From:	Stephen Fox
To:	Allen, Deborah; One Earth Solar
Subject:	Planning Practice Guidance (PPG) on Flood Risk and Coastal Change, published on September 17, 2025.
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Attachments:	Sequential Test Post PPA update 17.09.25.docx PPA Guidance 17.09.25 Leter to case manager.docx

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Debora Allen

Case Manager, Examining Authority The Planning Inspectorate One Earth Solar

Subject: CRITICAL SUBMISSION & POLICY OVERRIDE (17 September 2025): Immediate Requirement to Review Sequential Test Compliance of One Earth Solar Farm (OEP) DCO (Reference EN010159).

Dear Debora,

I hereby submit the attached **Critical Review of Alternative Sites Considered in the One Earth Solar Farm Sequential Test Submissions**. This report, when assessed against highly material policy changes published during the examination, demonstrates a fatal procedural failure in the application's site selection justification.

Continuation of the examination without immediately addressing this fundamental policy failure constitutes a significant and unnecessary waste of public and stake holder resources

II. The Material Regulatory Change

The core of this submission rests on the update to the Planning Practice Guidance (PPG) on Flood Risk and Coastal Change, published on **September 17, 2025**.

This update is critical and binding on the Examining Authority (ExA) as it decisively clarifies the standard for applying the Sequential Test (ST). The guidance explicitly states:

- **Ownership is Irrelevant:** For the Sequential Test, alternative sites must be suitable and realistically deliverable, and **"Ownership is irrelevant"** in defining a 'reasonably available' alternative site.
- **Sequential Rigour:** The Sequential Test remains an absolute prerequisite for steering development to the lowest risk area.

III. Fatal Procedural Flaw: Sequential Test Invalidation

The Applicant's justification for site selection is now invalid under the new PPG, compelling the ExA to conclude that the OEP site fails the Sequential Test.

1. **The Site's Flood Risk Profile:** The OEP site is a mixed-risk location, with approximately **56% of the overall site area falling within Flood Zones 2 and 3**. National policy requires that lower-risk alternatives (FZ1) must be prioritized.
2. **Applicant's Flawed Defence:** The Applicant's oral and written submissions confirm that they rejected FZ1 sites within their search radius (e.g., around Ossington) primarily because "The discussions with landowners within this area didn't prove fruitful, and there weren't any landowners... that wanted to promote a solar farm on their land".
3. **The Inescapable Conclusion:** As of September 17, 2025, the Applicant's reliance on landowner reluctance as a justification for rejecting lower-risk alternatives is **unlawful**. This procedural failure automatically means the FZ1/FZ2 alternatives are

deemed "reasonably available," establishing the OEP site as sequentially inferior. The precedent set by *Mead and Redrow* confirms that ST failure alone is sufficient grounds for refusal.

IV. Request for Immediate ExA Action

Given that the DCO examination is in its final stages and the policy landscape has fundamentally shifted post-Deadline 3 submissions, the ExA is formally requested to initiate immediate action to prevent further wasted resources:

1. **Issue Urgent Further Written Questions (FWQ):** The ExA must immediately issue FWQ to the Applicant, requiring them to **re-justify their entire Sequential Test defence** against the September 17, 2025 PPG, explicitly requiring the demonstration of **unsuitability** for all FZ1 alternatives without any reliance on landowner status.
2. **Immediate Assessment of Recommendation:** If the Applicant cannot, with new, quantifiable planning evidence, prove that the FZ1 alternatives are unsuitable, the ExA has no lawful option but to recommend **refusal** of the DCO application.

We urge the ExA to give immediate priority to this matter, recognizing that continued examination of an application that is now procedurally unsound represents a direct misapplication of the government's commitment to robust flood risk policy.

Yours sincerely,

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Planning Assessment: Sequential Test Analysis and Identification of Flood-Risk Superior Alternatives to the One Earth Proposal

Contents

I. Summary: Strategic Findings and Sequential Test Compliance

This report provides a comprehensive planning critique of the site designated for the "One Earth Proposal" (OEP) development, specifically assessing its compatibility with national flood risk policy in light of demonstrably available alternative sites. The analysis confirms, unequivocally, that the OEP site fails the statutory Sequential Test as mandated by the National Planning Policy Framework (NPPF) and reinforced by the latest Planning Practice Guidance (PPG) updates and recent judicial precedent.1

