	There is a large parcel of ancient woodland abutting the boundary of AP15 to the east. There are no Local Nature Reserves (LNRs) or Sites of Special Scientific Interest (SSSIs) within the site boundary.
Landscape and Visual	The site is entirely situated within the Trent and Belvoir Vales National Character Area. There are no National Landscapes within or adjacent to the site. As such, the site does not fall within nationally designated landscapes of high scenic or conservation value. The site is located outside of the Green Belt.
Cultural Heritage	There are no listed buildings within the site boundary, but a small number in proximity to the site, to the east and west. AP15 has no scheduled monuments within the Site boundary.
Residential/Communities	AP15 is not in close proximity to any towns or villages, with the nearest village being Stapleford 2.5 km to the east, and Newark-on-Trent which is 4 km to the southwest. The site is however in proximity to Newark Show Ground which is 1.5 km from the boundary.
Access	AP15 could be accessed directly from the A46 which runs along the northern boundary.
Agricultural Land Classification	AP15 is situated entirely within Grade 3 land.
Cumulative Impact	AP15 sits in the middle of two other DCO applications, Great North Road and Steeples Renewable Project creating a full band of DCO sites from east to west, but the sites do not appear to cross over.
Conclusion	The site is located in Flood Zone 1 so is sequentially preferable to the Order Limits. Ancient woodland abuts the southern boundary of the site, which would cause significant impacts without setbacks and mitigation. The site is also approximately 13km from the POC so the cables would need to cross the River Trent, and the A1133, the railway lines and the A46. On balance the site could be considered suitable, subject to detailed technical assessments. It is however noted as well that the landowners were not forthcoming in the initial site selection process.

