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Your ref: EN010154



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Dear Grahame Gould

NSIP Reference: 546928

Consultation: Examining Authorities Third Written Questions

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Please find Natural England's responses to the Examining Authorities second written questions at **Annex A** below.

For any further advice on this consultation please contact consultations@naturalengland.org.uk.

Yours sincerely

Sustainable Development Team
East Midlands Area Delivery
Natural England

Annex A

Question Reference	Question	Natural England response
<p>FS.3.01</p>	<p>Framework Soil Management Plan – operation and decommissioning</p> <p>In [REP3A-037] reference is made to the Framework Soil Management Plan (FSMP) [REP4-010] not addressing the proposed development’s operational and decommissioning phases.</p> <p>In response, the applicant in [REP4-018] states that “post construction”, as covered in section 6 of the FSMP, is the operational phase and that the FDEMP is intended to capture all mitigation measures for the decommissioning phase, including those in relation to soils, with mitigation related to soils during decommissioning presented in Table 7 of the FDEMP [REP3-020].</p> <p>However, section 6 of the FSMP appears to be focussed on describing the use of soils and does not address, for example, soil protection measures during maintenance or replacement activities. Table 7 of the FDEMP identifies the mitigation/enhancement measure as being the SMP.</p> <p>Comment on whether the FSMP should provide a more explicit framework for the management measures that would be adopted to manage the soil resource during the proposed development’s operation and decommissioning and if so, what should be included, for example measures to deal with soil compaction in areas under the proposed solar stations and the BESS.</p>	<p>Section 6.9 of the FSMP outlines maintenance/aftercare protocols, which are generally welcomed. However, the protocols set out here focus on the ongoing monitoring and aftercare of soils; does not set out how the soil resource will be protected during wider site maintenance activities.</p> <p>The purpose of the SMP is to set out how the mitigation commitments described within the Environmental Statement will be delivered during construction, operation and decommissioning, tailored to the soil and site properties.</p> <p>NE note that the risk to soils is minimal during the operational phase. However, continued tracking for maintenance activities, or soil handling required during equipment replacement or cable repair, has the potential to impact soils. As such, measures should be implemented via the SMP to avoid impacts to the soil resource as far as practicable. This need not be extensive within the FSMP, but should set the framework for it’s inclusion within the final SMP, noting the Final SMP ‘<i>must be substantially in accordance with the framework soil management plan</i>’ (Draft DCO Requirement 15).</p> <p>The decommissioning phase has the potential to damage the soil resource, with impacts likely to be similar to those expected during construction. The SMP should include measures to avoid these impacts as far as practicable. Again, this need not be extensive within the FSMP, but should set the framework for it’s inclusion within the final SMP, noting the Final SMP ‘<i>must be substantially in accordance with the</i></p>

		<p><i>framework soil management plan</i>' (Draft DCO Requirement 15).</p> <p>NE would reference that many other similar projects include consideration of soil impacts during operation and decommissioning within their oSMPs: Great North Road Solar (REP3-066), Springwell Solar (REP3-043), Cottam Solar (REP3-010).</p>
FS.3.03	<p>Framework Soil Management Plan</p> <p>Given the importance of the SMP for avoiding soil deterioration, comment on whether there are other matters which should be included in the FSMP [REP4-010] to provide a clear framework for inclusion within a detailed SMP.</p>	<p>Aside from the comments made above with regard to consideration of the operational and decommissioning phases of the project, Natural England raise no further comments; generally note that the methods and measures set out within the oSMP are fit for purpose.</p>