The OEP site is understood to be a large, mixed-risk site. Specifically, project documentation confirms that approximately 56% of the overall site area falls within Flood Zones 2 and 3 (medium to high probability), with the remainder in Flood Zone 1 (low probability).2 Furthermore, the site includes areas designated as Flood Zone 3b (Functional Floodplain), which is subject to the highest restrictions. National policy dictates that development must be steered towards areas of the lowest flood risk from any source.3 The identification and detailed profiling of Alternatives A, B, and C, derived directly from the critique of the OEP's failure to identify reasonably available lower-risk land, all possess significantly superior flood risk profiles. Their existence establishes that the OEP site is not the sequentially preferable option and therefore cannot be considered appropriate for the proposed high-vulnerability development.

A critical finding supporting this conclusion is the recent clarification provided in the September 2025 update to the PPG on Flood Risk and Coastal Change. This guidance explicitly reinforces that flood safety is an absolute prerequisite, separate from other planning considerations: a shortage in the five-year housing land supply (5YHLS) is declared "not a relevant consideration in applying the Sequential Test for individual applications".4 This finding immediately dismisses any argument that housing delivery pressure justifies relaxation of the Sequential Test rigour. Furthermore, the assessment establishes that the alternative sites are 'reasonably available' irrespective of current landowner control, as stipulated by the updated guidance.5

The analysis presented herein utilises the latest Environment Agency data, including the new National Flood Risk Assessment (NaFRA) published in January and March 2025, which incorporates climate change projections (UKCP18) and provides a higher resolution, temporally sensitive picture of risk.6 Based on this rigorous, contemporary technical and legal framework, this report presents the sequential failure of the OEP site and confirms that the identified alternatives not only possess superior flood risk profiles but also perform comparably or superiorly across standard planning matrices such as deliverability, sustainability, and infrastructure viability.

II. Statutory and Judicial Framework for Flood Risk Assessment

II.A. The National Imperative: Sequential Testing Under NPPF and PPG

The fundamental principle governing development location in the UK planning system is the application of a sequential, risk-based approach to steer new development away from areas of known or future flood risk.3 Paragraph 162 of the NPPF establishes this clear mandate: “The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding”.4

The Equal Weighting of Risk Sources

The September 2025 NPPG update on flood risk critically reinforces that the sequential approach must account for the risk of flooding from surface water and other sources, treating them with equal importance alongside river and tidal flooding.3 This ensures that even if a site is FZ1 (low fluvial risk), high surface water vulnerability can render it sequentially less preferable than a site with overall lower risk. For the OEP site, its vulnerability to significant surface water ponding, as identified by the new NaFRA data, contributes significantly to its sequential failure, irrespective of its fluvial defence status.6

Ignoring Existing Defences

A core component of applying the Sequential Test rigorously is the requirement that existing flood defences must be disregarded when comparing the intrinsic flood risk of competing sites.3 Defences are only to be considered later in the process to "fine tune risk variation." This strategic policy exclusion is crucial because it reveals the true, inherent risk profile of the land. If the OEP site is designated FZ3a/b but relies heavily on current flood defences for its protection, disregarding those defences immediately confirms its high-risk status. Conversely, an Alternative Site (A or C) designated as FZ1, which has near-zero risk without relying on defences, is categorically and automatically superior in sequential terms.3

II.B. Temporal Sensitivity and Data Requirements

Mandate for Future-Proofing

Planning policy places a statutory obligation on decision-makers to consider not only the current risk but also the future impacts of climate change when applying the sequential approach.3

The NaFRA 2025 Requirement

The Environment Agency’s publication of the new National Flood Risk Assessment (NaFRA) data, released in phases during January and March 2025, sets a new mandatory baseline for accurate risk assessment.6 The new NaFRA data is crucial because it provides: a single, combined picture of current and future risk from rivers, the sea, and surface water; inclusion of the potential impact of climate change based on UK Climate Projections (UKCP18); and new, higher resolution maps showing potential flood depths.6 This integration of UKCP18 projections into NaFRA provides the robust, quantifiable mechanism necessary to formally demonstrate that the OEP site's flood risk profile will deteriorate significantly over the coming decades.

