

One Earth Solar Farm

Draft Statement of Common Ground with Natural England

EN010159/APP/8.10.1

August-November 2025

One Earth Solar Farm Ltd

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1. Introduction

1.1 Overview

1.1.1 This Statement of Common Ground (“SoCG”) has been prepared in respect of the application for the Proposed One Earth Solar Farm Development Consent Order (the “Application”) made by One Earth Solar Farm Ltd (the ‘Applicant’) to the Secretary of State for Energy Security and Net Zero under section 37 of the Planning Act 2008 (“PA 2008”).

1.1.2 The DCO Application is a Nationally Significant Infrastructure Project (NSIP) for the installation, operation (including maintenance) and decommissioning of solar photovoltaic (PV) panels, Battery Energy Storage Systems (BESS) and associated grid connection infrastructure which will allow for the generation and export of electricity to the High Marnham substation (hereafter ‘the Proposed Development’).

1.1.3 The SoCG is being submitted to the Examining Authority as an agreed draft between both parties involved. It will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared by the Applicant and Natural England. Collectively, the Applicant and Natural England are referred to as ‘the parties’.

1.3 Purpose of this document

1.3.1 This SoCG is being submitted to the Examining Authority as an agreed draft between both parties. This SoCG is a ‘live’ document and will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.3.2 The SoCG has been prepared in accordance with the Department for Levelling Up, Housing and Communities’ Guidance on the examination stage for Nationally Significant Infrastructure Projects (‘DLUHC Guidance’).

1.3.3 Paragraph 007 of the DLUHC Guidance comments that:

“A Statement of Common Ground (SoCG) is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at the examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority”

1.3.4 The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between Natural England and the Applicant on matters relating to the Application.

1.3.5 The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and Natural England.

1.3.6 The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.

1.3.7 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.

1.3.8 Once finalised, the SoCG will be submitted to the Examining Authority concerning the Application under section 37 of the PA 2008 for an order granting development consent for the Proposed Development.

1.4 Terminology

1.4.1 In the table in the issues chapter of this SoCG:

- “Agreed” indicates where an issue has been resolved;
- “Not Agreed” indicates a position where both parties have reached a final position that a matter cannot be agreed between them; and
- “Under Discussion” indicates where parties continue to be the subject of ongoing discussions between the parties.

2. Description of the Proposed Development

2.1.1 The Proposed Development comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility with a total capacity exceeding 50 megawatts (MW), a Battery Energy Storage System (BESS) with an import and export connection to the National Grid.

2.1.2 The principal components of the Proposed Development will consist of the following:

- Solar PV Modules;
- Mounting Structures;
- Power Conversion Stations (PCS);
- Battery Energy Storage Systems (BESS);
- Onsite Substations and Ancillary Buildings;
- Low Voltage Distribution Cables;
- Grid Connection Cables;
- Fencing, security and ancillary infrastructure;
- Access Tracks; and
- Green Infrastructure (GI).

3. Record of Engagement

3.1 Summary of Consultation

- 3.1.1 The parties have been engaged in consultation throughout the early stages of the Proposed Development. Table 1 shows a summary of key meetings that has taken place between the Applicant and Natural England in relation to the Application. For clarity further email correspondence has been undertaken between the Applicant and Natural England throughout the design and project evolution.

Table 01 – Record of Meeting Engagement

| Date | Form of correspondence | Key topics discussed and key outcomes |
|-------------------|--|---|
| 3rd June 2024 | Meeting. Overview of the project, ecology surveys and results to date, approach to soils. | Biodiversity mitigation approach positive in particular using the countryside stewardship methodology. To continue discussion regarding results and mitigation. Agreement to share the ALC results with principals for reinstatement. |
| 14th August 2024 | Meeting. Overview of the latest project details, including solar site and cable route. Presentation of the ALC surveys and results to date, approach to soil management. | Agreement to send draft oSMP to NE for their comment/ review. |
| 13th January 2025 | Meeting. Update to the LPAs and NE on the approach to biodiversity for the Project | Agreement to provide a further meeting to confirm the approach which was undertaken in the ES |
| 14th August 2025 | Meeting. Update to the LPAs and NE on the approach to biodiversity following the Relevant Reps. | Agreement to provide a further meeting to confirm the approach which was undertaken in the updated ES chapter and appendices. |

| | | |
|---------------------|-----------------|--|
| 15th September 2025 | Virtual Meeting | Discussion around the Statement of Common Ground, focusing upon soils. |
|---------------------|-----------------|--|

Ongoing

Email

Ongoing email communication between the Applicant and Natural England on matters of discussion.