Alternative AP17 – Approx. 250 ha

See Appendix B for full assessment mapping results



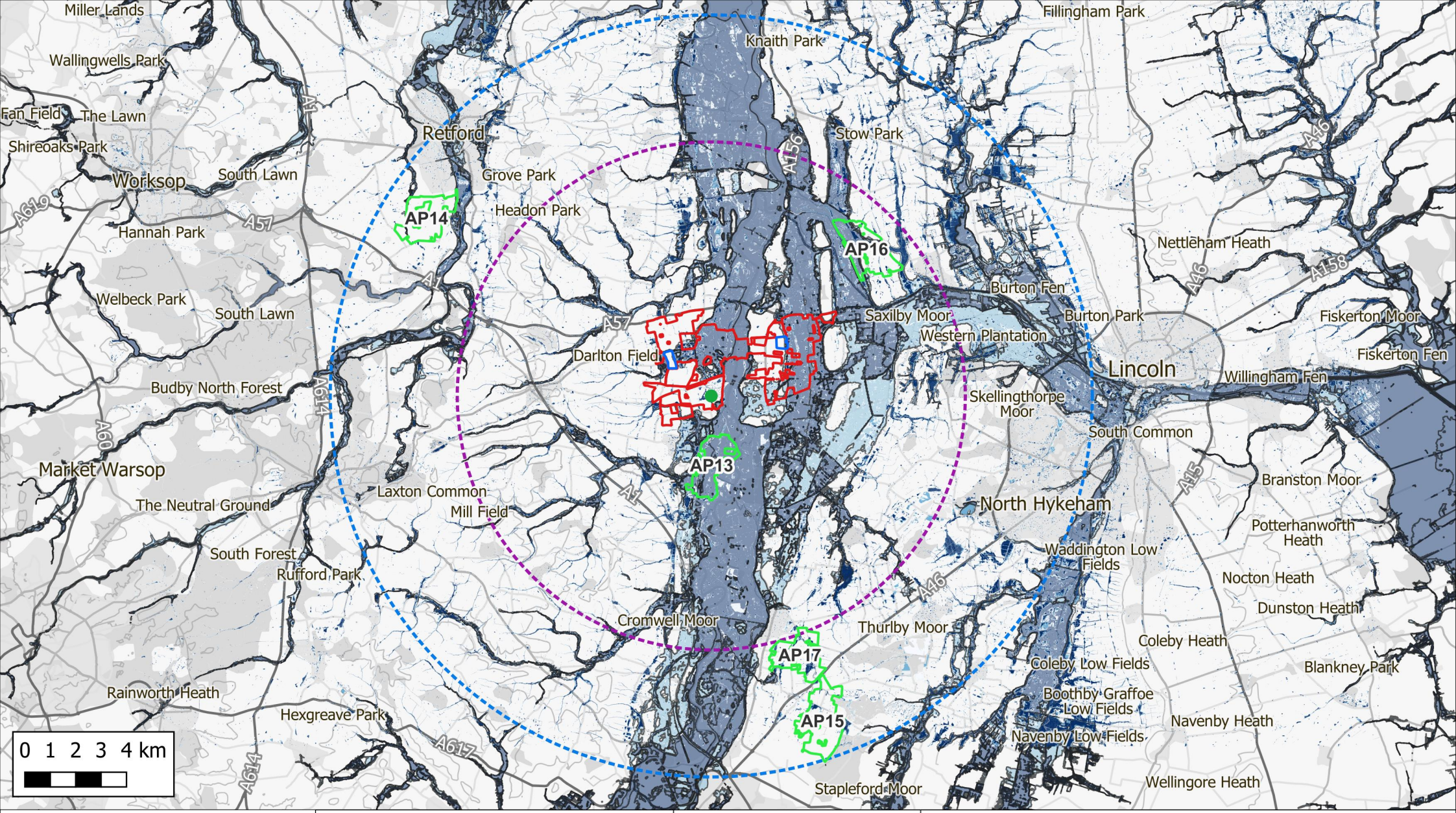
Assessment

Topic	Assessment
Land Use and Availability	A review of recent aerial imagery indicates that the site is currently in active use for agricultural purposes, primarily grazing. The land appears to have no evidence of built structures. This suggests that the site is presently part of the rural agricultural landscape. In terms of landowners, AP17 has 128 different land titles associated with the parcels, and previously no willing landowners had come forward to volunteer their land for the project.
Grid Connection	AP17 is located approximately 10 km from the point of connection (POC) at High Marnham and the cable route would have to cross the River Trent, the A1133 and the railway lines.
Hydrology and Flood Risk	AP17 is located wholly within Flood Zones 1, indicating low possibility of flooding. There is however a high risk of Surface Water Flooding.