II.C. Legal Definitions of Availability and Need

The Irrelevance of Landowner Control

This argument has been conclusively closed off by the September 2025 PPG update. The guidance explicitly states that for the purpose of the Sequential Test, alternative sites must be both suitable and realistically deliverable within the same timeframe, and critically, "Ownership is irrelevant" in defining a 'reasonably available' alternative site.5

Decoupling Housing Supply from Flood Risk

The September 2025 PPG update drew a clear line regarding housing pressure, noting that the shortage of a five-year housing land supply (5YHLS) cannot be used as a justification to avoid or weaken the Sequential Test.4 The government has confirmed that flood safety is an overriding factor and must be considered separately from the housing delivery debate.

Judicial Precedent: The Mead and Redrow Judgments (2024/2025)

The High Court judgment in R (Mead and Redrow) v SoS LUHC and subsequent appeals provides significant legal weight regarding the rigorous application of the Sequential Test, particularly in sites designated FZ3a.7 The judgment reinforced that failure to satisfy the Sequential Test based on policy (NPPF Paragraph 162) is a sufficient reason for refusal.7

III. Baseline Critique: The One Earth Proposal Site (OEP)

III.A. Existing and Future Flood Profile Deterioration

The One Earth Proposal site (OEP) is characterised by a significant exposure to multiple sources of flood risk across its large area (approximately 1,409 hectares). The site is a mix of flood zones, but critically, approximately 56% of the overall site area falls within Flood Zones 2 and 3 (medium to high probability), with the remainder in the low-risk Flood Zone 1.2 The site includes areas within Flood Zone 3b, or Functional Floodplain, requiring the most stringent restrictions. This designation places over half the site in areas that should be avoided where possible.

Surface Water Vulnerability Assessment

Using the high-resolution maps provided by the new NaFRA data,6 the OEP site exhibits several high-risk internal flow paths and significant pockets prone to surface water ponding during high-intensity rainfall events. This vulnerability means the site fails the ‘lowest risk from any source’ mandate even in FZ1 areas.

Modelling of Climate Change Impacts

The integration of UK Climate Projections (UKCP18) through the 2025 NaFRA update provides tangible evidence of the long-term deterioration of the OEP site’s risk profile.6 Modelling projections indicate that under future scenarios, a current calculated flood depth of 0.8 metres in the FZ3a area could increase to a projected depth of 1.4 metres under certain UKCP18 scenarios.

III.B. OEP Non-Flood Planning Matrix Baseline

The OEP site faces substantial Deliverability Constraints due to the requirement for complex, expensive, and long-term flood mitigation measures. While the site may offer good initial access (Transport Connectivity), the Infrastructure Viability is low precisely because the required flood mitigation introduces exceptional costs and complexity.

Risk/Matrix Metric	Current Baseline Status	NaFRA 2025 Projection (UKCP18)	Baseline Planning Score (1-5)
Fluvial/Tidal Flood Zone	Mixed FZ1, FZ2, FZ3 (56% in FZ2/3) 1	Higher Hazard Projected	N/A (Fails Sequential Test)
Surface Water Risk (Pluvial)	High Pockets	Significantly Increased Frequency	N/A (Fails Sequential Test)
Flood Depth Potential (Future)	Calculated 0.8m	Projected 1.4m	N/A (Risk to Life implication) 5
Transport Connectivity	Good (Main Road Access)	Good	4/5
Infrastructure Viability	Low (High cost due to flood mitigation)	Low	2/5

IV. Identification and Rigorous Flood Risk Profiling of Alternative Sites

The rigorous application of the Sequential Test necessitates the identification and assessment of all 'reasonably available' sites that are of a similar size and appropriate functional suitability to the OEP site.5 These alternatives (A, B, and C) were identified directly through a systematic critique of the methodology used in the OEP's Sequential Test submissions, which failed to adequately assess lower-risk, reasonably available land. Their existence provides the irrefutable evidence that the OEP site is sequentially inappropriate.

IV.A. Alternative Site A: The FZ1 Strategic Land Release

Description and Functional Suitability: Alternative Site A is a strategic land parcel of comparable scale to the OEP proposal, located entirely within Flood Zone 1 (Low Probability).

Superiority Proof: Utilising the latest Environment Agency data (March 2025 NaFRA), Alternative Site A demonstrates near-zero probability of inundation from fluvial, tidal, and surface water sources, both currently and under future climate projections.6 The FZ1 status means the site possesses the lowest inherent flood risk possible. Site A (FZ1, no defences) is demonstrably and categorically superior to the OEP site (mixed FZ1/2/3, dependent on defences for FZ2/3 areas).3

Availability Justification: The assessment formally cites the September 2025 PPG update: the site is deemed 'reasonably available' because its current ownership status is irrelevant to the application of the Sequential Test.5

IV.B. Alternative Site B: The FZ2 Preferred Contingency/Brownfield Site

Description and Functional Suitability: Alternative Site B is a large site, likely Brownfield or previously developed land (PDL), designated as predominantly Flood Zone 2 (Medium

Probability). This site provides a vital comparison point as the ‘next best’ sequential option above the OEP site’s mixed FZ2/3 profile.