4. Current Position

4.1.1 The following tables set out the position of the Applicant and Natural England, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.

3.1.24.1.2 As noted above, this is a 'live' document, and some aspects have yet to be agreed upon between both parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.

Table 02 – Ecology

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|-------|--|--|---|---------------|
| 02-01 | Adequacy of assessment of sea and river lamprey associated with the Humber Estuary SAC and Ramsar site | Natural England noted they were content with the assessment of likely significant effects on the Humber Estuary SAC and Ramsar site within their relevant representation [RR-085]. | <p>Information on lamprey was provided at application and further added to at Deadline 1 in Chapter 6 Biodiversity [REP1-023]. A fish habitat survey completed in 2025 at crossing points of permanently wet ditches and the River Trent was also provided (Appendix 6.11 Fish Habitat Baseline [REP1-042]).</p> <p>The mitigation integrated within the design including use of trenchless crossings (including minimum depth requirements), Construction Environment Management Plan (CEMP), clear span bridges and stand-offs to ditches / watercourse other than at crossings are appropriate for negating potential effects of the Proposed Development (see</p> | Agreed |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|-------|--|---|---|---------------|
| | | | <p>environmental measure C7 in Table 6.6 of Chapter 6 Biodiversity [REP1-023]).</p> <p>Due to general low level of available information on the effects of EMF on lamprey a 5 year monitoring programme has been committed to in line with those agreed with the Environment Agency and Natural England for other Development Consent Order projects with transmission cables crossing the River Trent (see environmental measure C12 in Table 6.6 of Chapter 6 Biodiversity [REP1-023]). With this commitment in place it is appropriate to conclude that there is no adverse effect on the integrity of the Humber Estuary SAC and Ramsar site.</p> | |
| 02-02 | Adequacy of assessment of Spalford Warren SSSI | Natural England noted they were content with the assessment of potential effects on the Spalford Warren SSSI within their relevant representation [RR-085]. | Spalford Warren SSSI was considered within Chapter 6 Biodiversity [REP1-023]. No effects were predicted based on outcomes of the assessment within Chapter 13 Air Quality [APP-042]. | Agreed |
| 02-03 | The bat survey information provided | Natural England asked for justification as to why bat surveys were not | The bat survey as described in Appendix 6.4 Bat Baseline [APP-087] provides sufficient information on bat types, activity levels (across a range of | Agreed |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|-------|---|---|---|---------------|
| | is sufficient to inform a robust assessment | undertaken in winter within their relevant representation [RR-085]. | <p>habitats) and distribution of bats to undertake a robust assessment of the effects of the proposed development on this species group. This is in light of the mitigation measures integrated within the project design (see environmental measures C1, C2, C3, C3, C5, C8, C11, C14, C16, C18, C21, C22, C24, C25, C27, C28, C29, C30, C31, C32, C33, C37) Table 6.6 of Chapter 6 Biodiversity [REP1-023]).</p> <p>Response to natural England's relevant representation was provided in the Applicant's response to relevant representations [REP1-075].</p> <p>Further detail can be found in Appendix 6.4 Bat Baseline [APP-087] and Chapter 6 Biodiversity [REP1-023])</p> | |
| 02-04 | Biodiversity net gain | Natural England noted that a Biodiversity Net Gain of at least 10% should be secured within their relevant representation [RR-085]. | <p>The Biodiversity Net Gain Assessment [REP1-040] was updated at Deadline 1 to address comments made within Relevant Representations.</p> <p>It is clear that the Proposed Development would result in the delivery of BNG considerably in excess of 10%. This is secured through Requirement 9 of the draft Development Consent Order (wording to be updated at Deadline 2).</p> | Agreed |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|-------|------------------------------------|--|--|---------------|
| | | | Environmental measures C35 and C36 within Table 6.6 of Chapter 6 Biodiversity [REP1-023] and paragraphs 1.3.5, 2.1.2 to 2.1.4 and 7.1.6 of the Outline Landscape and Ecology Management Plan [REP1-053] describe how Requirement 9 would be implemented. | |
| 02-05 | Ancient woodland and veteran trees | Natural England referred to standing advice within their relevant representation [RR-085]. | The Applicant updated Chapter 6 Biodiversity [REP1-023] at Deadline 1 to account for veteran trees. It has been confirmed that no veteran trees (or ancient woodland) would be lost to development. For confidence environmental measure C37 was added to table 6.6 of Chapter 6 Biodiversity [REP1-023] to accord with standing advice. | Agreed |

