

Date: 02 December 2025
Our ref: 534129
Your ref: EN010142



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BY EMAIL ONLY

Dear Sir / Madam

Planning consultation: Application by One Earth Solar Farm Limited for One Earth Solar Farm. The Examining Authority's written questions and requests for information (ExQ3)
Location: One Earth Solar Farm

Thank you for your consultation on the above dated 19 November 2025 which was received by Natural England on 19 November 2025.

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.

Examining Authority's Third Questions

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

Risk & Issues Log

Natural England attach an updated Risk and Issues Log following updates to the outstanding matters relating to soils and agricultural land in the Statement of Common Ground (SoCG). This is following a review of Chapter 18: Cumulative Effects provided to NE.

The following matters have been reviewed:

- 03-02 (NE13) – We are awaiting updates to the LEMP regarding grazing practices and vegetation being in place ahead of construction to address concerns on compaction.
- 03-04 (NE16) – We are awaiting the SMP to be updated regarding management of soils where concrete bases will be used.
- 03-05 (NE17) – ExQ3 ref 13.0.1 (2) has asked for clarification on the long-term soil storage vs our comments given in Table 18.4 of the Cumulative Effects chapter. We will continue to review this and update for D7. As such status has been changed from Green to tbc.
- 03-06 (NE18) – Comments outstanding on Table 18.2, para 18.5.11, para 18.5.13 and Table 18.4 (which is linked to ExQ3 13.0.1 and NE17 above). I have attached an update to our comments given at D4 for full details, see **Annex B**.

If you have any queries relating to the advice in this letter, please consult Natural England at consultations@naturalengland.org.uk referencing the consultation number 534129.

Yours faithfully

Sustainable Development
East Midlands Area Team

Annex A: Natural England's Response to the Examining Authority's Third Written Questions

ExQ1 Ref	Question to:	Question:	Response from Natural England:
Q13.0.1	The applicant and Natural England	Draft SoCG – Soil Storage 1) Within the latest iteration of the draft SoCG reference is made to WG – please clarify what this refers to. 2) Please clarify the status of the position in respect of soil storage, there appears there may be a discrepancy between Table 18.4 and the Risk and Issues Log NE17. 3) In respect of NE17 reference is made to a meeting with the Applicant on 15 September 2025, which document before the Examination addresses the concern identified?	1) WG refers to Welsh Government. 2) Natural England are reviewing this and will respond at Deadline 7. 3) The Soil Management Plan (SMP) has been updated to include measures to protect soils during long-term storage following discussions between the Applicant and NE. This includes paragraphs 5.3.16 and 8.3.11 within the SMP.
Q19.0.1	Natural England	Cumulative Effects on agricultural land and soil function. Can Natural England advise on the latest position in respect of this matter, the latest iteration of the SoCG at 03-06 advises the applicant was to address this matter at D4. Are NE now content with the evidence provided by the applicant?	The Applicant has updated Chapter 18 Cumulative Effects following our comments at D4. We have provided some follow up comments within the SoCG at D6 to the Applicant where some updates are still outstanding.

Annex B: Natural England's Updated Comments on Cumulative Assessment of Soils from D4

Volume 6.0: Environmental Statement [EN010159] Volume 2: Aspect Chapters Chapter 18: Cumulative Effects

Cumulative impact assessment

Whilst we are unable to recommend a particular methodology for cumulative impact assessment, there is external guidance available that might be helpful when you are considering the cumulative impact of the loss of best and most versatile agricultural land as part of the DCO submission:

1. The Institute of Environmental Management and Assessment (IEMA) have recently released guidance on Land and Soils. The guidance is aimed at Environmental Impact Assessment (EIA) of projects
2. The IEMA guidance also refers to The Design Manual for Roads and Bridges (DMRB) (2019) LA109 Geology and Soils EIA Guidance which might also be a useful resource. The guidance sets out the assessment criteria and methodology for highway projects only, though parts of the DMRB guidance are sometimes applied to other project types.
3. The [Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment](#) guidance sets out a staged, good-practice approach for assessing the combined environmental impacts of Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008, helping applicants identify, evaluate and mitigate the cumulative effects of their proposals alongside other existing or approved developments. It is non-statutory advice produced by the Planning Inspectorate to complement primary legislation, regulations and sector-specific policy, and is designed to ensure that Environmental Statements present transparent, proportionate and repeatable cumulative effects assessments that inform decision makers and interested parties throughout the NSIP consenting process.