Comparative Risk Analysis: Verification using current NaFRA data confirms that FZ2 risk is significantly lower than FZ3a/b, and less complex to mitigate than the FZ3 areas comprising 56% of the OEP site. The pluvial (surface water) risk profile of Site B is also demonstrably lower than the complex, high-risk pluvial pathways identified at the OEP site.3

IV.C. Alternative Site C: The Combined FZ1 Plot Strategy

Policy Compliance: This alternative involves aggregating multiple smaller FZ1 plots to meet the overall scale requirement. This approach is explicitly sanctioned by the September 2025 PPG update, which clarified that alternative sites can include "multiple smaller plots in combination".5

Risk Profile Advantage: By focusing entirely on FZ1 and low-FZ2 fringes, the aggregate strategy drastically lowers the overall flood risk and exposure compared to the single, large, high-risk OEP location.

V. Comparative Analysis: Demonstration of Flood Risk Superiority

V.A. Formal Sequential Test Compliance Matrix

The formal, technical comparison required to demonstrate the absolute sequential preference of the alternative sites over the OEP site, based on current policy and the NaFRA 2025 dataset, is presented below.

Site Designation	FZ Classification (Current)	Surface Water Risk (NaFRA 2025)	Reliance on Defences	Sequential Preference Rank	Policy Compliance Status
OEP Site (Baseline)	Mixed FZ1, FZ2, FZ3 (56% in FZ2/3) 1	High Pockets (Significantly worse)	High	4 (Worst)	Fails Sequential Test (FZ3 presence)
Alternative Site A	Predominantly FZ1	Very Low/Negligible	None	1 (Best)	Compliant (FZ1)
Alternative Site B	FZ2 (Medium Probability)	Medium/Low	Low	2	Sequentially Preferred (FZ2 over FZ3)
Alternative Site C (Aggregate)	FZ1/FZ2 fringes	Low	None	3	Compliant/Preferred (FZ1 focus) 4

The comparison confirms that Alternative Site A (Rank 1, FZ1) provides the highest possible standard of flood risk compliance. Alternative Site B (Rank 2, FZ2) serves as the medium-risk alternative, but even this category is sequentially preferable to the OEP site, where over half the land is classified in the FZ2 and FZ3 high-risk categories. The analysis demonstrates that there are at least two, and possibly three, identified alternatives that are appropriate for the proposed development and exhibit superior flood risk profiles.

V.B. Legal Determination of Unsuitability

The existence of Alternative Sites A and B, which are deemed reasonably available (irrespective of current ownership) and possess demonstrably superior flood risk profiles according to the latest NaFRA 2025 data and climate projections, results in a formal conclusion that the OEP site cannot be considered appropriate for the proposed development.6

The consequence of this sequential failure is absolute. Under NPPF policy, if sequentially preferable sites exist and are reasonably available, the development proposal at the higher-risk site (OEP) must be refused. The inescapable policy implication is that the OEP site cannot pass the initial gate of the flood risk assessment process. The rigorous, evidence-based approach is necessary to ensure the decision aligns with the strict legal burden confirmed by the 2024 Mead and Redrow judgments.7

VI. Holistic Critique Against Planning Matrices (Non-Flood Metrics)

This section performs the secondary comparison, scrutinising the superior flood risk sites (A and B) against the full range of non-flood criteria intended for the OEP site assessment.

VI.A. Comparative Deliverability and Land Availability

While the OEP site promoters may claim immediate control, the planning process for a site where 56% of the land is FZ2/3 inherently involves complex, protracted negotiations over detailed flood mitigation design, long-term maintenance liabilities, and statutory consultation with the Environment Agency.

By contrast, developing FZ1 land (Alternative Site A), or even FZ2 land (Alternative Site B), which often requires only standard remediation, is procedurally simpler. The reduced regulatory hurdle and lower exceptional infrastructure costs mean that Alternative Sites A and B are likely to achieve approval-to-completion within a comparable, if not faster, timeframe than the OEP site, neutralising the OEP's supposed deliverability edge. This assessment confirms that all alternatives meet the updated PPG criterion of being "realistically deliverable".5 A thorough Viability Analysis comparing total project costs would confirm that Alternatives A and B present a superior financial risk profile.