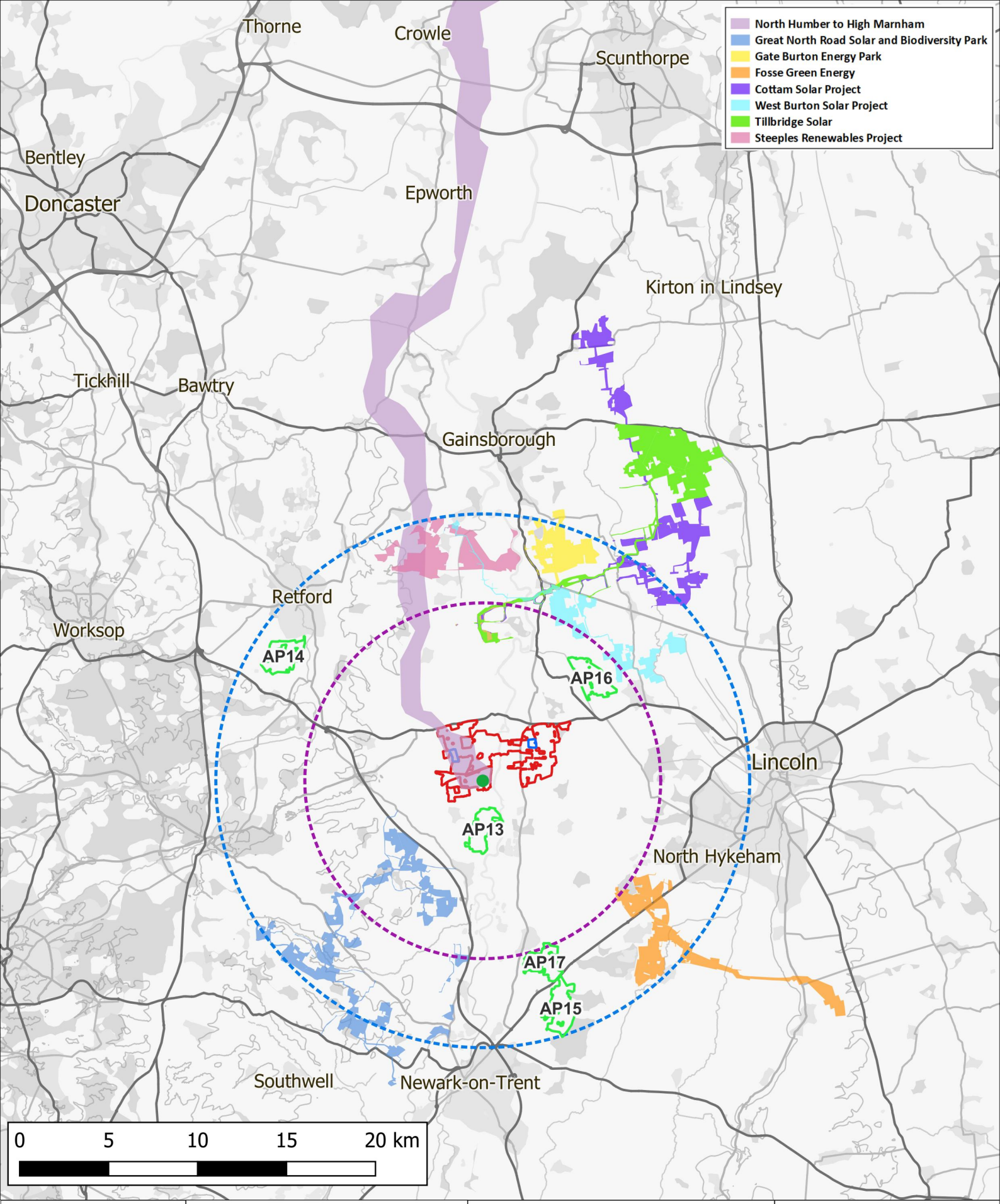
Ecology and Biodiversity	There are no areas of ancient woodlands within the site boundary however there are large areas to the east and south of AP17, approximately 3km away. There are no Local Nature Reserves (LNRs) or Sites of Special Scientific Interest (SSSIs) within the site boundary or in close proximity.
Landscape and Visual	The Site is located entirely within the Trent and Belvoir Vales National Character Area. There are no National Landscapes within or adjacent to the site. As such, the site does not fall within nationally designated landscapes of high scenic or conservation value. The site is located outside of the Green Belt.
Cultural Heritage	There are no listed buildings located within the site boundary. However, there is a large cluster of approximately 60 listed buildings situated immediately adjacent to the site boundary to the north and in the surrounding area, the closet of which is 0.4km away from the site. AP17 does not fall within a designated conservation area, however abutting the site to the east is the Collingham Conservation Area which also hosts the large cluster of listed buildings and is very sensitive from a heritage perspective. The parcels of land within the site boundary closest to Collingham are also restricted by an Article 4 direction by Newark and Sherwood District Council, the details of the Article 4 direction are not available online, but it is assumed it is for conservation purposes. Additionally, there are no scheduled monuments within the site boundary.
Residential/Communities	AP17 is located to the south of Collingham which is also within a conservation area and hosts a significant number of listed buildings. Collingham is a large village with a railway station, and a population of approximately 3,000 (2011 census). AP17 would be located 0.4km to the south of Collingham separated by the railway line. There are also some smaller individual properties which are adjacent to the site boundary.
Access	AP17 could be accessed directly from the A46 which runs along the eastern boundary.
Agricultural Land Classification	AP17 is situated entirely within Grade 3 land.
Cumulative Impacts	AP17 sits in the middle of two other DCO applications, Great North Road and Steeples Renewable Project creating a full band of DCO sites from east to west, but the sites do not appear to cross over.

Conclusion	The site is located in Flood Zone 1 so is sequentially preferable to the Order Limits. However, the site is in very close proximity to a large village (Collingham) to the north which includes a Conservation Area, and a large number of listed buildings. The parcels of land closest to Collingham, within the site boundary, are covered by Article 4 Direction which would make the site unsuitable for solar. It is noted as well that the landowners were not forthcoming in the initial site selection process.