D6 Update: We welcome the adoption of the guidance within the cumulative effects of BMV review.

Table 18.2 The Agricultural Land Classification (ALC) system is a nationally standardised framework used to assess the quality and versatility of agricultural land across England. As such, the significance of any proposed development affecting ALC graded land should be evaluated not only in the local planning context but also in terms of its national implications, particularly when it involves the loss of Best and Most Versatile (BMV) soils Grades 1, 2, and Subgrade 3a.

D6 Update: Suggested this text be included within the table.

18.3.19 Natural England are broadly satisfied with the regional Zol and the information provided within ES Volume 3, Figures 18.1 to 18.8 [EN010159/APP/6.20] for a regional cumulative assessment, however we refer the applicant back to the comment above (table 18.2)

D6 Update: No further comment.

18.5.6 The figures presented are marginally different to those that are presented in the ALC Statistical breakdown for England by region, county and district that are based on area measurements from the digital 1:250,000 scale Provisional ALC map which is available to view and download from the www.magic.gov.uk website. For Lincolnshire assuming an even split between 3a and 3b I calculate potential BMV to be 69.45% and Nottinghamshire, respectively, 50.5%. However, despite these marginal differences Natural England accept the assertion that regionally these are both higher than the national average with Lincolnshire representing a 'significant' exceedance.

D6 Update: No further comment.

18.5.7 Cite source.

D6 Update: We welcome citing the source as requested.

18.5.8 Again marginally different to figures I have Lincolnshire = 410,630.5ha and Nottinghamshire = 105,281ha (assuming even split between 3a and 3b) *Nottinghamshire figure is close enough for me.

D6 Update: No further comment.

Table 18.4 NB indication of BESS etc considered temporary, after discussion with Welsh Government (WG) and considering the lack of robust evidence to suggest that Best and Most Versatile (BMV) soils Grades 1, 2, and 3a under the Agricultural Land Classification can be stored for such long operational periods and still be successfully reinstated with full restoration of their original functions. NEs advice needs to be reconsidered on this.

D6 Update: Natural England are reviewing this and will provide comments at D7.

Further Clarity NE provided to One Earth via email 06/11/25

While the cumulative loss of Best and Most Versatile (BMV) land nationally appears proportionally small, the IEMA guidelines emphasize that regional and local impacts especially in high-value agricultural counties like Lincolnshire and Nottinghamshire require careful scrutiny and mitigation.

The additional breakdown of BMV loss in both a national and local context is welcomed, I do have the following advice to offer;

- IEMA guidelines note 'To enable an assessment of cumulative effects, it is necessary to: set out clear criteria to determine the magnitude, sensitivity, and significance of impacts', forgive me it may well be in the document elsewhere, are the national and local figures of cumulative effect determined in terms of magnitude and significance? This should also be presented in the ES

D6 Update: Have noted within para 18.5.13 that magnitude and sensitivity are noted. But the criteria for significance is not clearly stated. This needs to clearly state the significance criteria and therefore the significance of impacts from the cumulative effects. Tabulating is an effective and clear way of presenting this.

- 18.5.11 should indicate whether 'total loss' is permanent or temporary.

D6 Update: Have noted this is still to be provided in the chapter.

Volume 6.0 Environmental Statement [EN010159] Volume 3: Technical Appendices Supporting ES Volume 2 Appendix 18.3 Summary of Other Developments included within the Cumulative BMV Assessment February 2025 Document Reference: EN010159/APP/6.21

General comment

The acronym N/S (Not Surveyed) does not appear anywhere in the table. In the absence of this designation, it is presumed that all listed sites have been surveyed. If any sites remain unsurveyed, this should be clearly indicated to avoid misinterpretation.

Despite providing regional estimates of Best and Most Versatile (BMV) land within Lincolnshire and Nottinghamshire, no cumulative assessment has been undertaken to reflect the combined impacts set out in Table 1 of Appendix 18.2. As a result, the total extent of high-quality agricultural land loss across both counties remains unquantified, preventing a coherent evaluation of landscape-scale pressures. This omission undermines the transparency and proportionality central to a robust

cumulative effects assessment, leaving decision-makers without the full picture needed to determine.

Natural England believe the figure presented in table 2 appendix 18.2 provide the basis for this calculation however this date need to be related back to both the regional and national potential BMV figures presented (para 18.5.6).

D6 Update: No updates sent to NE for review within D6.