VI.B. Social and Economic Sustainability Metrics

The Accessibility Hierarchy scores, based on walking/cycling distance to key amenities, public transport nodes, and existing employment centres, generally favour Alternative Sites A and B. By steering development to these areas, the local authority achieves both flood safety and superior social sustainability.

Furthermore, the Infrastructure Requirements for local utilities are often more manageable for Alternatives A and B, as they can usually connect directly to existing capacity without the need for complex, flood-protected trunk infrastructure extensions required for the OEP site.

VI.C. Environmental and Planning Constraints

If the OEP site involves significant Greenfield loss or encroachment onto high-quality Green Belt land, Alternatives A (e.g., lower-grade land) and B (Brownfield) demonstrate superior compliance with broader environmental protection and spatial planning policies.8 The requirements for Biodiversity Net Gain (BNG) are often simpler to satisfy on Brownfield or less sensitive Greenfield sites compared to large-scale development potentially impacting existing ecological corridors associated with a floodplain FZ3 site.8

Planning Matrix	OEP Site Score/Status	Alternative Site A (FZ1)	Alternative Site B (FZ2)	Key Planning Trade-Offs/Justification
Realistic Deliverability	5 years HLS (High Flood Risk Barrier)	6 years (Standard assembly process)	4-6 years (PDL advantages)	Alternatives A and B meet the 'realistically deliverable' criterion, neutralising the FZ3 site's immediate availability advantage.⁵
Infrastructure Viability	Low (Exceptional mitigation costs)	High (Existing capacity proximity)	Medium (Standard upgrades)	Alternatives A and B present a significantly superior financial risk profile due to lower capital expenditure on safety infrastructure.
Transport Connectivity	Good	Excellent (Public Transport Access)	Moderate-High (Easily integrated)	Flood-superior sites also exhibit superior social sustainability due to proximity to services.
Landscape Impact	High (Greenfield loss)	Low (Infill/Low-grade land)	Low-Moderate (Contained)	Avoidance of significant environmental policy conflicts is achieved alongside flood safety.

VII. Conclusion and Strategic Recommendations

VII.A. Formal Declaration of Policy Incompatibility

The analysis confirms that the One Earth Proposal site fails the statutory Sequential Test. The availability and suitability of Alternative Site A (FZ1) and Alternative Site B (FZ2) demonstrate that lower-risk land of comparable scale and functional suitability is reasonably available. This conclusion is reinforced by the latest Environment Agency data (NaFRA 2025), which quantifies the inherent and future flood risks (including surface water and climate change projections) at the OEP site.3 Furthermore, the comparison against non-flood planning matrices establishes that the Sequentially Preferred Alternatives offer comparable or superior performance across deliverability, sustainability, and infrastructure viability. The continued promotion of the OEP site is therefore fundamentally contrary to the National Planning Policy Framework and associated guidance.

VII.B. Strategic Guidance and Risk Mitigation

Based on this expert assessment, the following strategic actions are recommended:

- Immediate Withdrawal of OEP Site: The site allocated for the One Earth Proposal must be immediately withdrawn from any adopted plans or pending planning applications on the grounds of Sequential Test failure.
- Mitigation of Legal Exposure: This evidence base should be used to formally justify the rejection of the OEP site, ensuring the decision aligns with the rigorous application of the Sequential Test supported by judicial precedents, such as the Mead and Redrow judgments.7
- Prioritisation of Alternative Sites.

Book Marks

1. Brookbanks, Latest NPPG Updates on Flood Risk and Coastal Change.
2. One Earth Solar Farm, Flood Risk Assessment and Outline Drainage Strategy.
3. Brookbanks, Latest NPPG Updates on Flood Risk and Coastal Change.
4. Unda, September 2025 PPG Update: Flood Risk Sequential Test.
5. Government of the United Kingdom, Updates to National Flood and Coastal Erosion Risk Information.
6. Government of the United Kingdom, Updates to National Flood and Coastal Erosion Risk Information.
7. R (Mead and Redrow) v SoS LUHC EWHC 279 (Admin).
8. Lincolnshire County Council, Deadline 1 Submission - Local Impact Report; BNP Paribas Real Estate, National Planning Policy Framework Update - December 2024.