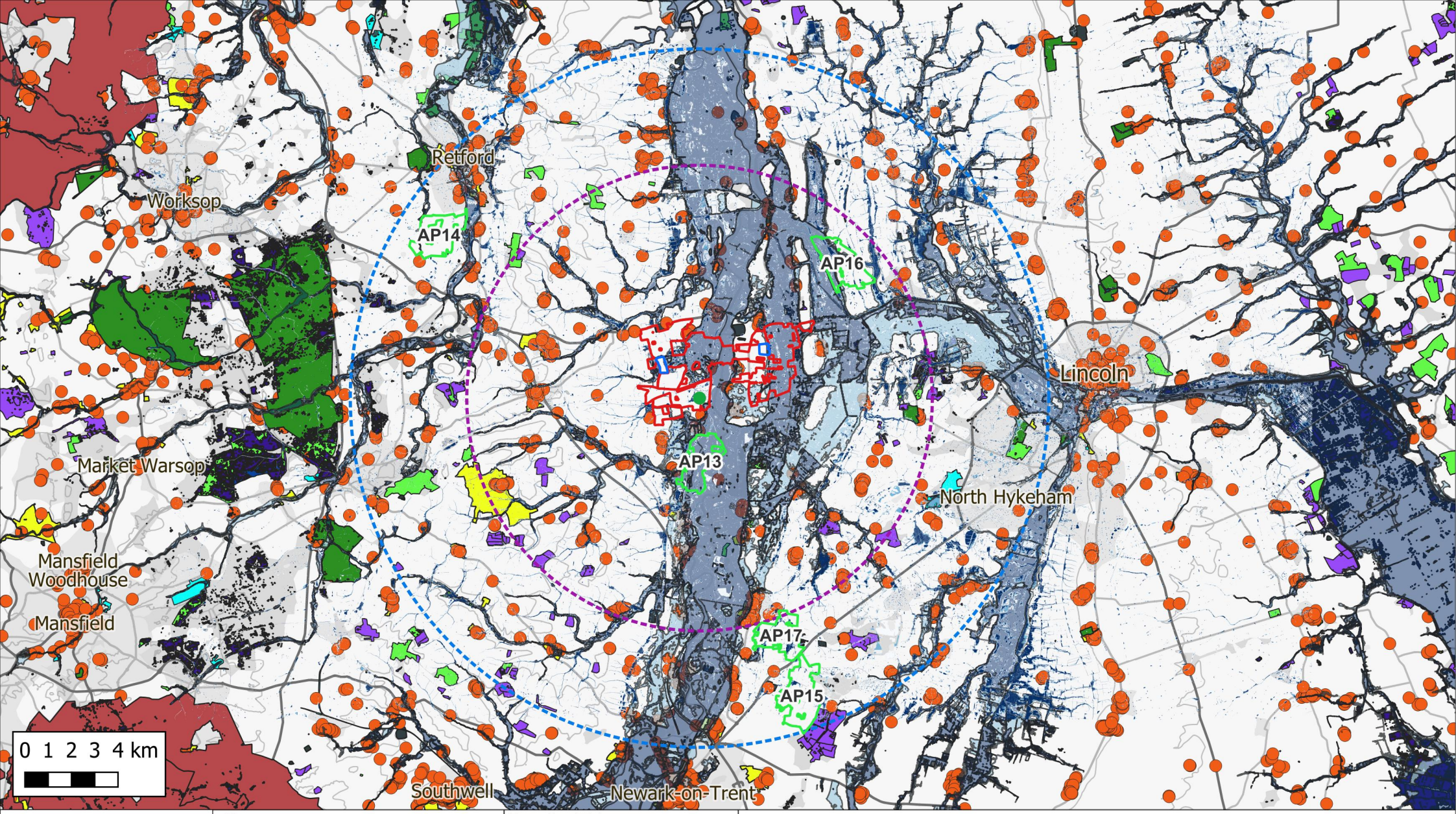
A.2 Appendix B – Full Assessment Mapping Results



one earth solar farm	Client: One Earth Solar Farm Ltd	Drawing Title: Flood Risk Zones	Legend: Order Limits; BESS and Substation; National Grid High Marnham Substation; 10km Search Zone; 15km Search Zone; 250ha Sites; Flood Zone 2; Flood Zone 3; Risk of Surface Water Flooding: High; Medium; Low
	Project: One Earth Solar Farm	Drawing Number: 14529A-0 / Rev: 01	
	Planning Inspectorate Scheme Ref: EN010159	Drawn Date: 2025-09-15	
	Environmental Statement Volume 2		



one earth solar farm	Client: One Earth Solar Farm Ltd	Drawing Title: Solar DCOs / Alternative Sites	Legend: Order Limits; BESS and Substation; 250 ha Sites; 10km Search Zone; 15km Search Zone; National Grid High Marnham Substation
	Project: One Earth Solar Farm	Drawing Number: 14529A-0 / Rev: 01	
	Planning Inspectorate Scheme Ref: EN010159	Drawn Date: 2025-09-15	
	Environmental Statement Volume 2		



