

Date: 11 December 2025  
Our ref: 535859  
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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 request for information and follow up to Examiner's Question 3.**

**Location: One Earth Solar Farm**

Thank you for your consultation on the above dated 09 December 2025 which was received by Natural England on 09 December 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.

**Rule 17 Further Information Request (8<sup>th</sup> December 2025)**

Following the request for information on the use of artificial intelligence (AI) in any of the submissions made by Natural England, we confirm that AI was not used in the review of information or responses made by Natural England in any of the submissions.

**Examining Authority's Third Questions**

Please find Natural England's updated 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) – Agreed in SoCG as the Applicant has committed to following the Defra Code of practice for the sustainable use of soils on construction sites within the SMP. It would be recommended to have establishment of grassland ahead of construction to ensure mitigation is bedded in ahead of construction works.
- 03-04 (NE16) – We suggest reviewing the impacts from the concrete bases post consent when more information on the extent of the PVs implemented and their contribution to total permanent loss are better known. Marked as not agreed in SoCG and will be reviewed and agreed post-consent.
- 03-05 (NE17) – NE are retracting our comment on Table 18.4 from D4. Agreed this issue in SoCG due to following current and available best practice guidance.
- 03-06 (NE18) – The Applicant has made agreed updates to the Cumulative Effects Chapter following our comments. As such have agreed this within the SoCG. See **Annex B**.

If you have any queries relating to the advice in this letter, please consult Natural England at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) referencing the consultation number 535859.

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:
Q19.0.1	Natural England	<p><b>Cumulative Effects on agricultural land and soil function.</b></p> <p>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?</p>	NE are retracting our comment on Table 18.4 from Deadline 4. The issue is agreed in SoCG due to the Project following current and available best practice guidance.

# 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.  
D7 Update: No further comment.

**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.  
D7: Suggested text has been included in the Table. No further comment.

**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.  
D7 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](http://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.

D7 Update: No further comment.

**18.5.7** Cite source.

D6 Update: We welcome citing the source as requested.

D7 Update: No further comment.

**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.

D7 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.

D7 Update: NE are retracting our comment on Table 18.4 from Deadline 4. Agreed this issue in SoCG due to the Project following current and available best practice guidance.

**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.

D7 Update: This has now been clearly tabulated and NE have no further comment.

- 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.

D7 Update: This has been updated in the chapter and NE have no further comment.

**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:**

### 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.

D7 Update: No updates sent to NE for review within D7.