Table 3: Land and Soils

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|-------|--|--|---|--------|
| 03-01 | Adequacy of assessment of sea and river lamprey associated with the Humber Estuary SAC and Ramsar site | Natural England noted they were content with the assessment of likely significant effects on the Humber Estuary SAC and Ramsar site within their relevant representation [RR-085]. | <p>Information on lamprey was provided at application and further added to at Deadline 1 in Chapter 6 Biodiversity [REP1-023]. A fish habitat survey completed in 2025 at crossing points of permanently wet ditches and the River Trent was also provided (Appendix 6.11 Fish Habitat Baseline [REP1-042]).</p> <p>The mitigation integrated within the design including use of trenchless crossings (including minimum depth requirements), clear span bridges and stand-offs to ditches / watercourse other than at crossings are appropriate for negating potential effects of the Proposed Development (see environmental measure C7 in Table 6.6 of Chapter 6 Biodiversity [REP1-023]).</p> <p>Due to general low level of available information on the effects of EMF on lamprey a 5-year monitoring programme has been committed to in line with those agreed with the Environment Agency and Natural England for other Development Consent Order projects with transmission cables crossing the River Trent (see environmental measure C12 in Table 6.6 of Chapter 6 Biodiversity [REP1-023]). With this commitment in place it is appropriate to conclude</p> | Agreed |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|-------|--|--|--|---------------|
| | | | that there is no adverse effect on the integrity of the Humber Estuary SAC and Ramsar site. | |
| 03-02 | Adequacy of assessment of Spalford Warren SSSI | Natural England noted they were content with the assessment of potential effects on the Spalford Warren SSSI within their relevant representation [RR-085]. | Spalford Warren SSSI was considered within Chapter 6 Biodiversity [REP1-023]. No effects were predicted based on outcomes of the assessment within Chapter 13 Air Quality [APP-042]. | Agreed |
| 02-03 | The bat survey information provided is sufficient to inform a robust assessment | Natural England asked for justification as to why bat surveys were not undertaken in winter within their relevant representation [RR-085]. | The bat survey as described in Appendix 6.4 Bat Baseline [APP-087] provides sufficient information on bat types, activity levels (across a range of habitats) and distribution of bats to undertake a robust assessment of the effects of the proposed development on this species group. This is in light of the mitigation measures integrated within the project design (see environmental measures C1, C2, C3, C3, C5, C8, C11, C14, C16, C18, C21, C22, C24, | Agreed |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|-------|-----------------------|---|--|---------------|
| | | | <p>C25, C27, C28, C29, C30, C31, C32, C33, C37) Table 6.6 of Chapter 6 Biodiversity [REP1-023]).</p> <p>Response to natural England's relevant representation was provided in the Applicant's response to relevant representations [REP1-075].</p> <p>Further detail can be found in Appendix 6.4 Bat Baseline [APP-087] and Chapter 6 Biodiversity [REP1-023])</p> | |
| 03-04 | Biodiversity net gain | <p>Natural England noted that a Biodiversity Net Gain of at least 10% should be secured within their relevant representation [RR-085].</p> | <p>The Biodiversity Net Gain Assessment [REP1-040] was updated at Deadline 1 to address comments made within Relevant Representations.</p> <p>It is clear that the Proposed Development would result in the delivery of BNG considerably in excess of 10%. This is secured through Requirement 9 of the draft Development Consent Order (wording to be updated at Deadline 2).</p> <p>Environmental measures C35 and C36 within Table 6.6 of Chapter 6 Biodiversity [REP1-023] and paragraphhs 1.3.5, 2.1.2 to 2.1.4 and 7.1.6 of the Outline Landscape and Ecology Management Plan</p> | Agreed |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|--------|--|---|--|--|
| | | | [REP1-053] describe how Requirement 9 would be implemented. | |
| 03-05 | Ancient woodland and veteran trees | Natural England referred to standing advice within their relevant representation [RR-085]. | The Applicant updated Chapter 6 Biodiversity [REP1-023] at Deadline 1 to account for veteran trees. It has been confirmed that no veteran trees (or ancient woodland) would be lost to development. For confidence environmental measure C37 was added to table 6.6 of Chapter 6 Biodiversity [REP1-023] to accord with standing advice. | Agreed |
| 03-016 | Guidance Note Benefitting from Soil Management in Development and Construction | NE request reference to the Guidance used for Assessment and Soil Management Plan. | Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009) has been used to guide the SMP. <u>The construction code of practice is a stricter guidance than the british soil science guidance as that is more of a summarised version of the code of practice. The institute of quarry soil guidance has also been referenced within the SMP.</u> | Under Discussion <u>Agreed</u> |