Client:
One Earth Solar Farm Ltd

Project:
One Earth Solar Farm

Planning Inspectorate Scheme Ref: EN010159

Environmental Statement Volume 2

Drawing Title:
Environmental Designations and Classifications within 15km

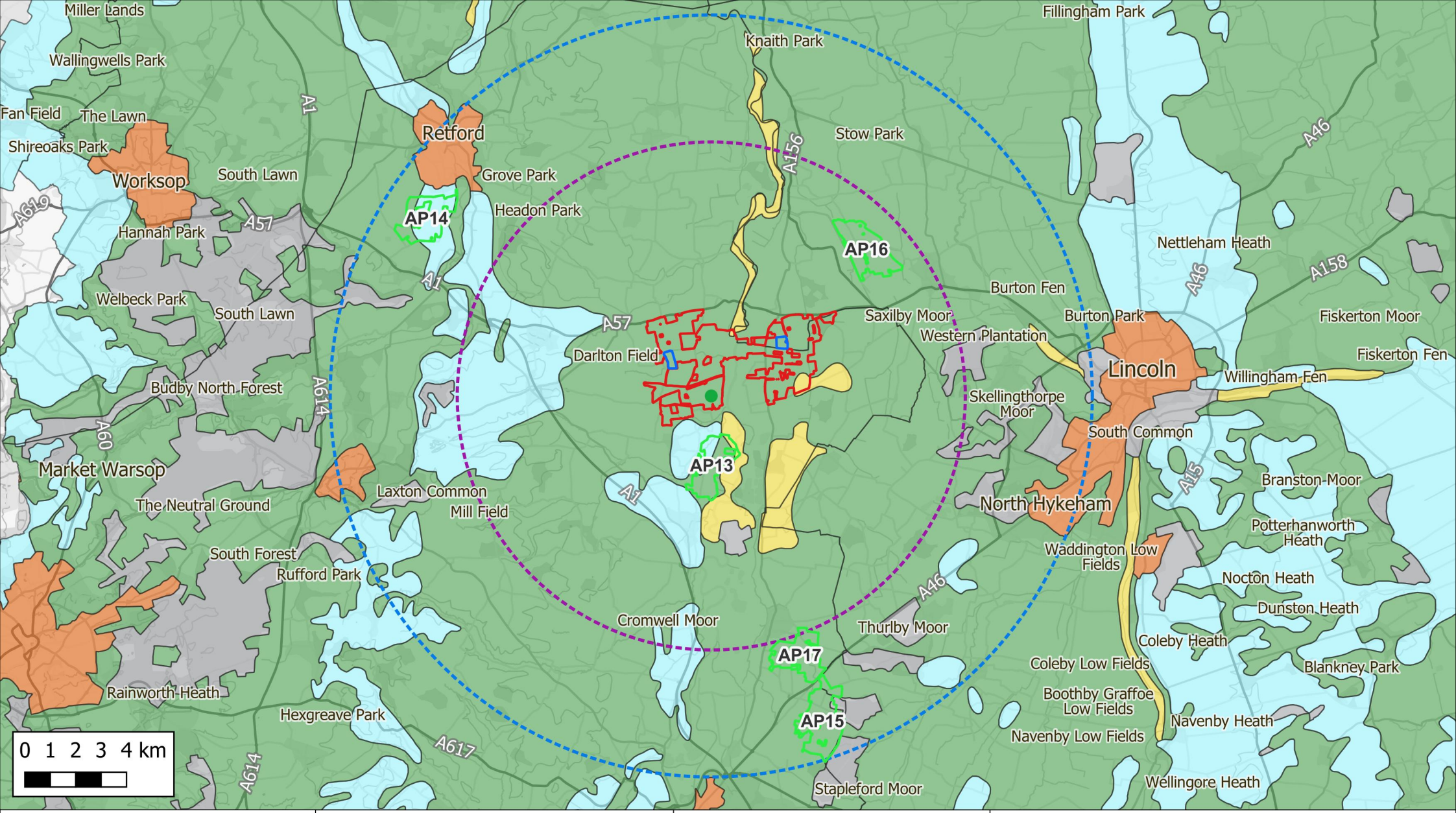
Drawing Number:
14529A-0

Rev:
01

Drawn Date:
2025-09-15

Legend:

- Order Limits
- BESS and Substation
- National Grid High Marnham Substation
- 10km Search Zone
- 15km Search Zone
- 250ha Sites
- Listed Building
- Conservation Areas
- Green Belt
- Registered Battlefield
- Scheduled Monument
- World Heritage Site
- Flood Zone 2
- Flood Zone 3
- Risk of Surface Water Flooding:
- High
- Medium
- Low
- Ancient Woodland
- Areas of OutstandingNatural Beauty
- National Parks
- Ramsar
- Registered Park and Garden
- Site of Special Scientific Interest
- Special Areas of Conservation
- Special Protection Area



one earth solar farm	Client: One Earth Solar Farm Ltd	Drawing Title: Agricultural Land Classifications	Legend: Order Limits; BESS and Substation; 10km Search Zone; 15km Search Zone; National Grid High Marnham Substation; 250ha Sites; Grade 1; Grade 2; Grade 3; Grade 4; Non Agricultural; Urban
	Project: One Earth Solar Farm	Drawing Number: 14529A-0 / Rev: 01	
	Planning Inspectorate Scheme Ref: EN010159	Drawn Date: 2025-09-15	
	Environmental Statement Volume 2		

one earth

solar farm