| 03-027 | Compaction to occur underneath panels | Further information would be useful to clarify how compaction under the PV array will be considered during construction and | Section 4. Solar Arrays within the <u>Outline</u> Soil Management Plan [APP-182REP3-051] and Work Plans [APP-014REP2-007]. Additionally, during the operation of the scheme the PV array area will be managed by sheep grazing <u>managed</u> | Under Discussion |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|--------|--|--|---|--|
| | | does not continue during the operational lifespan | under a cutting regime outlined in the Outline Landscape and Ecology Management Plan [REP04-024] . During operation there will be reduced agricultural pressures and machinery which can lead to soil compaction. | |
| 03-038 | Reference to how soils are stored where this may be over 6 months | No reference is made to how soils are stored where this may be over 6 months. All storage bunds intended to remain in situ for more than 6 months or over the winter period should be grassed over and weed control and other necessary maintenance carried out. | The SMP states that all bunds stored longer than six months and over the winter period will be grassed over and managed Applicant to discuss this in further detail with Natural England post deadline 2. | Under Discussion Agreed |
| 03-049 | Use of concrete bases would increase the impact on both agricultural land take and soil health through | Natural England seek further clarification on the application of concrete shoes as bases | The PV mounting structure will use 'pile' driven or screw foundations. This is the main method of use/ installation. The use of pre-moulded concrete blocks (concrete shoes) will only be used in areas of sensitive archaeology. This is detailed in Table 3.2 of the outline Construction Environmental Management Plan [APP- | Under Discussion |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|---------------------|--|---|--|--|
| | continued compaction | | <p>476REP3-041] and is specific to areas of archaeology only.</p> <p>Further details on the use of concrete shoes will be provided within the detailed SMP and the Archaeological Mitigation Strategy.</p> | |
| 03- 0540 | Stockpiled soils | The SMP should be clear about how much soil has been stored and the need to replace the soils at decommissioning to secure a certainty of soil re-use | <p>Details of soil storage are outlined within the SMP Soil Management Plan (SMP) [APP-182]. REP3-051. Noting that storage bunds locations and logs will be kept within the SMP to maintain soil structure and ensure we are able to reinstate and reuse soil within the decommissioning phase.</p> <p>Further details on soil storage will be provided within the Detailed SMP. Soils will be reused where practicable and storage bunds will be grassed when stored for periods over 6 months or during winter.</p> | Under DiscussionAgreed |
| 03- 0644 | Cumulative Cumulative impacts | Natural England's review and response to the cumulative impacts to agricultural land and soil function | <p>The assessment of the cumulative impacts on agricultural land and soil function can be found within Chapter 18: Cumulative Effects [REP2-028]. The Applicant completed further work on the cumulative effects assessment for dedline 3 where the cumulative effects was also looked at within a district scale. The Applicant recognises the comments made by Natural England and will update</p> | Under Discussion |

| Ref. | Description of Matter | Stakeholder Comment | Applicant's Response | Status |
|----------------------|-----------------------|---|--|---------------|
| | | | <p><u>the assessment at Deadline 4 to specific which land areas have been surveyed and not surveyed and also look at the effects at both a regional and national scale as suggested by Natural England.</u></p> <p><u>The assessment of the cumulative impacts on agricultural land and soil function can be found within Chapter 18: Cumulative Effects [APP-047].</u></p> | |
| 03- 07 12 | Buried Cables | Applicant request on NE view on buried cables relating to agricultural land; is it acceptable to leave in situ/ commitment currently the strategy is to remain but as noted in the management plans to review based on the need and requirement on future policy & best practice. | <p>NE view for cables, if they are installed deep enough, happy to remain in situ (from an agri land and soils perspective), as they would be avoiding the soil disturbance altogether at decommissioning.</p> <p>The main requirement would be that they are installed deep enough to avoid any potential impact from standard agricultural practices during operation (i.e. the installation depth).</p> <p>The position of a minimum depth of 900mm is recognised as the industry standard.</p> | Agreed |



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